

of the Act, to regulate directly, rather than through station licensees, "the adequacy of facilities and reasonableness of charges."

Eligibility of station licensees for STV

Although the FCC notice is silent on this question, ACLU believes it to be in the public interest to permit educational, municipal, and non-profit stations to employ STV for portions of their broadcasting schedules. STV programming by such stations could be expected to add to the variety of services available to the public, as well as contribute to their financial self-support.

COLORADO TRANSLATOR ASSOCIATION,
Leadville, Colo., October 5, 1967.

Hon. JOHN DINGELL,
House of Representatives,
Washington, D.C.

MY DEAR MR. DINGELL: We are enclosing a copy of our comments to the FCC regarding Subscription Television. We fully agree with you on your anti-pay TV bill.

We feel the FCC should have more important things to do than to succumb to the pressures of the few who will gain from such a system. We may need better TV in the country but we need it for everyone, not just the ones that can pay for it. Pay TV is not the way to better TV for everyone.

We see no way that siphoning of programming can be prevented in the long run.

Sincerely yours,

A. K. SMITH, *President.*

COLORADO TRANSLATOR ASSOCIATION,
Leadville, Colo., September 27, 1967.

Docket No. 11279

In the Matter of Amendment of Part 73 of the Commission Rules and Regulations (Radio Broadcast Services) to Provide for Subscription Television Service:

The Colorado Translator Association is comprised of approximately 60 translator organizations and represents approximately 250,000 translator TV viewers throughout the State of Colorado. Most of these viewers would like good quality, good programmed, multiple signal TV to be extended into their areas. We are interested in improvement and expansion of "free" broadcasting. We feel that the rural population of this country should be considered in FCC rule-making and not be forgotten to fend on our own.

STV apparently will only be allowed in the top 100 markets and further only in areas having five or more licensed stations. In both the case of CATV importing distance signals and in STV this can only have the effect of decrease or eliminating the possibility of a greater number of licensed stations in these areas. Further, this will then eliminate the possibility of a greater number of stations for the remainder of the outlying communities.

We, therefore, stand against any form of STV whether by over-the-air methods or by wire.

There is just so much programming available to place on TV. Any amount of siphoning will be detrimental to all television now received. It is stated that 85% of programming will be newer movies and combined with sports will take up a maximum of 90% of viewing. If it is felt that the new movies are such a boon to better programming, why is it only considered for a small portion of the population of the country? If this is the area that is to swell the knowledge of the people and give them the better things of life, maybe it should be considered to allow these on free TV so all could enjoy their benefits. The cultural benefits to be derived from such a system are just about nil. These can be put on ETV just as well where everyone can benefit by them.

We see no need for such a system nor any warrant for such a system. The only people who will benefit by this will be the suppliers of the equipment and the collectors of the dollars from the sale to the chosen few who can afford it.

With just a small percent of the population subscribing to STV there will be enough money involved to outbid any free broadcasting system and gradually siphon all the lucrative programs so that only a few will see them.