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SMALL ENTITY COMPLIANCE GUIDE

**Amendment of the Commission's Rules to
Advance the Low Power Television, TV Translator, and Class A Television Service
FCC 25-84**

MB Docket No. 24-148

Released: December 19, 2025

In accordance with Section 212 of the Small Business Regulatory Enforcement Fairness Act of 1996, this Small Entity Compliance Guide (Guide) is intended to help small entities—small businesses, small organizations (non-profits), and small governmental jurisdictions—comply with the rules adopted in the above-referenced Federal Communications Commission (FCC or Commission) rulemaking dockets. This Guide is not intended to replace or supersede these rules, but to facilitate compliance with the rules. Although we have attempted to cover all parts of the rules that might be especially important to small entities, the coverage may not be exhaustive. This Guide cannot anticipate all situations in which the rules apply. Furthermore, the Commission retains the discretion to adopt case-by-case approaches, where appropriate, that may differ from this Guide. Any decision regarding a particular small entity will be based on the statute and any relevant rules.

In any civil or administrative action against a small entity for a violation of rules, the content of the Guide may be considered as evidence of the reasonableness or appropriateness of proposed fines, penalties or damages. Interested parties are free to file comments regarding this Guide in the above referenced docket and the appropriateness of its application to a particular situation. The Commission will then consider whether the recommendations or interpretations in the Guide are appropriate in that situation. The Commission may decide to revise this Guide without public notice to reflect changes in its approach to implementing a rule, or it may clarify or update the text of the Guide. Please direct comments and recommendations, or requests for further assistance, to the FCC's Consumer Center:

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TABLE OF CONTENTS

I.	OBJECTIVES OF THE PROCEEDING	1
II.	COMPLIANCE REQUIREMENTS	1
	A. Revision of Rules Concerning Relocation of Facilities	1
	B. Clarifying Video Program Signal Requirements	2
	C. Class A, LPTV and TV Translator Station Designations and Call Signs	2
	D. EAS Obligations	3
	E. Channel 14 Emission Masks	4
	F. Additional Class A, LPTV, and TV Translator Rule Clarifications	4
III.	RECORDKEEPING AND REPORTING REQUIREMENTS	5
IV.	IMPLEMENTATION DATE	5
V.	INTERNET LINKS	5

I. OBJECTIVES OF THE PROCEEDING

In *Amendment of the Commission's Rules to Advance the Low Power Television, TV Translator, and Class A Television Service*, Report and Order (*Order*),¹ the Federal Communications Commission (Commission) adopted certain changes to its rules for the Low Power Television Service (LPTV Service)² as proposed in the Notice of Proposed Rulemaking adopted by the Commission in June 2024 in the above captioned proceeding. The Commission created the LPTV Service in 1982 to bring local television service to viewers “otherwise unserved or underserved” by existing full power television service providers. Today, these stations are an established component of the nation’s television system, delivering free over-the-air TV service, including locally produced programming, to millions of viewers in both rural and urban communities. In light of changes within the broadcast industry and LPTV Service over the last forty years, the Commission adopted changes to its rules to ensure that the LPTV Service continues to flourish and serve the public interest long into the future.

The rule changes included technical updates aimed at providing clarity and regulatory certainty to licensees so they can make informed business decisions about their station operations and to ensure that the public continues to benefit from their operations. For example, the Commission adopted revisions to the rules: (1) updating how the relocation distance measurement is calculated for displaced LPTV/TV translators and LPTV Service channel sharing stations; (2) establishing a uniform maximum relocation distance for minor modifications; (3) establishing a formal method for LPTV Service stations to specify a community of license; (4) requiring LPTV Service stations to utilize a call sign that matches their service designation; (5) establishing a process for LPTV Service stations to formally change their service designation; (6) making clear what EAS equipment must be installed by LPTV stations; (7) clarifying the video program responsibilities of LPTV stations; (8) revising the displacement rule to more clearly enumerate the circumstances that qualify a LPTV/TV translator station for displacement; and (9) making other revisions to our technical rules that are intended to streamline current processes, prevent interference, reduce burdens, and ensure that all applicants and licensees are treated equally. The Commission also revised the rules to clarify the manner in which LPTV/TV translator channel sharing stations may apply for a new, non-shared channel. The Commission found that its actions set forth in the *Order* will not only provide regulatory certainty to industry, but will help ensure the LPTV Service continues to benefit the public and thrive well into the future.

II. COMPLIANCE REQUIREMENTS

A. Revision of Rules Concerning Relocation of Facilities

1. Calculating Distance for Displaced and Channel Sharing Stations, 47 CFR § 74.787(b)(1)(iii)

The Commission adopted a rule revision eliminating the reference to an LPTV Service station’s community of license (COL) and incorporating the language of the part 74 minor change rule to measure a station’s proposed relocation distance from the reference coordinates of an “existing station’s antenna location.” Displaced stations and channel sharing stations may no longer use its existing COL coordinates to measure the distance of its proposed relocation.

¹ *Amendment of the Commission's Rules to Advance the Low Power Television, TV Translator, and Class A Television Service*, MB Docket No. 24-148, Report and Order, FCC 25-84 (Dec. 19, 2025) (*Order*).

² The LPTV Service includes low power television (LPTV) stations as well as television translator (TV translator) stations and Class A TV stations (Class A). When referring to all three station types collectively, the term “LPTV Service” shall be used. TV translator stations also include digital replacement translators (DRTs) or digital-to-digital replacement translators (DTDRTs). A DRT is a TV translator station licensed to a full power television station that allows it to restore service to any loss areas that may have occurred as a result of its transition from analog to digital. A DTDRT is a TV translator station licensed to a full power television station that allows it to restore service to any loss areas that may have occurred as a result of the station being assigned a new channel pursuant to the Incentive Auction and repacking process.

2. The Distance Relocation Limit, 47 CFR §§ 74.787(a)(4)(iii), (b)(1)(iii)

The Commission retained but modified the current LPTV Service minor modification distance relocation limit to no greater than 49.1 km from a station's current antenna reference coordinates. LPTV Service stations seeking to relocate their facilities must calculate the distance in kilometers only and may not refer to miles. Stations are not permitted to propose minor change site relocations that exceed 49.1 km from the stations' current antenna reference coordinates.

3. Community of License Designations and Coverage Requirements, 47 CFR § 74.787(a)(1)

LPTV Service Stations must specify a community of license (COL) with a boundary that overlaps with the station's "protected service contour." "Protected service contour" is defined as the contour set forth in section 74.792 of the Commission's rules for LPTV/TV translator stations and section 73.6010 of the rules for Class A stations. A COL's "boundary" for the purpose of determining whether there is overlap with a station's protected service contour will be defined as the "boundary of the community as has been recognized by any federal, state, local, or tribal governmental entity."

A station will be required to certify in any application designating a COL that its protected service contour overlaps with the COL's boundary. Stations are permitted to use the name of a county or a commonly used name of an unincorporated area, as recognized by any federal, state, local, or tribal governmental entity, as a station's COL. In cases where no community exists within a station's protected service contour, a licensee may select a nearby community located outside its protected service contour and use Longley-Rice to demonstrate the field strength is at or above the value found in sections 73.6010 or 74.792 of the Commission's rules (as appropriate), in the requested COL. Any amount of overlap between a station's protected service contour and boundary of a station's COL will be deemed sufficient to designate a community as a COL.

LPTV Service stations are permitted to change their COL to a new rule-compliant COL without limit. All stations in the LPTV Service shall designate a COL by filing an application for modification of license and by paying the appropriate filing fee. Such applications are filed electronically in the Commission's Licensing Management System (LMS) on FCC Form 2100, Schedule D (LPTV and TV translator) and Schedule F (Class A). Within six months of the effective date of this rule revision, all LPTV Service stations must have designated a COL that is rule-compliant. Stations whose current COL listed in LMS meets the requirements of the new COL rule do not need to take any action. Pursuant to section 1.1116 of the Commission's rules, such filings are exempt from paying an application filing fee where the station files a modification of license application during this six-month period solely to come into compliance with the new COL rule.

B. Clarifying Video Program Signal Requirements, 47 CFR §§ 74.780(a)(16), 74.790(g)(3)

Section 74.790(g)(3) of the Commission's rules currently requires that "[a]n LPTV station must transmit at least one over-the-air video program signal at no direct charge to viewers at a resolution of at least 480i (vertical resolution of 480 lines, interlaced)." In the *Order*, the Commission clarified that test patterns, slides, or still pictures with unrelated aural transmissions do not constitute a "video program signal" for purposes of compliance with section 74.790(g)(3). This clarification is codified in section 74.780(a)(16) of the Commission's rules. The Commission noted, however, that it is "not prohibiting stations from airing such material" but that "such content is by itself insufficient for purposes of meeting the minimum video program signal obligation under section 74.790(g)(3)."

C. Class A, LPTV, and TV Translator Station Designations and Call Signs

1. Changes Between LPTV Service Designations, 47 CFR § 74.787(a)(2)

The *Order* includes a new rule that provides that, LPTV, and TV translator stations that want to change their service designation (i.e., from LPTV to TV translator, or vice versa) must do so by way of a license modification application. The *Order* also requires that Class A stations file a license modification

when downgrading to LPTV status. LPTV and TV translator stations may change their designation without limit. Such applications are filed electronically on LMS on FCC Form 2100, Schedule D (LPTV and TV translator) and Schedule F (Class A). Applicants will be required to pay the requisite application filing fee.

2. TV Translator Call Sign Assignments, 47 CFR § 74.791

The Commission, in the *Order*, revised its rules to clarify that all TV translator stations must have an alphanumeric call sign comprised of a prefix consisting of the initial letter “K” or “W” (based on the station’s geographic location in relation to the Mississippi River), followed by the channel number assigned to the station and two additional letters, and a suffix consisting of the letter “-D.” Within thirty days after the effective date of the *Order*, the Commission staff will automatically modify any TV translator call signs that do not comply with the TV translator call sign convention. The 30-day period will allow licensees to inform their viewers of the impending call sign change as they deem necessary. Similarly, when a station converts from LPTV to TV translator status, the Commission staff will provide a 30-day period before automatically modifying a station’s call sign to comply with the call sign naming convention in the TV translator call sign rule, in order to allow the station a period of time to inform viewers of the impending call sign change as appropriate. Existing, non-compliant TV translator call signs shall not be “grandfathered.”

3. Class A and LPTV Call Sign Assignments, 47 CFR § 74.791

The Commission adopted a rule revision requiring that all Class A and LPTV stations must have a four-letter call sign, with the suffix “-LD” for LPTV stations and “-CD” for Class A stations. However, LPTV and Class A stations licensed as of the date of the release date of the *Order* shall not be required to change their call signs and will have their current non-compliant call signs “grandfathered.” A grandfathered call sign may be retained, unless or until the station changes its service designation or voluntarily chooses to modify its call sign. Grandfathered call signs may also be retained as part of an assignment or transfer of a station’s license.

Stations that do not qualify for grandfathering or that want to voluntarily change their call sign to comply with the new rule will be provided one-year from the effective date of the rule changes in the *Order* to designate a four-letter call sign with the correct suffix. During this one-year period, pursuant to section 1.1116(a) of the Commission’s rules, such filings are exempt from payment of the fee associated with any call sign change request that is submitted by a station solely to come into compliance with the revised rule. Any station that subsequently modifies its service designation will be required to submit a call sign change request and pay the appropriate fee.

The *Order* adopts a rule revision to modify the call sign of a Class A station that reverts from Class A status to LPTV to reflect its LPTV status by automatically changing its call sign suffix from “-CD” to “-LD” upon the change in service designation. The newly classified LPTV station will retain its current four-letter call sign prefix unless it conflicts with that of an existing LPTV station. In such a circumstance, the former Class A station will be required to modify its four-letter call sign prefix in through the Commission’s LMS call sign reservation process and pay the appropriate fee. The newly created Class A station will retain its current four-letter call sign prefix unless it conflicts with that of an existing Class A station. In such a circumstance, the new Class A station will be required to modify its four-letter call sign prefix through the Commission’s LMS call sign reservation process and pay the appropriate fee.

D. EAS Obligations, 47 CFR §§ 11.11, 11.51, 11.61

The *Order* amends the rules to clarify that all stations with the LPTV designation, regardless of how the station is operated, must generally comply with the part 11 Emergency Alert System (EAS) rules. A station formally designated in the Commission’s database as a TV translator is not required to comply with the part 11 requirements, such as installing EAS equipment or meeting related obligations like filing in the EAS Test Reporting System (ETRS), if it entirely rebroadcasts the programming—including all EAS—of a Primary Station. The part 11 EAS rules currently provide that “LPTV stations that operate as

television broadcast translator stations, as defined in section 74.701(b) of the Commission's rules, are not required to comply with the requirements of this part." The revised rule will not require a LPTV station to procure any new EAS equipment, does not expand our existing EAS obligations, and does not increase burdens on existing stations that are or are acting as TV translators. TV translators and any broadcast station (LPTV or otherwise) that rebroadcast 100% of its programming from a "hub station (or common studio or control point)" will continue to be exempt. LPTV licensees that have a station without EAS equipment because it is being operated like a TV translator either need to change the station's designation to TV translator, or ensure the necessary EAS equipment is installed at the hub station (or common studio or control point) being rebroadcast.

E. Channel 14 Emission Masks, 47 CFR § 74.794

The Commission's revised rules require that all new channel 14 LPTV Stations licensed after the effective date of the rule must specify either stringent or full service mask filtering. All channel 14 LPTV Stations that are licensed as of the effective date of this new rule must specify either stringent or full-service mask filtering if they modify their facilities, unless the station is decreasing power or making a modification to its facilities that does not change its service contour. With respect to those channel 14 LPTV Stations that are licensed as of the effective date of this new rule, are operating without causing interference to Land Mobile Radio (LMR) facilities despite use of a simple emissions mask, and do not seek to modify their facilities as described above, are not required to take any further action.

F. Additional Class A, LPTV, and TV Translator Rule Clarifications

1. DTS Emission Masks, 47 CFR § 74.720

Pursuant to the rules adopted in the *Order*, all transmitters in LPTV Service station Distributed Transmission System (DTS) facilities must utilize the same emission mask. All three emission masks referenced in the rules (simple, stringent, and full service) are permissible for use by LPTV Service stations. In order to ensure accurate interference calculations and reduce the potential for interference, the DTS rules are amended to require that all LPTV Service DTS facilities utilize the same emission mask at each DTS site. A station is permitted to use any of the emission masks permitted by the rules, so long as the same emission mask is used at all of their DTS transmitter sites.

2. Interference Allowance, 47 CFR §§ 74.793(i) and (j)

The *Order* amends the rules to require LPTV Service stations seeking to use an agreement to resolve interference concerns to enter into a signed written agreement that is submitted with any application that would exceed the 2% interference threshold and makes clear whether money or other consideration was exchanged. Stations operating pursuant to interference agreements, or that are unilaterally accepting interference from another station, will be permitted to maintain those agreed upon interference thresholds when modifying a facility. Under our current rules, when an LPTV Service station agrees to accept interference above the threshold permitted by our rules (accepting station) from another broadcast television station (interfering station), if the interfering station subsequently modifies its facilities it must reduce its level of interference to the accepting station to less than 2%. The Commission concluded that this result is unnecessary when stations have either mutually agreed, or a station has unilaterally agreed, to accept a certain level of interference.

3. Maximum Grid Resolution, 47 CFR § 74.793(b)

The Commission codified the use of a one square kilometer grid resolution as the maximum permitted in evaluating the interference caused by LPTV Service facilities. The finer 0.5 km grid resolution remains available so long as it is specified in an exhibit to the application.

4. Displacement Caused by Full Power Channel Substitutions, 47 CFR § 74.799(i)

The *Order* clarified that, when an LPTV/TV translator station is displaced by a full power station's channel substitution, the LPTV/TV translator station cannot file a displacement application until

the report and order granting the channel substitution and amending the Table of TV Allotments is effective.

5. Displacement Exhibit, 47 CFR § 74.787(a)(4)(iii)

The Commission revised its rules to require that applicants for displacement include an exhibit briefly describing the specific cause of displacement.

6. Program Test Authority Rule for LPTV/TV Translators, 47 CFR §§ 73.1620, 74.780(a)(12)

The *Order* revised the rules to make the part 73 “program test authority” (PTA) rule applicable to LPTV/TV translator stations. Pursuant to this change, within 10 days of commencing operations pursuant to program test authority, stations must submit an application for license.

III. RECORDKEEPING AND REPORTING REQUIREMENTS

The *Order* adopted rules with new recordkeeping and reporting requirements. Details on these new requirements are noted above in section II.

IV. IMPLEMENTATION DATE

The *Order* and the new or modified rules became effective on February 23, 2026. Amendments to sections 73.3700(g), 73.6001(b), 73.6002(b), 74.787(a), 74.791(a) through (c), 74.793(a) through (c), and 74.799(i) which contain new or modified information collection requirements that require approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 will become effective upon OMB approval.

V. INTERNET LINKS

A copy of the *Order* is available via this website at: <https://docs.fcc.gov/public/attachments/FCC-25-84A1.pdf>

A copy of the *Federal Register* Summary of the *Order* is available at: <https://www.federalregister.gov/documents/2026/01/23/2026-01279/advancement-of-the-low-power-television-tv-translator-and-class-a-television-service>

A copy of the Notice of Effective Date of the modified rules is available at: <https://docs.fcc.gov/public/attachments/DA-26-90A1.pdf>