



By courier

July 13, 2018

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

ATTN: Video Division, Media Bureau

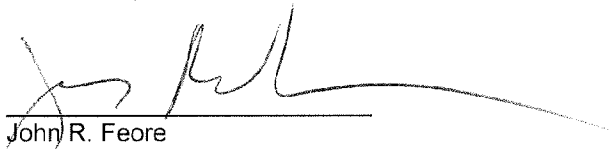
Re: MB Docket No. 18-153, RM-11801
Comments in Support of NPRM to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of ION Television License, LLC, licensee of commercial television station WPXQ-TV, Block Island, Rhode Island, we hereby transmit an original and one copy of the enclosed Comments in support of the Notice of Proposed Rulemaking to delete Channel 17 at Block Island, Rhode Island and substitute Channel 17 at Newport, Rhode Island in the DTV Table of Allotments.

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

Respectfully submitted,



John R. Feore
Jason E. Rademacher
Counsel to ION Television License, LLC

Enclosure

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

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

In the Matter of)	
)	
Amendment of Section 73.622(i))	MB Docket No. 18-153
Digital Television Table of Allotments)	RM-11801
(Block Island and Newport, Rhode Island))	

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

COMMENTS AND EXPRESSION OF CONTINUED INTEREST

ION Television License, LLC (“ION”) licensee of WPXQ-TV, Block Island, Rhode Island, FCC Facility Identification Number 50063 (the “Station”), by its attorneys and pursuant to Sections 1.415 and 1.419 of the Commission’s Rules,¹ hereby submits these comments in response to the Commission’s Notice of Public Rulemaking (the “*NPRM*”) in the above-captioned proceeding.² The *NPRM* proposes to delete Channel 17 at Block Island, Rhode Island and substitute Channel 17 at Newport, Rhode Island 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 17 from

¹ 47 C.F.R. §§ 1.415, 1.419.

² See *Notice of Public Rulemaking*, DA 18-496, MB Docket No. 18-153, RM-11801 (rel. May 15, 2018); see also *Ocean State Television, LLC, Petition for Rulemaking*, filed Dec. 13, 2017 (the “*Petition*”); *Ocean State Television, LLC, Supplement to Petition for Rulemaking*, filed April 17, 2018 (the “*Supplement*”). ION Television License, LLC was formerly known as “Ocean State Television, LLC,” and that licensee name is referenced in the *NPRM*. WPXQ-TV operates on a shared basis with commonly-owned WLWC-TV. WLWC-TV is licensed to New Bedford, Massachusetts, and is not directly affected by this proceeding.

Block Island to Newport. Substitution of Newport, Rhode Island as the Station's community of license with continued operations on Channel 17 will represent a preferential arrangement of allotments by affording Newport its first local full-power television service in satisfaction of the Commission's second allotment priority.³

As demonstrated in the Petition and Supplement, Newport is a substantial community of 25,000 with a rich history and a vibrant present. Founded in 1639, Newport today is home to both the Newport Folk and Jazz Festivals, the U.S. Naval War College, and the Naval Undersea Warfare Center. A thriving tourist industry that celebrates Newport's colonial roots, Gilded Age prominence, and modern identity as a center for the arts rounds out the community's diversified local economy. Newport also exhibits all of the traditional indicia of community recognized by the Commission, such as a local government, police force, fire and rescue departments, and much more. By any measure, Newport is a community deserving of a first local television service.

Commission precedent also supports Reallocating Channel 17 to Newport because the Agency's decisions permit removal of Block Island's first local service "if offsetting factors show that removal is in the public interest."⁴ Here, Newport is a far larger community than Block Island (25,000 residents in Newport vs. 1,000 in Block Island). Newport has more municipal services (larger government, police force, fire stations); more employers with more

³ NPRM at ¶ 3.

⁴ See *Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations (Bessemer and Tuscaloosa, Alabama)*, 5 FCC Rcd 669, 671 (1990), review granted, 11 FCC Rcd 2967, 2968-69 (1996) (reallocating local service from Tuscaloosa, Alabama to provide first local service to Bessemer, Alabama) ("Bessemer"). See also, *Ardmore, Oklahoma and Sherman, Texas*, 7 FCC Rcd 4846 (1992); *Columbia and Edenton, North Carolina*, 20 FCC Rcd 12457 (2005).

employees; and more cultural, historical and religious organizations than Block Island.⁵ As ION stated in its Petition, “if the Commission were making an initial choice between [Block Island and Newport] for a new service allotment, Newport would unquestionably be the preferred community for a first local service.”⁶

Moreover, ION does not propose any changes in the Station’s authorized facilities, and has committed to ensure continued service to Block Island viewers. Accordingly, the actual over-the-air television service provided to Block Island will not change.⁷

As described in its petition for rulemaking and in the foregoing, ION strongly supports the proposed rulemaking to substitute Newport for Block Island as the community of license for

⁵ *NPRM* at ¶ 3.

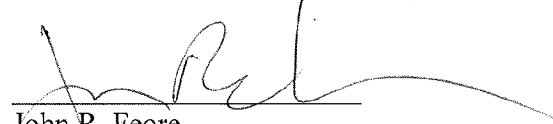
⁶ *Id.* (citing Petition at 3).

⁷ *NPRM* at ¶ 3. ION also has committed to ensuring that Block Island continues to receive over-the-air service from WPXQ-TV in the event that it seeks a facilities modification in the future. *See* Supplement at 3.

WPXQ-TV. Allowing WPXQ-TV to change its community of license from Block Island to Newport is in the public interest, and the FCC should approve the *NPRM* promptly.⁸

Respectfully submitted,

ION TELEVISION LICENSE, LLC



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⁸ Because WPXQ-TV is already operating as a full-service television station, ION will not need “to apply for the channel if it is allotted and, if authorized, to build a station promptly.” *NPRM* at ¶ 5.