

REPLY TO COMMENTS OF INTERNATIONAL BROADCASTING NETWORK

There are over 2700 LPTV and low-power Class A stations across the nation, delivering much-needed programming to local communities that might not otherwise receive such programming. With the mandated transition to DTV, it is IMPERATIVE that the FCC grant permanent primary status to ALL LPTV stations that make the considerable investment to further the FCC's DTV policy and convert to digital. It's time to end "secondary" status for LPTV stations once and for all. Even with "Class A" status, the regulatory burden is just too great in comparison to the minimal benefit, which is qualified, contingent and easily lost. There is URGENT need for this type of immediate relief, which was not acknowledged by the FCC in the NRPM. As someone just getting into the broadcast industry, I'm SHOCKED at the second-class status being accorded to the LPTV industry, and I have no doubt that if the FCC doesn't confer immediate permanent primary status on any and all LPTV stations that convert to digital, and instead keeps the present system, we will see a quick and painful end to community broadcasting, and an end to any hope for localism in television services. Don't make the mistake made with the foray into media ownership rules -- keep localism in broadcasting alive, by granting permanent primary status to all digital LPTV stations.