

We welcome the proposed FCC rule allowing unlicensed transmitters on vacant tv channels. This will greatly enhance the ability of local residents to upgrade and improve over-the-air translator service to areas that have no other broadcast television reception.

In widely scattered rural areas many customers and translator sites rely on input signals much weaker and from greater distances than those determined by any predetermined protected contours. This should be considered in the proposed FCC rules.

For example, in eastern Montana most of the translators receive their network programming via multiple hops from preceding translators or translator relays, some as far as seventy miles, using high gain antennas. Even low level signals on these input channels can cause serious interference.

I recommend to local tv districts and communities that they upgrade and expand their tv translator coverage using UHF channels. There are still many channels available for this. However, FCC rules should include guidelines for determining channel selections and power levels based on actual field use and application, to avoid channel overlap and interference.

Both local and area channel co-ordination would be desirable to avoid interference problems. Such co-ordination should be based on the experience and needs of the existing translator districts and their technical advisers, most of who have been serving their communities for more than forty years.

Respectfully submitted,

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