

In the Matter of

Amendment of Parts 73 And 74 of the)
Commission's Rules to Establish Rules)
For Digital Low Power Television,) MB Docket No. 03-185
Television Translator, and Television)
Booster Stations and to Amend Rules For)
Digital Class A Television Stations)

COMMENTS OF UNITED TELEPHONE ASSOCIATION, INC.

United Telephone Association, Inc. (United) by its consulting engineers, hereby submits these comments to the Federal Communications Commission (FCC) in the above captioned proceeding.

United has received licenses for 13 RSAs and MSAs in many parts of the Midwestern United States. The licenses received in the two auctions are both for rural and urban areas. United presented its concerns over the Notice of Proposed Rulemaking to the FCC in the form of comments. These comments are based on proposed language that if placed in effect would delay the implementation of the 700 Mhz services and cause uncertainty regarding interference issues.

United's concerns are listed below:

1. Inconsistent with prior Commission Statements:

In a prior Order which set up the service rules for the Lower 700 MHz band, the FCC stated that the Television Translator Stations and LPTV operators must be prepared to stop operation once the channels are

reclaimed. Should the FCC through this notice allow the continuation of service on a secondary basis, the auction winners will see compounding problems caused by interference with no steps for easy resolution.

2. Secondary Status:

The FCC should continue to hold the previously set mark that the LPTV Operators and the Television Translator Stations should make plans to vacate these frequencies at the time the primary licensees are ready for operation. The Television Translator stations and LPTV operators have many options available for relocation. An option which **should not** be included in the list, is the adjacent channels to the lower 700 MHz band.

Conclusion:

For the reasons listed above United expresses its concern with the Notice of Proposed Rulemaking and requests the reversal of the FCC's position. The FCC should maintain its past stance to the Lower 700 MHz Auction winners and keep the LPTV stations from using frequencies that can cause long-term problems to the primary licensee.

Respectfully Submitted,

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