

July 21, 2017

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th St, S.W.
Washington, DC 20536

Dear Chairman Pai,

On behalf of the below organizations representing a cross-section of rural communities and businesses, we write to once again voice our long-standing concerns with a proposal to the FCC seeking to reserve additional spectrum for use by unlicensed wireless devices. While our organizations certainly understand the need for improved broadband access in rural America and support the deployment of high-speed broadband in our communities, this proposal will only serve to deprive our members of critical access to local broadcast television coverage.

Broadcast television is the vital thread which connects rural America. Our members rely heavily on local broadcast stations to stay up to date on the important issues in our communities and the rest of the country. Farmers and ranchers rely on local news and weather reports to make production and marketing decisions. When fast-moving weather emergencies arise – a frequent occurrence in rural America – we turn to local broadcast TV for lifesaving information on where those weather patterns are headed.

With the conclusion of the auction, we understand that the FCC will now turn its focus to completing a “repack” of an approximately 1,000 broadcast television stations in the next three years. This repack will prove challenging to the Commission, local TV broadcasters, tower manufacturers and erectors, and, most importantly, millions of broadcast television viewers across the country.

Further complicating the repack process will be attempting to find a place on the broadcast dial for television translators and low-power television stations (LPTVs), which may be forced off the air permanently if they cannot be accommodated. Losing television translators and LPTVs would have a devastating impact on our members, as these services are often our only means of receiving free, over the air local broadcast television service.

We have expressed our concerns in [May 2013](#) and again in [December 2015](#) with the Commission potentially reserving “television white space” on the broadcast TV dial for use by unlicensed devices. In light of a recent proposal seeking out these white spaces for unlicensed use, we once again urge the FCC to be mindful of the serious impact this would have on rural areas.

The white space proposal would take away yet another channel from local broadcasters. Combining this loss of spectrum for unlicensed use with the sheer number of full power stations needing to be repacked and the interference protections between neighboring stations, many LPTVs and television translators could be left without a new home and would be forced out of business. When local broadcast stations go dark, rural communities are deprived of a vital source of information that is essential for managing our day-to-day lives.

Our organizations strongly support the goal of the deployment of high-speed broadband throughout the country so that all can compete in and contribute to the global economy. However, promises of what *potentially may materialize in the future* should not jeopardize the critical local television service that *currently, reliably and effectively* fulfills the needs of rural communities.

Sincerely,

American Agri-Women
Intertribal Agriculture Council
National Association of Wheat Growers
National Association of State Departments of Agriculture
National Black Growers Council
National Farmers Union
Rural & Agriculture Council of America
U.S. Cattlemen's Association
Women Involved in Farm Economics

cc:

Commissioner Mignon Clyburn
Commissioner Michael O'Rielly