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VIA HAND DELIVERY

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

Re: Comments of Citadel Communications Co., Ltd. in the Sixth
Further Notice of Proposed Rulemaking, MM Docket No. 87-268

Dear Mr. Caton:

Enclosed on behalf of Citadel Communications Co., Ltd. ("Citadel") are an original plus nine copies of Comments related to the Commission's Sixth Further Notice of Proposed Rulemaking, Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268, FCC 96-317 (rel. Aug. 14, 1996). Although the original deadline for filing comments in this rulemaking was November 22, 1996, Citadel files these comments at this time in reliance on the Commission's Order on November 20, 1996, DA 96-1929, stating that it would accept late-filed comments in this rulemaking for a reasonable period of time after the November 22, 1996 due date.

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Mr. William F. Caton
December 4, 1996
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Please do not hesitate to contact the undersigned should you have questions concerning this matter.

Very truly yours,



Mark D. Spoto
of LATHAM & WATKINS

Enclosures

cc: Philip J. Lombardo
John Lundin
Eric L. Bernthal, Esq.
Steven H. Schulman, Esq.
Lorraine W. Self

Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

DUCKET FILE COPY ORIGINAL

To: The Commission

**COMMENTS OF CITADEL COMMUNICATIONS CO., LTD. ON
THE SIXTH FURTHER NOTICE OF PROPOSED RULEMAKING**

Citadel Communications Co., Ltd. ("Citadel") submits these comments in the Commission's Sixth Further Notice of Proposed Rulemaking, MM Docket No. 87-268, FCC 96-317 (rel. Aug. 14, 1996) (the "Sixth FNPRM"). Citadel and entities affiliated with Citadel own and operate four small market television stations, WHBF-TV, Rock Island, Illinois, WOI-TV, Ames, Iowa, KLKN(TV), Lincoln, Nebraska and KCAU-TV, Sioux City, Iowa.¹

The Sixth FNPRM proposes that a significant number of TV stations currently broadcasting on low NTSC VHF channels, including current VHF channels 2-6 (which would be reclaimed by the Commission for subsequent auction), be relocated in the high DTV UHF band. Although replication of current Grade B signal coverage was one of the main criteria in

¹ Citadel's stations operate in Nielsen DMA market numbers 72 (WOI-TV, Des Moines), 88 (WHBF-TV, Davenport-Rock Island-Moline), 101 (KLKN(TV), Lincoln) and 141 (KCAU-TV, Sioux City). See 1 Broadcasting & Cable Yearbook (1996 ed.).

formulating the proposed DTV channel allotment table (the "DTV Allotment Table"),² it is obvious that the Commission has not adequately considered the substantial increases in transmission power that will be necessary to replicate the current coverage of these stations to the proposed UHF locations. These power increases will require significant additional capital and operating expenses. In smaller markets, such as those where Citadel's stations are located, such expenses will impair the ability of broadcasters such as Citadel to provide even the basic levels of local programming currently being aired, much less fully develop the potential programming possibilities that the DTV technology will create. Accordingly, Citadel proposes that the Commission modify its basic approach in the DTV Allotment Table so that VHF channels 2-6 are retained and stations currently licensed on those channels should be returned to their current VHF channel locations for final DTV operations.

I. BECAUSE THE DTV ALLOTMENT TABLE WOULD REQUIRE THE EXPENDITURE OF SUBSTANTIAL SUMS FOR NECESSARY TRANSMISSION EQUIPMENT AND OPERATIONS, BROADCASTERS IN SMALLER MARKETS SUCH AS CITADEL WOULD BE SEVERELY DISADVANTAGED.

It is clear that, although the Commission proposes relocation of certain NTSC VHF channels based in large part on replication of each station's current Grade B coverage, the Commission does not adequately consider costs of increased power necessary to replicate this coverage at the proposed UHF locations. For example, the DTV Allotment Table moves WOI-TV from NTSC VHF channel 5 to DTV UHF channel 30, and has specified that the relocated channel must operate at a DTV effective radiated power ("ERP") of 3918 kW. This power specification requires a transmitter with a peak power rating of approximately 750 kW. See

² See Sixth FNPRM at 13 ("we are proposing to identify digital TV allotments that, to the extent possible, will allow all existing broadcasters to provide digital TV service to a geographic area that is comparable to their existing NTSC service area.")

Exhibit 1, Technical Statement of John A. Lundin Supporting the Comments from Citadel Communications Co., Ltd. (the “Technical Statement”), at 4. However, Citadel accomplishes WOI-TV’s current NTSC average ERP on VHF channel 5 with a 25 kW transmitter. Id. at 2. Accordingly, the channel allocation proposed by the Sixth FNPRM would require a transmitter power increase of thirty times the current amount for Citadel to replicate the station’s Grade B signal on DTV UHF channel 30. Transmitters of the required size do not even currently exist on the commercial market, and, based on information provided by two transmitter manufacturers, the approximate capital cost of a 600 kW transmitter would be \$4,000,000. Id. at 4. Costs to operate such a transmitter would undoubtedly be significantly higher and are estimated at approximately \$433,000 annually, an increase of approximately 12 times the cost to currently operate the station’s transmitter.³ See Exhibit 2, Declaration of Philip J. Lombardo (the “Lombardo Declaration”).

As the Technical Statement reflects, these significant costs would be borne by much of the industry as well as Citadel. The Commission proposes to relocate all stations currently operating on VHF channels 2-6 and to reclaim this spectrum for later use. Such a move would affect 270 stations, most of which operate in medium and small markets. Relocation of those stations to a UHF channel (which is true for 264 of the 270 stations) will require an average ERP increase from 87.4 kW to 3521 kW (average).⁴ Id. at 3. Furthermore, 315 (out of 376

³ Current average power costs to operate WOI-TV are \$35,727 per year. The estimated average power cost for operation of WOI-TV on DTV channel 30 is \$433,334 per year. See Lombardo Declaration.

⁴ In comparison, six stations currently operating on VHF channels 2-6 would be relocated to a high VHF channel (i.e., channels 7-13). The average DTV ERP for these six stations is 17.2 kW.

possible) stations will be moved from a high VHF channel (i.e., channels 7-13) to a UHF channel and will require an average ERP increase from 266 kW (peak) to 1715 kW (average). *Id.* It is obvious that a large portion of the television broadcasting industry would be required to expend substantial sums simply to be able to transmit their signals under the approach proposed by the Sixth FNPRM.

These additional costs are significant and could jeopardize current operations for broadcasters in small markets. In an era when margins and cash flows at small market TV stations are low, such an increase could threaten the vitality of numerous current programs, most significantly local news and public interest programming. Average operating profits -- before debt service -- have ranged from \$1,468,000 to \$2,472,000 in recent years for stations in markets 100-110.⁵ When reasonable debt service is added, it is apparent that such dramatic increases in capital and operating expenses could be genuinely debilitating for small market stations. Such a result is untenable and counter to the public interest that the Commission is obligated to serve.⁶

Furthermore, such additional transmission expenditures could jeopardize development of additional programming made possible by the DTV technology. When the transition to DTV is made, television station licensees are likely to begin operations on multiple programming channels within each licensee's 6 MHz block of spectrum. In the provision of one

⁵ BIA's State of the Television Industry, Television '96, at 63.

⁶ See, e.g., Carroll Broadcasting Co. v. FCC, 258 F.2d 440, 443 (D.C. Cir. 1958) (economic injury caused by action of FCC to existing stations is not in the public interest when it diminishes or destroys existing services). Although the so-called "Carroll Doctrine" was abolished in 1988 in the context of licensing and allotment proceedings, the Commission is obligated to consider such public interest factors in the context of policy and rulemaking proceedings. Policies Regarding Detrimental Effects of Proposed New Broadcasting Stations on Existing Stations, 4 FCC Rcd 2276, 2276-77 (1989).

to as many as six additional channels of programming, local broadcasters can expect a multifold increase in programming costs. Accordingly, the transition to DTV will be a period of intense capital spending. Such an increase in programming should be encouraged by the Commission, as it will provide further diversity of programming to local viewers. Accordingly, the Commission must consider more conservative regulatory approaches that favor efficient and reasonable capital outlays for transmission equipment.

II. THE FCC SHOULD RETURN ALL STATIONS TO THEIR CURRENT NTSC CHANNEL LOCATIONS FOR FINAL DTV OPERATIONS

The Commission states that its primary goal in creating the DTV Allotment Table is to ensure replication of current signal coverage whenever possible. However, in many instances (including those faced by Citadel), this replication will only occur through the use of “brute force,” intense UHF power. As demonstrated above, such an inefficient approach threatens to debilitate small market television stations.

Citadel proposes a more efficient method of allocation that would ensure replication of current coverage yet alleviate the financial stress that could be caused to small market broadcasters. Citadel urges that the full amount of spectrum currently available for NTSC service continue to be available in the future and that all stations be returned to their current NTSC channel positions for final DTV operations. Citadel proposes that the allocations set forth in the DTV Allotment Table be used for interim DTV operations. Under Citadel’s approach, broadcasters would be required to replicate each station’s current Grade A contour (which represents the heart of each station’s coverage) during interim DTV operations. See Technical Statement at 6. Conversion of the current NTSC VHF channel to DTV operations (and return of the interim DTV UHF channel) would occur when a sufficient percentage of each station’s

audience possesses the requisite DTV technology to justify replication of the station's Grade B Contour in DTV transmissions.

Citadel's proposed approach would result in many benefits that must be considered by the Commission in this important rulemaking. Most importantly, Citadel's proposal would result in significantly lower power requirements, thus obviating the expenditure of substantial sums of money for new or additional equipment and operations. For example, WOI-TV would require 8.5 kW of DTV ERP to replicate its current Grade B signal if its final DTV channel is channel 5. *Id.* at 5. Furthermore, if broadcasters in small markets such as Citadel are not required to make such operating outlays, they will be in a better position to improve local programming and to develop additional programming for use on the increased number of channels that result from the DTV technology. Citadel's approach would also minimize station interference, and thus allow for improved services or the ability to add new or relocated stations. *Id.* Additionally, the lower power requirement resulting from Citadel's proposal would have a decreased impact on low power television operations. *Id.* at 7. Citadel's approach would also minimize the disruptive effect of coordinating DTV channel allocations at Canadian and Mexican border areas.⁷ These benefits are significant and justify serious reconsideration of the Commission's proposals.

⁷ The Commission noted in the Sixth FNPRM that portions of the DTV Allotment Table are not fully compliant with existing agreements between the United States and Mexico for border areas. See Sixth FNPRM at 90 n.93.

CONCLUSION

Citadel recognizes the complexity of the task faced by the Commission in the conversion to DTV transmissions. However, because the methodology proposed in the Sixth FNPRM would result in massive capital and operating costs simply for transmission of the DTV signal, Citadel urges that the Commission reconsider its basic approach to DTV channel allotments. Specifically, Citadel urges that all stations be returned to their current NTSC channel locations for final DTV operations. Such an approach would ensure efficient uses of resources in smaller TV markets and encourage rapid development of opportunities created by the DTV technology.

Dated: December 4, 1996

Respectfully submitted,

CITADEL COMMUNICATIONS CO., LTD.



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Its Attorneys

TECHNICAL STATEMENT
SUPPORTING THE COMMENTS FROM
CITADEL COMMUNICATIONS CO., LTD.

This Technical Statement has been prepared on behalf of Citadel Communications Co., Ltd. (Citadel) in support of Citadel's comments in the Federal Communications Commission's (FCC) 6th Further Notice of Proposed Rule Making (FNPRM) in MM Docket No. 87-268. This proceeding concerns advanced television systems and their impact upon the existing television broadcast service. In the FNPRM the FCC has proposed an allotment table for digital television (DTV) assignments, with associated effective radiated powers (ERP) to replicate existing coverage. The FNPRM also proposes to reclaim the spectrum presently used for low VHF television (channels 2 through 6), and make it available for other services.

The following television stations are controlled by Citadel:

WHBF-TV, Channel 4, Rock Island, IL
WOI-TV, Channel 5, Ames, IA
KLKN(TV), Channel 8, Lincoln, NE
KCAU-TV, Channel 9, Sioux City, IA

The FCC has proposed UHF channels for the DTV operations of these stations. It has also specified a DTV ERP at the current antenna height above average terrain (HAAT). These proposed DTV transmitting facilities were determined on the basis of replication of the current NTSC predicted Grade B coverage. The following is a summary of the FCC's proposed allotments for these 4 stations.

du Treil, Lundin & Rackley, Inc.

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Citadel
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<u>Station</u>	<u>NTSC Chan.</u>	<u>NTSC ERP</u>	<u>Antenna HAAT</u>	<u>DTV Chan.</u>	<u>DTV ERP</u>
WHBF-TV	4	100 kW	408 m	46	3188 kW
WOI-TV	5	100	564	30	3918
KLKN	8	316	440	21	1546
KCAU-TV	9	309	616	31	1722

The NTSC ERP is peak power, whereas, the DTV ERP is average power. A "rule of thumb" approximation for comparison is average power is 25% of peak power.

If replication of existing service is the real goal for DTV service, then it is believed all stations should return to their present NTSC channel locations for the final DTV operations. Returning to the current channel location is the best means of insuring present coverage. It will involve less power, be more spectrum efficient, cause less interference, have less impact on LPTV service, and still permit the possible recapture of spectrum for other uses in the future.

As is evident with the FCC's proposed DTV allotment table, inband DTV allotments require significantly lower power than the NTSC counterpart. However, out-of-band allotments, involving NTSC VHF channel relocations to DTV UHF, require significant power increases in an attempt to replicate the

current VHF coverage. For instance, there are 270 low VHF (channels 2 through 6) NTSC assignments in the FCC's proposed DTV allotment table. The average NTSC ERP for these assignments is 87.4 kilowatts (kW). The average antenna HAAT is 433 meters (1420 feet). The FCC allotted high VHF DTV channels to 6 of these assignments, and UHF DTV channels to the remainder. The average DTV ERP for the 6 high VHF allotments is 17.2 kW. The average DTV ERP for the 264 UHF allotments is 3521 kW.

There are 376 high VHF (channels 7 through 13) NTSC assignments in the FCC's proposed DTV allotment table. The average NTSC ERP for these assignments is 266 kW, and the average antenna HAAT is 433 meters (1420 feet). The FCC allotted low VHF DTV channels to 4 of these assignments, high VHF DTV channels to 57 of the assignments, and UHF DTV channels to the remainder. The average DTV ERP for the 4 low VHF allotments is 2.3 kW. The average DTV ERP for the 57 high VHF channels is 5.6 kW. For the 315 UHF DTV channels, the average ERP is 1715 kW.

The average TV station going from a low VHF channel to a UHF DTV channel will require its ERP to be increased from 87.4 kW (peak) to 3521 kW (average) to replicate present coverage. The high VHF station going to a UHF DTV channel will require its ERP to be increased from 266 kW (peak) to 1715 kW (average) to replicate present coverage. From the above, it is evident that staying inband will require less power. Going from a VHF channel to a UHF channel will require substantially greater power to replicate existing service.

The following is the minimum transmitter peak power ratings required for the 4 Citadel stations to replicate their present NTSC coverage on the proposed DTV channels.

<u>Station</u>	<u>DTV Chan.</u>	<u>DTV ERP</u>	<u>Minimum Transmitter Peak Power Rating</u>
WHBF-TV	46	3188 kW	600 kW
WOI-TV	30	3918	750
KLKN	21	1546	300
KCAU-TV	31	1722	325

From information provided by 2 manufactures (Comark and Acrodyne) transmitter cost estimates have been made. The cost of a 240 kW transmitter (peak power rating) is approximately \$1,600,000. A 300 kW transmitter would cost approximately \$2,200,000; and a 600 kW transmitter would be around \$4,000,000. Furthermore, 600 kW transmitters are not currently manufactured. In addition to the large transmitter costs, there will be significant costs for the waveguide and antenna system to handle these large power levels. Furthermore, the operating costs for the proposed DTV facilities to replicate the current coverage would be substantially more than for the current NTSC operations.

If the 4 Citadel stations remain at the current VHF channel locations for the final DTV operations after the transition, the power levels required for replication of coverage are much less. The following power levels are based on replication of the present Grade B coverage areas with the appropriate noise limited contours identified in the FCC's 6th FNPRM.

<u>Station</u>	<u>Chan.</u>	<u>DTV ERP</u>
WHBF-TV	4	7.5 kW
WOI-TV	5	8.5
KLKN	8	7.0
KCAU-TV	9	8.5

Under this approach, the present transmission line and antenna systems would be able to be employed for the DTV operation. The only modification required would be to the transmitter system to reflect DTV instead of NTSC operation. In many cases it will be possible to modify the present transmitter.

It is not practical to try and replicate the superior VHF propagation characteristics with brute force UHF power. The best way to replicate existing service is to use the existing channel location. The final DTV operation on the current NTSC channel will be at significantly less power than the current NTSC operation, resulting in lower operating costs. With less power, there will be less interference on the channels, providing opportunities for improvement in service, or the addition of new or relocated stations. Overall, it makes the most sense for each station to remain on the present channel location for the DTV operation.

The obvious question is how to accommodate the transition from NTSC to DTV. It is suggested that each station

be assigned a second channel for DTV use during the transition period, similar to what has been proposed by the FCC. Citadel proposes to return to its current VHF channel for the final DTV operation and ultimate DTV replication of its present NTSC coverage. It proposes to employ transmitting facilities for the FCC's proposed UHF DTV channel based on replication of the station's current NTSC Grade A contour. The service within this NTSC contour is considered to represent the "heart" of each station's coverage. Once sufficient DTV sets are in the public's hands, then the stations will convert the current VHF NTSC channels for DTV use. The UHF DTV loaner channel would then be returned.

As noted above, the average NTSC ERP and antenna HAAT for the 270 low VHF assignments is 87.4 kW and 433 meters. For these transmitting facilities, the predicted Grade A (68 dBu) contour extends approximately 61.3 kilometers. To replicate the low VHF NTSC f(50,50) Grade A contour with the DTV noise limited f(50,90) 43.8 dBu contour requires a DTV ERP of only 2.5 kW in the UHF band. This is substantially less than the 3521 kW required to replicate the existing NTSC Grade B service area.

The average NTSC ERP and antenna HAAT for the 376 high VHF assignments is 266 kW and 433 meters. The predicted Grade A (71 dBu) contour for these transmitting facilities extends approximately 71.8 kilometers. To replicate the high VHF NTSC f(50,50) Grade A contour with the UHF DTV noise limited f(50,90) 43.8 dBu contour requires a DTV ERP of only 14 kW. This power is significantly less than the 1715 kW required to replicate the existing NTSC Grade B coverage area.

Under the above proposal, it is obvious that much lower

power is possible for the commencement and orderly transition from NTSC to DTV. Hence, there will be less interference among stations, and less impact on low power television (LPTV) use. In addition, the cost of the equipment to be used during the interim DTV transition period will be much more reasonable. The following is a summary of the UHF DTV operations for the 4 Citadel stations as proposed by the FCC and as suggested by Citadel for the transition period.

<u>Station</u>	NTSC	Interim	FCC Prop.	Proposed
	<u>Chan.</u>	<u>DTV Chan.</u>	<u>DTV ERP</u>	<u>Interim DTV ERP</u>
WHBF-TV	4	46	3188 kW	3 kW
WOI-TV	5	30	3918	6
KLKN	8	21	1546	18
KCAU-TV	9	31	1722	29

The above suggestion for the transition to DTV service requires retention of the low VHF band (channels 2 through 6). In its 6th FNPRM the FCC proposes to recapture the low VHF spectrum for other uses since it feels the low VHF channels are less suitable for DTV use because of the high level of atmospheric and man-made noise. Citadel disagrees with the FCC's assessment for DTV use of low VHF channels.

The September 1994 and October 1995 reports on the Charlotte, North Carolina DTV field tests do not conclude that

low VHF channels are unsuitable for DTV use. The VHF observations at Charlotte were made on channel 6. The VHF test was run at one-tenth NTSC power, or an NTSC peak ERP of 10 kW. The DTV power was conducted at one-sixteenth NTSC power, or an average ERP of 0.63 kW.

The reports indicate the channel 6 tests at Charlotte experienced unanticipated interference from impulse noise, co-channel interference, cable system interference, and non-commercial educational (NCE) FM interference. The prevalence of the impulse noise was due to 60 Hz sources (AC power). The report stated: "It is believed the impulse noise problem in Charlotte is atypical (emphasis added) and may not be representative of other areas."

The field test reports indicate that satisfactory NTSC VHF reception occurred at 39.6% of the locations. Satisfactory DTV VHF reception occurred at 81.7% of the locations, more than twice the satisfactory NTSC locations. In other words, DTV service was substantially better than NTSC, even at the low power level used. The DTV system performed significantly better than the NTSC system in the presence of impulse noise. Adding 6 dB of power (i.e., DTV ERP of 2.5 kW) improved the satisfactory reception from 82% to 94% of the locations. The reports indicate that if the DTV power for low VHF is increased 10 dB (i.e., DTV ERP of 6.3 kW), as expected for low VHF DTV operations, then the interfering sources would be substantially less effective in producing impairments.

The Charlotte report summarizes that because of the limited sample size and interference experienced, the low VHF results are inconclusive. The report suggests, and Citadel

agrees, that more field testing is desirable. However, the report states that DTV performs significantly better than NTSC at low VHF. It may be that more DTV power than has been initially anticipated at low VHF for DTV will resolve the problem. The report does not conclude that low VHF is not suitable for DTV. Therefore, Citadel urges retention of the low VHF channels for TV use.

This suggested process for the transition to DTV and replication of existing service has many benefits.

- A. It will require much lower DTV power during the transition.
- B. There will be much less interference caused and received. The final DTV operation on the existing NTSC channel locations will likely have improved service due to the improved interference performance with DTV.
- C. There will be much less impact on LPTV operations. It will provide more opportunity for those LPTV stations that do become displaced.
- D. It will enable the use of more channels for DTV allotment to TV assignments not eligible for the initial table.
- E. It will enable potential recovery of the non-commercial allotments after the transition.
- G. It will permit an orderly inband relocation of UHF assignments for potential recovery of spectrum for other purposes.

H. The current NTSC transmitting systems for each station can be employed for the final DTV operation with modifications to the transmitter system. It will only be necessary to acquire modest (low powered) DTV facilities for the transition period (i.e., more economical).

In summary, Citadel requests retention of the low VHF channels (2 through 6) for TV use. Citadel also desires to return its 4 TV stations (WHBF-TV, WOI-TV, KLKN and KCAU-TV) to their current NTSC VHF channels for the final DTV operations. It proposes to employ the UHF DTV channels suggested by the FCC during the interim transition period, replicating the present Grade A coverage. Citadel proposes to replicate its current NTSC Grade B coverage with the final DTV operation on the current VHF channel locations. It suggests consideration of the same scenario for all NTSC VHF stations for which the Commission has proposed UHF DTV allotments.


John A. Lundin

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December 2, 1996

DECLARATION OF PHILIP J. LOMBARDO

I am the Managing General Partner of Citadel Communications Co., Ltd. ("Citadel"). I am submitting this declaration in connection with the Comments of Citadel in the Sixth Further Notice of Proposed Rulemaking, MM Docket No. 87-268, FCC 96-317 (rel. Aug. 14, 1996) (the "Sixth FNPRM").

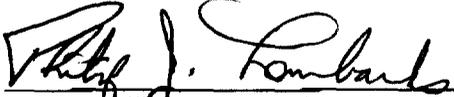
Citadel and entities affiliated with Citadel own and operate four television stations that will be directly affected by the Sixth FNPRM: (i) WHBF-TV, Rock Island, Illinois; (ii) WOI-TV, Ames, Iowa; (iii) KLKN(TV), Lincoln, Nebraska; and (iv) KCAU-TV, Sioux City, Iowa. Each of these television stations operates in a small market. According to the 1996 edition of the Broadcasting & Cable Yearbook, the Nielsen DMA markets that these stations operate in are 72 (WOI-TV), 88 (WHBF-TV), 101 (KLKN(TV)) and 141 (KCAU-TV). WHBF-TV currently operates on NTSC channel 4. WOI-TV currently operates on NTSC channel 5. KLKN(TV) currently operates on NTSC channel 8. KCAU-TV currently operates on NTSC channel 9. Under the Sixth FNPRM, the Commission proposes to move these channels to DTV channels 46, 30, 21 and 31, respectively.

The Commission's proposed channel relocation for Citadel's stations will require substantially more powerful transmission equipment, and this required equipment will have a significant impact on capital and operating costs for these stations. For example, Citadel accomplishes WOI-TV's current NTSC peak effective radiated power ("ERP") on VHF channel 5 with a 25 kW transmitter. The current average cost to operate WOI-TV with this power are \$35,727 per year. However, the channel location proposed by the Sixth FNPRM would require a transmitter of approximately 750 kW. Costs to operate such a transmitter are estimated at \$433,000 annually (this approximation is based on the following assumptions: (i) ERP = 3917.7 kW; (ii) antenna gain = 25; (iii) antenna input power = 156.7 kW; (iv) line loss = 31.34 kW; and (v) transmitter power out = 188.04 kW).

These significant operating costs, as well as the substantial capital costs that will be necessary to purchase such transmission equipment, will have an extremely detrimental impact on Citadel's ability to offer programming that it currently broadcasts, as well as its ability to develop additional programming made possible by the DTV technology.

I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Date : December 2, 1996


Philip J. Lombardo