



# NATIONAL TRANSLATOR ASSOCIATION

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

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## Statement concerning Auction 81

NTA members waited 6 years to be able to file for additional translators and another five for those with conflicts to reach the auction stage.

The NTA urges the Commission to structure the auction procedure to maximize the number of granted applications. Specifically it is important that all applications not directly mutually exclusive with an auction winner be processed on the basis of their status after the first auction. Smaller “Daisy Chains” should be set for subsequent auctions and “Singletons” should be process to a grant.

It is our understanding that the auction MX groups listed in DA05-506 were supposed to be groups with no “Daisy Chains”. That is there would be a single winning bidder and no other applications would be eligible for further processing. It is our belief that a substantial portion of the groups do in fact contain “Daisy Chains”. Four examples are attached..

In addition we found two instances where applications appeared to have been included in error and in one group we found a missing application. These were identified on the basis of the CDBS entries. It was not possible to take account of any settlements that were filed unless they were included in the CDBS record for the application.

The missing application is BNPTTL-20000816AAI, FI 125598 in MX038.

Applications which appear to have been included in error are:

BNPTTL-20000831BZJ in MX238.

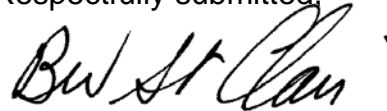
BNPTTL-20000828BGZ in MX054

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

The examples offered herein represent only a sampling of the auction cases. They are meant to demonstrate that there are problems but not to be a comprehensive listing.

The NTA urges the Commission to structure the various steps of the auction process so that no application is needlessly excluded from being granted.

Respectfully submitted,

A handwritten signature in black ink that reads "B. W. St. Clair". The signature is written in a cursive style with a small dot at the end.

B. W. St. Clair  
President

MX Groups Which Need Reexamination for “Daisy Chains”

MX018	<b>MX054*</b>	MX090	MX139
MX031	MX057	MX101	MX143
MX032	MX065	MX104	MX144
MX035	MX066	MX105	MX146
<b>MX038*</b>	MX067	MX115	MX152
MX042	MX068	MX116	MX164
MX043	MX069	MX121	MX180
MX045	MX070	MX123	MX183
MX047	MX083	<b>MX130*</b>	MX205
MX048	MX088	MX131	<b>MX238*</b>
			MX247

\* Detailed studies presented.

## MX038

**This MX group has one “Daisy Chain” which will take one of four forms depending on which application is the initial winner. Note one missing application.**

The applications in this auction are:

Jackalope Broadcasters, BNPTVL-0816ABN, Ch 09, (Jackalope9)

Joseph W. Shaffer, BNPTVL-20000831BNC, Ch 09, (Shaffer)

KM Communications, Inc., BNPTVL-20000829AVP, Ch 11, (KM)

KSWO Television Co. Inc., BNPTVL-200008BKY, Ch 10, (KSWO)

A fifth application should have been included in this auction group:

Jackalope Broadcasters, BNPTVL-20000816AAI, FI 125598, Ch 11  
(Jackalope11)

The following discussion assumes the missing application, Jackalpe11, should be included.

There are four possible scenarios:

1.) Jackalope9 wins the first auction:

Shaffer and KSWO are eliminated.

KM and Jackalope11 are MX and would go in a secondary auction

2) Shaffer wins the first auction:

Jackalope9 and KSWO are eliminated

KM and Jackalope11 are MX and would go in a secondary auction

3) KM wins the first auction:

KSWO and Jackalope 11 are eliminated

**MX038 continued....**

Jackalope9 and Shaffer are MX and would go to a secondary auction

4) Jackalope11 wins the first auction:

KSWO and KM are eliminated

Jackalope9 and Shaffer are MX and would go to a secondary auction

5) KSWO wins the first auction:

All other applicants are eliminated.

Conclusion

In four of the five possible scenarios a “Daisy Chain” results.

BWS  
03/28/05

## MXO54

**This MX group has multiple “Daisy Chains” and probably will require five successive auctions.**

The applications in this auction are:

Orrick, Twin Falls, ID, BNPTTL-20000807AGZ  
Townsend, Hailey, ID, BNPTTL-20000828AVQ  
Townsend, Rupert, ID, BNPTTL-20000828AVU  
Townsend, Shoshone, ID, BNPTTL-20000828ATG  
Townsend, Sun Valley, ID, BNPTTL-20000828AVY  
Mosely, Hailey, ID BNPTTL-20000828AOK  
Mosely, Missoula, ID, BNPTTL-20000828ALM  
Mosely, Rupert, ID, BNPTTL-20000828AJY  
Mosely, Shoshone, ID, BNPTTL-200008AXK  
Mosely, Sun Valley, ID, BNPTTL-20000828AON  
Equity, Twin Falls, ID, BNPTTL-20000829AVE  
esi, Burley, ID BNPTTL-20000829ASL  
Falls B'casting, Twin Falls, ID, BNPTTL-20000829ATA  
Frandsen, Newton, UT, BNPTTL-20000828BGZ (Note 1)  
Three Angels, Twin Falls, ID, BNPTTL-20000830BJF (Note 2)

Note1: Frandsen, Newton, UT appears to not have interference contour overlap, either incoming or outgoing, with any other application and is not included in the scenarios which follow.

Note 2: Three Angels database entry has an error apparently carried over from an original application error. The ground elevation in the application and in TV query is 130.2 m instead of 1301.2 m. The HAATS on all radials will be negative. It is not known how the FCC will analyze this application. In the scenarios which follow it is assumed the ground elevation will be corrected to 1301.2 m and the radiation center above sea level will be 1344.2 m.

**MX054 continued....**

The composition of the multiple “Daisy Chains” in this group of applications will of course depend upon who is the auction winner at each step. For the purpose of demonstrating that multiple (successive) the “Daisy Chains” exist hypothetical winners have been utilized.

Assume the first winner is Townsend Hailey the following are not in conflict with the winner and should go to a second round

:

Townsend, Rupert	Townsend, Shoshone
Mosely, Missoula	Mosely, Shoshone
Mosely, Rupert	Orrick, Twin Falls
Equity, Twin Falls	Three Angels, Twin Falls
esi , Burley	Equity, Twin Falls
Falls B'casting, Twin Falls	Mosely, Missoula

Assume the second round winner is Mosely, Missoula the following are not in conflict with the winner and should go to a third round:

Townsend, Rupert  
Mosely, Missoula  
Mosely, Rupert  
Equity, Twin Falls  
esi , Burley  
Three Angels, Twin Falls  
Falls B'casting, Twin Falls  
Orrick, Twin Falls

Assume the third round winner is esi, Burley the following are not in conflict with the winner and should go to a fourth round:

Townsend, Rupert  
Mosely, Rupert  
Equity, Twin Falls  
Orrick, Twin Falls

**MX054 continued....**

Assume the fourth round winner is Orrick, Twin Falls the following are not in conflict with the winner:

Townsend, Rupert  
Mosely, Rupert

And these remaining two would go to a fifth round.

Alternate Scenario

Assume the fourth round winner is Towsend, Rupert the following are not in conflict with the winner:

Orrick, Twin Falls  
Equity, Twin Falls

and would go into a fifth round.

Conclusion

It is demonstrated that this auction group includes "Daisy Chains".

BWS  
03/26/05



## MX130

**This MX group has one “Daisy Chain” which will take one of three forms depending on which application is the initial winner.**

The applications in this auction are:

Beartooth Communications Company, Butte, MT, BNPTTL-20000829AHK  
(Beartooth-Butte)

Beartooth Communications Company, Great Falls, MT, BNPTTL-20000829AHF  
(Beartooth-Great Falls)

Montana State University, Great Falls, MT, BNPTTL-20000803ABF (Montana-  
Great Falls)

There are three possible scenarios:

1.) Beartooth-Butte wins the first auction. Then

Beartooth-Great Falls  
&  
Montana-Great Falls

are MX and would go in a secondary auction.<sup>1</sup>

2.) Montana-Great Falls wins the first auction. Then Beartooth-Great Falls is eliminated and Beartooth-Butte becomes a singleton.

3.) Beartooth-Great Falls wins the first auction. Then Montana-Great Falls is eliminated and Beartooth-Butte becomes a singleton.

### Conclusion

No matter which applicant wins the first auction a “Daisy Chain” remains.

BWS  
03/28/20050

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<sup>1</sup>Montana-Great Falls shows no interference to Beartooth-Butte based on a Longley-Rice terrain dependent analysis included in their application and it agreed to accept incoming interference from any other application.

## MX238

### **This MX group has one possible “Daisy Chain”**

The applications in this auction are:

Fiberlessnet, Inc., BNPTTL-200008BZJ. Ch 15, (Fiberless)

IBG, Inc. BNPTTL-200008CCW, Ch 30, (IBG)

Stead Communications, Inc., BNPTTL-200008CCH, Ch 15, (Stead)

There are three possible scenarios:

1.) Fiberless wins the first auction:

Stead is eliminated and IBG becomes a “Singleton”

2) IBG wins the first auction

Stead and Fiberless remain, are in conflict with each other and go to auction

Stead causes interference to Fiberless but there is not interference the other way. If Fiberless wins the second auction Stead is eliminated. If Stead wins Fiberless becomes a singleton

3) Stead wins the first auction:

IBG is eliminated, Fiberless becomes a singleton.

It should be noted that this Fiberless is in this auction group predicted on the assumption that Stead’s interference contour overlaps Fiberless’ protected contour. This appears to be incorrect and in actuality Fiberless should not have been in this auction group.

### Conclusion

In two of the three possible scenarios a “Daisy Chain” results.

BWS  
03/28/05