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April 8, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: **MB Docket No. 03-15**  
Negotiated Channel Arrangement No. 20050207ABL  
Supplement to Comments of Public Broadcasting  
Council of Central New York, Inc.

Dear Ms. Dortch:

Public Broadcasting Council of Central New York ("PBCCNY"), licensee of noncommercial educational station WCNY-TV, Syracuse, New York, supplements its previously-filed Comments concerning the referenced Negotiated Channel Arrangement ("NCA"), as specified in the Commission's Public Notice "DTV Channel Election Issues – Proposed Negotiated Channel Election Arrangements and Procedures for Filing Associated Pleadings," released March 1, 2005 (DA 05-519) ("Public Notice"). PBCCNY requests leave to submit this supplement after the filing deadline set forth by the Public Notice for the purpose of clarifying and correcting the record and PBCCNY's prior submissions.

The Public Notice shows WCNY-TV as a participant in NCA No. 20050207ABL, with WSTM License Subsidiary, Inc. ("WSTM"). In a March 8, 2005 Comment filing, PBCCNY noted that while it had consented to WSTM-TV's election of Channel 24, it did not want its own DTV channel election put "in play" as a result of being listed as a participant in the NCA.

The Reply Comments of WSTM, submitted March 22, 2005, included a copy of a signed NCA between WSTM and PBCCNY. WSTM's Reply Comments suggested that PBCCNY had inadvertently failed to make note of the NCA in its Form 382 filing.

WSTM's suggestion explanation is accurate. PBCCNY filed its Form 382 to specify the election of Channel 25 for post-transition DTV operation of WCNY-TV quite early -- on December 23, 2004 in FCC File No. BFREET-20041223AAV -- prior to even being approached by WSTM about an NCA. Subsequent to the February 3, 2005 execution of the NCA, however, PBCCNY did not understand the need to go back and amend its previously-filed Form 382 filing

Ms. Marlene H. Dortch

April 8, 2005

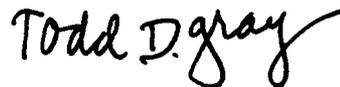
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to make note of the NCA, and undersigned counsel for PBCCNY, who drafted PBCCNY's Comment in response to the Public Notice, was not aware of its existence. PBCCNY therefore seeks to correct the record in this matter to acknowledge the NCA. As the FCC's CDBS online filing system no longer permits amendment of Form 382 filings, PBCCNY submits this supplement to confirm that it is a party to, and proponent of, the NCA with WSTM. The NCA is properly reflected by WSTM's Form 382 filing and the appendix to the Public Notice.

Nonetheless, PBCCNY's election of Channel 25 for post-transition DTV operation of WCNY-TV, as indicated on PBCCNY's filed Form 382, remains unchanged and is completely consistent with both the NCA and WSTM's channel election of Channel 24.

Should any questions arise concerning this matter, please contact undersigned counsel for PBCCNY.

Very truly yours,



Todd D. Gray  
Counsel to PBCCNY

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