



ORIGINAL

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

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APR 30 2004

In the Matter of)
)
Amendment of Section 73.622(b))
Table of Allotments,)
Digital Television Broadcast Stations)
(Greenwood, Mississippi))
)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MB Docket No. _____
RM- _____

To: Office of the Secretary
Attn: Chief, Video Division
Media Bureau

**SUPPLEMENT TO
PETITION FOR RULE MAKING
TO AMEND THE DTV TABLE OF ALLOTMENTS**

Mississippi Broadcasting Partners ("MBC"), licensee of WABG-TV, Greenwood, Mississippi, by its attorneys and pursuant to Sections 1.401 and 73.622(a) of the Commission's Rules,¹ hereby respectfully amends its Petition for Rulemaking filed on February 23, 2004, which requested that the Commission institute a rulemaking to amend Section 73.622(b), the DTV Table of Allotments, by substituting Channel 32 as WABG-TV's paired DTV allocation in lieu of Channel 54, as originally allotted (the "Petition").

By this amendment, MBC supplements the Petition to provide the attached Technical Statement of Denny & Associates, P.C. ("Technical Statement").² The Technical Statement

¹ 47 C.F.R. §§ 1.401, 73.622(a) (2003).

² See Technical Statement appended at Attachment.

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demonstrates that the proposed WABG-DT Channel 32 facilities do not result in a coverage area that exceeds the geographic coverage area of the largest station in the market.³

Moreover, as illustrated by Figure 1 of the Technical Statement, MBC's Petition proposes an effective radiated power and height above average terrain for the Channel 32 facilities that would permit close service replication of the station's NTSC service area, furthering one of the FCC's paramount goals in the DTV transition. As the Commission has stated, "We established NTSC service replication as a goal in the creation of the initial DTV Table of Allotments. . . . [T]his approach provides important benefits to both viewers and broadcasters and 'will ensure that broadcasters have the ability to reach the audiences that they now serve and that viewers have access to the stations that they can now receive over-the-air.'"⁴

For the reasons described herein and in the Petition, which is incorporated by reference, MBC respectfully requests that the Commission amend the DTV Table of Allotments as set forth in Section 73.622(b) of its Rules to substitute Channel 32 for Channel 54 for use by WABG-DT in Greenwood, Mississippi, as follows:

	<u>Present</u>	<u>Proposed</u>
Greenwood, MI	*25, <u>54</u>	*25, <u>32</u>

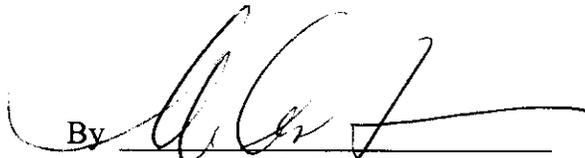
³ See 47 C.F.R. § 73.622(f)(5).

⁴ *Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, Memorandum Opinion and Order on Reconsideration*, 16 FCC Rcd 20594 at ¶ 20 (2001).

As described in the Petition, adoption of this proposal would serve the public interest by permitting WABG-DT to commence operations on a core channel and by facilitating the reallocation of non-core spectrum prior to the end of the DTV transition.

Respectfully submitted,

MISSISSIPPI BROADCASTING PARTNERS

By 

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Dated: April 30, 2004

ATTACHMENT

Technical Statement

**DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND**

**ENGINEERING EXHIBIT
IN SUPPORT OF AMENDMENT
TO PETITION FOR RULEMAKING
TO AMEND SECTION 73.622(b) OF THE FCC RULES
DTV TABLE OF ALLOTMENTS
(FCC FILE NUMBER BPRM-20040223AXZ)
MISSISSIPPI BROADCASTING PARTNERS
STATION WABG-DT
GREENWOOD, MISSISSIPPI**

ENGINEERING STATEMENT

INTRODUCTION

This engineering exhibit of which this statement is part was prepared at the request of the FCC staff and on behalf of Mississippi Broadcast Partners (hereinafter MBP), permittee of station WABG-DT, Greenwood, Mississippi, as a supplement to the "Petition for Rulemaking to Amend the DTV Table of Allotments" that it filed on February 23, 2004 (hereinafter Petition). MBP has proposed (FCC File Number BPRM-20040223AXZ) the substitution of digital television (DTV) channel 32 (578 to 584 megahertz (MHz)) for channel 54 (710 to 716 MHz) at Greenwood, Mississippi.

WABG-TV is licensed (FCC File Number BLCT-19821102KE) for analog television (TV) operation on channel 6 (82 to 88 MHz) with 100 kilowatts (kW) maximum peak visual ERP, horizontally polarized, 597 meters antenna radiation

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center HAAT, from a site located at geographic coordinates 33° 22' 23" North Latitude, 90° 32' 31" West Longitude, referenced to the 1927 North American Datum (NAD 27).

WABG-TV also is authorized (FCC File Number BPCT-20030701BNS) for analog TV operation on channel 6 (82 to 88 MHz) with 100 kW maximum peak visual ERP, circularly polarized, 597 meters antenna radiation center HAAT, from a site located at geographic coordinates 33° 22' 23" North Latitude, 90° 32' 25" West Longitude (NAD 27). The distance from the licensed WABG-TV site to the geographic coordinates of the authorized WABG-TV site is 155.1 meters.

WABG-DT is authorized (FCC File Number BPCDT-19991013ABI) for DTV operation on channel 54 with 1,000 kW maximum average ERP, horizontally polarized, 572 meters antenna radiation center HAAT, from the authorized (CP) WABG-TV site. The reference facilities for the channel 54 DTV allotment at Greenwood, Mississippi, which was paired with the WABG-TV NTSC channel 6 assignment, are also 1,000 kW maximum ERP and 597 meters HAAT.

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In its Petition, MBP proposes DTV operation on channel 32 with 1,000 kW maximum average ERP, horizontally polarized, 610 meters antenna radiation center HAAT, from the authorized WABG-TV and WABG-DT site.

Section 73.622(f)(5) of the FCC Rules permits an applicant to specify ERP and/or antenna radiation center HAAT up to that needed to provide the same geographic coverage area as the largest station in its market. Figure 1 of this engineering exhibit is a map showing the locations of the licensed and authorized WABG-TV Grade B (47 dB μ F(50,50)) contour and the proposed WABG-DT channel 32 noise limited (41 dB μ , F(50,90)) contour computed using the conventional contour prediction methodology. The licensed and authorized WABG-TV Grade B contour encloses land area of 51,462 square kilometers. The proposed WABG-DT service contour encloses land area of 44,619 square kilometers. The proposed WABG-DT geographic coverage area is 86.7 percent of the WABG-TV geographic coverage area, so the proposed WABG-DT facilities do not result in coverage exceeding that of the largest station in the market in compliance with Section 73.622(f)(5) of the FCC Rules.

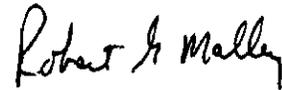
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CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on April 30, 2004.



Robert G. Mallery

Figure 1

