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UNIVERSAL APPLICATION FREEZE

STILL IN EFFECT

New stations and major changes -- forbidden everywhere in the country.

Minor changes -- permitted for Class A, LPTV, TV Translators in all markets.

Displacement applications -- permitted in all markets.

Companion digital channel applications - permitted in all markets.

No new Class A upgrade opportunity anticipated.



LPTV

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LPTV DIGITAL TRANSITION

Full Power TV Stations completed their transition in June 2009. All analog service ended.

Class A/LPTV/TV Translators permitted to continue analog service but also permitted to apply for digital:

- either flash cut**
- or digital companion**

ET Docket 10-235 proposes mandatory end of digital transition in 2012.

- Impractical deadline - 2015 also suggested.**
- Investment difficult with repacking threat looming.**
- Allow Class A stations to transfer status to digital companion.**

(Many stations cannot flash cut because of market move-ins.)

- Allow full service emission mask.**

Decision coming soon?



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NATIONAL BROADBAND PLAN (page 1)

PREMISES:

Nation needs universal mobile broadband for health care, education, job creation, job search, small business promotion.

Public demand for wireless is mushrooming. At least 500 MHz of new spectrum needed, of which 120 MHz can come from TV broadcasting.

Stock market values wireless services much higher than TV.

RULEMAKING PROCEEDINGS:

1. Make mobile services equal in priority to TV in all TV bands -- rulemaking in progress.

2. Repack TV spectrum to Channels 2-31 and reallocate 32-51 to broadband - future.

- **Uniform national frequency “swath” needed.**
- **Spectrum auction will result in optimum economic resource use.**
- **TV stations can be accommodated more easily than during original DTV transition, because duplicate channels not needed, some stations may share channels, and some stations may sell out in incentive auction.**
- **Full power TV station relocation costs will be reimbursed.**
- **Class A stations to be protected, but we do not know how.**
- **No answer yet on protection of LPTV and translators – possible exclusion of all or just smaller stations.**



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NATIONAL BROADBAND PLAN (page 2)

- 3. Incentive Auctions. Allow TV stations to contribute their spectrum to an auction and share in the proceeds.**
- **Class A included.**
 - **LPTV and Translators may be excluded.**
 - **Requires legislation to allow private parties to share revenue.**
 - **FCC likely to decide how much goes to private parties and how much to government.**



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FCC ATTITUDE TOWARD LOW POWER TV

- **Digital transition in limbo.**
- **FCC Spectrum Dashboard does not include LPTV stations.**
- **Not likely to be considered in repacking software.**
- **May not be included in spectrum auctions.**
- **No new Class A filing upgrade opportunity.**
- **Delay in allowing Class A stations to elect to keep digital companion channels with Class A status.**
- **End of waivers to allow use of full service mask.**
- **FCC Future of Media Report – Were any LPTV operators interviewed?**



ALTERNATIVE TECHNOLOGIES

It is possible for LPTV stations to provide both broadcast and broadband services on their existing channels, including multiple broadcast video streams.

Optimum efficiency would require modulation other than ATSC 8 VSB standard with adapters for current consumer digital receivers.

Some broadcasters like the idea, others do not.

More available at www.SpectrumEvolution.org.

FCC does not like the idea and has denied an experimental license application to demonstrate the capabilities of the technologies.

FCC insists on:

- 1. Clean spectrum swath for wireless.**
- 2. No flexibility for broadcasters unless they buy back their own frequencies at an auction.**
- 3. Immediate maximum cash for the government.**