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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In Re Matter of	)	
	)	
AMENDMENT OF SECTION 73.606(b),	)	MM Docket No. 95-77
Table of Allotments,	)	RM-8616
TV Broadcast Stations.	)	
(Virginia Beach, Virginia)	)	

To: Mr. John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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REPLY COMMENTS OF
LOCKWOOD BROADCASTING, INC.

Lockwood Broadcasting, Inc. ("Lockwood"), by and through its undersigned counsel, hereby offers the following reply comments in response to the Comments of Centennial Communications in the above-referenced rulemaking proceeding.

Lockwood instituted the instant proceeding requesting the allotment of UHF Channel 21 to Virginia Beach, Virginia, as an additional television service subject to a 2.2 mile site restriction to the south-southwest of the community coordinates. In its Notice of Proposed Rule Making (Released: June 9, 1995), the Allocations Branch gave notice of its initial finding that the public interest would be served by the allotment of Channel 21 to Virginia Beach and sought comment from other interested parties. In its Notice, the Allocations Branch noted that the allotment could be made to Virginia Beach "consistent with the minimum distance separation requirements of

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Sections 73.610 and 73.698 of the Commission's Rules with a site restriction of 4.0 kilometers (2.5 miles) south to avoid the freeze zone surrounding Washington, D.C."

In its Comments, Centennial Communications argues (1) that the FCC's "freeze" order precludes the allotment in this case, and (2) that Lockwood has not demonstrated that its hypothetical transmitter site is a viable site. Neither argument is meritorious.

The Commission's freeze order prohibits the allotment of new television stations within the co-channel separation distance, as specified in Section 73.610(b) of the Commission's Rules, of the top thirty television markets. See Advanced Television Systems and Their Impact on the Existing Television Broadcast Service, 52 Fed. Reg. 28346, 76 Rad. Reg. 2d 843 (Released: July 17, 1987) ("ATV Order"). The FCC's prescribed reference point for Virginia Beach falls within the Washington, D.C. freeze zone. See Commission Rules, § 73.611.

As propounded by Lockwood in its petition and as recognized by the Allocations Branch in its Notice of Proposed Rule Making, however, the proposed allotment in this case is subject to a geographical site restriction which avoids the freeze area. Because the allotment, as proposed, would not lie within the freeze area, the proposed allotment does not violate the ATV Order.[1]

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[1] Centennial overlooks this fundamental aspect of Lockwood's proposal in its prediction of the dire consequences of the grant of an allotment in this case. Centennial states: "If the Commission allotted Channel 21 to Virginia Beach, an applicant could get a channel allocated to a community inside the freeze zone and specify a transmitter site up to ninety kilometers . . . inside the freeze zone so long as it could find a hypothetical reference point outside the freeze zone." Comment, at 4. This claim fails to appreciate the central facet of Lockwood's proposal -- the site restriction. The restriction proposed by Lockwood and tentatively approved by the Allocations Branch would prohibit the construction of a transmitter within the Washington, D.C. freeze zone. Any similar allotment could only be made subject to a site restriction in order to comply with the ATV Order.

In numerous cases, the Commission has permitted new allotments, subject to a site restriction, when the community of license was within a freeze zone. For example, in In the Matter of Amendment of Section 73.606(b), Table of Allotments, TV Broadcast Stations (Kennett, Missouri), MM Docket No. 91-267, 6 FCC Rcd 7119 (1991), the Commission authorized the allotment of Channel 58 to Kennett, which was within the freeze zone of St. Louis, Missouri, provided there was a site restriction 15.1 kilometers south of the community to avoid the zone. In In the Matter of Amendment of Section 73.606(b), Table of Allotments, TV Broadcast Stations (Alamosa, Colorado), MM Docket No. 90-611, 6 FCC Rcd 4293 (1991), Channel 47 was allotted to Alamosa, even though the community of license was approximately 10 miles inside the freeze zone for Denver, Colorado, provided there was a "minimum site restriction of 16.7 kilometers (10.4 miles) south of the community to comply with the terms of the freeze Order." And again, in In the Matter of Amendment of Section 73.606(b), Table of Allotments, TV Broadcast Stations (Coos Bay, Oregon), MM Docket No. 89-105, 5 FCC Rcd 999 (1990), the Commission allotted Channel 41 to Coos Bay, which was approximately 6 miles inside the freeze zone of Portland, Oregon, specifying a site restriction of 12.2 kilometers south of the community of license. These cases are indistinguishable from the case at hand and compel the grant of the requested allotment.

Even if the Commission were to find that the proposed allotment falls within the scope of the ATV Order, a waiver of the freeze is compelled by the facts of this case. See ATV Order, at 844 ("The Commission will also consider waiver requests on a case-by-case basis . . . for applicants which provide compelling reasons why this freeze should not apply to their particular situations . . . ."); Commission Rules, § 73.611(a)(4). Numerous reasons support such a waiver in this case:

1. The intrusion of the Virginia Beach reference point into the Washington, D.C. freeze zone is truly de minimis, lying a mere 3.5 kilometers inside the 248.6 kilometer zone. Virginia Beach is therefore closer to the edge of the freeze zone than in each of the cases of Kennett, Missouri, Alamosa, Colorado, or Coos Bay, Oregon, where new allotments were permitted. See also In re Applications of Pappas Telecasting, Inc. and Carolina Christian Broadcasting, Inc. ("CCB"), BC Docket No. 81-364, BC Docket No. 81-495, 49 Rad. Reg. 2d 1688 (Released: August 11, 1981) (full Commission) (finding, for purposes of a Section 73.611(a)(4) waiver, that proposed short-space of 2.4 miles out of 175, or 1.4%, was de minimis).

2. The Virginia Beach FCC reference point, lying on a northeasterly portion of a large municipal area, is a fictional construction which does not fairly reflect the municipal boundaries of the City of Virginia Beach. In fact, as shown by the attached Engineering Exhibit, the majority of the community of license lies outside the Washington, D.C. freeze zone. A more logical reference point for describing this community of license would be south of the presently-defined point, an area outside the freeze zone.

3. As has become increasingly apparent in the pending ATV proceeding, it appears likely that ATV will not require a 174.5 mile buffer zone as the Commission thought in 1987 when it instituted the freeze. At present, 100 miles appears to be a more appropriate buffer for ATV. Consequently, the allocation requested in this proceeding which lies at the very edge of a freeze zone is unlikely to have any deleterious effect on the allocation of ATV spectrum.

4. Neither the Commission in its draft table of ATV allotments nor that of the broadcasters in their independent proposal have proposed to allocate ATV Channel 21 in the Washington, D.C. area. See In the matter of Advanced Television Systems and Their Impact upon Existing Television Broadcast Service, MM Docket No. 87-268 (Released: August 14, 1992); Broadcasters' Proposed ATV Allotment/Assignment Approach, In the matter of ATV Systems and their Impact upon Existing Television Broadcast Services, MM Docket 87-268 (January 13, 1995). Therefore, according to the best information currently available, there appears to be no direct ATV conflict in Washington, D.C. to the allocation of Channel 21 to Virginia Beach.

Centennial's second argument -- that Lockwood has not identified a viable transmitter site -- is specious. As shown in Lockwood's original Engineering Exhibit, there is a large swath of land that is available for locating a transmitter. In addition, as described in the attached

Engineering Exhibit, there are numerous hypothetical transmitter sites which can transmit the required city-grade contour at low tower elevations. For instance, according to the calculations of Lockwood's consulting engineer, using the FCC's proposed transmitter reference coordinates and assuming an effective radiated power of 5000 kw, it is possible to comply with the FCC's city-grade coverage requirement utilizing a tower approximately 200 feet tall. Typically towers at such height pose little concern from an FAA standpoint unless located immediately off an existing airport runway. In this case, neither Lockwood's nor the Allocations Branch's proposed transmitter site is adjacent to an airport runway. In fact, since this allotment does not require the construction of a tall tower in order to provide city-grade service over the community of license, FAA issues are likely to be avoided.

Moreover, the applicant has no duty to demonstrate a viable site for purposes of an allocation. The cases cited by Centennial are inapposite. In the Anniston, Alabama case relied on by Centennial, the Commission rejected a request for a waiver of the principal city coverage requirement based, primarily, on the fact that only 0.75 kilometers of land was available for constructing a transmitter and the applicant made no showing that this particular parcel of land was available for construction. By contrast, in the case at hand, Lockwood has demonstrated that a wide area of land is available for construction of a transmitter site. At the allotment stage, Lockwood need not do more.

In sum, Centennial provides no reasons why the public interest would not be served by allotting Channel 21 to Virginia Beach. The Commission should grant the proposed allotment of Channel 21 to Virginia Beach since the public interest would be served by providing needed competition and an additional voice of diversity in the rapidly growing metropolitan area of

Hampton Roads, Virginia.

CONCLUSION

Lockwood respectfully requests that the Commission grant its request to allot Channel 21 to Virginia Beach, Virginia so that Lockwood may file an application to construct a TV broadcast station thereon.

This the 15th day of August, 1995.

Respectfully Submitted,

LOCKWOOD BROADCASTING, INC.

By: _____
Mark J. Prak
Marcus W. Trathen

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Brooks, Pierce, McLendon,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply Comments of Lockwood Broadcasting, Inc. was served on the following parties in the manner indicated:

By hand-delivery:

John A. Karousos
Chief, Allocations Branch
Mass Media Bureau
Federal Communications Commission
2025 M Street, Room 8322
Washington, D.C. 20554

Pam Blumenthal
Allocations Branch
Policy and Rules Division
Mass Media Bureau
2025 M Street, N.W., Room 8308
Washington, D.C. 20554

By depositing a copy in the United States Mail, postage prepaid, addressed to:

John J. Schauble
Bechtel & Cole, Chartered
1901 L Street, N.W., Suite 250
Washington, D.C. 20036

This the 15th day of August, 1995.

Kevin Fisher

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of LOCKWOOD BROADCASTING, INC. (Lockwood), petitioner for the proposed allocation of Channel 21 in Virginia Beach, Virginia (MM Docket No. 95-77, RM-8616), in support of its Reply to Comments of Centennial Communications, Inc. (Centennial) in response to the Notice of Proposed Rulemaking (NPRM), DA 95-1215.

In its comments, Centennial asks the Commission to reject the proposed allocation due to the need for a slight site restriction in order to protect the Advanced Television (ATV) freeze arc to the reference coordinates of Washington, D. C. Further, Centennial asserts that Lockwood and the FCC erred in specifying a hypothetical reference site for the proposed allocation rather than specifying an actual transmitter site. Centennial claims that the allocation area which exists for the allotment contains airports which would restrict the construction of a tall tower.

Attached is a map on which is plotted the required 174.5-mile ATV freeze arc from the Washington reference coordinates, as well as the reference sites for Virginia Beach City, and the reference sites specified by Lockwood and the FCC in the NPRM. Shaded on the map are the city boundaries for Virginia Beach City, according to the 1990 U. S. Census. As shown on the map, the majority of Virginia Beach City lies outside the ATV freeze arc. Thus, an applicant for this allotment could specify a site

located within the community of Virginia Beach City. In fact, the FCC's proposed reference coordinates lie within Virginia Beach City.

In many cities throughout the United States, the reference coordinates for the community are located in close proximity to the geographic center of the city. In the case of Virginia Beach City, the reference coordinates lie well north of the geographic center of the community as shown on the map. Had a Virginia Beach City reference site been located closer to the geographic center of town, there would be no need to request a site restriction on the allocation of Channel 21 here.

Centennial argues that allotment of Channel 21 in Virginia Beach City could allow the specification of transmitter site located a substantial distance within the Washington ATV freeze arc. However, Centennial appears to have ignored the fact that the FCC is proposing to allot this channel with a specific site restriction designed to protect the arc.

It is important to note that initial testing of the Grand Alliance's ATV system indicates that, due to the differences between digital and analog systems and the ability of receivers to reject the different types of signals, ATV-NTSC co-channel mileage separation requirements are likely to be closer to 100 miles rather than the 174.5 mile arc protecting the major markets. Further, Channel 21 was not proposed for use as an ATV assignment either in the FCC's proposed draft table of ATV allotments (in 1987) or that of the Broadcast Caucus (submitted to the FCC earlier this year). Therefore, allotment of NTSC Channel 21 in Virginia Beach City

appears to have no impact on the use of ATV Channel 21 in the Washington area.

With regard to the use of a hypothetical reference site for this allotment, neither Lockwood nor the FCC are required to specify actual sites in this proceeding. §73.611(a)(4) of the Commission's Rules requires that an available transmitter site be specified in an allocation proceeding where the reference coordinates of the community of license do not meet the mileage separation requirements to authorized or proposed television stations (as defined in §73.610 of the Rules). In this instance, the Virginia Beach City reference coordinates comply with all parts of §73.610. This argument notwithstanding, there is ample area within which a suitable transmitter site can be located in observance of the FCC mileage separation requirements to other television authorizations, applications and allotments (as well as the ATV freeze arc to Washington), as shown on the map contained in Centennial's engineering exhibit.

On that map, Centennial includes hypothetical arcs around existing airports located in the allocation area and argues that the FAA would restrict the construction of tall towers within these arcs. However, Centennial overlooks the fact that construction of such a tall tower is not necessary in this instance. For example, with an effective radiated power of 5000 kw at the FCC's proposed reference point for the Channel 21 allocation, the effective antenna height would need be only 160 feet above average terrain in order to comply with the FCC's city-grade coverage

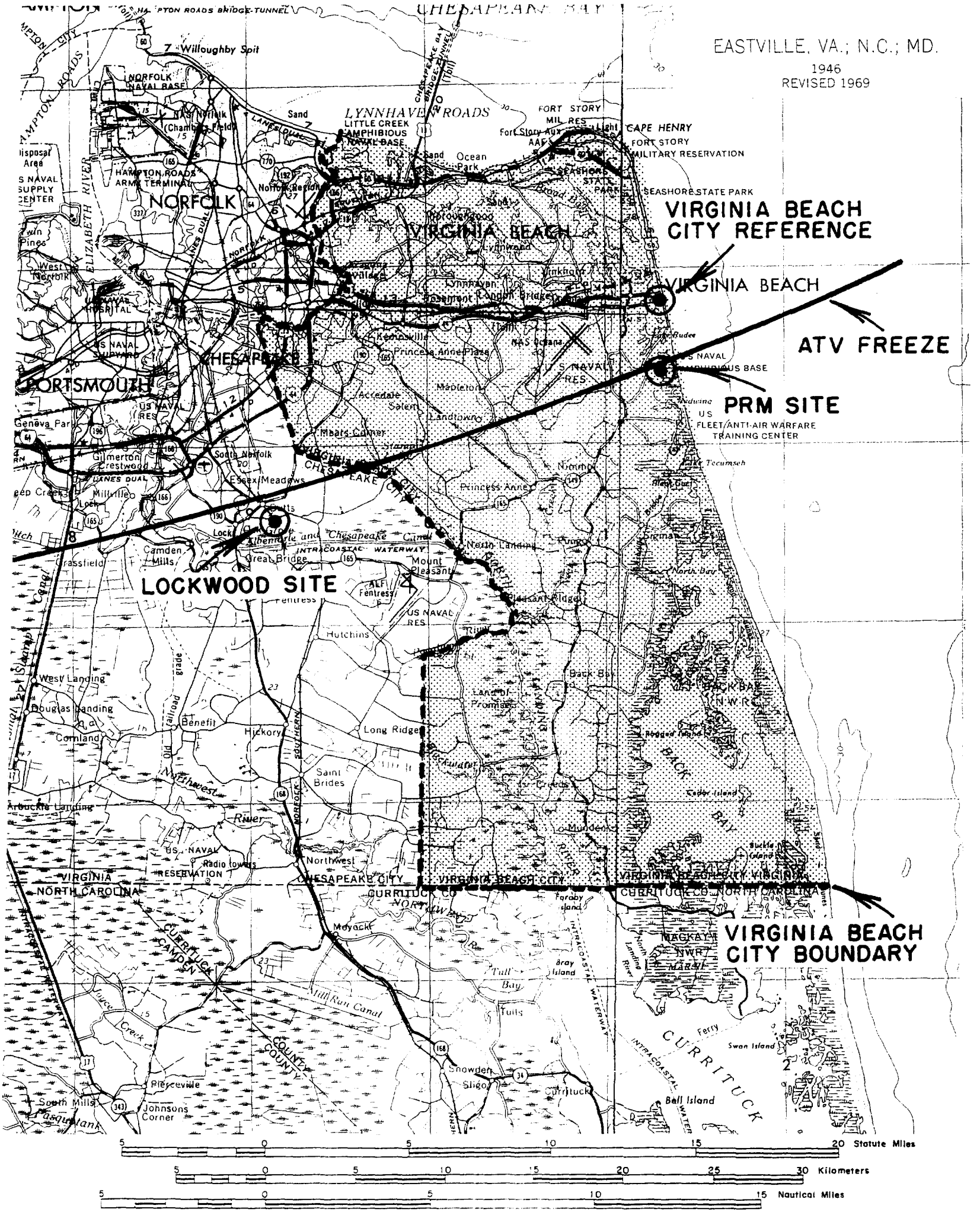
requirement. In order to achieve such an effective antenna height, one could construct a tower with an overall height of less than 200 feet above ground. Typically, towers of such height are not considered by the FAA to be hazardous to air navigation unless they are located immediately off an airport runway. There are numerous sites within the available allocation area for this assignment which would allow for the construction of such diminutive towers.

In conclusion, contrary to the claims of Centennial, allotment of Channel 21 to Virginia Beach City will have no deleterious effect on the assignment of ATV channels in Washington, D. C., and there is ample area within which a suitable site can be located that will meet the FCC's mileage separation requirements (including that of the Washington ATV freeze zone), that will pass muster with the FAA, and can provide city-grade coverage to the entirety of Virginia Beach City.

I declare, under penalty of perjury, that the foregoing statements and the attached map, which was prepared under my supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

August 14, 1995


EASTVILLE, VA.; N.C.; MD.
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REVISED 1969
VIRGINIA BEACH CITY REFERENCE
VIRGINIA BEACH
ATV FREEZE
PRM SITE
US FLEET/ANTI-AIR WARFARE TRAINING CENTER
LOCKWOOD SITE
VIRGINIA BEACH CITY BOUNDARY
NORFOLK
PORTSMOUTH
CHESAPEAKE
VIRGINIA BEACH
LYNNHAVEN ROADS
CHESAPEAKE BAY BRIDGE-TUNNEL
HAMPTON ROADS BRIDGE-TUNNEL
NORFOLK NAVAL BASE
LITTLE CREEK AMPHIBIOUS NAVAL BASE
FORT STORY MIL RES
CAPE HENRY
FORT STORY MILITARY RESERVATION
SEASHORE STATE PARK
HAMPTON ROADS ARMY TERMINAL
US NAVAL SUPPLY CENTER
US NAVAL HOSPITAL
US NAVAL RES
NAS Oceana
Princess Anne Plaza
Great Bridge
Mount Pleasant
North Landing
Pleasant Ridge
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Northwest River
US NAVAL RESERVATION
Radio towers
Norfolk Regional
Willoughby Spit
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West Norfolk
Geneva Park
Deep Creek
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Grassfield
Old Railroad grade
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Lockwood
Albemarle and Chesapeake Canal
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