

In addition, half of the land mobile channels on Channel 14 in Pittsburgh have not been assigned and the average mobile occupancy is less than 10. Channel 20 in Philadelphia also shows a mobile occupancy of less than 10.

These channels should not be allowed to remain fallow, especially given the spectrum demands involved in implementing HDTV. MSTV consequently urges the Commission to investigate reallocating these underutilized channels back to television broadcasting.

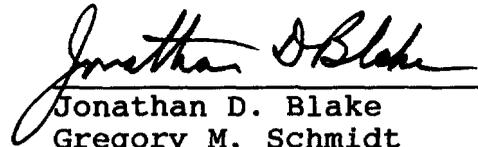
IV. CONCLUSION

MSTV commends the Commission for its strong leadership in the challenging task of making it possible for the broadcasting public to receive the benefit of HDTV service. While there is much work ahead, MSTV believes that

with input such as the Joint Broadcaster Comments the
Commission is well on its way to realizing this goal.

Respectfully submitted,

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