

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

In the Matter of	)	
	)	
	)	
Second Periodic Review of the	)	MB Docket No. 03-15
Commission's Rules and Policies	)	
Affecting the Conversion	)	RM 9832
To Digital Television	)	
	)	
	)	

To: Office of Secretary  
Attention: The Commissioners

**COMMENTS IN SUPPORT OF PETITION FOR RECONSIDERATION  
OF COHEN, DIPPELL AND EVERIST, P.C.**

Block Communications, Inc. ("Block"), by its counsel, files these comments in support of the Petition for Reconsideration filed November 3, 2004 by Cohen, Dippell and Everist, P.C., (the "Petition") of the Report and Order released September 7, 2004 in the above-referenced rulemaking proceeding (the "Order"). Block generally supports the requests made by Cohen, Dippell and Everist in the Petition and also specifically provides comments in support of the Petition on the issues addressed herein.

First, Block supports the Petition's request for clarification of certain issues regarding stations on DTV Channel 51, as detailed in Paragraph 122 of the *Order*. As the Petition describes, broadcasters may elect to operate their DTV facilities on Channel 51. The broadcaster operating on Channel 51 would be required to protect the operations of a party operating on Channel 52 until the end of the DTV transition, when Channel 52 will be reallocated to other services and no longer be used for television broadcast. Many stations electing Channel 51 for post-transition operation will be able to expand their service areas at that time, and indeed, such expansion currently can be determined. Block fully supports the Petition's request that the

Commission clarify that it will recognize agreements between parties electing Channel 51 and parties currently assigned Channel 52 to allow for current maximization of the Channel 51 facilities. Block further requests that the Commission clarify that, regardless of the existence of such an agreement, it will provide protection to the maximized facilities that will be available after the end of the DTV transition to a party electing DTV Channel 51.

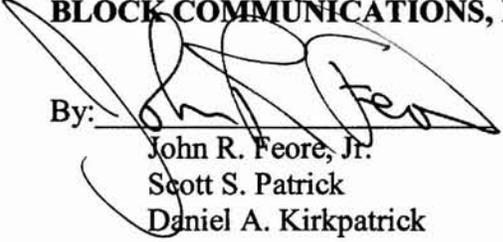
Block also supports the Petition's request that the Commission release any technical data or analyses of the potential impact of interference from NCE-FM stations to DTV operations on Channel 6. As the Petition notes, it is not certain that NCE-FM stations authorized by Section 73.525 of the Commission's Rules will adequately protect over-the-air reception of broadcasters operating on DTV Channel 6. Additional information and clarification of the potential for interference from these NCE-FM stations is necessary to allow those television broadcasters considering the election of DTV Channel 6 to make an informed election, and to allow for the resolution of any potential technical issues related to Channel 6.

Block lastly supports the Petition's request for clarification of any system control and monitoring functions that the Commission may require be present at DTV transmitter and remote control sites, and of any other requirements the Commission may impose on the technical operation of DTV transmitters.

Therefore, for the reasons set forth above, Block supports the Petition for Reconsideration of Cohen, Dippel and Everist, P.C., and requests that the Commission grant the Petition and provide the clarifications and further information requested therein.

Respectfully submitted,

**BLOCK COMMUNICATIONS, INC.**

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