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July 15, 2004

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Federal Communications Commission  
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, D.C. 20554

Re: MM Docket 04-192  
RM-10966  
Request for Substitution of Channel  
KALO-DT, Honolulu, Hawaii

Dear Ms. Dortch:

Transmitted herewith, on behalf of Pacifica Broadcasting Company, permittee of KALO-DT, Honolulu, Hawaii, are an original and four copies of its "Comments" in the above-referenced proceeding, which proposes to substitute digital channel \*10 for digital channel \*39 at Honolulu, Hawaii.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Anne Goodwin Crump  
Counsel for Pacifica Broadcasting Company

Enclosures

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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Federal Communications Commission  
Office of Secretary

In the Matter of	)	
	)	
Amendment of Section 73.622(b),	)	MM Docket No. 04-192
DTV Table of Allotments.	)	RM-10966
(Honolulu, Hawaii)	)	

Directed to: Chief, Media Bureau

**COMMENTS**

Pacifica Broadcasting Company ("Pacifica"), licensee of noncommercial educational television station KALO(TV) and permittee of KALO-DT, by its attorneys, hereby respectfully submits its Comments in support of the *Notice of Proposed Rule Making* ("NPRM") in the above-captioned proceeding, DA 04-1407, released May 28, 2004, which proposes to amend the DTV Table of Allotments to substitute digital channel \*10 for the current KALO-DT allotment on Channel \*39 at Honolulu, Hawaii. With respect thereto, the following is stated:

1. As set forth in the *NPRM* and Pacifica's Petition for Rule Making, the proposed substitution will serve the public interest by allowing KALO-DT to provide improved and maximized service to the public with reduced concerns stemming from adjacent channel interference. Further, the resulting ability for KALO-DT to maximize its service area will provide for a more efficient use of the spectrum and will thereby advance the DTV transition. In addition, the change from a UHF channel to a VHF channel will lead to associated savings in operational costs, including significant reductions in the cost of power to operate the station. These cost savings are particularly critical for noncommercial stations such as KALO-DT, and

the funds saved can be applied in other areas to advance service to the public with KALO-DT's digital facilities.

2. As demonstrated in the Engineering Statement attached to its Petition for Rule Making, the proposed channel substitution in accordance with the Commission's technical rules and policies and would not create any prohibited, objectionable interference.

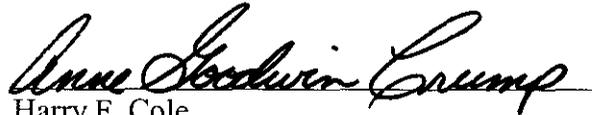
3. Accordingly, Pacifica hereby expresses its support for the channel substitution as proposed in the *NPRM* in this proceeding. Assuming that the requested substitution is made, Pacifica will amend its currently pending application for construction permit for a DTV facility, File No. BPEDT-20000501AFZ, to specify Channel \*10. In the event that the now-pending application has been granted, Pacifica will submit a new modification application to specify the substituted channel. Upon grant of the implementing application, Pacifica will construct the proposed facility in a timely manner.

WHEREFORE, the premises considered, Pacifica hereby respectfully requests that Section 73.622(b) of the Commission's Rules be amended to substitute Channel \*10 for Channel \*39c at Honolulu, Hawaii, and that Channel \*10 be assigned to KALO-DT.

Respectfully submitted,

PACIFICA BROADCASTING COMPANY

By:



Harry F. Cole

Anne Goodwin Crump

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