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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

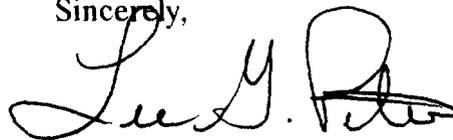
RE: Comments of WWAC, Inc.
MM Docket No. 87-268

Dear Ms. Salas:

Transmitted herewith is an original and four (4) copies of Comments to be associated with the above-referenced proceeding, filed on behalf of WWAC, Inc., licensee of Station WWAC(TV), Atlantic City, New Jersey.

Should you have any questions, please contact undersigned counsel.

Sincerely,



Vincent A Pepper
Lee G. Petro

Counsel for WWAC, Inc.

Enclosures

File of the Commission received

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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)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

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JUN 2 - 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: The Commission

COMMENTS OF WWAC, INC

WWAC, Inc. ("WWAC"), by its attorneys, hereby submits the following Comments in the above-referenced proceeding. These Comments are filed in response to the "Further Petition for Reconsideration" filed by Maranatha Broadcasting Company, Inc. on April 20, 1998, and the related "Comments" filed by Mountain Broadcasting Corporation on May 22, 1998.

Both pleadings attempt to resolve the severe short-spacing in the Northeastern United States caused by the Commission's adoption of digital television allotments. Memorandum Opinion and Order On Reconsideration of the Sixth Report and Order, FCC 98-24 (rel. Feb. 23, 1998). Maranatha proposed that the Commission change the allocation of Station WWAC(TV) from Channel 46 to Channel 8 to eliminate interference with its station, which would also operate on digital Channel 46 in Allentown, Pennsylvania. As part of its pleading, Maranatha determined that Station WWAC(TV) could be allocated channels 8, 25, or 50.

In response, Mountain Broadcasting opposed the change of Station WWAC to Channel 8, citing additional interference to its station, which will also be operating on digital Channel 8 in Newton, New Jersey.

In light of Maranatha "Further Petition", and Mountain's responsive "Comments", WWAC proposes that the Commission change the digital allocation for Station WWAC(TV) from Channel 46 to Channel 50. This change would eliminate the conflict between Stations WWAC(TV) and WFMZ-TV on Channel 46, and the conflict between Stations WWAC(TV) and WMBC-TV on Channel 8.

In addition, WWAC notes that the allocation of Station WWAC(TV) on Channel 50 was also proposed by Association for Maximum Service Television, Inc, and WWAC supported this proposal in its "Second Further Petition for Reconsideration", which was filed on December 17, 1997.

Therefore, in order to eliminate the interference between Stations WWAC(TV), WFMZ-TV, and WMBC-TV, WWAC, Inc. hereby proposes that the Commission change the digital allocation for Station WWAC(TV) from Channel 46 to Channel 50.

Respectfully submitted,

WWAC, INC.

By



Vincent A Pepper

Lee G. Petro

Its Attorneys

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June 2, 1998

CERTIFICATE OF SERVICE

I, Lisa A. Skoritoski, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that on this 2nd of June, 1998, copies of the foregoing Comments were mailed, postage prepaid, to the following:

*The Honorable William E. Kennard
Chairman
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

*Mr. Bruce Franca
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, NW, Room 480
Washington, DC 20554

*The Honorable Michael K. Powell
Commissioner
Federal Communications Commission
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*Mr. Alan Stillwell
Office of Engineering and Technology
Federal Communications Commission
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*The Honorable Harold Furchtgott-Roth
Commissioner
Federal Communications Commission
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*Mr. Robert Eckert
Office of Engineering and Technology
Technical Research Branch
Federal Communications Commission
2000 M Street, NW, Room 230
Washington, DC 20554

*The Honorable Susan Ness
Commissioner
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*Mr. Gordon Godfrey
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*The Honorable Gloria Tristani
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*Roy J. Stewart, Chief
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*Clay Pendarvis, Chief
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Lisa A. Skoritoski

* Via Hand Delivery