

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

COMMENTS OF YOUNG BROADCASTING INC.

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Young Broadcasting Inc. (“Young”), through its undersigned attorneys, files the following comments in response to the *Seventh Further Notice of Proposed Rule Making*, FCC 06-150 (Rel. Oct. 20, 2006) (“*Seventh Further Notice*”). Young is the ultimate parent company of the licensees of each of the stations discussed below.

I. WTEN-DT, Albany, New York (Facility ID No. 74422)

Young submits the instant comments to clarify certain data included in Appendix B to the *Seventh Further Notice* for its station WTEN-DT, Albany, New York (Facility ID No. 74422). In Appendix B, WTEN-DT’s post-transition ERP is listed as 1000 kW, its HAAT is listed as 306 meters, its Antenna ID is listed as 74903, and its geographic coordinates are listed as 42-38-15 N, 73-59-54 W (NAD 27). Those data are incorrect for WTEN-DT’s post-transition facility.

Young’s post-transition WTEN-DT facility will operate at 700 kW, at an HAAT of 426 meters, its Antenna ID will be 67986, and its geographic coordinates will be 42-37-31 N, 74-0-38 W (NAD 27). Indeed, these data are currently in the Commission’s CDBS database, and are derived from Young’s current license for WTEN-DT (File No. BLCDT-20060104ACC). These are the data to which Young certified in Form 381 (File No. BCERCT-20041105AFJ). *See* BCERCT-20041105AFJ, Exhibit 1 (“WTEN has indicated its replication facilities in Question 1 of Section II upon the advice of FCC Staff because the form does not permit WTEN to certify its intent with respect to a pending application. However, notwithstanding its certification in Question 1 of Section II, it is the licensee’s intention to operate its post-transition DTV station pursuant to the parameters of its pending application [File No. BMPCDT-20041028AEB], subject to FCC approval.”)

Young believes that the erroneous Appendix B information derives from WTEN-DT’s original digital facility. However, the Commission in August 2005 approved Young’s

application to modify its original facility (File No. BMPCDT-20041028AEB), which was ultimately covered by the license in File No. BLCDDT-20060104ACC. Given the convoluted history of the WTEN digital facility,¹ it is apparent that the inclusion in Appendix B of the data for WTEN-DT was an administrative or clerical error. Young respectfully requests that the Appendix B data be corrected to account for the licensed WTEN-DT parameters as follows:

Erroneous Appendix B WTEN-DT Data	Correct WTEN-DT Data
1000 kW ERP	700 kW ERP
305 meters HAAT	426 meters HAAT
Antenna ID 74903	Antenna ID 67986
42-38-15 N latitude (NAD 27)	42-37-31 N latitude (NAD 27)
73-59-54 W longitude (NAD 27)	74-0-38 W longitude (NAD 27)

II. WATE-DT, Knoxville, Tennessee (Facility ID No. 71082)

Young submits the instant comments to clarify certain data included in Appendix B to the *Seventh Further Notice* for its station WATE-DT, Knoxville, Tennessee (Facility ID No. 71082). In Appendix B, WATE-DT's post-transition geographic coordinates are listed as 36-00-13 N, 83-56-35 W (NAD 27). The longitude is off by one second, and WATE-DT's geographic coordinates should be listed as 36-00-13 N, 83-56-34 W (NAD 27). In fact, Young filed an application to correct the longitudinal coordinates to specify 34 seconds, which the Commission granted in March 2005 (File No. BMLCDDT-20041203AEG). The Commission's CDBS engineering database does reflect the corrected geographic coordinates. In addition, the issue was noted in the WATE-DT Form 381 filing in Exhibit 1 (File No. BCERCT-20041105AHC).

¹ For the complete history of the WTEN-DT facility, please see Young's Request for Waiver File No. BMPCDT-20041028AEB (attachment 46).

Young respectfully requests that the data in Appendix B be corrected to reflect the correct geographic coordinates for WATE-DT as set forth in the table immediately below:

Erroneous Appendix B WATE-DT Data	Correct WATE-DT Data
83-56-35 W longitude (NAD 27)	83-56-34 W longitude (NAD 27)

Young notes that there is no Antenna ID listed in Appendix B for WATE-DT. The Commission's CDBS database indicates that the Antenna ID for WATE-DT's operation pursuant to BMLCDT-20041203AEG is 42892, although Young is unable to confirm the accuracy of that identification number. File No. BMLCDT-20041203AEG modified the certified facility (BMLCDT-20040305AAI) in the WATE-DT form 381 only to correct the geographic coordinates and authorizes operation on WBAY-DT's tentative channel designation ("TCD").

III. WBAY-DT, Green Bay, Wisconsin (Facility ID No. 74417)

Young submits the instant comments to clarify certain data included in Appendix B to the *Seventh Further Notice* for its station WBAY-DT, Green Bay, Wisconsin (Facility ID No. 74417). In Appendix B, WBAY-DT's post-transition geographic coordinates are listed as 44-24-35 N, 88-00-05 W (NAD 27). The longitude is off by one second, and WBAY-DT's geographic coordinates should be listed as 44-24-35 N, 88-00-06 W (NAD 27). In fact, Young filed an application to correct the longitudinal coordinates to specify 6 seconds, which the Commission granted in December 2004 (File No. BMLCDT-20040723ADS). The Commission's CDBS engineering database does reflect the corrected geographic coordinates. In addition, the issue was noted in the WBAY-DT Form 381 filing in Exhibit 1 (File No. BCERCT-20041105AFV). Young respectfully requests that the data in Appendix B be corrected to reflect the correct geographic coordinates for WBAY-DT as set forth in the table immediately below.

Erroneous Appendix B WBAY-DT Data	Correct WBAY-DT Data
88-00-05 W longitude (NAD 27)	88-00-06 W longitude (NAD 27)

Young also notes that there is no Antenna ID listed in Appendix B for WBAY-DT. The Commission's CDBS database indicates that the Antenna ID for WBAY-DT's authorization in File No. BMLCDT-20040723ADS is 33010, although Young is unable to confirm the accuracy of that identification number. File No. BMLCDT-20040723ADS modified the certified facility (File No. BLCDDT-20020429ABC) in the WBAY-DT Form 381 only to correct the geographic coordinates and authorizes operation on WBAY-DT's TCD.

IV. WRIC-DT, Petersburg, Virginia (Facility ID No. 74416)

Young notes that there is no Antenna ID listed in Appendix B for WRIC-DT. The Commission's CDBS database indicates that the Antenna ID for WRIC-DT's operation pursuant to BLCDDT-20021112ACD is 42589, although Young is unable to confirm the accuracy of that identification number. File No. BLCDDT-20021112ACD is the certified facility in the WRIC-DT Form 381 (File No. BCERCT-20041105AGD) and authorizes operation on WRIC-DT's TCD.

V. WKRN-DT, Nashville, Tennessee (Facility ID No. 73188)

Young notes that there is no Antenna ID listed in Appendix B for WKRN-DT. The Commission's CDBS database indicates that the Antenna ID for WKRN-DT's operation pursuant to BLCDDT-20020528AAC is 44967, although Young is unable to confirm the accuracy of that identification number. File No. BLCDDT-20020528AAC is the certified facility in the WKRN-DT Form 381 (File No. BCERCT-20041105AGY) and authorizes operation on WKRN-DT's TCD.

VI. Additional Antenna Identification Number Discrepancies

For each of the following stations, Young is unable to confirm or deny the accuracy of the Antenna ID referenced in Appendix B:

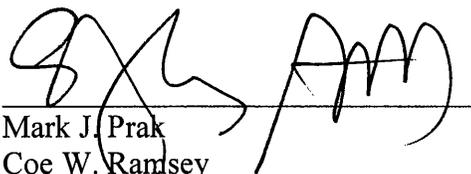
Station	Appendix B Antenna ID
KLFY-DT, Lafayette, LA Facility ID No. 35059	74641
KRON-DT, San Francisco, CA Facility ID No. 65526	74655
KELO-DT, Sioux Falls, SD Facility ID No. 41983	74495
KDLO-DT, Florence, SD Facility ID No. 41975	74334
KWQC-DT, Davenport, IA Facility ID No. 6885	74638
WLNS-DT, Lansing, MI Facility ID No. 74420	72523

With the exception of KRON-DT and WLNS-DT, each of the above stations has a TCD for its respective current analog channel. KRON-DT's and WLNS-DT's respective TCDs are neither their current DTV nor their current analog channels. Young requests that the Commission ensure that all antenna identification numbers reflect accurate parameters. In addition, Young requests that Antenna ID's identified in Appendix B not be used by the Commission to limit or affect a digital facility's operating parameters.

* * *

Respectfully submitted,

YOUNG BROADCASTING INC.

Handwritten signatures of Mark J. Prak and Coe W. Ramsey, written in black ink over a horizontal line.

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