



ASSOCIATION OF

FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D.C.

January 14, 2005

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

Re: Request for Extension of the January 27, 2005
Deadline for Filing FCC Form 382

Dear Ms. Dortch:

The Association of Federal Communications Consulting Engineers (AFCCCE), celebrating over 50 years of continuous service to the communications industry, is an organization that includes approximately 90 full members who are Registered Professional Engineers engaged in the practice of consulting engineering before the Federal Communications Commission.

This purpose of this letter is to request a 45 day extension of the January 27, 2005 deadline for filing FCC Form 382 regarding DTV channel election. There are several reasons supporting a grant of this extension request. Briefly, they are as follows:

- Consulting engineering firms in AFCCCE are overwhelmed with the large volume of data to analyze and run corresponding studies in order to respond to client requests.
- Extra time is required for engineering firms in AFCCCE to obtain from the Commission staff further understanding of the policies and procedures the FCC will utilize to perform its conflict analysis, especially for stations interested in choosing to return to their analog channel post-transition.
- Extra time is required for many of their clients to ascertain which channel is the optimum choice for service and, if appropriate, begin negotiations with other

stations to ensure that a specific level of service can be provided on a given channel.

- Extra time is required to negotiate and finalize suitable negotiated channel arrangements between stations. These agreements, if finalized, will streamline the next round in the repacking process by reducing the number of interference conflicts to be resolved.

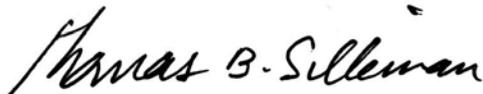
AFCCE recognizes the valuable contribution made by the Commission in issuing on December 21, 2004 Table I and Table II with reference to populations and areas. Further, it also recognizes the contribution by MSTV in making available certain data studies which help a station start the process of making an optimal channel selection. However, this is a very time-consuming and tedious process and, unfortunately, 30 days (a part of which occurred through the holiday period in a month with two Federal holidays and a possible curtailment of Wednesday due to inaugural security precautions) is an insufficient time to make the best choice of channel for DTV operation.

Because a station will remain on the channel selected for the foreseeable future, careful study needs to be exercised in making this selection so that an optimization of the coverage can be done prudently and wisely. These important decisions cannot be made in this 30 day period given to stations. Furthermore, if the best choice is made at the time of the filing of FCC Form 382, it will result in fewer complications to resolve in the conflict resolution round, thereby reducing the drain on FCC resources.

For all these reasons, AFCCE hereby requests that the Commission grant a 45 day extension of the January 27, 2005 deadline to file FCC Form 382 to allow additional time for stations to study and to conduct further analysis for their permanent DTV channel selections.

Thank you for your consideration of the above.

Respectfully submitted,



Thomas B. Silliman
President, AFCCE