

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

In the Matter of)
)
Advanced Television Systems) MB Docket 87-268
And Their Impact upon the)
Existing Television Broadcast)
Service)

TO: Office of The Secretary

REPLY COMMENTS OF CONNECTICUT PUBLIC BROADCASTING, INC.

Connecticut Public Broadcasting, Inc. (CPBI), through its attorneys, hereby files its Reply Comments in response to the Commission's Seventh Further Notice of Proposed Rule Making ("Notice") in the above-referenced proceeding proposing a new DTV Table of Allotments (DTV Table). In support thereof, the following is shown:

1. In its "Comments" filed in this proceeding,¹ CPBI supported the proposed plan to allot Channel *45 for use by Station WEDH-DT, Hartford and Channel *9 for Station WEDN-DT, Norwich, Connecticut. Based on the Commission's invitation to comment "on how best to time the adoption and effective date of the proposed DTV Table," CPBI also urged the Commission to allot those channels immediately in the interim Table of Allotments so that CPBI could implement pre-transition DTV operations on these channels. CPBI noted it had no realistic alternative to initiate DTV programming in Hartford. The Media Bureau had not granted the "swap" of Channel *32 Hartford and Channel *45 Norwich as proposed in applications in 2003, nor had it concluded the 2003 rulemaking to change the Norwich allotment to Channel *9. Now that a hard deadline of February 17, 2009 has been established for the analog cut-off,

¹ "Comments of Connecticut Public Broadcasting" in MB Docket 87-268, filed January 25, 2007; "Errata" filed February 5, 2007.

construction of a DTV facility on Channel *32 at Hartford would obviously be fiscally irresponsible for a noncommercial licensee that relies on government grants and public donations for its operations.

2. In its discussion of the allotments for Stations WEDH-DT and WEDN-DT, the Commission invited parties that previously objected to the use of Channels *45 at Hartford and *9 at Norwich to file comments in this docket.² Of the three previous objectors, the Walt Disney Company alone made reference to its previous objections, and only to reiterate that it does not have any objection to the WEDH Channel *45 allotment as long as Channel 7 continues to be allotted to WABC.³ Entravision Holdings, LLC and the Scripps-Howard Broadcasting Company had earlier filed objections to the pre-transition use of Channel *45 at Hartford and Channel *9 at Norwich, respectively. Although both parties filed comments on the Notice, neither addressed the Connecticut channel allotments.

3. The Commission concluded in the Notice that CPBI's "swap" applications and the channel substitution at Norwich both complied with the applicable 2% interference standard for proposals made prior to the initiation of the channel election process. No party has objected to this finding. Accordingly, there appears to be no impediment remaining to the immediate implementation of the Norwich channel change pending in MM Docket No. 04-184 and the grant of the application for Station WEDH-DT.⁴ These immediate actions by the Bureau will greatly serve the public interest,

² Notice, para. 40.

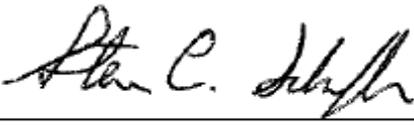
³ "Comments of the Walt Disney Company" in MB Docket 87-268, filed January 25, 2007, at fn. 16.

⁴ While the Commission stated that these application and rulemaking proceedings involving Hartford and Norwich were "superseded" by the Notice, searches of the FCC's Electronic Comment Filing System and Media Bureau Consolidated Data Base show both the application and docket are still pending

permitting CPBI to initiate over-the-air digital television service to Hartford as well as to the additional population that will receive service from Station WEDN-DT, Norwich.

Respectfully submitted,

CONNECTICUT PUBLIC BROADCASTING,
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