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*Christian  
Communicators  
Impacting  
the World*



October 1, 2008

The Honorable Kevin Martin  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Martin:

We have been watching with great interest your recent announcement that the Commission may consider issuing a Notice of Proposed Rule Making (NPRM) regarding an upgrade of Class A, low power television stations (A-LPTV) to full power status in conjunction with the impending digital conversion. Our understanding is that such upgrades would be allowed only where the signal of those A-LPTV stations would not interfere with incumbent full power television licensees, but would provide "must carry" cable television carriage rights for those A-LPTV licensees.

Here at National Religious Broadcasters (NRB), our goal is to advance the greatest expansion possible for the electronic communication of the Gospel. As a result, we look favorably on opportunities for our low power Christian television broadcast members to benefit from expanded coverage, provided, of course, that it does not interfere with the service provided by our full power television members. Your potential proposal for upgrading A-LPTV stations to full power status holds great promise for achieving our stated goal, and for that reason, we view your preliminary idea with positive anticipation.

We have a few cautions regarding this proposal, however. We understand that this concept would likely seek to maintain the "local programming" character of the A-LPTV stations which qualify for an upgrade to full power status. As you know, NRB has, in its several filings in the pending localism proceeding, opposed some of the new localism proposals contained in the NPRM. Thus, we would be opposed to any attempt, through this A-LPTV upgrade process, to impose any new or additional "localism" requirements on broadcasters as a result.

Also, we would need to carefully review any proposed standards that would be used by the Commission in granting, or denying upgraded full power status to A-LPTV applicants, beyond those that merely relate to signal interference. For instance, will the programming content of an

A-LPTV applicant be a consideration in granting or denying such an upgrade, beyond that which is minimally required under present rules to qualify that station as a low power Class A station? And if so, what preferences for programming content will be entertained by the Commission as it decides whether a given A-LPTV station will receive the benefit of an upgrade to full power status?

These, and other concerns will have to be favorably addressed in any NPRM proceeding before NRB can give our unqualified support. Until then, however, we commend you on your initiative to the extent that it will expand the broadcasting opportunities for our A-LPTV station members in the wake of the imminent digital conversion.

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank Wright", with a long, sweeping flourish extending to the right.

Frank Wright, Ph.D.  
President & CEO

cc: Commissioner Michael Copps  
Commissioner Jonathan Adelstein  
Commissioner Deborah Tate  
Commissioner Robert McDowell