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LOCAL & FEDERAL PRACTICE
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November 18, 1996

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Mr. William Caton
Acting Secretary
Federal Communications Commission "FCC"
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: MM Docket 87-268 "In the Matter of Advanced TV
Systems"--"DTV spectrum"--Comments for WUJA-TV
Channel 58 (UHF), Caguas, Puerto Rico

Dear Mr. Caton:

We are legal counsel to station WUJA-TV, channel 58 (UHF), located in Caguas, P.R., and in that capacity, comment regarding the proposed spectrum for the station under the DTV, allotment as it appears on the Table for the Sixth Further Notice Of Proposed Rule Making.

In the case of channel 58, the DTV/NTSC area match, is a low 71.6, compared to a higher ratio (over 93.0) for most of other stations in the table.

In terms of served area, the proposed is for 5979 sq. kilometers, down from an actual 8316 sq. km. under existing NTSC. This reduction, has an extremely adverse impact, in terms of served population.

According to the 1990 U.S. Census, Puerto Rico had a population of 3,522,037 inhabitants, equating, a per sq. km. demographic density of 2,606 persons.

The reduction in proposed DTV area, amounts to 2337 sq. km. (8316 less 5979). This shortfall in served area, represents A HUGE CUT IN THE POTENTIALLY SERVED POPULATION. Station's estimates show effect over 200,000 potential viewers.

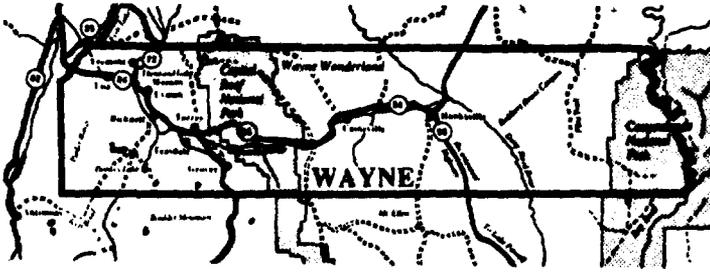
In view of the above, please re-design the channel 58 allotment, under the DTV system, as to grant it THE SAME, served area, under the existing NTSC. This petition will increase the DTV/NTSC area match to 100.0.

Respectfully submitted,



Walter X. Martinez

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November 16, 1996

Secretary, FCC
 RE: Docket Number 87-268
 1919 M Street, N.W.
 Washington, DC 20554

Dear Sir:

Wayne County is located in the central portion of Utah. Within this county there are 9 small isolated communities with a total population of approximately 2,300 people.

These communities are served with 23 Television Translators, both VHF & UHF, from 5 different locations. Citizens of Wayne County are very dependent on this public service for education, information, and recreation. We have many concerns about the FCC's proposal to auction off a portion of the Television spectrum at this time. 5 Channels which feed our entire network, along with 3 Channels within our network would be immediately displaced. We have been advised, that because of the complexity of the Utah Translator Network, it is not as easy as just picking another channel. We are also very concerned about the costs that could accompany this change. Wayne County is in favor of a Time Frame and a Plan which would allow displacement of Television channels without disrupting service. We encourage the FCC to consider Television service to remote rural areas and to delay the auction of channels 60 to 69 until a Time Frame and Plan have been put in place for the transition to DTV.

Sincerely,

Meeks Morrell

Meeks Morrell
 County Commissioner
 County of Wayne

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