

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact upon the )  
Existing Television Broadcast ) MB Docket No. 87-268  
Service )  
 )  
To: The Commission )

**COMMENTS**

Griffin Tulsa II Licensing, L.L.C., the licensee of KQCW-TV, Channel 19, Muskogee, Oklahoma (“KQCW”), hereby submits these comments through counsel in response to the Commission’s *Seventh Further Notice of Proposed Rulemaking* (“*Further Notice*”) in this proceeding.<sup>1</sup> In the *Further Notice*, the Commission proposed a new digital television Table of Allotments (“DTV Table”) which provides each eligible broadcast television station with a channel allotment for DTV operations after the February 17, 2009 transition. KQCW has been approved for post-transition operations on Channel 20.

KQCW respectfully requests that the Commission change the DTV Table to reflect the data described in the attached Engineering Statement prepared by Ross Heide of Cohen Dippell & Everist, P.C. Incorporating the proposed change will serve the public interest by ensuring that

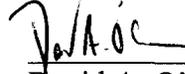
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<sup>1</sup> *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Services, Seventh Further Notice of Proposed Rulemaking*, MB Docket No. 87-268, FCC 06-150, 21 FCC Rcd 12100 (rel. Oct. 20, 2006) (“*Further Notice*”). On January 9, 2007, the Commission extended the comment deadline to January 25, 2007. See *Order Granting Extension of Time for Filing Comments and Reply Comments*, MB Docket No. 87-268, DA 07-38 (MB rel. Jan. 9, 2007). Therefore, these comments are timely filed.

the DTV Table is as accurate as possible.

Respectfully submitted,

Griffin Tulsa II Licensing, L.L.C.



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ENGINEERING STATEMENT  
IN SUPPORT OF COMMENTS TO  
CORRECT REFERENCE PATTERN FOR  
KQCW-DT IN THE 7<sup>TH</sup> FNPRM

JANUARY 2007

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of Griffin Tulsa II Licensing, L.L.C., licensee of KQCW(TV), Channel 19, Muskogee, Oklahoma. KQCW-DT has been allotted DTV Channel 20 in the Seventh Further Notice of Proposed Rule Making (“7<sup>th</sup> FNPRM”).

These comments are submitted to correct a single azimuth in the reference pattern for KQCW (facility ID number 78322, reference pattern antenna ID number 72527). The relative field value in the reference pattern at 280° is given as “0.096” where it should be “0.958”. The decimal point shift error occurred in the 2<sup>nd</sup> round conflict resolution input (FCC File No. BSRCC-20060403BKW). The correct value of 0.958 restores the value specified at this azimuth by the FCC in the reference pattern for the tentative channel designation.

The incorrect value at 280° did not have any role in the conflict resolution and the tentative channel designation meets all interference requirements with the correct value inserted. Furthermore, no allotment in the 7<sup>th</sup> FNPRM would be predicted to receive any interference as a result of correcting the relative field value for this single azimuth. Therefore, this error should be rectified in the reference pattern for the proposed Table of Allotments.