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January 24, 1997

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Advanced Television Systems and Their Impact upon the
Existing Television Broadcast Service
MM Docket No. 87-268
Reply Comments

Dear Mr. Caton:

Christian Communications of Chicagoland Inc., through
counsel, hereby files the original and five copies of its reply
comments to the Sixth Further Notice of Proposed Rule Making in
MM Docket No. 87-268. Please contact the undersigned if you have
any questions.

Sincerely,



Ann K. Ford
Michael Ruger

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

JAN 24 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

REPLY COMMENTS

1. Christian Communications of Chicagoland Inc. ("CCC"), licensee of WCFC-TV, Channel 38, Chicago, Illinois, hereby files these brief Reply Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making (FCC 96-207, released August 14, 1996). CCC continues to oppose the proposal set forth in the Broadcasters' Comments to reserve Channel 64 as the DTV channel for Station WCFC-TV.

Discussion

2. CCC faces significant expenses in operating Station WCFC-TV as an independent UHF station in the Chicago market. Operation on a higher UHF channel as proposed in the Broadcasters' Comments will cause the station to incur significant additional expenses, which could affect the economic viability of the station. Furthermore, if the Commission's "core spectrum" plan is adopted, operation on Channel 64 would require Station WCFC-TV to change channels twice--first to Channel 64 and then to a channel within the core spectrum. Two moves would cause the station to incur additional expenses and would result in viewer confusion.

3. The Commission's channel allotment plan, which would reserve Channel 21 as the DTV channel for Station WCFC-TV, would not cause the problems outlined above. Operation on a lower channel would not increase operational expenses, and CCC would be assured of facing only one channel change. Therefore, CCC endorses the reservation of Channel 21 as its DTV channel.

Conclusion

4. CCC intends to work with local broadcasters and the Broadcasters' Caucus in developing a DTV allotment plan for the Chicago area. As noted in CCC's previous comments, however, there is no public interest benefit in reserving Channel 64 as the DTV channel for WCFC-TV.

Respectfully submitted,



Ann K. Ford
Michael Ruger

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of Chicagoland Inc.

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Filed: January 24, 1997