

Southern Oregon Public Television Inc.
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Comment on Notice of Proposed Rulemaking Making MB Docket No. 03-185

With regard to paragraph 118 DTV booster stations.

Southern Oregon Public Television believes that consideration be given to allow DTV incumbents who are operating under an STA to construct booster stations to permit coverage in terrain shielded areas within the confines of their analog license protected contours.

Southern Oregon Public Television is located in an extremely mountainous area typical of many far western TV facilities. In order to provide the best possible service to our rural viewers it is important that the "last mile" to their antennas have the best signal possible in terms of field strength and multi-path conditions. To this end an on channel "booster" type facility is ideal.

There are several advantages to booster type facilities including simplified channel tuning (PSIP) and spectrum efficiency.

In order to make effective use of channels during the transition to full DTV service, the use of boosters in a "cellular" type of approach seems very advantageous. Better and more reliable service can be obtained for lower capital cost. The mountainous terrain greatly reduces the problems associated with coverage overlap, and booster operations using only one primary DTV modulator-exciter will have no problems with trellis code synchronization.

We would propose that such boosters be required to have their coverage limited to be within the primary analog stations protected contour.

At the end of the DTV transition a possible scenario would include conversion of the original analog channel to digital, and changing the input channels of the booster stations to receive this newly converted digital channel. At the conclusion of the DTV transition there would then be just two channels in use for all booster and translator facilities, the primary DTV channel and the "last mile" or booster channel to most viewers. This technique has been proposed in Australia where it is called the "One Plus One" method.

We believe that building boosters in the early stages of the DTV transition will provide an excellent over the air DTV service to very rural areas. Allowing the use of boosters even with those still operating under DTV STA for reduced power

or non-collocation with the primary analog station will accelerate the transition to DTV in areas where the transition has not even begun.

Presently Southern Oregon Public Television uses 5 different channels with existing analog translator systems. Conversion to the proposed single booster/translator channel will greatly reduce the amount of spectrum required to broadcast to remote rural areas with simplified tuning and better management of DTV coverage and provide superior DTV service.