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

DEC 4 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.622(b))
Table of Allotments,)
Digital Television Broadcast Stations)
(Corpus Christi, Texas))
)

MM Docket No. 00-198
RM-9980

To: Chief, Video Services Division
Mass Media Bureau

COMMENTS OF KVOA COMMUNICATIONS, INC.

KVOA Communications, Inc. ("KVOA Communications"), licensee of KRIS-TV, Corpus Christi, Texas, by its attorneys and pursuant to Sections 1.401 of the Commission's Rules (47 C.F.R. § 1.401), hereby respectfully submits these comments regarding the above-captioned *Notice of Proposed Rule Making* ("Notice") released by the Commission on October 13, 2000. The *Notice* seeks comment on KVOA Communications's request, as set forth in its *Petition for Rule Making* ("Petition"), that the Commission amend Section 73.622(b), the DTV Table of Allotments, by substituting Channel 13 as the station's paired DTV allocation for the transition period in lieu of Channel 50, as originally allotted.

KVOA Communications hereby reaffirms the justification for the proposed DTV allotment change advanced in detail in the *Petition* and reconfirms its desire and intent to construct and operate Station KRIS-DT on Channel 13, as proposed. Upon the Commission's adoption of changes in the DTV Table of Allotments as described in the *Notice*, KVOA Communications will timely file an application specifying the operation of KRIS-DT on Channel

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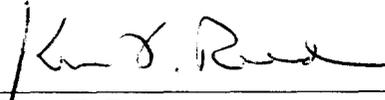
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13 at the parameters proposed in the *Petition* and in accordance with applicable Commission rules and policies governing construction and commencement of operation.

THEREFORE, for the reasons previously set forth in the *Petition*, KVOA Communications respectfully requests that the Commission promptly adopt the changes proposed in the *Notice* and amend Section 73.622(b) of its Rules to substitute Channel 13 for Channel 50 for use by KRIS-DT at the specified reference point in Corpus Christi, Texas.

Respectfully Submitted,

KVOA COMMUNICATIONS, INC.

By: 
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Dated: December 4, 2000