ORIGINAL

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

RECEIVED
DEC 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

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

RESPONSE TO *EX PARTE* FILINGS ADDRESSING DIGITAL TV ALLOTMENTS

PAXSON COMMUNICATIONS CORPORATION
THE CHRISTIAN NETWORK, INC.
ROBERTS BROADCASTING COMPANY
COCOLA BROADCASTING COMPANIES
DP MEDIA, INC.

By: John R. Feore, Jr.
Scott S. Patrick

Their Counsel

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 776-2000

December 17, 1997

No. of Copies rec'd 0+9
List ABCDE

SUMMARY

MSTV's late attempt to rearrange the Commission's DTV Table of Allotments would result in increased interference for the stations analyzed by the Petitioners. It is difficult to discern how MSTV could characterize their 357 proposals as "improvements" under such circumstances, unless migrating stations to channels slated for early auction somehow constitutes an enhancement for the respective stations. These ill-considered proposals would only result in delay to the roll-out of digital television and should be rejected in their entirety.

The Petitioners support the efforts of ALTV to ameliorate the DTV power disparity and encourage the Commission to permit UHF stations to increase their DTV power immediately. Yet this step is not enough. The Commission should adopt a *de minimis* standard for evaluating modifications to the DTV Table so that UHF-to-UHF stations can increase their power within the framework that it established. The Commission should also increase the ERP floor for DTV stations from 50 kW to 200 kW as the marginal increase in interference would be commensurate with levels tolerated in the existing Table.

The Petitioners wish to reiterate that low power stations must be protected by the Commission, or those licensees will be forced to protect themselves. Efforts must be taken to mitigate the egregious circumstances faced by the otherwise annihilated low power licensees.

Due to tower capacity issues and the current DTV power disparity, the Commission should attempt to establish a simple formula that would allow licensees to certify within authorized parameters. This would facilitate the processing of DTV applications and ensure

that the maximum number of viewers have access to the largest number of over the air stations.

TABLE OF CONTENTS

I. **THE COMMISSION'S CONCERNS ARE NOT ADDRESSED BY THE WHOLESALE CHANGES PROPOSED IN THE MSTV TABLE.** 2

II. **UHF STATIONS SHOULD BE PERMITTED TO INCREASE DTV POWER.** 5
- A. ALTV's Proposal Helps Mitigate the DTV Power Disparity. 5
- B. Increase the Power Floor and Adopt a *De Minimis* "New Interference" Standard. 6

III. **FURTHER STEPS MUST BE TAKEN TO ASSIST DISPLACED LOW POWER STATIONS.** 7
- A. The Commission Should Allow Low Power Stations to Continue to Operate on Channels 60-69 During the Transition Period. 7
- B. The Commission Should Reasonably Compensate Owners of LPTV Stations that Are Forced to Shut Down. 8
- C. The Commission Should Initiate a Rule Making to Establish a New Permanent Class of LPTV Stations. 9

IV. **THE COMMISSION SHOULD ADOPT A FLEXIBLE APPROACH TO DTV TRANSMISSION FACILITY PARAMETERS.** 10

V. **CONCLUSION** 12

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

RESPONSE TO *EX PARTE* FILINGS
ADDRESSING DIGITAL TV ALLOTMENTS

Paxson Communications Corporation, through its licensee subsidiaries ("PCC"), the Christian Network, Inc., through its licensee subsidiaries ("CNI"), Roberts Broadcasting Company and its affiliated companies ("RBC"), Cocola Broadcasting Companies ("CBC") and DP Media, Inc. ("DP Media") (collectively the "Petitioners"),[1/] by its attorneys, hereby responds to the Commission's request for comments on recent *ex parte* filings by the Association for Maximum Service Broadcasters, Inc. ("MSTV") and the Association of Local Television Stations, Inc. ("ALTV") relating to the above-referenced proceeding.[2/]

In the past, MSTV promoted the interests of broadcasters and the public in the development of digital television ("DTV") in general, and the DTV Table of Allotments in particular. On this occasion, however, MSTV's late-offered proposals for 357 changes to the proposed DTV Table cannot be accepted by the Commission at this late date and would only

---

1/ The Petitioners' television stations are listed in Exhibit A.

2/ FCC Public Notice, *FCC Seeks Comment on Filings Addressing Digital TV Allotments* (rel. Dec. 2, 1997).

delay DTV implementation. Although MSTV's proposals on their face may provide relief for some broadcasters, the effect on PCC stations alone indicates that broadcasters would be much worse off under the MSTV proposal. Rather than making these changes now, the Commission should evaluate adjacent market interference or congestion problems on a case-by-case basis in accordance with the procedures it has established for resolving DTV problems. Within that framework, the Petitioners believe that ALTV's proposal to increase station power should be embraced and other steps taken to provide adequate power levels for UHF stations. Accordingly, the Petitioners urge the Commission to deny MSTV's *ex parte* submission and accept ALTV's proposal to boost station power.

I. THE COMMISSION'S CONCERNS ARE NOT ADDRESSED BY THE WHOLESALE CHANGES PROPOSED IN THE MSTV TABLE.

MSTV proposes 357 changes to the DTV Table of Allotments that it characterizes as "improvements."[3/] As the Commission is aware, the effects of these changes are not limited to the 357 stations, but extend to the multiple number of other stations in each set of respective and adjacent markets. MSTV's proposal thus cannot be considered as some kind of localized regional approach, but, if adopted in whole, would have wide-reaching consequences likely affecting the majority of television stations throughout the country.

The Petitioners do not have the time or resources to evaluate each proposed change and determine whether the proposals represent individual improvements, or, more importantly, an aggregate benefit. However, PCC has evaluated MSTV's proposed changes to the extent that they directly affect PCC's stations. PCC through wholly owned

---

3/ MSTV *Ex Parte* Submission at 8.

subsidiaries owns, operates, programs and is acquiring an extensive nationwide broadcast television group in anticipation of the launch of the seventh broadcasting network. With pending acquisitions, PCC, the largest owner of full-power broadcast television stations in the U.S., owns, operates or affiliates with 62 full-power television stations in markets reaching 60% of all U.S. television households, including stations in almost all of the largest television markets with the overwhelming majority of the stations being UHF facilities. The Commission should agree with the Petitioners that an evaluation of this sample size would be sufficient to ascertain the merits of the MSTV proposal.

As demonstrated in the attached exhibit, by any benchmark, the proposed MSTV table fails the test (Exhibit B attached hereto). For the sampled stations, the MSTV proposal would result in a net population loss of *over half a million people*. Under the MSTV plan, eleven of the sampled stations would move to higher numbered channels and eight of the stations would be removed from the "core" spectrum. Certainly the proposals do not aggregately improve the service conditions of the sampled stations, and the petitioners can only conclude that this is true for other station owners. Accordingly, Petitioners oppose <u>each of MSTV's proposed changes</u> to the DTV Table and urge the Commission to reject the proposals.

Beyond the effect of the proposals on the sampled stations, based upon this analysis, the Petitioners have two general concerns regarding the MSTV proposal. First, the Petitioners question to whom these changes are considered "improvements." Again, without attempting an exhaustive analysis, it appears to the Petitioners that the proposals are designed mainly to provide relief for large-market (*i.e.*, the top 10 television markets) stations at the

expense of stations in smaller markets. Surely such a result is not in the public interest. Second, it appears that stations in smaller markets have been migrated out of the Commission's core spectrum. Notwithstanding that this contradicts the Commission's policy objectives for, *inter alia.,* Channels 60-69, the practical effect on capital-strapped stations in smaller markets facing "double moves" while rolling-out DTV service is unacceptable.[4/] If expanded use of the spectrum is necessary to alleviate serious interference problems, the Petitioners suggest that the larger market stations which can more easily afford a nomadic allotment approach be reassigned outside of the core spectrum for the duration of the transition.

The Commission has already established a proper framework for modifying the DTV Table — on a *case-by-case* basis — by encouraging affected stations to negotiate arrangements among themselves within the parameters set in the DTV Table and elsewhere. Even the act of proposing wholesale changes tends to thwart such efforts by delaying negotiations and adding one more issue (or, in this case, 357) that the Commission must address. The MSTV Table is a hastily assembled proposal that does not improve upon the Commission's existing Table. For these reasons, the Petitioners oppose the MSTV proposal in its entirety and urge the Commission to deny their request.

4/ *See Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Sixth Report and Order, MM Docket No. 87-268, 7 CR 994, 1017-19 (P&F) (April 22, 1997) (adopting policy of early recovery of and minimal DTV allotments in Channels 60-69); *Reallocation of Television Channels 60-69, the 746-806 MHz Band*, Notice of Proposed Rule Making, ET Docket No. 97-157 (July 10, 1997) (proposing Channels 60-69 band be allocated early for public safety and auction purposes). The Petitioners further note the significant number of low power stations that would be displaced by additional assignments in this band.

II. UHF STATIONS SHOULD BE PERMITTED TO INCREASE DTV POWER.

A. ALTV's Proposal Helps Mitigate the DTV Power Disparity.

ALTV proposes in its *ex parte* letter, *inter alia*, to address the concerns of many UHF stations about the disparity in DTV power appearing in the DTV Table. The Petitioners agree that the power disparity will have significant consequences that could result in serious resistance to the DTV roll-out. Under current presumptions regarding DTV antenna use, at the onset of digital television, some viewers may find they no longer receive over the air service from their UHF stations. Higher powered VHF-to-UHF DTV stations will be easily received by many viewers without the addition of thirty-foot tower antennas. The Petitioners believe viewers will consider the addition of external antennas as inconsistent with a technology "upgrade," and many will simply do without their over the air UHF-to-UHF service rather than constructing antenna towers to attach to their new DTV receiver. The Petitioners cannot believe that the Commission wishes for the DTV roll-out to result in a reduction of licensees and their associated local programming diversity. Accordingly, the Petitioners appreciate and support the efforts of ALTV to help alleviate the problems caused by the higher power stations.

The Petitioners fully support ALTV's proposal for stations to increase their DTV power in coordination with the use of tilt beam transmission antenna. It would be difficult for any party to disagree with a proposal that would increase reception penetration without increasing the station service area. However, the Petitioners question whether a critical focus on UHF-to-UHF service area boundaries is supported by the facts. Given the power disparity of UHF-to-UHF stations, actual reception of those stations under currently proposed

regulatory parameters — combined with the likely habits of viewers — will effectively translate into reduced service areas. Hence the Petitioners see little rationale for prohibiting UHF-to-UHF stations from increasing their ERP — whether they employ tilt beam techniques or not.

B. Increase the Power Floor and Adopt a *De Minimis* "New Interference" Standard.

Members of Congress agree with the Petitioners that steps must be taken to address the DTV power disparity. Senator John McCain and Senator Conrad Burns wrote that the disparity "disadvantages the nation's UHF broadcasters" and that "this matter must be remedied as quickly as possible."[5/] ALTV's proposal, while helpful, does not go far enough to mitigate the consequences of the DTV power disparity. The Petitioners suggest that increasing the power floor from 50 kW to 200 kW for DTV transmissions would considerably improve the prospects for UHF-to-UHF stations. The Petitioners recognize that this would create additional interference for some stations, but those amounts would likely be commensurate with levels tolerated in the currently proposed DTV Table of Allotments.

At the very least, the Commission should adopt a *de minimis* standard for interference in its consideration of modifications to the DTV Table. The Commission has established a framework for stations to increase their ERP or HAAT on a case-by-case basis, so long as

---

5/ Letter from Senator John McCain, Chairman, Committee on Commerce, Science and Transportation, Senator Conrad Burns, Chairman, Subcommittee on Communications, to William E. Kennard, Chairman, Federal Communications Commission (Nov. 3, 1997). *See also* Letter from Richard A. Gephardt, House Democratic Leader, to Reed E. Hundt, Chairman, Federal Communications Commission (Aug. 25, 1997); Letter from Senator John Ashcroft to Reed E. Hundt, Chairman, Federal Communications Commission (July 29, 1997).

those requests would create "no new interference." This standard — a higher one than was applied to the existing DTV Table — prevents many UHF-to-UHF stations from increasing their DTV power. The adoption of a more reasonable standard, whereby *de minimis* levels of interference would be tolerated, would be an appropriate step in resolving the disparity issue. The Commission could adopt a three-phase *de minimis* standard: one for the reconsideration phase; a lower *de minimis* number for the transition phase; and a return to traditional *de minimis* levels subsequent to the analog channel return. In this manner, UHF-to-UHF stations would be permitted to increase their DTV power so that viewers during the transition period are not cut-off from their traditional UHF local service, and the Commission could ensure that the maximum number of viewers benefit from the service of the greatest number of over the air stations.

III. FURTHER STEPS MUST BE TAKEN TO ASSIST DISPLACED LOW POWER STATIONS.

A. The Commission Should Allow Low Power Stations to Continue to Operate on Channels 60-69 During the Transition Period.

The Commission has gone to some lengths to help mitigate the egregious circumstances regarding the massive displacement of low power stations, and the Petitioners appreciate these steps. The Commission, of course, must recognize the dramatic changes that have occurred since the time of the adoption of the LPTV rules and the 100% increase in the number of authorized full-power allotments. When LPTV was initially classified as "secondary" to analog stations, a widespread displacement created by a new service was never contemplated by the Commission, full-power stations or LPTV licensees (reduction of LPTV service area was perhaps contemplated; annihilation of LPTV service — definitely

not). Because of the seriousness of the consequences and the massive changes in the contemplated structure of broadcast services, further steps must be taken to protect LPTV service from complete elimination.

Accordingly, the Commission should permit LPTV stations to continue to operate on, or to temporarily move to, Channels 60-69 during the DTV transition period. In the *Reallocation of Television Channels 60-69* proceeding, the Commission stated that "it believes that it may be possible for many low power stations operating on Channels 60-69 to co-exist with public safety and other new service operations on a non-interfering basis."[6/] The Petitioners urge the Commission to act on this belief and permit, at the very least, LPTV stations to remain or relocate to this band during the transition period to allow displaced licensees to continue operations until full-power stations return their second channels. The Commission should clarify, however, that "non-interfering basis" and "secondary" status does not implicate that LPTV or TV translator stations *which are currently authorized in the band* could be displaced by licensees of the new services that will operate on Channels 60-69, at least before the end of the digital transition period.

B. The Commission Should Reasonably Compensate Owners of LPTV Stations that Are Forced to Shut Down.

Owners of LPTV station should be compensated for their displacement expenses. Full power stations will benefit greatly from their second digital channels, with each station having the potential exploit lucrative income streams, becoming "mini-cable operators" and engaging in community multicasting. This gain to full power stations comes at the expense,

---

6/ *Reallocation of Television Channels 60-69* at ¶18.

of course, of displaced low power stations that risk elimination due to the questionable interpretation of "secondary status." Accordingly, it is only fair for low power licensees to receive some form of reasonable compensation for their displacement. At the very least, displaced low power stations that cannot find alternative channels on which to operate and face complete termination should receive reasonable compensation. The Petitioners agree with the Community Broadcasters Association that such compensation could come from auction funds or from the displacing full power station itself.[7]

Additionally, clear procedures for relief of displaced low power stations should be established. The Commission, thus, should clarify when the filing window opens for displaced LPTV stations to file applications for replacement channels. That clarification should permit the filing at the earliest possible date (hopefully, this means immediately). The Petitioners further urge the Commission to clarify that LPTV stations may convert to digital transmissions at any time. Low power station owners should be free to respond to market forces and determine for themselves the appropriate time to convert to digital transmissions.

C. The Commission Should Initiate a Rule Making to Establish a New Permanent Class of LPTV Stations.

The Commission should initiate a rule making that would create a permanent class of low power stations. If the Commission established a permanent home for the soon-to-be displaced stations, the hardship of relocating would be significantly reduced. The Petitioners

---

7/ Community Broadcasters Association, *Petition for Reconsideration*, in MM Docket No. 87-268, at 16 (submitted June 13, 1997).

also urge the Commission to commence a rule making proceeding early on to allow LPTV stations that are willing and capable of upgrading to full power operating standards the opportunity to obtain primary status. At the very least, the Commission should give LPTV stations priority to obtain primary status if they so desire.

If steps are not taken by the Commission to protect low power stations, LPTV and TV translator licensees will be forced to seek other remedies. It should come to no one's surprise that low power stations, facing widespread elimination, will seek legal protection for themselves, and the result of such appeal will be additional delay for the roll-out of DTV service — an outcome benefiting no interested party. The Petitioners urge the Commission to protect low power stations from being abolished and thereby promote the rapid roll-out of digital television.

IV. THE COMMISSION SHOULD ADOPT A FLEXIBLE APPROACH TO DTV TRANSMISSION FACILITY PARAMETERS.

Notwithstanding Sections 73.622(f) and 73.623(c) of the Commission's Rules,[8/] the Commission should adopt, to the extent possible, a simple formulaic approach to modifications to a facility's ERP and HAAT. The Petitioners support the Commission's effort in the rapid roll-out of DTV, and, accordingly, applaud the Commission's streamlined certification for DTV construction permits.[9/] Applications for construction permits that are in accordance with the facility parameters as authorized by the Commission are approved within

---

8/ 47 C.F.R. §§ 73.622(f), 73.623(c).

9/ *See Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Fifth Report and Order, MM Docket No. 87-268, 7 CR 863, 883-84 (P&F) (April 22, 1997).

days of public notice. The Petitioners note, however, that applications which cannot be certified face substantial delay in their processing, resulting in delay of the provision of DTV service.

In these early stages of the DTV transition, the Petitioners are growing concerned about the quantity of those applications which cannot be certified, believing that a good number of stations likely will be unable to place their DTV antennas at their authorized height due to loading and capacity problems with transmission towers. The Commission is well aware of the difficulties regarding the installation of DTV antennas caused by the limited number of tower construction companies and the barriers established by local zoning authorities.[10/] More and more stations will choose to modify their own existing facilities or seek space on those of others. As such, authorized antenna height becomes an illusory cap instead of an actual facility parameter. Stations thus face either reduced service areas due to lower HAAT or lengthy delays in DTV service provision due to the inability to certify.

The Petitioners request that the Commission adopt a reasonable formula that would permit stations that are forced to operate at lower than authorized HAAT to increase accordingly their ERP. Use of the formula would be within the parameters of certification, so DTV service would not be delayed and service coverage would not be sacrificed. The formula could reasonably err on the side of caution to account for interference concerns, but the goals of the rapid roll-out would still be promoted. The approach would reduce administrative burden by increasing the number of applications that could be certified.

10/ *See Preemption of State and Local Zoning and Land Use Restrictions on the Siting, Placement and Construction of Broadcast Station Transmission Facilities*, Notice of Proposed Rule Making, MM Docket No. 97-182 (rel. Aug. 19, 1997).

V. CONCLUSION

The Petitioners appreciate the opportunity provided by the Commission to comment on the proposals of MSTV and ALTV. The Petitioners support the efforts of groups like ALTV attempting to resolve various DTV obstacles within the framework established by the Commission. The Petitioners believe that, through industry cooperation and negotiation and the Commission's steady guidance, DTV will obtain resounding favor with viewers. The Commission would be ill-advised at this late date, however, to approve of wholesale, unsubstantiated "improvements" proposed to the DTV Table. Real improvements to the DTV Table can and should be made on a case-by-case basis. The Petitioners' own case-by-case analysis illustrates the merit of this approach. The MSTV proposal places PCC, and, by extension, probably most other broadcasters, in a much worse position. Accordingly, for the reasons herein, the Petitioners oppose the MSTV table in its entirety, ask the Commission to permit UHF-to-UHF broadcasters to increase their respective station's ERP and request that the Commission consider its additional suggestions.

Respectfully submitted,

PAXSON COMMUNICATIONS CORPORATION
THE CHRISTIAN NETWORK, INC.
ROBERTS BROADCASTING COMPANY
COCOLA BROADCASTING COMPANIES
DP MEDIA, INC.

By: _____
John R. Feore, Jr.
Scott S. Patrick

Their Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
202-776-2000

December 17, 1997

EXHIBIT A

Petitioners' Television Stations

PETITIONERS

Paxson Communications Corporation, directly and through subsidiaries, is the licensee of the following television stations:

WHAI-TV	Bridgeport, Connecticut
KZKI(TV)	San Bernardino, California
WTGI-TV	Wilmington, Delaware
KLXV-TV	San Jose, California
WGOT(TV)	Merrimack, New Hampshire
WVVI(TV)	Manassas, Virginia
KINZ(TV)	Arlington, Texas
WTLK-TV	Rome, Georgia
KTFH(TV)	Conroe, Texas
WAKC-TV	Akron, Ohio
KXLI(TV)	St. Cloud, Minnesota
KWBF-TV	Flagstaff, Arizona
KUBD(TV)	Denver, Colorado
WCEE(TV)	Mount Vernon, Illinois
WHKE(TV)	Kenosha, Wisconsin
KINB(TV)	Kansas City, Missouri
KOOG-TV	Ogden, Utah
WILV(TV)	Battle Creek, Michigan
KMNZ-TV	Oklahoma City, Oklahoma
WAAP(TV)	Burlington, North Carolina
WOST-TV	Block Island, Rhode Island
WNAL-TV	Gadsden, Alabama
WOCD(TV)	Amsterdam, New York
WTJC(TV)	Springfield, Ohio
KGLB-TV	Okmulgee, Oklahoma
WEFC(TV)	Roanoke, Virginia
WSCO(TV)	Suring, Wisconsin
WSJN(TV)	San Juan, Puerto Rico
WKPV(TV)	Ponce, Puerto Rico
WJWN(TV)	San Sebastian, Puerto Rico

Roberts Broadcasting Company, through subsidiaries and affiliates, is the licensee of the following television stations:

WTWS-TV	New London, Connecticut
WHSL-TV	East St. Louis, Illinois
WKZX-TV	Cookeville, Tennessee
KZAR-TV	Provo, Utah
KTVJ-TV	Boulder, Colorado

Cocola Broadcasting Companies, through affiliates, is the licensee of the following television stations:

KGMC-TV	Fresno, California
KXVO-TV	Omaha, Nebraska

D P Media, Inc., through subsidiaries, is the licensee of the following television stations:

WSHE-TV	Martinsburg, West Virginia
WRMY-TV	Rocky Mount, North Carolina
WCEE-TV	Mt. Vernon, Illinois

The Christian Network, Inc., through subsidiaries, is the licensee of the following television stations:

WCTD-TV	Miami, Florida
WFCT-TV	Bradenton, Florida
WIRB-TV	Melbourne, Florida
WHRC-TV	Norwell, Massachusetts

EXHIBIT B

Effect of MSTV Proposals on PCC Stations

EFFECT OF MSTV PROPOSALS ON PCC STATIONS

STATIONS WITH HIGHER DTV CHANNELS

	MARKET	NTSC	FCC	MSTV
KINZ	DALLAS	68	42	59
KMNZ	OKLAHOMA CITY	62	50	61
WPXN	NEW YORK	31	30	61
WCTD	MIAMI	35	21	41
WGOT	BOSTON	60	34	55
WOAC	CLEVELAND	67	47	63
WSHE	WASHINGTON DC	60	12	55
WSWB	SCRANTON	64	32	65
WTGI	PHILADELPHIA	61	31	68
WTWS	HARTFORD	26	34	50
WVVI	WASHINGTON DC	66	36	46

STATIONS TO MOVE OUT OF THE PROPOSED CORE SPECTRUM

	MARKET	NTSC	FCC	MSTV
KINZ	DALLAS	68	42	59
KMNZ	OKLAHOMA CITY	62	50	61
WPXN	NEW YORK	31	30	61
WGOT	BOSTON	60	34	55
WOAC	CLEVELAND	67	47	63
WSHE	WASHINGTON DC	60	12	55
WSWB	SCRANTON	64	32	65
WTGI	PHILADELPHIA	61	31	68