

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

REPLY COMMENTS OF
INTERNATIONAL BROADCASTING NETWORK

I.

International Broadcasting Network ("IBN"), having reviewed the comments of others, hereby submits its reply comments.

II.

IBN's initial comments, filed on November 25, 2003, emphasized the following basic principles:

1. All low power television ("LPTV") stations should be given the opportunity to fully participate in the digital transition in a manner that will ensure their viability and permanence.
2. The concept of secondary status for LPTV stations should have no relevance in the digital realm.
3. It is of vital importance that all digital LPTV stations have permanent and unconditional primary status.
4. Realistic power limits are important. The power limits proposed in the NPRM may be inadequate.

5. Digital LPTV stations should not be encumbered with unnecessary regulatory burdens that will inhibit their viability or lead to financial ruin.
6. Call sign suffixes should be the same for LPTV stations as for full power stations. For digital stations, "DT" is the appropriate suffix.
7. All LPTV stations should be given the opportunity to acquire a second channel for digital broadcasts.

III.

Each of the basic principles enumerated above is of immense importance to all LPTV stations as well as the hundreds of communities and millions of viewers they serve. During the past two decades, no group of broadcasters has done more to serve the public interest than LPTV stations. Unlike many full power television stations, which are often owned by giant for-profit corporations having no motive other than to maximize revenues, LPTV stations have, for the past two decades, passionately pursued their commitment to the communities they serve. Despite the extreme hardships LPTV broadcasters have endured because of the regulatory restraints their stations have been subjected to, they are eager to continue serving and to do everything within their power to make the digital transition a success. It is essential, however, that the Commission adopt rules which will enable LPTV stations to thrive in the digital environment. Without favorable rules which provide permanent and unconditional primary status, it will be impossible for LPTV broadcasters to obtain the necessary financing to construct digital facilities.

IV.

IBN recognizes that some of those who have filed comments have views that are at odds with the views expressed by IBN. There may be various reasons for that, but a desire to eliminate the competition that LPTV stations provide is the underlying motive of most, if not all, opponents. The Commission should not countenance the continued anti-competitive stance of those who have long sought to cripple and destroy the LPTV service.

V.

For the foregoing reasons, and for the reasons stated in IBN's initial comments, IBN urges that the Commission adopt rules that are fully consistent with the basic principles enumerated above, including, in particular, the necessity of permanent and unconditional primary status for all digital LPTV stations.

Respectfully submitted,

INTERNATIONAL BROADCASTING NETWORK

By its President

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