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December 20, 1991

87-268

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Hand Delivered

Dear Ms. Searcy:

Transmitted herewith, on behalf of Great American Television and Radio Company, Inc., are an original and eleven copies of its "Supplemental Comments of Great American Television and Radio Company, Inc." filed in MM Docket No 87-268, In the Matter of Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service.

In the event there are any questions, please communicate with this office.

Very truly yours,

Arthur B. Goodkind

Arthur B. Goodkind

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Federal Communications Commission
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	)	

SUPPLEMENTAL COMMENTS OF GREAT
AMERICAN TELEVISION AND RADIO COMPANY, INC.

Great American Television and Radio Company, Inc. (Great American), the licensee of five television stations, is a participant in the "Joint Broadcaster Comments" being filed this date by Association for Maximum Service TV and numerous other broadcaster organizations and licensees. Great American supports the positions taken in the Joint Broadcaster Comments, and submits these supplemental comments with respect to a single issue that will affect a significant minority of licensees.

The Joint Broadcaster Comments advocate a site-specific channel pairing plan for the allotment of new HDTV channels, i.e., a plan under which each specific HDTV channel allotment would be paired with an existing NTSC station, with the specific channel chosen for the allotment meeting spacing criteria at that station's existing transmitter site and with the new HDTV station, at a minimum, replicating the existing station's NTSC service area. While Great American supports that concept as a general allotment standard, it urges the Commission to develop

procedures under which certain licensees may, for good cause, request allotments premised on HDTV transmitter sites that are different from those of the NTSC stations with which the new HDTV allotments are to be paired.

The Joint Broadcaster Comments note in Section I(B) that some NTSC stations may have legitimate reasons for seeking HDTV transmitter site locations different from the sites of their NTSC stations. A licensee may, for example, know already that it will not be possible to locate a second transmitter and antenna at its existing NTSC site owing to zoning prohibitions, lease restrictions, or the capacity of an existing tower. Such a licensee may also have tentatively identified a specific alternative site. Other stations may presently be located at unfavorable transmitter sites owing to mileage separation restrictions in the Commission's rules.

Great American station WTSP-TV, St. Petersburg, Florida, is in the latter category. The minimum mileage separation required between WTSP-TV and a co-channel station in Miami has resulted in WTSP-TV's transmitter being located approximately 38 miles north and west of the "antenna farm" area at which other stations in the Tampa/St. Petersburg market are located. Owing to this site restriction, viewers in the Tampa/St. Petersburg market suffer from an antenna orientation problem in seeking to receive WTSP-TV, and viewers in the southern portion of the market receive a weaker signal from WTSP-TV than from other market stations. To

the extent WTSP-TV's signal is inferior to those of its competitors, full and robust competition between local off-air television stations is impaired. Since these results occur only by reason of technical channel assignment limitations in the existing NBC Table of Allotments, and not because the Commission would otherwise have sought to assign such channels at unfavorable locations, there is no reason to perpetuate such inequities in a new HDTV allotment table. To the extent that minimum spacing requirements do not compel use of inferior site locations, the Commission should attempt to accommodate licensee transmitter site preferences.

Once the Commission's new HDTV channel allotment plan is released, there will inevitably be requests for channel changes based on considerations such as those described above. Great American urges the Commission to minimize such post-allotment requests and to increase the efficiency of its initial channel allotment plan by providing a means by which licensees may make known in advance their preferences for HDTV channel allotments at sites different from their existing NTSC sites.

One such method would be for the Commission to decide first on the basic parameters to be used in making its HDTV allotments, and then to provide a brief window period during which existing licensees may file requests for paired allotments premised on sites different from their existing NTSC sites. Such licensees would be required to show:

(1) that an alternative site is necessary or appropriate owing to an unavoidably unfavorable location of a station's current NTSC site, the apparent unavailability or unsuitability of a current NTSC site for a second transmitter, or for other legitimate reasons; and

(2) that an HDTV station broadcasting at the alternative site requested would meet all principal city coverage requirements for the station's community of license and would not otherwise result in an HDTV station providing signal coverage of its market that would be materially inferior to that presently provided by the licensee's NTSC station.

An effort to accommodate such alternative site needs at the initial allotment stage would be more efficient than attempting to do so on an ad hoc basis over a period of time after a table of HDTV allotments is issued. Since the presumed site for each HDTV allotment potentially affects the locations at which other allotments in the table may be made, more precise information as to each site at the time the allotment table is initially prepared will result in a more efficient channel allotment process.

Accordingly, Great American urges the Commission either to adopt the procedures set forth above or to adopt equivalent procedures that would produce the same result.

Respectfully submitted,

GREAT AMERICAN TELEVISION AND
RADIO COMPANY, INC.

By /s/ Arthur B. Goodkind
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December 20, 1991