



NATIONAL TRANSLATOR ASSOCIATION

OUR AIM – TO PROVIDE FM and TV SIGNALS in EVERY HOME

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STATEMENT OF THE NATIONAL TRANSLATOR ASSOCIATION

The National Translator Association represents the owners and operators of the TV rebroadcast translators which extend free over-the-air reception into rural areas which do not get direct reception.

Convenient Operation for Both Analog and Digital Signals Important

TV translators do not have the same statutory deadline for conversion to digital operation that exists for full service stations. We anticipate that digital signals will gradually become available in translator served areas but that the full transition to digital output signals will not be complete until a considerable time after the statutory deadline for full service stations is past. Thus we consider it very important that the converter boxes be convenient to use in a signal environment that includes a mixture of analog and digital signals.¹

Our recommendation is that the converter boxes pass analog signals directly through without processing or modification. In this way the characteristics of the underlying TV set govern the reception of analog signals. For instance the selectivity and/or resistance to overload of the underlying receiver is not changed and a possible source of trouble is eliminated.

Home VCR's currently on the market function this way. They are inserted between the antenna and the TV set and pass the signal through if turned off or the internal tuner deactivated. Thus we assume the pass through technology is well established.

Dedicated to the improvement of over the air broadcast service to all United States residents through the maximum utilization of TV and FM Translators.

¹There is a growing trend towards selecting the digital signals of the source stations as the inputs for analog translators. The change to a digital input provides the same program content but with a higher quality signal. It is expected that many of these digital input - analog output translators will continue to transmit an analog signal for several years after the full service transition deadline.

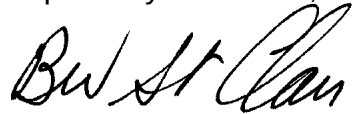
Appropriate Performance Standard

We have been made aware of the concerns raised by Mr. Charles Rhodes regarding the use of the ATSC A/74 document as the basis for the performance standard for subsidized converter boxes. It is our understanding that this standard is not appropriate for this purpose. Rather the performance standards should be based on the system planning factors in FCC Office of Engineering Technology Bulletin 69 which describes the actual signal levels and interference ratios which may be encountered in practice.

Eligibility

We urge the eligibility for the subsidy be extended to include households that have cable or satellite service but have one or more analog TV sets that rely entirely on over-the-air reception. It is common in translator served communities for subscribers to cable or satellite to still depend on translator delivered free over-the-air signals for service from the nearest metropolitan area. We believe the greater eligibility will help to speed the transition to an all digital delivery system.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. W. St. Clair". The signature is fluid and cursive, with a small dot at the end.

B. W. St. Clair
President

September 22, 2006