



March 15, 2019

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th St, SW  
Washington, DC 20554

Re: MB Docket No. 19-18, RM-11823  
Comments in Support of NPRM to Amend the DTV Table of  
Allotments

Dear Ms. Dortch:

On behalf of ION Media License Company, LLC, licensee of commercial television station WPXH-TV, Gadsden, Alabama, I hereby transmit the enclosed Comments in support of the Notice of Proposed Rulemaking to delete Channel 45 at Gadsden, Alabama, and substitute Channel 45 at Hoover, Alabama in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Christman".

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David Christman, General Counsel  
ION Media License Company, LLC

Enclosure

cc: Ms. Joyce Bernstein (*via e-mail*)  
Mr. David Brown (*via e-mail*)  
Mr. Darren Fernandez (*via e-mail*)  
Ms. Terri M. Santisi (*via e-mail*)

**Before the  
FEDERAL COMMUNICATIONS  
COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Section 73.622(i)	)	
Table of Allotments,	)	MB Docket No. 19-18
Digital Television Table of Allotments	)	RM-11823
(Gadsden and Hoover, Alabama)	)	

To: Office of the Secretary  
Attn: Chief, Video Division, Media Bureau

**COMMENTS AND EXPRESSION OF CONTINUED INTEREST**

ION Media License Company, LLC ("ION") licensee of WPXH-TV, Gadsden, Alabama, FCC Facility Identification Number 73312 (the "Station"), pursuant to Sections 1.415 and 1.419<sup>1</sup> of the Commission's Rules, hereby submits these comments in response to the Commission's Notice of Public Rulemaking (the "*NPRM*") in the above-captioned proceeding. The *NPRM* proposes to delete Channel 45 at Gadsden, Alabama and substitute Channel 45 at Hoover, Alabama in the DTV Table of Allotments. ION strongly supports the proposed substitution to change the Station's community of license, and ION hereby expresses its continuing interest in pursuing the reallocation of Channel 45 from Gadsden to Hoover. Substitution of Hoover, Alabama as the Station's community of license with continued operations on Channel 45 will represent a preferential arrangement of allotments by affording Hoover its first local full-power television service in satisfaction of the Commission's second allotment priority.<sup>2</sup>

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<sup>1</sup> 47 C.F.R. §§ 1.415, 1.419.

<sup>2</sup> *NPRM* at ¶ 3.

As demonstrated in the Petition, Hoover is a vibrant and substantially larger community than Gadsden with a population of 81,619. Hoover has an active government that provides a full range of services such as E911 Emergency Services, Hoover Police Department, City of Hoover Fire Department, Public Works Department and Utilities, including Water, Gas and Electricity, Garbage and Recycling. Furthermore, Hoover has seven hospitals/medical centers, two historic sites, two performing arts center, a public library, a local newspaper, and numerous sports facilities. By any measure, Hoover is a community deserving of a first local television service.

Moreover, ION asserts that Gadsden, population 36,856, will continue to have a station allotted to it, WTJP-TV, licensed to Trinity Christian Center of Santa Ana, Inc., on channel 26 at Gadsden.

As described in its petition for rulemaking and in the foregoing, ION strongly supports the proposed rulemaking to substitute Hoover for Gadsden as the community of license for WPXH-TV. Allowing WPXH-TV to change its community of license from Gadsden to Hoover is in the public interest, and the FCC should approve the NPRM promptly.

Respectfully submitted,  
**ION Media License Company, LLC**



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By: David Christman, General Counsel

March 15, 2019