

**ALERT**

# FCC Approves Changes to Rules Governing LPTV, TV Translator, and Class A Stations

December 23, 2025

On December 18, 2025, the Federal Communications Commission (FCC) approved a Report and Order (Order) adopting changes to its rules for the Low Power Television Service (LPTV Service [1]). The Order implements a series of revisions to the application processes and operating procedures for LPTV Service stations that were originally proposed in a July 2024 Notice of Proposed Rulemaking.

The Order will take effect 30 days after publication in the Federal Register.

The Order contains the following provisions, which apply to all LPTV, TV Translator, and Class A stations unless otherwise noted:

- Mandates applications for channel-sharing or displacement relief calculate maximum distances based on the location of the station's existing antenna instead of the station's community of license. This harmonizes the calculation method with applications for minor changes.
- Increases the distance limit for minor modifications to 49.1 kilometers from the site of the existing antenna and eliminates any references based on miles. This is a slight increase from the previous limit of 48 kilometers.
- Requires stations to select a community of license (COL) whose boundary overlaps (in any amount) with its protected service contour. Stations must select a compliant COL within six months of the rule's effective date. Any change to a station's COL must be filed via an application for a license modification with an appropriate fee, but fees are waived for initial applications solely made to comply with this new rule.

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## Practice Areas

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- Clarifies that LPTV stations must broadcast at least one video program signal and that test patterns, slides, and still pictures with unrelated aural transmissions, by themselves, are insufficient.
- Requires any change between an LPTV and TV Translator designation to be made via a formal application for a license modification.
- Requires TV Translator stations to have alphanumeric call signs starting with "K" or "W" followed by the channel number assigned to the station and two additional letters before "-D". The FCC will automatically modify non-compliant call signs if stations do not come into compliance within 30 days of the Order's effective date.
- Requires new LPTV stations to have four-letter call signs with a "-LD" suffix, but grandfathered those call signs already licensed on the effective date of the Order. LPTV stations with non-compliant call signs will be required to modify them when applying for a change in service designation.
- Requires new Class A stations to have four-letter call signs with a "-CD" suffix, but grandfathered those call signs already licensed on the effective date of the Order. Class A stations with non-compliant call signs will be required to modify them when applying for a change in service designation.
- Clarifies that all stations with an LPTV designation must generally comply with the Part 11 EAS rules. TV Translator stations are exempt if the Translator rebroadcasts 100% of programming from a "Primary Station," including EAS alerts. Although LPTV stations that rebroadcast 100% of programming from a "hub station (or common studio or control point)" are also exempt, they must either change their designation to TV Translator or ensure the necessary EAS equipment is installed at the hub station (or common studio or control point) being rebroadcast.
- Requires all new LPTV, TV Translator, and Class A stations broadcasting on Channel 14 to deploy a "full service" or "stringent" emission mask. Existing Channel 14 stations may continue to use a "simple" emission mask, but must upgrade to a "full service" or "stringent" mask when applying for any facility modifications.
- Prohibits LPTV and TV Translator stations from operating above Channel 36.
- Requires stations that rely on Distributed Transmission System (DTS) facilities to deploy the same type of emission mask at each of their DTS transmitter sites.
- Requires stations entering into an interference agreement to submit a signed written agreement alongside the application. The Order clarifies that agreements may include the exchange of money or other consideration between entities.
- Permits stations that are parties to interference agreements to cause or receive interference up to the agreed-upon threshold after modifying facilities. The old rule required stations to reduce their interference to a 2% maximum if the station sought any facility modifications.
- Codifies the use of a maximum one square kilometer grid resolution when calculating predicted interference areas.
- Eliminates the 30-day public notice period for displacement applications.

- Clarifies that an LPTV or TV Translator station is displaced when it 1) causes any *actual* interference to a full-power television station; 2) causes 0.5% or more *predicted* interference to a full-power television station; or 3) receives 2% or more *predicted* interference from any TV broadcast station.
- Codifies that an LPTV or TV Translator station is displaced when it 1) causes interference to land mobile radio (LMR) facilities; 2) causes interference to a TV Translator input channel; or 3) causes interference to or receives interference from protected television facilities in Canada and Mexico.
- Prohibits the filing of any displacement application resulting from a channel substitution for a full-power television station *before* the channel substitution becomes effective in the Table of TV Allotments.
- Permits LPTV and TV Translator stations that relinquished their operating channels and subsequently channel shared to apply for a new, non-shared channel via the major modification process.
- Extends the automatic program test authority rules to LPTV and TV Translator stations.

The Commission declined to adopt several proposals from the original Notice of Proposed Rulemaking. For example, the Order does not include minimum operating hour requirements for LPTV stations. However, in a footnote, the FCC “instruct[s] the Bureau to continue to monitor LPTV station operations to ensure licensees are not spectrum warehousing...to undertake investigations where it appears stations are not in fact serving the public and to take appropriate action in accordance with the Act and our rules.” The Order emphasizes that a station’s failure to operate for more than 30 consecutive days (except when beyond the licensee’s control) shall be evidence of discontinuation of operation and that the Commission may then cancel the license at its discretion.

The Commission also declined to adopt provisions that would limit how often LPTV Service stations may change their community of license or how often LPTV and TV Translator stations may change their status designations. The Order explains that these decisions were made to provide LPTV Service stations with the necessary flexibility to adapt to market trends and the programming demands of their viewers.

The June 2024 NPRM—issued under then-Chairwoman Jessica Rosenworcel—also initiated a companion proceeding to expand the online public inspection file requirement to certain LPTV stations. The FCC noted in a footnote that it is not taking any action on that proposal at this time.

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Wiley’s Media Practice has a deep bench of attorneys with extensive experience counseling LPTV, TV Translator, and Class A stations on FCC applications and compliance. If you have any questions about these new rules or about filing an application, please contact the Wiley attorney who regularly handles your FCC matters or the authors of this alert.

[1] LPTV Service is an umbrella term for three similar, but distinct classes of television stations: low power television (LPTV), TV Translator, and Class A. All three classes are authorized at lower power levels and serve smaller geographic areas compared to full power television stations.