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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 20, 1998

BY HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

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

Dear Ms. Salas:

Transmitted herewith on behalf of Fant Broadcast Development, L.L.C., are an original and four copies of its "Petition for Reconsideration," which is being filed in response to the Commission's *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24 (released February 23, 1998), in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate directly with this office.

Very truly yours,

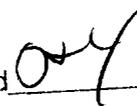


Andrew S. Kersting
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Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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APR 20 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

To: The Commission

PETITION FOR RECONSIDERATION

Fant Broadcast Development, L.L.C. ("Fant"), by its counsel, hereby seeks reconsideration of the Commission's *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24 (released February 23, 1998) ("*MO&O*"), in the above-captioned proceeding.

In support of this petition, the following is stated:

I. Background.

On July 22, 1996, Fant filed an application for a new television station to operate on Channel 51 at Jackson, Mississippi (File No. BPCT-960722KJ).¹ On August 16, 1996, the Commission issued a *Public Notice*, Report No. A-196 (released August 16, 1996), announcing that three previously filed applications for the same facility had been accepted for filing.² The *Public Notice* also announced a cut-off date of October 1, 1996, for filing mutually-exclusive applications for the

¹ Fant's application included a request for waiver of the Commission's order in *Advanced Television Systems and Their Impact on the Existing Television Broadcast Service*, RM-5811, 1987 FCC LEXIS 3477 (July 17, 1987), 52 Fed.Reg. 28346 (1987) ("*Freeze Order*").

² The *Public Notice* listed the applications of Natchez Trace Broadcasting Company (File No. BPCT-960710KU), KB Communications Corporation (File No. BPCT-960710KY), and Edward I.St. Pe (File No. BPCT-960711LI).

Channel 51 facility at Jackson. In response to the Commission's October 1, 1996, cut-off list, five additional applications (excluding Fant's) were filed for the Jackson facility. On January 30, 1998, the applicants filed a "Joint Request for Approval of Universal Settlement," proposing the grant of the application of George S. Flinn, Jr.

II. The Commission Failed to Protect the Pending NTSC Applications For Channel 51 at Jackson.

In its *Sixth Report and Order* in this proceeding, 12 FCC Rcd 14588 (1997), the Commission noted that, in its *Sixth Further Notice of Proposed Rulemaking*, it stated that it would not accept additional applications for new NTSC stations that were filed after September 20, 1996.³ The Commission also noted, however, that it would continue to process applications already on file and those that were filed on or before September 20, 1996, because the Commission did not believe that these applications would have a "significant negative impact" on the development of the DTV Table of Allotments. *Sixth Report and Order*, 12 FCC Rcd at 14635, ¶104. In addition, the Commission stated that when applications for new stations were accepted for filing, it would continue its practice of issuing cut-off lists announcing the opportunity to file competing, mutually-exclusive applications.⁴

In its recent *MO&O*, the Commission repeatedly confirmed that it fully intended to protect pending NTSC applications filed by the September 20, 1996, deadline. *See, e.g., MO&O* at ¶¶571,

³ *See Sixth Further Notice of Proposed Rulemaking*, 11 FCC Rcd 10968, 10992 ¶60 (1996) ("*Sixth Further Notice*"). Specifically, the Commission stated that it would not accept additional applications for NTSC stations that were filed after 30 days from the publication of the *Sixth Further Notice* in the Federal Register. A summary of the *Sixth Further Notice* was published in the Federal Register on August 21, 1996. *See* 61 Fed.Reg. 43209 (1996).

⁴ *Report and Order*, ¶104; *Sixth Further Notice*, ¶60.

575, 608, 627. Nevertheless, the DTV Table set forth in the *MO&O* fails to protect the pending NTSC applications for the Channel 51 facility at Jackson because it contains a co-channel DTV allotment for the same community. As stated above, the applications of Fant and the other competing applicants for the NTSC Channel 51 facility at Jackson either were on file by September 20, 1996, or were filed in response to a cut-off list affording the opportunity to file competing applications. The Commission's failure to protect the pending NTSC applications for Channel 51 at Jackson is inconsistent with the statements the Commission made in its *Sixth Further Notice* and *Sixth Report and Order*, and the Commission neglected to provide any explanation for its failure to consider the pending applications in establishing the DTV Table. Therefore, for this reason alone, the DTV Table contained in the *MO&O* should be revised to accommodate the existing NTSC allotment of Channel 51 at Jackson, Mississippi, and the pending applications for that facility.

III. The Commission Should Substitute DTV Channel 53 for the DTV Channel 51 Allotment at Jackson, Mississippi, or, Alternatively, the Pending Applicants for the NTSC Channel 51 Facility at Jackson Should be Permitted to Amend Their Respective Pending NTSC Applications to Specify an Available Alternative Channel.⁵

As stated above, the NTSC allotment of Channel 51 at Jackson, Mississippi is severely short-spaced to a co-channel DTV allotment for Station WLBT(TV), Jackson, Mississippi. Assuming, *arguendo*, the Commission should determine that its failure to consider the pending NTSC applications for the Channel 51 facility at Jackson does not constitute a sufficient basis, in itself, for granting reconsideration of the allotment of DTV Channel 51 to the same community, the Commission has stated throughout this proceeding that it intends to give broadcasters the flexibility

⁵ In light of the pending settlement proposal in the Jackson television proceeding, for all practical purposes, it is necessary only for the prevailing applicant, George S. Flinn, Jr., to amend his application to specify operation on an available alternative channel.

to develop alternative allotment plans where they do not result in additional interference to other stations and/or allotments. In order to accommodate the pending applications for the NTSC Channel 51 facility at Jackson, Fant respectfully requests that the Commission change the DTV allotment for Station WLBT(TV), Jackson, from Channel 51 to Channel 53. As demonstrated in the attached engineering materials, the substitution of DTV Channel 53 for Channel 51 at Jackson would result in Station WLBT(TV) continuing to receive a 100% replication match, and would cause only negligible interference (less than 0.05%) to any digital or NTSC stations.

Alternatively, in the event the Commission elects not to substitute DTV Channel 53 for Channel 51 at Jackson, Fant requests that the applicants for the NTSC Channel 51 facility at Jackson be permitted to amend their respective applications to specify operation either on Channel 53, 57 or 59. As shown in the attached engineering materials, operation on any of these NTSC channels will not cause interference to any other DTV facility.

The proposed substitution of DTV Channel 53 for Channel 51 at Jackson, or, alternatively, permitting the applicants in the Jackson television proceeding to amend their respective NTSC applications to specify operation on any one of the available alternative channels at Jackson, would effectuate the Commission's pronouncements in its *Sixth Further Notice* and *Sixth Report and Order* that it would protect those pending NTSC applications that were filed on or before September 20, 1996.

IV. The Proposals Set Forth Herein Would Provide Substantial Public Interest Benefits.

In this case, either substituting an alternative DTV channel for Channel 51 at Jackson, or permitting the applicants to amend their respective NTSC applications to specify operation on any

one of the available alternative NTSC channels set forth above would serve the public interest by promoting the emergence and development of new networks.⁶ As far back as 1941, when the Commission adopted its Chain Broadcasting Rules,⁷ a primary goal of the Commission was to remove barriers that would inhibit the development of new networks. The Commission explained that the Chain Broadcasting Rules were intended to “foster and strengthen broadcasting by opening up the field to competition. An open door to networks will stimulate the old and encourage the new.” *Report on Chain Broadcasting* at 88.

The successful emergence of new networks, however, depends in large part upon their ability to attract and retain local affiliates, which is the life blood of any national network. Moreover, for emerging networks, it is critical that they be afforded the opportunity to compete for affiliates as

⁶ Fant’s application for the Jackson facility was filed in tandem with a series of other applications which, together, cover many of the top 100 markets in which there are no full power television stations to primarily affiliate with The WB Television Network (“The WB”), with whom these respective applicants have existing affiliations. Although there is no commitment on the part of either the applicants or The WB to enter into an affiliation agreement, The WB has indicated a willingness to enter into an affiliation agreement with these applicants in the event they are successful in acquiring a station in their respective communities. It should be made clear, however, that the public interest benefit of promoting an emerging network will be achieved regardless of which applicant ultimately acquires the construction permit. The important element is that the NTSC allotment be preserved and that the station become operational and available for affiliation. By the same token, the public interest benefit of promoting emerging networks is served regardless of whether it is The WB or some other new network that gains a primary affiliate in a top 100 market.

⁷ See *Report on Chain Broadcasting*, Commission Order No. 37, Docket 5060 (May 1941) at 88 (“*Report on Chain Broadcasting*”); *Amendment of Part 73 of the Commission’s Rules and Regulations with Respect to Competition and Responsibility in Network Television Broadcasting*, 25 FCC 2d 318, 333 (1970); *Fox Broadcasting Co. Request for Temporary Waiver of Certain Provisions of 47 C.F.R. §73.658*, 5 FCC Rcd 3211, 3211 n.9 (1990), (citing, Network Inquiry Special Staff, *New Television Networks: Entry, Jurisdiction, Ownership, and Regulation* (Vol. 1 Oct. 1980)), waiver extended, 6 FCC Rcd 2622 (1991).

quickly as possible. Indeed, the large financial losses that confront any national network in its initial years of operation can be stemmed only by obtaining additional affiliates to carry the emerging network's programming. In many markets, however, there simply are not enough stations to provide affiliates for emerging networks in addition to those of the more established networks. Thus, the Commission should make the requested change in the DTV Table which, by permitting an additional broadcast station to serve the Jackson television market, will help promote emerging networks.

Although the Commission has noted that it is not its function to assure competitive equality in any given market, it has acknowledged its "duty at least to take such actions as will create greater opportunities for more effective competition among the networks in major markets."⁸ The history of the Commission's financial interest and syndication ("finsyn") rules provides a good illustration of how the Commission has remained steadfast in its commitment to the goal of nurturing new networks. In 1970, when the Commission first adopted the finsyn rule, it noted that "[e]ncouragement of the development of additional networks to supplement or compete with existing networks is a desirable object and has long been the policy of this Commission." *Competition and Responsibility in Network Television Broadcasting*, 25 FCC 2d at 333. More than two decades later, when the Commission first relaxed and later eliminated the finsyn rule, it did so at the behest of the

⁸ See, e.g., *Television Broadcasters, Inc.*, 4 RR 2d 119, 123 (1965) (Commission granted a short-spacing waiver to an ABC affiliate based largely upon its finding that the station had inferior facilities compared to those available to other national networks in the market, which resulted in a "serious competitive imbalance"), *recon. granted in part on other grounds*, 5 RR 2d 155 (1965); *New Orleans Television Corp.*, 23 RR 1113 (1962) (short-spacing waiver granted for the purpose of assuring the existence of a third truly competitive station in the market, thereby making available competitive facilities to the networks).

then-newest network entrant, Fox.⁹ The FCC's goal of fostering new networks also is reflected in the Commission's relaxation of its multiple ownership rules. *See Amendment of Section 73.3555 of the Commission's Rules Relating to Multiple Ownership of AM, FM, and Television Broadcast Stations*, 100 FCC 2d 17, 50 (1984) (relaxing restrictions on multiple ownership advances the Commission's diversity goal by providing alternatives to the three television networks).

The Commission also has crafted other rules and granted a variety of waivers designed to foster the development of new networks over the years. In 1967, for example, the Commission granted a waiver of the dual network rule to ABC, the then-new network entrant, in connection with ABC's four new specialized radio networks. Although operation of the four networks violated the dual network rule, the Commission nevertheless concluded that waiver of the rule was appropriate because ABC's proposal "merits encouragement as a new and imaginative approach to networking." *Proposal of American Broadcasting Cos., Inc. to Establish Four New Specialized "American Radio Networks,"* 11 FCC 2d 163, 168 (1967). The Commission explained that it was "of more than usual

⁹ Pending its review of the finsyn rule, the Commission granted Fox's request for a limited waiver of the rule. *Fox Broadcasting Co.*, 5 FCC Rcd at 3211 (1990). As Commissioner Duggan explained, "Fox has been a bright and innovative force. The existence of a fourth network is certainly in the public interest. . . . Fox deserves to be encouraged." *Broadcasting & Cable*, May 7, 1990, ed., p. 28; accord, *Application of Fox Television Stations, Inc. for Renewal of License of Station WNYW-TV, New York, New York*, 10 FCC Rcd 8502, 8528-29 (1995) (Commissioner Quello stating in his concurring statement, "I believe . . . that the creation of the fourth network was a compelling public interest goal."). Similarly, in deciding to phase out the finsyn rule entirely in 1995, the Commission evaluated the rule's impact on "[t]he overall business practices of emerging networks, such as Fox, in the network television and syndication business . . . [and t]he growth of additional networks, including the development of Fox and its position vis-à-vis the three major networks." *Evaluation of Syndication and Financial Interest Rules*, 10 FCC Rcd 12165, 12166 (1995).

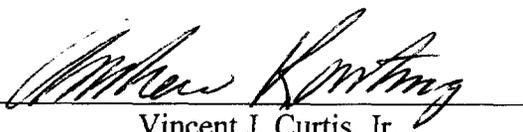
importance to encourage to the extent possible innovation and experimentation in the operation of networks." *Id.* at 165.

As these examples illustrate, the Commission has remained steadfast in its commitment to the goal of encouraging new networks. Indeed, the Commission has consistently concluded for more than fifty years that the development of new networks -- with the accompanying diversity of viewpoint that they bring -- serves the public interest. In order for emerging networks to survive, however, it is imperative that they be afforded the opportunity to compete for additional local affiliates. The requested change in the DTV Table of Allotments will help facilitate the Commission's longstanding interest in promoting the emergence of new networks by providing an additional broadcast station with which to affiliate in the Jackson market.

WHEREFORE, in light of the foregoing, Fant Broadcast Development, L.L.C., respectfully requests that the Commission GRANT reconsideration of its *MO&O* by substituting DTV Channel 53 for Channel 51 at Jackson, Mississippi, or, alternatively, permit the applicants for the NTSC Channel 51 facility at Jackson to amend their respective pending applications to specify operation on any one of the available alternative NTSC channels set forth herein.

Respectfully submitted,

FANT BROADCAST DEVELOPMENT, L.L.C.

By: 
Vincent J. Curtis, Jr.
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Its Counsel

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(703) 812-0400

April 20, 1998
c:\ask...wb\rm\jackson.pet

Engineering Statement
Jackson, MS, Channel 51
Wes, Inc. Broadcast Consultants

The program used to demonstrate interference and service replication percentages in this study was the OET FLR program, OET Bulletin 69, running on our own Sun Microsystems computers. These computers have been verified to give identical results to the runs generated by OET. The spacing programs are our own proprietary programs utilizing the FCC broadcast database and DTV database.

Due to a digital channel Channel 51 being assigned to Jackson, MS 15.77km away, a study was conducted to propose moving the digital channel 51 to channel 53. The study showed that it would receive a 100% match and would cause negligible interference to any digital or NTSC stations (less than 0.05%).

Should the Commission prefer moving the proposed NTSC channel 51 in Jackson, MS, the TV channel spacing study shows channel 53, 57, and 59 open to such a change. Also, the attached list of digital channels within 300 km shows no conflict on channels 53, 57, and 59 with any digital channels.



Pete E Myrl Warren, III Date
Whose qualifications are a matter of
record with the Commission

Jackson, MS, Digital Channel 51 moved to Digital Channel 53

Run begins Fri Apr 17 14:49:15 1998, host providence

Analysis of: 3N MS JACKSON

	POPULATION	AREA (sq km)
within Noise Limited Contour	932820	47559.1
not affected by terrain losses	909831	46404.7
lost to NTSC IX	176074	11898.9
lost to additional IX by ATV	0	0.0
lost to all IX	176074	11898.9

Analysis of: 53A MS JACKSON

HAAT 610.0 m, ATV ERP 1000.0 kW, Cap Adj 4.3 dB 270.0 deg T, F/B = 0.3 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	932820	47559.1
not affected by terrain losses	917375	46836.6
lost to NTSC IX	1155	60.5
lost to additional IX by ATV	28472	2490.4
lost to ATV IX only	28536	2502.5
lost to all IX	29627	2550.9
percent match ATV/NTSC	98.0	98.6

Finished Fri Apr 17 15:05:11; run time 0:14:20

55598 calls to Longley-Rice; path distance increment 1.00 km

Jackson, MS, as it is presently on Digital Channel 51

Run begins Fri Apr 17 13:44:32 1998, host gilwell

Analysis of: 3N MS JACKSON

	POPULATION	AREA (sq km)
within Noise Limited Contour	932820	47559.1
not affected by terrain losses	909831	46404.7
lost to NTSC IX	176074	11898.9
lost to additional IX by ATV	0	0.0
lost to all IX	176074	11898.9

Analysis of: 51A MS JACKSON

HAAT 610.0 m, ATV ERP 1000.0 kW, Cap Adj 4.1 dB 270.0 deg T, F/B = 0.3 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	932820	47559.1
not affected by terrain losses	918725	46856.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2167	157.4
lost to ATV IX only	2167	157.4
lost to all IX	2167	157.4
percent match ATV/NTSC	100.0	99.8

Finished Fri Apr 17 14:00:57; run time 0:14:16

52501 calls to Longley-Rice; path distance increment 1.00 km

***** TV CHANNEL SPACING STUDY *****

Job title: JACKSON, MS
 Channel: 53
 Database file name: c:\tvsvr\tv980408.edx

Latitude: 32 17 44
 Longitude: 90 14 44

CH	Call	Record No.	City	ST	Z	STS	Bear.	Dist.	Reqd. Dist.	Result
53o	WPAN	3576	FORT WALTON BEACH	FL	3	L	123.4	374.0	329.0	45.0
51o	NEW	4218	JACKSON	MS	2	A	38.8	56.3	31.4	24.9
51o	NEW	4219	JACKSON	MS	2	A	38.8	56.3	31.4	24.9
51o	ALLOTM	4444	JACKSON	MS	2		86.5	5.1	31.4	-26.3
51o	NEW	4445	JACKSON	MS	2	A	251.2	4.9	31.4	-26.5
51o	NEW	4446	JACKSON	MS	2	A	27.2	33.7	31.4	2.3
51o	NEW	4447	JACKSON	MS	2	A	29.1	44.0	31.4	12.6
51o	NEW	4448	JACKSON	MS	2	A	.0	.0	31.4	-31.4
51o	NEW	4449	JACKSON	MS	2	A	251.2	4.9	31.4	-26.5
51o	NEW	4450	JACKSON	MS	2	A	31.2	41.4	31.4	10.0
51o	NEW	4451	JACKSON	MS	2	A	247.7	16.1	31.4	-15.3

***** End of channel 53 study *****

***** TV CHANNEL SPACING STUDY *****

Job title: JACKSON, MS
 Channel: 57
 Database file name: c:\tvsrc\tv980408.edx

Latitude: 32 17 44
 Longitude: 90 14 44

CH	Call	Record No.	City	ST	Z	STS	Bear.	Dist.	Reqd. Dist.	Result
42+	ALLOTM	4643	NATCHEZ	MS	3		233.5	136.5	119.9	16.6
42+	NEW	4644	NATCHEZ	MS	3	A	231.7	140.1	119.9	20.2

***** End of channel 57 study *****

***** TV CHANNEL SPACING STUDY *****

Job title: JACKSON, MS
 Channel: 58
 Database file name: c:\tvsrc\tv980408.edx

Latitude: 32 17 44
 Longitude: 90 14 44

CH	Call	Record No.	City	ST	Z	STS	Bear.	Dist.	Reqd. Dist.	Result
51o	NEW	4218	JACKSON	MS	2	A	38.8	56.3	95.7	-39.4
51o	NEW	4219	JACKSON	MS	2	A	38.8	56.3	95.7	-39.4
51o	ALLOTM	4444	JACKSON	MS	2		86.5	5.1	95.7	-90.6
51o	NEW	4445	JACKSON	MS	2	A	251.2	4.9	95.7	-90.8
51o	NEW	4446	JACKSON	MS	2	A	27.2	33.7	95.7	-62.0
51o	NEW	4447	JACKSON	MS	2	A	29.1	44.0	95.7	-51.7
51o	NEW	4448	JACKSON	MS	2	A	.0	.0	95.7	-95.7
51o	NEW	4449	JACKSON	MS	2	A	251.2	4.9	95.7	-90.8
51o	NEW	4450	JACKSON	MS	2	A	31.2	41.4	95.7	-54.3
51o	NEW	4451	JACKSON	MS	2	A	247.7	16.1	95.7	-79.6

***** End of channel 58 study *****

***** TV CHANNEL SPACING STUDY *****

Job title: JACKSON, MS
 Channel: 59
 Database file name: c:\tvsrc\tv980408.edx

Latitude: 32 17 44
 Longitude: 90 14 44

CH	Call	Record No.	City	ST	Z	STS	Bear.	Dist.	Reqd. Dist.	Result
45o	ALLOTM	4203	COLUMBIA	MS	3		161.4	121.8	95.7	26.1
45o	NEW	4204	COLUMBIA	MS	3	A	161.0	120.6	95.7	24.9
51o	NEW	4218	JACKSON	MS	2	A	38.8	56.3	31.4	24.9
51o	NEW	4219	JACKSON	MS	2	A	38.8	56.3	31.4	24.9
51o	ALLOTM	4444	JACKSON	MS	2		86.5	5.1	31.4	-26.3
51o	NEW	4445	JACKSON	MS	2	A	251.2	4.9	31.4	-26.5
51o	NEW	4446	JACKSON	MS	2	A	27.2	33.7	31.4	2.3
51o	NEW	4447	JACKSON	MS	2	A	29.1	44.0	31.4	12.6
51o	NEW	4448	JACKSON	MS	2	A	.0	.0	31.4	-31.4
51o	NEW	4449	JACKSON	MS	2	A	251.2	4.9	31.4	-26.5
51o	NEW	4450	JACKSON	MS	2	A	31.2	41.4	31.4	10.0

Computing Tools FCC Database Reports Rev 1.4
 Digital TV Stations within 280.000 of 032-17-44 090-14-44
 Accuracy and completeness of these results is NOT assured.

St City	channel	latitude	longitude	distance, (km),	bearing (degrees)
LA New Orleans	11	29-57-14	089-56-58	261.147,	173.79121
LA New Orleans	14	29-55-11	090-01-29	264.244,	175.42716
LA New Orleans	15	29-58-55	089-56-58	258.055,	173.71745
MS Biloxi	16	30-45-14	088-56-44	210.863,	144.15746
MS West Point	16	33-47-40	089-05-16	198.312,	33.04718
MS Greenville	17	33-39-26	090-42-18	156.999,	344.12362
MS B\ude	18	31-22-19	090-45-05	113.052,	205.05978
AL Demopolis	19	32-22-01	087-52-03	224.043,	87.97511
LA Monroe	19	32-11-45	092-04-10	172.243,	266.31909
MS Jackson	20	32-12-46	090-22-54	15.772,	234.41076
MS Jackson	21	32-16-39	090-17-41	5.046,	246.62170
LA Slidell	24	30-17-08	089-54-18	225.197,	171.72119
LA Baton Rouge	25	30-22-22	091-12-16	231.893,	203.17488
MS Greenwood	25	33-22-34	090-32-32	123.009,	346.94963
LA Alexandria	26	31-33-56	092-32-50	232.224,	249.60075
MS Meridian	26	32-18-43	088-41-33	146.282,	89.28816
AR El Dorado	27	33-04-41	092-13-41	205.180,	295.01938
MS Laurel	28	31-27-12	089-17-05	130.334,	135.76746
LA New Orleans	29	29-57-14	089-56-58	261.147,	173.79121
LA New Orleans	30	29-54-23	090-02-23	265.608,	175.75999
LA New Orleans	31	29-58-57	089-57-09	257.962,	173.78030
MS Meridian	31	32-19-34	088-41-12	146.847,	88.67788
LA Alexandria	32	31-33-54	092-33-00	232.492,	249.60914
LA Baton Rouge	34	30-19-35	091-16-36	239.374,	204.20830
LA Alexandria	35	31-02-15	092-29-45	254.950,	236.82996
MS Columbus	35	33-45-06	088-52-40	205.932,	38.35653
LA West Monroe	36	32-05-41	092-10-39	183.528,	263.03041
MS Oxford	36	34-17-26	089-42-24	226.880,	12.78184
LA West Monroe	38	32-30-21	092-08-54	180.529,	277.42125
MS Mississippi Stat	38	33-21-07	089-08-56	155.789,	41.23718
MS Biloxi	39	30-43-25	089-05-29	205.906,	147.82727
LA New Orleans	40	29-58-41	089-56-26	258.578,	173.54106
MS Jackson	41	32-14-26	090-24-15	16.141,	247.79929
LA Baton Rouge	42	30-17-49	091-11-40	239.297,	202.18120
LA New Orleans	43	29-57-01	089-57-28	261.461,	173.97374
MS Meridian	44	32-08-18	089-05-36	110.012,	99.11822
LA Baton Rouge	45	30-19-35	091-16-36	239.374,	204.20830
LA Baton Rouge	46	30-21-58	091-12-47	232.897,	203.28941
MS Gulfport	48	30-44-48	089-03-30	205.447,	146.70965
MS Meridian	49	32-19-38	088-41-28	146.431,	88.62589
MS Natchez	49	3140-08	091-41-30	198.442,	223.72750
LA New Orleans	50	29-55-11	090-01-29	264.244,	175.42716
MS Jackson	51	32-12-46	090-22-54	15.772,	234.41076
MS Jackson	52	32-14-26	090-24-15	16.141,	247.79929
MS Greenwood	54	33-22-23	090-32-31	122.673,	346.92550
LA Monroe	55	32-11-45	092-04-10	172.243,	266.31909

LA Columbia	57	32-03-19	092-11-12	185.004,	261.71971
MS Tupelo	57	33-47-40	089-05-16	198.312,	33.04718
MS Hattiesburg	58	31-24-20	089-14-13	137.301,	135.95036

End of report.

CERTIFICATE OF SERVICE

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 20th day of April, 1998, copies of the foregoing "Petition for Reconsideration" were hand delivered or mailed first-class, postage pre-paid, to the following:

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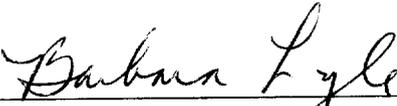
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