

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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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

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To: The Commission

PETITION FOR RECONSIDERATION

The Virgin Islands Public Television System (VIPTS), licensee of noncommercial educational television Station WTJX, Channel *12, Charlotte Amalie, St. Thomas, U.S. Virgin Islands, files herewith its Petition for Reconsideration of the Sixth Report and Order in the above-referenced proceeding, which adopts a Table of Allotments and related technical rules governing digital television (DTV). VIPTS urges the Commission to assign Channel *10 rather than Channel *44 as the DTV channel for Station WTJX.

1. In that Sixth Report and Order, the Commission allots Channel *44 in lieu of Channel *12 for use by VIPTS. As shown in the attached engineering statement, this will require an excessive expenditure of monies for UHF operations. Station WTJX as a public television station must rely upon governmental funds for such costs, since it would not be possible for funds of this magnitude to be raised through donations from the 100,000 people living in the USVI served by Station WTJX.

2. The attached engineering study demonstrates that VHF Channels 3, 10 or 11 could be utilized for DTV operations by VIPTS for its Station WTJX. In particular, it is VIPTS' understanding that the license of Station WBNB, Channel 10, Charlotte Amalie, has been cancelled by the Commission. The inclusion of Channel 10 and its pairing

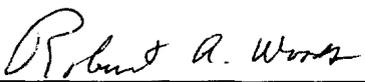
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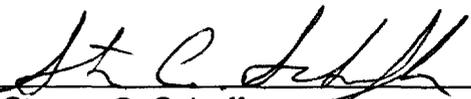
with a DTV channel in the Table contained in the Sixth Report and Order was a clear error on the part of the Commission. It is therefore proposed that Station WTJX should be assigned DTV Channel *10. In this way, Station WTJX would avoid the unnecessary expense of purchasing UHF equipment, which will be discarded at the end of the transition period.

WHEREFORE, for the reasons set forth above and in the attached engineering statement, VIPTS urges the Commission on reconsideration to assign Channel *10 rather than Channel *44 for use by Station WTJX at Charlotte Amalie, St. Thomas, U.S. Virgin Islands.

Respectfully submitted

VIRGIN ISLANDS PUBLIC TELEVISION
SYSTEM

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June 13, 1997

ENGINEERING STATEMENT OF KEITH G. BLANTON OF THE FIRM OF
KESSLER AND GEHMAN ASSOCIATES, INC., CONSULTING ENGINEERS,
IN CONNECTION WITH THE DIGITAL TELEVISION ASSIGNMENT TO
VIRGIN ISLANDS PUBLIC TELEVISION SYSTEM
LICENSEE OF TELEVISION BROADCAST STATION WTJX NTSC CHANNEL 12
AT CHARLOTTE AMALIE, USVI

I, Keith G. Blanton, am an associate of Kessler and Gehman Associates, Inc., with offices in Gainesville, Florida. I have been working in the field of radio and television consulting engineering since 1961. I graduated from Duke University in 1951 with a Bachelor of Science degree in Physics.

This firm has been employed by Virgin Islands Public Television System licensee of television broadcast station WTJX operating on channel 12 at Charlotte Amalie, USVI to make engineering studies in connection with the assignment in the 6th Report and Order in MM Docket 87-268. of UHF channel 44 to be used by WTJX for digital television broadcasting. The 6th Report and Order thereby requires that WTJX continue broadcasting on their presently licensed NTSC channel 12 using their licensed equipment and in addition obtain equipment to operate on UHF channel 44 during a transition period after which time they may if they wish revert to operation on their present channel 12 using digital technology.

In order for WTJX to operate on DTV channel 44 during the transition period it would be necessary for WTJX to obtain a new UHF DTV transmitter and directional antenna capable of radiating 50.1 kW ERP. In addition the additional expense of operating the higher powered transmitter during the transition period must also be considered. Since WTJX is a noncommercial station these costs would have to be funded by some government agency for it would not be possible for funds of this magnitude to be raised by asking for donations from the 100,000 people living in the USVI served by WTJX.

We have made studies that indicate that VHF channels 3, 10 or 11 could be used by WTJX for their DTV operation during the transition with minimal if any interference to cochannel and adjacent channel NTSC stations. It is our understanding that the license of WBNB channel 10 at Charlotte Amalie has been canceled and therefore it is proposed that WTJX be assigned DTV channel 10. This will enable

WTJX to avoid the expenses of purchasing a new UHF transmitter and antenna for use during the transition period only to discard them at the end of the transition period when they would return to their NTSC channel 12. If WTJX were assigned DTV channel 10 they would choose to continue use of channel 10, which would be reserved for educational television, after the transition period and channel 12 would become available for other applicants.

KESSLER AND GEHMAN ASSOCIATES, INC.

Keith G. Blanton

Keith G. Blanton, Consultant

June 12, 1997