

“EXTRAORDINARY CIRCUMSTANCES”

- 1- T-MOBILE SENT OUT NOTIFICATION AS REQUIRED 47 CFR 73.3700 (g)(4) TO CEASE OPERATIONS BY SPECIFIC DATES. WE SEEK RELIEF BY CHANGING FREQUENCY, (CHANNEL) OF TRANSLATOR BY WORKING TOGETHER AS A GROUP, TIM ANDERSON, JOHN BARNETT, SUSAN HANSEN, BYRON ST. CLAIR WE AS A WHOLE IN EASTERN WASHINGTON COORDINATED THE NEW FREQUENCIES. FEDERAL REGISTER VOLUME 82, NUMBER 135 FCC PUBLIC NOTICE SPECIFIES THAT “LPTV, TRANSLATOR STATIONS ON CHANNELS 38 TO 51 MUST TERMINATE OPERATIONS OR RESOLVE INTERFERENCE”. WE AS A GROUP RESOLVED INTERFERENCE BY CHANGING TO A CLEAR AND CLEAN FREQUENCY BELOW 600MHZ AS SPECIFIED. FCC PUBLIC NOTICE DA17-584 MB-16-306, GN12-268 PROVIDES THE AUTHORITY FOR THE DISPLACED STATIONS AS WELL AS A SOLUTION FOR THE SPECIAL DISPLACEMENT WINDOW.
  
- 2- THE PUBLIC WILL BE FURTHER BENEFITED BY STATION STAYING ON THE AIR WITH PROGRAMMING SERVICES VS GOING OFF THE AIR. WE ARE LOCATED IN A RURAL MOUNTAINOUS AREA AND COMMUNITIES ARE FAR APART SEPERATED BY HIGH AND STEEP MOUNTAINS. ONLY 60% OF THE AREA ARE WIRED FOR CABLE AND EVEN LESS FOR FIBER. ON AVERAGE 25% OF THE POPULATION RELY ON THE LPTV/TRANSLATOR SERVICES TO GET LOCAL PROGRAMMING AND NEWS. IN MANY AREAS THE MOUNTAINS ARE SOUTHERN EXPOSURE AND MANY HOMES ARE ON LOWER NORTH FACE OF THOSE MOUNTAINS SO SATELLITE SERVICES ARE NOT EVEN AVAILABLE. 1000’S OF PEOPLE RELY ON OUR SERVICES.
  
- 3- THE EXPECTED DURATION OF THE STA IS WELL WITHIN THE RULES OF THE REQUEST. THE STANDARD STA OF 120 DAYS IS FINE BUT WE WILL BE FILING A PERMINATE SOLUTION DURING THE “SPECIAL DISPLACEMENT WINDOW” BY JUNE 01, 2018. IF THE FCC IS REQUIRED TO HAVE MORE TIME TO PROCESS THE APPLICATIONS, THAN WE WILL ASK FOR A EXTENTION OF THE STA UNTIL THE FCC PROCESSES THE APPLICATIONS. THE STA WILL KEEP US LEGAL WHILE THE FCC PROCESSES THE DISPLACEMENT APPLICATIONS. WE AS A GROUP SOLVED THE INTERFERENCE ISSUES THUS THE PLAN FOR LICENSED OPERATIONS IS THE ACCEPTANCE AND GRANT OF OUR DISPLACEMENT APPLICATION.