

Office of the Secretary,  
Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

Received & Inspected

JUN 13 2017

FCC Mailroom

Attention: Evan S. Morris, Video Division  
Media Bureau

RE: KTGF TV, Great Falls, Montana  
Facility ID number 13792  
File number: BRCDT- 20131125AED

To Whom It May Concern:

This letter is being written in response to the FCC's letter of April 12, 2017, from David Brown, Deputy Chief, Video Division, which requested information from the KTGF License Corporation ("Licensee"), Licensee of KTGF, Great Falls, Montana.

In its letter, the FCC set forth seven questions which the Licensee seeks to answer with the information contained herein.

**Question 1) Identification of Streams:**

Other than the Station's main stream, at this time KTGF is airing the following streams:

- Channel 16.2: **JUCEtv** - official launch date January 2, 2016
- Channel 16.3: **TBN** - official launch date January 2, 2016
- Channel 16.4: **Smile of A Child** - official launch date January 2, 2016
- Channel 16.5: **\*Hillsong Channel** - official launch date January 2, 2016

Each of the above referenced digital streams has been in operation from the launch date shown above to the present. Each digital stream airs 168 hours per week of free, over the air, television programming. In addition to the Core Programming aired on KTGF's main stream, the average number of hours per week of Core Programming aired cumulatively on KTGF's four digital streams is a minimum of 12 hours per week.

**Question 2) Review and Amendment of Children's Reports:**

Pursuant to the FCC's instructions, the Licensee has reviewed all Children's Reports which it has filed since it became the Licensee of KTGF. To the best of the Licensee's knowledge, all reports covering the quarters prior to the first quarter of 2016 were accurate and complete, as originally filed.

A review of the 5 quarterly reports filed covering the period from January 1, 2016 to the present showed that the information presented was accurate, other than the omission of information concerning the additional digital streams which debuted on January 2, 2016. The reports have now been amended to show the additional information concerning the four digital streams, and the Licensee's compliance with the requirement to air additional Core Programming accordingly to satisfy the requirements of Section 73.671 (e) (2) (i) of the Rules.

*\*Prior to June, 2016, the Hillsong Channel was branded as "The Church Channel"*

**Question 3) Core Programming Requirements:**

As noted above, though the Licensee failed to report the additional information concerning Core Programming on the additional digital streams in its quarterly reports covering the period from January 1, 2016 through March 31, 2017, KTGF did, in fact, meet and exceed the requirements for Core Programming set forth under Section 73.671 of the Rules.

**Question 4) Disclosure of Commercial Limits:**

Pursuant to the FCC's instructions, the Licensee has reviewed the commercial limits disclosures which are contained in its online Public Inspection File. Each of the four additional digital streams aired on KTGF is 100% commercial-free. The Licensee has amended its reports covering the period from January 1, 2016 to March 31, 2017, to include the information about commercials limits compliance in its Core Programming aired on the additional digital streams.

**Question 5) Issues & Programs Lists:**

Pursuant to the FCC's instructions, the Licensee has reviewed each Issues & Programs List filed since it became the Licensee of KTGF, and has amended them in its online Public Inspection File to the fullest extent possible in accordance with the instructions of Section 73.3526 (e) (11) (i) of the Rules. The Licensee only retains its Program Logs for a period of two years, as required by FCC Rules, and as a result was only able to amend reports covering the period of time from April 1, 2015, to the present.

**Question 6) Review and Amendment of License Renewal Application:**

Pursuant to the FCC's instructions, the Licensee has reviewed its License Renewal Application, BRCDT-20131125AED. It was accurate, as originally filed, except in the response to Question 2(b), Section IV, in which the Licensee had checked "Yes" in regards to posting EEO information on its website. The Licensee is exempt from this requirement and should have checked "N/A". The Licensee filed an amendment on June 5, 2017, to reflect that change.

**Question 7) Copies of Children's Reports and Declaration:**

Pursuant to the FCC's instructions, copies of all amended Children's Reports are being submitted with this letter. Also in accordance with the FCC's instructions, a declaration attesting to the truthfulness and accuracy of the information contained herein is included in this letter.

The KTGF License Corporation was organized for the purpose of purchasing KTGF-TV, and providing viewers with a locally owned & operated, free to the public broadcast service which would fill a variety of unmet programming niches for local viewers. In spite of the fact that KTGF was off the air, and in terrible shape prior to the Licensee acquiring it (*see below*), the KTGF License Corporation has steadily moved forward in serving local TV viewers. In addition to the Station's main programming stream, the Licensee has added 4 additional

digital streams all of which broadcast 24/7. These streams include a channel dedicated to airing programs exclusively for children, a channel dedicated to providing wholesome, quality, programming for teens and young adults, and two streams for viewers at large.

From its inception, it has been the goal of the Licensee to operate in the public interest, and to comply with FCC Regulations in a satisfactory manner. The Licensee has had to face many unexpected challenges, though, which have been a major, major distraction during its first years operating KTGF.

Prior to being purchased by the KTGF License Corporation, KTGF suffered a series of operational and financial crises. The Station had lost its NBC network affiliation and ultimately ended up being forced into operating as an independent TV station in one of the smallest Nielsen DMA's in America. The loss of its network affiliation led to severe financial crises for the previous owner of KTGF, and the station ultimately went dark for extended periods of time. Ultimately, KTGF was unable to meet its debt repayment obligations and was repossessed by a lender.

During that season of extreme crises, KTGF lost its studio and office location, and all of its cable and satellite distribution. The Station's broadcasting equipment deteriorated as it had not been cared for properly for a number of years, and sat unused in an equipment building at a remote tower site location after the Station was repossessed.

When the KTGF License Corporation purchased the Station, it worked quickly and diligently to return KTGF to normal operation, and to provide a quality broadcast service to local viewers. Its efforts were significantly and adversely affected by the general condition of the Station, the lack of cable and satellite distribution, and other factors. Within its first two years of operating the station, KTGF License Corporation had experienced so many off-air situations that it became necessary to replace the transmitter, antennas, broadcast encoder, and virtually all of its studio and transmitter site equipment. This led to a far greater outlay of cash and manpower than had been anticipated during the first few years of operation and diverted the attention of management significantly.

The significant amount of time that management was distracted by these issues contributed to errors being made in some Issues & Programs Lists and Children's Reports.

Since it became the Licensee of KTGF, the KTGF License Corporation has generally filed reports and handled Public Inspection File obligations in a timely manner. The information contained in filings has generally been accurate, though now it is understood that it was sometimes incomplete. Mistakes were inadvertently made, though it has been a high priority and the intention of the KTGF License Corporation to operate the Station in accordance with FCC Rules, to the best of its ability.

KTGF is now on the air, under stable local ownership, moving through and past the challenges it has faced in taking over a station which was dark, and is providing its community of license with five streams of free, quality, digital TV programming, 24 hours per day. Its programming is filling otherwise unmet niches for viewers, has been well received by local TV viewers, and is broadcasting content which is largely unavailable to viewers in its community of license, especially to those who rely exclusively on over the air television for TV viewing.

The grant of KTGF's pending License Renewal Application is, of course, essential to the continuation of KTGF as a free broadcast service for the people of Great Falls, Montana.

As the FCC continues processing the License Renewal Application, the Licensee asks that the FCC recognize the issues in its letter of April 12, 2017, come down to errors in reporting processes, but not actual failure of the Licensee to comply with FCC Rules.

The Licensee realizes that it has made mistakes, and it also realizes the importance of properly reporting information to the FCC. Since it received the FCC's letter of April 12, 2017, the Licensee has taken steps to ensure that its reporting requirements are handled adequately.

These steps have included retaining a respected communications law firm as its counsel on FCC compliance, and spending time reviewing programming requirements and reporting processes with an attorney from the law firm.

Station management has consulted with the Station's new communications counsel and has received guidance as to how KTGF can be even more effective in airing programming to address community needs.

Station management has drafted guidelines, and a reporting form, which will be used in selecting and creating programming to fully address community needs, and to properly report all required information on future Issues & Programs Lists. A similar review process has now been put into place by the Licensee which adds an additional level of review of all future Children's Reports prior to their filing.

The KTGF License Corporation has a sincere desire to satisfy any concerns the FCC has as it completes the processing of the pending License Renewal Application. The Licensee will gladly provide the FCC any additional information it deems necessary on an ongoing basis to demonstrate to the FCC that it is adequately meeting its obligations to air and report Core Programming and community needs programming.

The undersigned certifies, under penalty of perjury, that he is president of the KTGF License Corporation, and that the information contained in this letter and the amended FCC filings is both true and correct, to the best of his knowledge.

Please direct any correspondence concerning this matter to the undersigned at [406-949-4308](tel:406-949-4308), or to [TVinvestor@gmail.com](mailto:TVinvestor@gmail.com).

Respectfully Submitted,

  
Roger Lonnquist

President,

KTGF License Corporation

**Enclosures:**

1. 5 Amended Children's Reports covering periods from January 1, 2016 – March 31, 2017
2. 5 Amended Commercial Limits Compliance statements covering periods from January 1, 2016 – March 31, 2017
3. 8 Amended Issues & Programs Lists covering periods from April 1, 2015 – March 31, 2017