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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN 13 1997

Federal Communications Commission
Office of Secretary

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

MM Docket No. 87-268

To: The Commission

**MEDIA GENERAL, INC.
PETITION FOR RECONSIDERATION**

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Dated: June 13, 1997

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Summary of Argument

The transition to digital television ("DTV") is the culmination of ten years of painstaking planning, research, technological development and unprecedented cooperation between the Commission and the private sector. Media General, Inc. ("Media General"), the ultimate parent corporation of the licensees of thirteen full power television stations, wholly supports the DTV transition and commends the Commission for its dedication to making DTV a reality. Nevertheless, as the onset of DTV speeds toward us, the Commission has promulgated a table of allotments which threatens to compromise the effectiveness of the transition and leave many of the nation's broadcasters, including Media General, at a distinct technological and competitive disadvantage.

One of the principal goals of the transition is to afford broadcasters the channel allotments and power limits to replicate their existing NTSC television service. For Media General and many other broadcasters, however, the DTV table of allotments does not allow this goal to be achieved. Under the Commission's own predictions, many of Media General's stations will not replicate their service area. Indeed, one Media General station is predicted to lose nearly 10% of its NTSC service (91% replication). Even where the Commission predicts full replication, the actual power limits and channel allotments will frustrate this prediction. The failure to replicate is compounded by the fact that in those Media General markets other stations have huge power advantages, thereby leaving the Media General stations at an immediate competitive disadvantage.

The Commission has created a procedure for maximizing power and has encouraged broadcasters to work together to resolve interference and other competitive issues.

Unfortunately, the Commission has created these procedures for the post-transition era. By then the harms inflicted on Media General's stations will be irreparable. The power-deprived Media General stations will never have had a chance to compete on equal terms and other power laden stations will have every incentive to oppose Media General's power increases to protect their own service.

To solve these problems, Media General proposes that stations be permitted (and encouraged) to maximize power in this reconsideration proceeding. This will have a dual effect: unnecessary power disparities will be eliminated, and the Commission will have a more detailed understanding of how the DTV landscape look when most stations are operating with peak facilities. The Commission should allow parties an additional 90 days following the release of *OET Bulletin No. 69* to assess the impact of the engineering methodologies contained in that document and to file their maximization requests. The Commission then should issue the final table of allotments incorporating the new power and revised channel allotments.

This additional period also will enable the Commission to correct cases of immediate irreparable harm such as the plight of WTVR-TV, Richmond, Virginia, which operates on NTSC channel 6 and will receive devastating interference from DTV channel 6 in Washington, D.C. WTVR-TV will lose at least 20% of its audience to interference from the Washington station, which is slated for DTV transition in the first roll-out period. An additional 90 days will enable the Commission, Media General and other parties to devise a solution to this problem, including the possibility of changing the DTV channel of the Washington station.

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To: The Commission

PETITION FOR RECONSIDERATION

Media General, Inc., together with its wholly-owned subsidiaries, each a television station licensee (collectively, "Media General"), by their attorneys, and pursuant to 47 C.F.R. § 1.402(h) (1996), hereby petition the FCC for reconsideration of its *Fifth Report and Order* and *Sixth Report and Order* in the above-captioned proceeding.^{1/} Media General wholly supports the Commission's movement toward full implementation of digital television ("DTV") and applauds the Commission's efforts to bring this new television service to the American public. Nonetheless, there are several elements of the Commission's DTV rules that require reconsideration if DTV is to become a true success for broadcasters and television viewers.

^{1/} *Fifth Report and Order*, MM Docket No. 87-268, FCC 97-116 (rel. Apr. 21, 1997) ("*Fifth R&O*"); *Sixth Report and Order*, MM Docket No. 87-268, FCC 97-116 (rel. Apr. 21, 1997) ("*Sixth R&O*") (collectively, the "*R&Os*").

I. Introduction.

Media General is the licensee of the following full-power and television translator stations:

WCBD-TV, Charleston, South Carolina
WFLA-TV, Tampa, Florida
WJWB(TV), Jacksonville, Florida
WNCT-TV, Greenville, North Carolina
TV Translator W05BI, Morehead City, North Carolina
WBMG(TV), Birmingham, Alabama,
TV Translator W04CB, Sylacauga, Alabama
WSLS-TV, Roanoke, Virginia
WTVR-TV, Richmond, Virginia
WUTR(TV), Utica, New York,
TV Translator W63AE, Oneonta, New York
WDEF-TV, Chattanooga, Tennessee
WJHL-TV, Johnson City, Tennessee
WTVQ(TV), Lexington, Kentucky
KALB-TV, Alexandria, Louisiana
WHOA-TV, Montgomery, Alabama.

Although all but one of Media General's stations is located in the southeast United States, there is great variation in the location, terrain, facilities and coverage of these stations. The stations run the gamut from VHF to UHF, from small market to large market, and from flat terrain to Appalachian country. Several of the stations employ TV translators to provide improved coverage in service and to compensate for terrain anomalies. Given the wide range of issues which affect each station, the Commission's table of allotments could not result in an optimal DTV allotment for each of Media General's stations. Nevertheless, the DTV table of allotments exposes two interrelated issues that will jeopardize the ability of Media General's stations to provide full-scale digital television broadcasts to its viewers.

The DTV table of allotments is based on the overarching goal of replicating existing service. *Sixth R & O* at ¶ 28. Despite this goal, the power levels and channels assigned by

the Commission to almost half of Media General's DTV allotments will render this goal of replication an impossibility. The inability to replicate interference-free service areas, when combined with extreme power disparities between DTV allotments in particular Media General television markets will immediately, and perhaps perpetually, place Media General's stations in these markets at a competitive disadvantage in the digital era.

To resolve these problems, Media General proposes two solutions. First, the Commission should delay final issuance of the DTV table of allotments for a 90-day period following the issuance of *OET Bulletin No. 69*, the critical technical document that will provide needed guidance in resolving interference and other engineering issues. Second, Media General suggests that stations should be permitted (and encouraged) to maximize power now, as provided for in the *Sixth R & O*, rather than later in individual modification applications or petitions for rulemakings. Similarly, the Commission should permit stations to increase their power now, even if interference is caused, upon a showing by a station that the interference can be avoided through certain engineering mechanisms such as directional antennas, moving transmitter sites or using terrain shielding.

II. The DTV Table of Allotments Does Not Realistically Meet the Commission's Stated Goal of Service Replication.

Service replication (along with minimizing interference) is the bedrock of the Commission's DTV table of allotments. In devising the digital allotments for over 1,200 full power television stations, the Commission attempted to ensure that each television station's DTV assignment replicated the station's current NTSC coverage areas and populations. Indeed, in the *Sixth R&O*, the Commission specifically emphasized:

We believe that providing DTV allotments that replicate the service areas of existing stations offers important benefits for both viewers and broadcasters. This approach will ensure that broadcasters have the ability to reach audiences that they now serve and that viewers have access to the stations that they can now receive over-the-air.

Sixth R&O ¶ 29. Despite the best of intentions, and based on the limited information currently available to Media General, the Commission's DTV channel assignments and power levels do not accomplish this goal with respect to almost half of the Media General stations. Although the negative impact on such stations will be significant, the impact on viewers will be even greater. Viewers simply will not be able to receive certain of the Media General television signals they have been accustomed to receiving for decades. While it may be possible for the stations to fully replicate their service through translators, the cost and risk associated with converting translators to DTV are such that such a conversion could not occur until well after the transition period for DTV is completed, leaving a large number of potential Media General viewers without DTV service for several years if not longer.

The replication problem is exemplified by Media General's station in Greenville, North Carolina. In that market Media General owns WNCT-TV, a CBS affiliate that operates on NTSC Channel 9. WNCT-TV has been assigned DTV channel 10 at a power of only 21.1 kW. As a result, WNCT-TV's DTV channel will replicate only 91.4% of the current NTSC broadcast coverage area. By contrast, the two other Greenville allotments will fully replicate their current NTSC service *and* will operate at a higher power than WNCT-TV.

Another Media General station, WUTR(TV), Utica, New York, will replicate only 95.1% of its NTSC coverage from its new DTV allotment (Channel 30) and its assigned 50

kW of power. No other Utica or Syracuse will replicate less NTSC service or operate with less power than WUTR(TV) and WUTR(TV)'s adjacent DTV channel has been allotted ten times the power of WUTR(TV). Similarly, as the *Sixth R & O* allotment table displays, Media General's station WJHL-TV, Johnson City, Tennessee, will replicate only 96.2% of its current NTSC contours, even with high power allotted to it.

Even where the Commission's allotment table predicts full replication of coverage, Media General has determined that its assigned power levels will be insufficient to actually replicate such service. The failure of the allotment table to reflect the actual replication that may be achieved is exacerbated by the huge power disparities that exist in some of Media General's markets. Such disparities will immediately place Media General's lower powered stations at a competitive disadvantage from which they may never recover. Furthermore, the failure to replicate NTSC in these small markets, combined with the expense of constructing DTV facilities, will guarantee financial trouble for these stations.

For example, in Birmingham, Alabama, Media General owns WBMG(TV), a CBS affiliate which operates on NTSC Channel 42. The station serves 1,253,000 people over an area of 23,781 sq. km. The Commission allotted WBMG(TV) DTV Channel 30 at an effective radiated power of 159.2 kW. Operating on its digital channel, WBMG(TV) will serve 1,330,000 people over an area of 26,381 sq. km. However, three other network affiliates in Birmingham, which currently broadcast on VHF channels, are allowed a megawatt each on their DTV channels. This power disparity increases the already-large coverage and population disparities that exist under the NTSC regime.

WBMG(TV) is not the only Media General station that has been placed at power and competitive disadvantage. WHOA-TV, Montgomery, Alabama; WJWB(TV), Jacksonville, Florida; WFLA-TV, Tampa, Florida; and WTVQ(TV), Lexington, Kentucky all received less power than at least one other station in their respective markets. Furthermore, WHOA-TV, allotted DTV channel 51; WCBD-TV, Charleston, South Carolina, allotted DTV Channel 59; and WJHL-TV, allotted channel 58, all may be forced suffer the additional economic hardship of an additional transition because their DTV channels are likely not to be part of the ultimate "core" spectrum. These stations would be compelled to bear the expense of constructing two DTV facilities—one on their currently allotted DTV channels and then another on a "core" DTV channel.

A more devastating problem affects WTVR-TV, Richmond, Virginia. Under the DTV table of allotments proposed in the *Sixth R&O*, WTVR-TV, operating on NTSC Channel 6 in Richmond, will receive a substantial amount of destructive interference—the majority of which is inside the Richmond/Petersburg DMA—from a co-channel DTV assignment. As demonstrated in the attached technical exhibit, interference from WTTG(TV), Washington, D.C., which has been assigned DTV Channel 6, will cause WTVR-TV to lose a significant portion of its coverage area (Grade B contour) and, as set forth in the Commission's table of allotments, at least 16 percent of its coverage population which presently receives WTVR-TV interference free. And, because viewers without outdoor antennas will be subject to even more interference, the predicted interference likely underrepresents the actual signal damage to WTVR-TV.

As noted above, the Commission has not yet released its methodology for precisely measuring interference caused by its DTV allocations or for determining whether such interference would be deemed unacceptable. But in light of the Commission's objective of preserving existing coverage areas and coverage populations, it is hard to imagine how interference that causes reductions of anywhere near this magnitude could be deemed acceptable under *any* reasonable methodology. Severely reducing WTVR-TV's potential audience while other competing broadcasters in the same market maintained their coverage areas intact would result in a serious reduction in revenue—a result that would be at odds with the Commission's goal of maintaining maximum availability of free, over-the-air television service. *Fifth R & O* at ¶5.

These interference problems may not last forever. At some point, when the transition ends, both WTVR-TV and WTTG(TV) will, under existing rules, be required to relinquish one of their channels. But the substantial damage inflicted on WTVR-TV in the interim cannot be undone. Moreover, the length of the "interim" remains uncertain and, as the Commission acknowledges, will depend on market penetration, equipment development and other unpredictable factors. *Fifth R & O* at ¶100. As long as a substantial number of viewers continue to rely on NTSC reception, the co-channel interference to WTVR-TV's NTSC channel caused by WTTG(TV)'s DTV channel will continue to inflict irreparable and unfair economic injury. In short, in this case the DTV table has produced an allocation that is wholly at odds with the Commission's objectives and contrary to the public interest. Some other channel for WTTG(TV)'s DTV use must be found.

III. The Commission Should Allow Stations to Maximize Power Immediately.

Despite the nature of the problems identified by Media General, there are definitive solutions that the Commission may adopt to rectify the hardships inflicted upon Media General and other broadcasters prior to the ultimate roll-out of DTV transmissions. The most feasible solution, in fact, is contained within the text of the *Sixth R & O*. In adopting maximum and minimum power limits, the Commission stressed that

stations should be able to maximize their facilities provided that no new interference is caused to other stations. We therefore will permit stations to request an increase in their operating power and/or height of antenna from that specified in the DTV Table, up to the maximum permissible limits on DTV power and antenna height set forth below or up to that needed to provide the same geographic coverage as the largest station within their market.

Sixth R & O at ¶ 31. This procedure is contemplated as a post-roll-out mechanism.

Principles of fundamental fairness, however, dictate that the Commission should permit and encourage stations to maximize power now, during this reconsideration proceeding. The Commission's proposed upgrade process would create and perpetuate a nation of entrenched DTV stations with high power and broad coverage fighting to prevent less powerful stations from obtaining the necessary engineering tools to remain competitive. Each station wishing to fight this entrenched system would be forced to file an individual modification application. The Commission would be compelled to continually evaluate hundreds of these applications, many of which would conflict with one another. Additional procedures to resolve conflicts would need to be developed and scarce administrative resources would be wasted as the Commission continually addressed the "ripple" effect caused by each modification. Furthermore, because each modification application would be dependent on a showing that no interference increase would occur or that affected stations

had agreed to the modification, incumbently powerful stations would have a strong incentive to make every proposed power modification hotly contested. Unhappy applicants also could pose the continual specter of lengthy appeals under *Melody Music*^{2/} and related Commission precedents requiring common treatment of similarly situated parties.

Rather than endure this costly and time-consuming procedure — to both the Commission and private parties — the Commission should conserve its administrative resources and permit stations to maximize their power during this reconsideration proceeding. Acting now would produce the primary benefit of providing the Commission with a more detailed understanding of the ultimate DTV landscape with most stations at their peak coverage and power. More importantly, maximizing power now would strip the transition period of fairness questions and would allow the Commission and licensees to focus on addressing the real and potentially thorny engineering issues certain to arise in implementing a wholesale change in the manner of delivering free over-the-air television signals.

Permitting power maximization now would not delay the DTV transition either. Media General and numerous other broadcasters already have commissioned engineering studies that demonstrate the feasibility of huge power increases free of harmful interference. As the attached engineering statement prepared by Moffet, Larson & Johnson, Inc. demonstrates, Media General already has confirmed that four of its six stations that have less than maximum DTV power allotments can increase their power without causing additional

^{2/} *Melody Music Inc. v. FCC*, 345 F.2d 730 (D.C. Cir. 1965).

interference to other DTV allotments. These stations, WHOA-TV,^{3/} WJWB(TV), WJHL-TV and WSLs-TV, can meet the stated power increase requirements and there is no reason to arbitrarily and capriciously prevent these stations from entering the DTV era with competitive and high-powered signals.

Of course, not every station has the technical information at its fingertips to determine what shortcomings or solutions exist for its DTV allotment. The Commission, however, need not leave these stations without a remedy. Rather, the Commission should designate the current DTV table of allotments as second "interim table" and allow parties additional time to bring engineering solutions to the Commission (along with the aforementioned power maximization requests).

The need for additional time is evident. In order to evaluate whether the DTV Table implements the Commission's objectives in specific instances, interested parties must be able to calculate the interference that is likely to result and determine the service areas of new DTV stations in accordance with the Commission's methodology (Longley-Rice). But the critical piece of information necessary for stations to evaluate contours—*OET Bulletin No. 69*—has not been timely released though the *R&Os* refer to it numerous times. Without *OET Bulletin No. 69*, it is impossible, for example, for stations to know precisely what operational parameters for the Longley-Rice methodology apply or what amount of interference is considered *de minimis*. In turn, it is impossible for stations to know how to assess the reasonableness of either their own

^{3/} WHOA-TV is predicted to cause interference to several ungranted NTSC new station applications, but believes, as the Commission has dictated, that a plan to maximize power on DTV facilities should be preferred over ungranted NTSC new station applications. Media General therefore has not factored these applications into the WHOA-TV interference studies.

DTV allotment or those of nearby licensees. Moreover, broadcasters are ill equipped to verify whether the DTV Table meets *any* standard of adequacy, much less whether it is *optimized* as the Commission contends.^{4/}

Therefore, before the rules and the table of allotments become final—but *after* the Commission’s methodology is made available—the Commission should give interested parties a further opportunity to comment on the Table and the methodology. A brief additional comment period of 90 days will not significantly delay implementation of the transition to DTV. Indeed, to the extent that there are problems with the table of allotments, the Commission can fix those problems more efficiently and expeditiously if they are identified in a further round of comments while this proceeding remains open than if they are identified in a plethora of separate petitions for rulemaking after the DTV Table becomes final.

A brief delay also will individual station grappling with difficult engineering issues. Media General's problem with WTVR-TV in Richmond is symptomatic. The station will lose over 16% of its population from DTV Channel 6 in Washington, D.C. Under the *R & O*, Fox's WTTG(TV), as a network affiliate in the 7th largest market, must begin DTV broadcasts by November 1998, the earliest possible roll-out period. If the severe interference problem to WTVR-TV is not addressed now, the station will be irreparably harmed. A short 90-day delay would enable all interested parties to devise a solution, including the preferred solution of locating a new DTV Channel for WTTG(TV).

^{4/} As a matter of administrative law, the Commission must, of course, set forth the basis and underlying support for its rules in a manner that is sufficiently detailed to permit judicial review. *See, e.g., National Nutritional Foods Association v. Weinberger*, 512 F.2d 688, 701 (2d. Cir. 1975), *cert. denied*, 423 U.S. 827 (1975).

Similarly, Media General owns two stations which cannot take advantage of the automatic power maximization provision of the *Sixth R & O* due to predicted additional interference. These stations, WBMG(TV) Birmingham, Alabama, and WTVQ(TV) Lexington, Kentucky, could use directional antennas, move their towers, employ terrain shielding or craft other engineering solutions to compensate for the vagaries of their current allotments. A brief extension of the comment period would serve these stations well as they develop workable solutions. Furthermore, a brief delay would enable the Commission to issue a final DTV table of allotments that permits *all* eligible stations to maximize their power where possible.

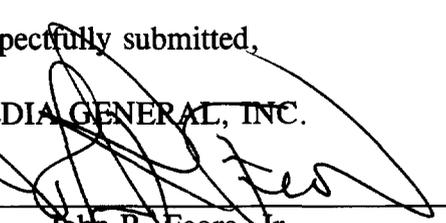
IV. Conclusion.

The Commission's DTV table of allotments leaves almost half of Media General's stations unable to satisfy the Commission's primary transition goal—interference-free service replication. Hampered by lower power, these stations are consigned to begin the DTV era at a significant competitive and technical handicap. The DTV table also saddles at least one of Media General's stations with untenable interference as long as it remains on its NTSC allotment. The Commission should attempt to rectify these problems now, by affording parties an extra 90 days to comment on the DTV table of allotments and by allowing parties to seek power maximization during this reconsideration period.

The success of DTV is not foreordained simply because technology permits digital transmission. Only a transition that treats all parties, including consumers, fairly and with the same limitations can ensure that DTV succeeds. The Commission should not bind itself to a table that perpetuates inequities and simply for the sake of expediency.

Respectfully submitted,

MEDIA GENERAL, INC.

By: 

John R. Feore, Jr.

H. Anthony Lehv

Scott S. Patrick

Its Attorneys

DOW, LOHNES & ALBERTSON, P.L.L.C.

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Dated: June 13, 1997

**Engineering Statements of
Moffet, Larson & Johnson, Inc.**

June 13, 1997

Mr. H. Anthony Lehv, Esq.
Dow, Lohnes & Albertson
1200 New Hampshire Avenue N.W.
Washington, DC 20036-6802

Dear Anthony:

The original and 14 copies of the engineering statement for Media General in support of the Petition for Reconsideration in MM Docket No 87-268 are enclosed.

If you have any questions concerning the statement described above, please call.

Sincerely,



J. W. Stielper

Enclosures

cc: Mr. Ardel Hill

ENGINEERING STATEMENT
IN SUPPORT OF THE PETITION OF
MEDIA GENERAL, INC.
FOR RECONSIDERATION OF
THE FIFTH AND SIXTH REPORTS AND ORDERS
IN MM DOCKET NO. 87-268

June 10, 1997

Media General, Inc.
Tampa, Florida

Engineering Statement
in Support of the Petition of
Media General, Inc.
for Reconsideration of
the Fifth and Sixth Reports and Orders in MM Docket No. 87-268

The firm of Moffet, Larson and Johnson, Inc. (MLJ) has been retained by Media General, Inc. (Media General) to make engineering studies in support of the Media General Petition for Reconsideration filed in response to the Fifth and Sixth Reports and Orders in MM Docket No. 87-268. In the Sixth Report, which was released on April 21, 1997, the Commission has assigned a digital television (DTV) channel to each television station. The criteria used by the Commission for the assignment of channels and facilities would result in interference to Media General stations and preclude the stations from increasing effective radiated power (ERP).

The engineering studies focused on two aspects of the Sixth Report: (1) Predicted interference to Media General analog stations and (2) the potential for increasing ERP of the Media General stations. Many of the Media General stations were assigned less than the 1 MW maximum permitted by the new rules. Distance separation studies were completed for the Media General analog stations to determine sources of potential interference from DTV stations on the Commission's assignments and as the first step in the evaluation of the potential for power increases. A review of these studies reveals that there are serious flaws in the Commission's DTV assignment plan.

Media General owns WTVR-TV on NTSC channel 6 in Richmond, Virginia. The Commission has assigned DTV channel 6 to WTTG at Washington, DC. The WTTG transmitting site is only 158 kilometers (98.2 miles) from the WTVR-TV transmitting site. This separation is much less than the separation of 244.6 kilometers required by the rules for new VHF television stations. As expected, there would be substantial predicted mutual interference between these stations, particularly to the service of WTVR-TV. This is because analog receivers are inherently more susceptible to interference than digital receivers.

Figure 1A is a map showing the noise-limited coverage contour of WTVR-TV and predicted interference using the Institute for Telecommunications Studies (ITS) software which essentially duplicates the Commission's software. The map shows the extensive interference that would result from the Commission's plan. Table 1 of Appendix B of the Sixth Report shows that an increase in interference to WTVR-TV's coverage of 18.6 percent in land area and 16 percent in

Media General, Inc.
Tampa, Florida

population. All of this interference would be caused by the operation of DTV channel 6 in Washington.

However, greater interference than predicted by the Commission's interference model will likely occur. The Commission's interference model assumes that viewers will use directional receiving antennas. However, in areas near WTVR-TV's conventional Grade A contour, many viewers may use set-top "rabbit ears" for reception. These antennas afford no discrimination against unwanted signals. In such cases, interference could be much worse than the Commission's model predicts. The ITS DTV software was designed to yield the same predicted interference results as the FCC DTV assignment software, hence it is not feasible at this time to predict interference using the Longley- Rice propagation model but eliminating the directional receiving antenna. To illustrate the effect of ignoring antenna discrimination, conventional interference studies were completed using the propagation curves of the Commission's Rules and the interference ratios of the Sixth Report. Figure 1B is a map showing the results of such calculations. With conventional studies, predicted interference extends to areas within the WTVR-TV Grade A contour and nearly to the City Grade contour. There are areas of predicted interference less than 48 kilometers (30 miles) from WTVR-TV where reception on indoor antennas is expected to be common.

The noise-limited coverage contours of the Media General analog NTSC station WTVR-TV in Richmond and a DTV Channel 6 station in Washington, DC overlap because there would be less than 100 miles between the stations and the contours each extend over 60 miles. Thus, there is potential for both DTV service and NTSC service on channel 6 at some locations. This scenario has not been tested in the field.

It appears that channel 69 could be assigned to a Washington, DC station to replace channel 6. Channel 69 was assigned to Washington in the original Commission plan. Table 1 is an allocation separation study for channel 69 at the WTTG site using the required distances as adopted by the Sixth report for new DTV stations. The primary limitation is picture image interference to station WNUV on channel 54 in Baltimore, Maryland. Any interference to WNUV from channel 69 would likely be confined to areas outside WNUV's market. In contrast, interference to WTVR-TV from the channel 6 DTV in Washington falls well within WTVR's Dominant Market Area, as defined by Arbitron. Assignment of channel 69 to Washington would involve several minor taboo violations, none of which were apparently considered serious problems when the channel was proposed earlier by the Commission. For example, use of channel 69 for DTV in Washington would preclude the grant of a new analog station on channel 69 in Fredericksburg, Virginia. It is our understanding that such conflicts will not prevent use of channels for DTV.

Media General, Inc.
Tampa, Florida

Media General operates WUTR at Utica, New York. In the Sixth Report, WUTR would receive channel 30 and WKTV, also at Utica, would receive adjacent channel 29. The sites of the two stations are separated by 19.7 kilometers (12.2 miles). Predicted interference to the DTV operation of WUTR on channel 11 may be slight under the ground rules used by the Commission. Desired-to-undesired adjacent channel ratios of more than -40 dB are assumed in the studies. The ratios are based upon the interference tests conducted on the prototype receiver. There is no guarantee that actual receivers will achieve this selectivity, particularly if relatively inexpensive DTV converters are manufactured. Station WKTV would receive more than ten times the power assigned to WUTR and hence will likely cause much more interference than it will receive. Interference could possibly be controlled by collocating the DTV operations of the two stations, however this may not be feasible. Ideally, another channel should be assigned to WKTV, or at least WUTR should be allowed higher power. As shown below, WUTR can apparently increase power to 1 MW.

There are numerous other problems that occur in the northeast region between Richmond and Boston. A DTV reallocation of this region should be completed to correct the problems such as the assignment of channel 6 in Washington, DC and adjacent channels in Utica.

Power Increases for Media General Stations

A number of Media General stations were assigned power less than 1 MW (1000 kW), the maximum permitted under the rules for UHF DTV stations. Interference studies were run for these stations to assess the feasibility of a power increase to 1 MW. The interference maps are shown in Figures 2A through 13B for stations that limit the ERP of Media General's lower powered stations. Interference was first predicted for the ERP specified in Table 1 of Appendix B to the Sixth Report. The potential for increased power was considered by repeating the predictions with the ERP of the associated Media General station increased to 1 MW. The maps show that stations WJWB, Jacksonville, Florida; WJHL-TV, Johnson City Tennessee; WSLS-TV Roanoke, Virginia and WUTR; Utica New York can apparently increase ERP to 1 MW.

In the case of WJWB, there is a relatively slight increase in predicted interference to station WUBI, channel 34 at Baxley, Georgia. Such a small increase in interference may be considered de minimis; however, the Commission has not yet set forth standards for evaluating such situations. The Commission's software is not available and hence was not used for the studies. Furthermore, OST Bulletin No. 69, which will establish engineering standards for DTV, has not yet been published. Thus, permissible power increases cannot yet be determined precisely, especially for WJWB.

Media General, Inc.
Tampa, Florida

An increase to maximum power for Media General station WHOA-TV at Montgomery Alabama could be limited if any of the applicants for a new station at Marianna, Florida on channel 51 (co-channel with WHOA-TV DTV) were granted. The policy regarding new stations is not clear, but new analog stations should not preclude power increases for DTV operations of existing stations.

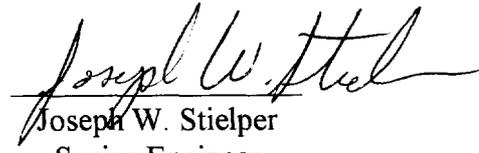
Conclusions

The assignment of channel 6 to WTTG for DTV use in Washington DC is expected to result in extensive interference to the service of station WTVR-TV. A reallocation plan for the northeast region could solve this problem as well as the adjacent channel problem in Utica. Channel 69 appears to be available for assignment to a station in Washington. Assignment of this channel was apparently avoided in order to minimize the use of channels from 60 through 69.

In addition, it appears to be possible to increase the power of a number of Media General stations. The following stations may be increased to the maximum of 1000 kW: WJWB(TV), Jacksonville, Florida; WJHL-TV, Johnson City, Tennessee; WSLS-TV, Roanoke, Virginia; and WUTR, Utica, New York

The undersigned certify that this statement and the attached figures were prepared by them or under their supervision.


Ann Gallagher
Senior Engineer


Joseph W. Stielper
Senior Engineer

ENGINEERING REPORT

1110 N. Glebe Road, Suite 800

Arlington, VA 22201

Media General, Inc.
 Tampa, Florida

Table 1

TV ALLOCATION SEPARATION REPORT

Channel : 69
 City : WASHINGTON, DC
 Coordinates: 38 57 21.0 N
 : 77 04 57.0 W

Zone : I

CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear	Notes
File-Number	City	City	Freq	HAAT-m	Longitude	Dist-km	Short-km
WFMZTV	LIC	MARANATHA BROADCASTING	69I	1070.00	40 33 54.0N	37.6	SHORT
BLCT-931029KZ		ALLENTOWN, PA	801.3	315	75 26 26.0W	227.42	217.30 21.18
WFMZTV	APP	MARANATHA BROADCASTING	69I	1780.00	40 33 54.0N	37.6	SHORT
BMPCT-960515KE		ALLENTOWN, PA	801.3	315	75 26 26.0W	227.42	217.30 21.18
NEW	APP	MARRI BROADCASTING, L.P	69I	1510.00	38 17 4.0N	211.0	SHORT
BPCT-960920IL		FREDERICKSBURG, VA	801.3	109	77 35 41.0W	86.86	217.30 130.44
14943ADD	ADD	SINCLAIR COMM. OF GEIST	69I	0.00	40 17 30.0N	314.6	SHORT
-		GEISTOWN, PA	801.3	-580	78 52 24.0W	213.64	217.30 12.7
WJAL	LIC	CHANNEL 68 BROADCASTING	68I	3890.00	39 53 31.0N	324.1	CLEAR
BLCT-870515KG		HAGERSTOWN, MD	795.3	392	77 58 2.0W	128.86	88.5
WNUVTV	LIC	BALTIMORE (WNUV-TV) LIC	54I	5000.00	39 17 15.0N	36.9	SHORT
BLCT-890914KF		BALTIMORE, MD	711.3	352	76 45 38.0W	46.16	24.1-80.5
NEW	APP	GRANT TELECASTING INC.	55I	5000.00	40 14 1.0N	22.4	CLEAR
BPCT-960723KY		LEBANON, PA	717.3	419	76 23 26.0W	153.81	24.1-80.5
WFPT	LIC	MARYLAND PUBLIC B/CASTI	62I	3160.00	39 17 53.0N	329.5	VIOLATION
BLET-931014KE		FREDERICK, MD	759.3	138	77 20 35.0W	44.17	24.1-80.5
WFPT	APP	MARYLAND PUBLIC B/CASTI	62I	3160.00	39 17 53.0N	329.5	VIOLATION
BPET-960624KI		FREDERICK, MD	759.3	214	77 20 35.0W	44.17	24.1-80.5
WMPB	LIC	MD PUBLIC BROADCASTING	67I	1000.00	39 27 1.0N	25.5	VIOLATION
BLET-312		BALTIMORE, MD	789.3	249	76 46 37.0W	60.91	24.1-80.5
WVVI	LIC	WVVI (TV), INC.	66I	4370.00	38 47 16.0N	229.0	VIOLATION
BLCT-960516KE		MANASSAS, VA	783.3	170	77 19 49.0W	28.47	31.40 2.93