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1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
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RECEIVED July 19, 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Clay Pendarvis
Associate Chief, Video Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Request for Extension of Time to Respond to Media
Bureau's Letter 1800E1-PB in MB Docket No. 02-66**

Dear Mr. Pendarvis:

Vermont Educational Television, Inc. ("VETV"), licensee of station WVER(TV), Rutland, Vermont, by its undersigned attorneys, hereby respectfully requests a 30-day extension of time to respond to your letter dated June 24, 2002 ("Letter"). The Letter directs VETV to submit within 30 days an appropriate amendment to its petition for rulemaking proposing substitution of DTV channel *9 for WVER(TV)'s assigned DTV channel *56 at Rutland, Vermont eliminating predicted interference to NTSC channel 9 at Sherbrooke, Quebec or, in the alternative, to submit a Longley-Rice analysis showing less than 2% interference. VETV is working with its outside engineer to provide the information requested by the Bureau; however, the engineer has not had sufficient time to complete the comprehensive technical analysis suggested by the Bureau in the Letter. While the engineer is optimistic that he can finish the study shortly, VETV will need time to analyze his findings and to prepare its response to the Bureau.

One issue complicating the timing with respect to this matter is that, although the Letter is dated June 24, 2002, it was postmarked July 5, 2002, and counsel to VETV did not receive it until July 8, 2002, approximately two weeks before its response was due.¹ To give VETV sufficient time to review the engineering study and to address thoroughly the issues raised by the Bureau, VETV therefore requests that the Bureau extend the time that VETV has to respond to the Letter for an additional 30 days, or until August 23, 2002. Such action by the Bureau will allow VETV to make an informed decision regarding the most appropriate course of action.

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¹ A copy of the Letter, including the postmark, is attached as Exhibit A.

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Mr. Clay Pendarvis
July 19, 2002
Page 2

We appreciate your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Amy L. Levine".

Jennifer A. Johnson
Amy L. Levine
Counsel to VETV

cc: Ms. Marlene H. Dortch, Secretary
Mr. James McLuckie, International Bureau



Federal Communications Commission
Washington, D.C. 20554

Jennifer A. Johnson
Covington & Burling
1201 Pennsylvania Avenue, NW
Washington, DC 20037-1128

JUN 24 2002

1800E1-PB

In Re: MB Docket No. 02-66
Station WVER(TV)
Rutland, Vermont

Dear Ms. Johnson:

This is regarding the above-referenced petition for rule making you filed on behalf of Vermont ETV, Inc. proposing the substitution of DTV channel *9 for station WVER(TV)'s assigned DTV channel *56 at Rutland, Vermont.

As you are aware, Rutland is located within 400 kilometers of the U.S.-Canadian border and concurrence of the Canadian government must be obtained for this proposal. We have reviewed Vermont ETV's proposal and find that it is unacceptable to forward to the Canadian government for consideration pursuant to the standards outlined in the *Letter of Understanding (LOU) between the Commission and Industry Canada, released September 29, 2000*. Specifically, Vermont ETV's proposal, based on the contour overlap method, fails to adequately protect NTSC channel 9 at Sherbrooke, Quebec.

Accordingly, you must within 30 days of the date of this letter, submit an appropriate amendment to Vermont ETV's petition eliminating the overlap or submit a Longley-Rice analysis that shows less than 2% interference. It is recommended that Vermont ETV conduct a complete technical analysis of its proposal in an effort to correct the deficiency outlined in this letter as well as any other technical problems that might exist. You are cautioned that Vermont ETV's failure to comply with the requirements of this letter within the time specified herein may result in the dismissal of its petition for rule making.

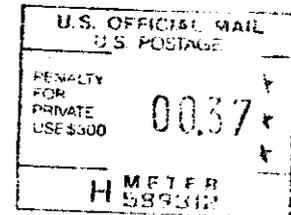
Sincerely,

Clay Pendarvis
Associate Chief, Video Division
Media Bureau

cc: James McLuckie, International Bureau

**Federal Communications Commission
Washington, D.C. 20554**

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**Jennifer A. Johnson, Esquire
Covington and Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044-7566**

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20044+7566 39

