

**Island Broadcasting Co.  
4 Hunters Lane  
Roslyn, New York 11576**

September 25, 2006

To: Milton Brown, Office of the Chief Counsel  
National Telecommunications and Information Administration  
1401 Constitution Avenue, Room 4713  
Washington, DC 20230

Re: **NTIA Docket No. 060512129-6129-01**

Island Broadcasting Co. ("Island"), licensee of five low power television ("LPTV") stations located in New York, New York,<sup>1</sup> hereby respectfully submits comments in the above-referenced proceeding.

By way of background, Island's LPTV stations serve diverse, primarily ethnic and non-English speaking audiences. Like the vast majority of LPTV stations in the U.S., none of Island's stations is carried on a cable system or other multi-channel video delivery service. Out of concern for the ability of LPTV station viewers around the nation to continue to receive the signals of analog LPTV stations after the digital transition, Island wishes to comment on the standards for a minimum-capabilities, digital-to-analog converter box addressed in Section II. E. of the Notice of Proposed Rulemaking ("NPRM").

1. In the second paragraph of Section II, E of the NPRM, six characteristics for certification of a converter box are proposed. Island urges one additional characteristic - - that the converter readily pass analog signals directly through from the antenna to TV receiver. This

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<sup>1</sup> Island holds licenses issued by the Federal Communications Commission ("FCC") for Stations WNYX-LP, WNXV-LP, WNYN-LP, WNYZ-LP and WXNY-LP.

can easily be incorporated into the design of the box - - either that when the box is shut off, the analog signal is passed, or by means of a built in by-pass switch.

2. Thousands of operating analog LPTV stations will remain in analog operational mode after the February 18, 2009 digital transition deadline for full service stations. These LPTV stations, by and large, are not carried by cable systems or other multi-channel video delivery systems and therefore depend totally on over-the-air reception by receivers. Since most users of the converter boxes will permanently install them between the antenna and the TV receiver, the converter box's ability to pass analog signals directly through from the antenna to the TV receiver is essential to the continued service to niche audiences that LPTV stations provide. By permitting LPTV stations to continue to operate in analog mode after February 18, 2009, the FCC clearly intended that they continue to be viewed. Therefore, adding the feature described above should not be considered beyond the allowable characteristics of the converter box as defined by Congress. Rather, the ability to pass analog signals directly through from the antenna to the TV receiver is a characteristic of the converter box, which is necessary to meet the needs and interests of the public.

Respectfully submitted,

Island Broadcasting Co.

By:   
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