

MM Docket 03-185

Reply Comments of Martin J. Jackson, Aptos, CA

I am a member of the Board of Directors of the National Translator Association (NTA), and participated in the formulation of the organization's comments, and I fully support same.

I am also the owner of KMCE-LP, Monterey, CA. I wish to file additional comments on the above referenced Docket.

1) All LPTV, Class A and TV translators should be given the opportunity to participate in the digital transition in a manner that compliments the full conversion of the United States' television delivery system on a viable, PERMANENT basis. Since the delivery system will have an entirely new "look", the concept of secondary status is irrelevant. Primary status is necessary for the completion of the digital transition. Those participating and investing in the future of this mandated transition must have their investment protected from encroachment by granting their stations primary status after construction in strict accordance with the issued construction permits, and interference-free operation is assured.

2) A second channel, when proven technically sound, must be made available for digital operation, since many of the VIEWERS in smaller markets where these stations operate will have a longer "transition period," due to lower incomes, non-English speaking households, etc.

3) Initial digital power limits, as suggested in the NTA comments, may or may not be appropriate as the complete digital transition is completed, and the final "pattern puzzle" is resolved. The final rule(s) that result from this Docket should leave room for power changes on a "minor change" basis.

4) The goal of the digital transition should be that multiple channels of programming be available free, over the air, in all American households, and digital television applied correctly can fulfill that goal. It will take a combination of full service, low power and translators to reach all these areas.

I urge the Commission to act quickly so that the transition to digital can begin soon for LPTV, Class A and Television Translator stations.

Martin J. Jackson  
540 Hauer Apple Way  
Aptos, CA 95003  
831-768-8668