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December 4, 2000

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FEDERAL COMMUNICATIONS COMMISSION
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Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

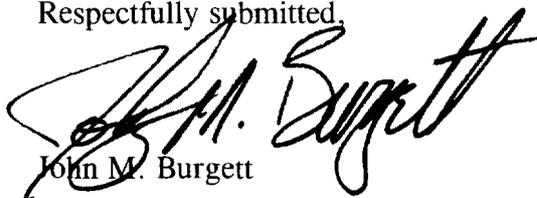
Re: Amendment of Section 73.622(b),
Table of Allotments,
Digital Television Broadcast Stations
(New Orleans, Louisiana)
MM Docket No. 00-188,
RM-9969

Dear Ms. Salas:

Submitted herewith, on behalf of WWL-TV, Inc., the petitioner in the above-referenced proceeding, are an original and four copies of its reply comments in support of the Notice of Proposed Rule Making in the above-referenced proceeding.

If there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,



John M. Burgett

Enclosures

cc: All Parties on Certificate of Service

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Before the
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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)
)
Amendment of Section 73.622(b),) MM Docket No. 00-188
Table of Allotments) RM - 9969
Digital Television Broadcast Stations)
(New Orleans, Louisiana))

To: Chief, Video Services Division

**REPLY COMMENTS
OF WWL-TV, INC.
IN SUPPORT OF RULE MAKING**

WWL-TV, Inc. ("WWL"), the licensee of WWL-TV (NTSC Channel 4), New Orleans, Louisiana, by its attorneys, hereby submits these reply comments in further support of the Notice of Proposed Rule Making (the "NPRM") proposing to substitute digital television ("DTV") Channel 36 for WWL-TV's currently authorized DTV Channel 30.¹

As shown in WWL's original Petition for Rule Making (dated September 14, 1999), supplements thereto and the comments filed in this proceeding, the substitution of DTV Channel 36 for DTV Channel 30 at New Orleans is a preferable use of the digital television spectrum and should be authorized because it would eliminate the significant interference that would otherwise be caused to the adjacent channel DTV allotments of WVUE-DT and WLAE-DT in New Orleans (DTV Channels 29 and 31, respectively) and to WGBC-TV, NTSC Channel 30, in Meridian, Mississippi. In addition, as WWL has demonstrated and the Commission has

¹ See Notice of Proposed Rule Making, MM Docket No. 00-188, RM-9969 (rel. Oct. 4, 2000).

acknowledged in the NPRM, WWL-DT's proposed channel change complies with the Commission's principle community coverage requirements of Section 73.625(a) and is acceptable under the Commission's criterion for *de minimis* impact under Section 73.623(c)(2). Finally, WWL notes that the only other party submitting comments in this proceeding, Iberia Communications, LLC ("Iberia"), also supports the allotment of DTV Channel 36 to WWL-DT. Accordingly, there is no impediment to prompt Commission adoption of WWL's proposal to substitute DTV Channel 36 for DTV Channel 30 at New Orleans.

Iberia is an applicant for vacant NTSC Channel 36 at New Iberia, Louisiana, and has requested a waiver of the Commission's freeze on the acceptance of applications for new NTSC stations located within the "TV freeze areas" specified in *Advanced Television Systems and Their Impact on the Existing Television Broadcast Service*, RM-5811, 52 Fed. Reg. 28346 (1987). In view of WWL-DT's proposed operation on DTV Channel 36, Iberia filed a petition for rule making pursuant to the Commission's *Public Notice*, DA 99-2605, released November 22, 1999, seeking the substitution of Channel 53 for Channel 36 at New Iberia. The Commission, however, has yet to take any action on Iberia's petition. To further the Commission's expressed interest in bringing additional voices and services to television viewers, WWL encourages the Commission promptly to issue a Notice of Proposed Rule Making and expedite action on Iberia's separate Channel 53 proposal so that the agency may preserve a television channel for service to New Iberia following authorization of WWL-DT's use of Channel 36 at New Orleans.

Conclusion

WWL herein reiterates its present intention to apply for DTV channel 36 at New Orleans, Louisiana if it is allotted and, if authorized, to build a DTV facility promptly. Accordingly, WWL respectfully requests that the Commission amend the DTV Table of Allotments to allot

and assign DTV channel 36 (in lieu of channel 30) to New Orleans, Louisiana, for use by WWL-
DT.

Respectfully submitted,

WWL-TV, INC.

By: 
Richard E. Wiley
John M. Burgett

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(202) 719-7000

Its Attorneys

December 4, 2000

CERTIFICATE OF SERVICE

I, Wendy Marcus, a secretary in the law firm of Wiley, Rein & Fielding, hereby certify that on this 4th day of December, 2000, I caused copies of the foregoing "Reply Comments of WWL-TV, Inc. In Support of Rule Making" to be mailed via first-class postage prepaid mail to the following:

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Federal Communications Commission
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Washington, DC 20554

Barbara Kreisman, Esq.
Chief, Video Services Division
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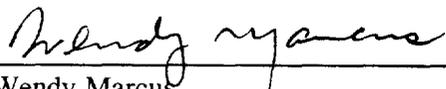
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