

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

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Amendment of Section 73.622(b),  
Table of allotments,  
Digital Television broadcast Stations.  
(Kingston, New York)

) MM Docket No. 00-121  
) RM-9674

To: Chief, Video Services Division  
Mass Media Bureau (Mail Stop 1800E1)

**REPLY COMMENTS OF WKOB COMMUNICATIONS, INC.**

1. WKOB Communications, Inc. ("WKOB") is the licensee of WKOB-LP, New York, New York, and filed initial comments in this proceeding demonstrating that the proposal to substitute DTV Channel 48 for Channel 21 at Kingston, New York, would destroy WKOB-LP without good cause and would not be in the public interest.

2. WKOB is aware of initial comments filed by only two other parties. WRNN-TV Associates Limited Partnership ("WRNN"), licensee of WRNN-TV and the proponent herein, filed the required statement reiterating its support for the proposal. Long Island Educational Television Council, Inc. ("LIETC"), licensee of WLIW-TV, Garden City, New York, filed comments supporting the proposal because it would remove what WRNN claims would be a potential source of co-channel interference to WLIW-TV. Neither WRNN or LIETC addressed the WKOB-LP situation, because neither had seen WKOB's comments at the time they filed their comments. WKOB expects them to address WKOB-LP in their reply comments.

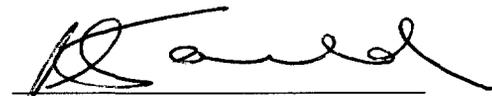
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3. Meanwhile, however, WKOB's arguments have merit and require that the proposed channel change not be adopted. As discussed in WKOB's initial comments, established Commission policy requires that the proponent of a channel change that would destroy an LPTV station, WRNN has not even begun to meet that burden, and it will not be able to meet that burden in this case. Thus the *status quo* must be maintained, or WRNN must find a channel other than Channel 48 if it still wishes not to construct DTV facilities on Channel 21. LIETC's comments do not require any different result, because it has made no showing apart from adopting WRNN's showing with regard to interference, and there has been no showing by anyone of where the interference areas lie, what other public television services are available in those areas, or whether residents of land areas separated from WLIW-TV's community by the Long Island Sound rely on WLIW-TV for any unique local services that warrant the destruction of WKOB-LP.

4. In light of the foregoing, WKOB respectfully submits that the Digital Table of Allotments should not be changed as proposed in this proceeding.

Irwin, Campbell & Tannenwald, P.C.  
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Respectfully submitted,

  
Peter Tannenwald

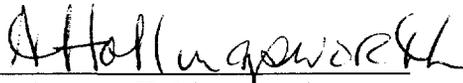
September 5, 2000

**CERTIFICATE OF SERVICE**

I, Annette Hollingsworth, do hereby certify that I have, this 5th day of September, 2000, caused to be sent by first class United States mail, postage prepaid, copies of the foregoing "Reply Comments of WKOB Communications, Inc." to the following:

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Wiley, Rein & Fielding  
1776 K St., N.W.  
Washington, DC 20006  
counsel for WRNN-TV Associates Limited Partnership

Terrel L. Cass, President and General Manager  
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Plainview, NY 11803

  
Annette Hollingsworth