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Before the
Federal Communications Commission
Washington, D.C. 20554

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

TO: The Commission

VENTURE TECHNOLOGIES GROUP'S SUPPLEMENTAL FILING RELATING TO ITS PETITION FOR CLARIFICATION AND PARTIAL RECONSIDERATION OF THE FIFTH AND SIXTH REPORTS AND ORDERS

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On June 12, 1997, Venture Technologies Group ("VenTech") submitted to the Federal Communication Commission ("FCC") its Petition for Clarification and Partial Reconsideration of the Fifth and Sixth Reports and Orders (adopted April 3, released April 21, 1997) ("Petition"). VenTech included several parties that it represented in its Petition. Included amongst the parties represented by the Petition are Atrium Broadcasting Company, licensee of KNET-LP, channel 38, Los Angeles, California; and Venture Technologies Group, Inc., licensee of WTWB-TV, channel 19, Johnstown, Pennsylvania.

Amongst the issues raised by the VenTech were that it was optimal DTV channel assignments could not be formulated until the FCC released OET Bulletin No. 69, in order to fully evaluate the accepability of the DTV allotments proposed. On July 2, 1997 the FCC released an Order (adopted July 2, 1997, released July 2, 1992, DA 97-1377), which provided the filing of supplemental information related to petitions for reconsiderations that reserved the right to propose alternative channels after the release of OET Bulletin No. 69. This document is filed as such on behalf of the parties represented in the Petition filed by VenTech.

I. Southern California and Baja California, Mexico

In the Southern California area, VenTech proposes the basis for the development of a new table of allotments, which can be used in the event that the Commission does not abandon its attempt to create a complete DTV Table of Allotments at this time. This proposed table, included at Exhibit A, allows for greater spectral efficiency, including protection of Mexican channels, preservation of LPTV stations, no overlap of co-channel NTSC and DTV signals in the crucial signal inducting area north of Los Angeles along the

coastline toward Santa Barbara. In the proposal, Channel 38 is no longer used for DTV in the Los Angeles region, thus preserving viewable signal on NTSC Channel 38 in Santa Barbara and five LPTV stations operating on channel 38 in Southern California.

The attached table, included at Exhibit A, of NTSC and paired DTV assignments covers Southern California and The Tiajuana area in Mexico. It was prepared following the above principles. It avoids overlap of co-channel DTV and NTSC service areas, and reduces impact on LPTV stations, translator stations, unused assignments, and Land Mobile stations.

II. Western Pennsylvania and West Virginia

The Commission proposed the use of DTV channel 28 to be paired with NTSC channel at Clarksburg, West Virginia, the use of DTV channel 29 to be used with NTSC channel 8 at Johnstown, Pennsylvania; and the use of DTV channel 30 to be used with NTSC channel 19 at Johnstown, Pennsylvania. On July 14, 1997, the FCC released a Report and Order amending Section 73.606(b) of the FCC rules and modifying the TV Table of Allotments with respect to channel 19 at Johnstown, Pennsylvnia (adopted July 14, 1997, released July 18, 1997, MM Docket No. 97-96, RM-8756, DA 97-1503). In that Report and Order, the FCC changed the city of license of WTWB-TV, the licensee on channel 19 at Johnstown, from Johnstown to Jeannette, Pennsylvania. This change is effective September 2, 1997. As such, the television market of WTWB-TV is changed from Johnstown-Altoona to Pittsburgh.

Channel 28 is not a well-suited DTV assignment to be paired with NTSC channel 46 at Clarksburg, West Virginia. It is nearby NTSC channel 29 which is assigned to Charleston, West Virginia. Several other channels, including DTV channel 45, 10, 17, 31, and 41, could

be used that would not be so proximate to an adjacent channel, however, we believe that channel 45 would be the best because it could likely be used with their current antenna configuration with minimal adjustments.

Channel 29 is not a well-suited DTV assignment to be paired with NTSC channel 8 at Johnstown, Pennsylvania. The Johnstown-Altoona market is quite wide and the terrain is quite rough. It is impossible to serve the whole market from a single site. In the last Nielsen ratings book a full third of the ratings books came from Centre County, where State College, Pennsylvania is located. State College is the home to NTSC assignment channel 29. Because DTV channel 29 is assigned to Johnstown and NTSC channel 29 is assigned to State College, neither of these two stations will be able to effectively compete in the market. The FCC should substitute DTV channel 30 to be paired with NTSC channel 8 at Johnstown, Pennsylvania.

To allow for this, DTV channel 28 should be substituted for DTV channel 30 to be paired with NTSC channel 19 at Jeannette, Pennsylvania. Channel 28 will work just as effectively with NTSC at Jeannette as does channel 30.

Moreover, by providing a two-channel separation in the DTV assignments associated with NTSC channel 19 at Jeannette and NTSC channel 8 at Johnstown, the FCC will be allowing for greater siting flexibility in the future. NTSC channel 8 at Johnstown and NTSC channel 19 at Jeannette have transmitter sites that are approximately 1 mile from each other. If the FCC does not change the current DTV pairings in this region, because the stations' DTV assignments are adjacent channel, i.e., 29 and 30, they will forever be required to

remain co-sited, even though they are now serving different cities and different television markets.

WHEREFORE, as set forth above, the Commission should modify its DTV allotments as proposed herein.

Respectfully submitted,

VENTURE TECHNOLOGIES GROUP

By _____
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August 21, 1997

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Exhibit A: Proposed DTV Table of Allotments in Southern California

City	NTSC Channel	DTV Allotment
San Diego	8	31
	10	43
	15	65
	39	38
	51	52
	69	64
Tijuana, BC, Mexico	6	30
	12	18
	21	22
	27	28
	33	34
	45	46
	57	58
Tecate, BC, Mexico	49	48
	67	66
Los Angeles (Mt. Wilson)	2	26
	4	32
	5	41
	7	47
	9	48
	11	35
	13	36
	22	21
	28	27
	34	33
Santa Ana	40	39
Ontario	46	45
Corona	52	53
Los Angeles	58	69
	68	67
San Bernardino (Sunset Rdg)	18	17
	30	60
Anaheim	56	55

Exhibit A: Proposed DTV Table of Allotments in Southern California (continued)

City	NTSC Channel	DTV Allotment
Riverside	62	61
Huntington Beach	50	49
San Bernardino	24	25
Rancho Palos Verde (Cat Is.)	44	29
Avalon	54	66
Big Bear Lake	59	51
Twentynine Palms	31	29
Palm Springs	36	49
	42	23
Barstow	64	43
Ventura	57	65
Oxnard	63	23
Santa Barbara	3	19
	32	43
	38	15
	55	51
Bakersfield	23	31
	29	42
	17	54
	45	46
	65	66
San Luis Obispo	6	10
	33	34

Certificate of Service

I, Lawrence Rogow, hereby certify that on this 21th day of August 1997, I have caused an original and nine copies of the foregoing Venture Technologies Group's Supplemental Filing Relating to its Petition for Clarification and Partial Reconsideration of the Fifth and Sixth Reports and Orders to be hand delivered to the offices of the following:

Mr. William Caton
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

Lawrence Rogow