

**Before the
Federal Communications Commission
Washington, DC 20554**

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

To: Office of the Secretary

REPLY COMMENTS OF SMITH MEDIA LICENSE HOLDINGS, LLC

Smith Media License Holdings, LLC (“Smith”), by its counsel, hereby submits these reply comments in the above-referenced proceeding.¹ Smith requests change of certified facilities for KATN-DT, Fairbanks, Alaska (the “Station”) and proposes revision of the allotment set forth in the *FNPRM*. Pursuant to these comments, the DTV Table of Allotments in relevant portion would be changed as set forth in the *FNPRM*:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
13813	AK	FAIRBANKS	2	18	60	33	74795	645042	1474252

To:

13813	AK	FAIRBANKS	2	18	16	230		645520	1474249
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To the extent necessary, Smith requests leave to submit this proposal at the reply stage. Smith did not submit initial comments because, subsequent to the January 25th comment date, the Commission issued a construction permit for authorization of KATN(TV)’s NTSC facilities at Skyline Drive overlooking Fairbanks.² Smith thereafter prepared and submitted a DTV

¹ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268, *Seventh Further Notice of Proposed Rule Making*, FCC 06-150 (rel. Oct. 20, 2006) (“*FNPRM*”).

² See FCC File No. BPCT-20051101AAZ.

construction permit application proposing co-location of analog and digital facilities.³ Smith intends to operate these digital facilities as constructed once analog service terminates.

No party would be prejudiced by acceptance of this proposal. As demonstrated in the attached Technical Exhibit, this proposal satisfies the requirement in the *FNPRM* that any modification to the proposed Table not cause interference in excess of 0.1 percent to any tentative channel designation.⁴ Indeed, the proposal is not predicted to cause any interference whatsoever. In addition, the proposed service area entirely encompasses that initially certified, so there is no coverage short-fall with respect to Smith's certification for the Station. Smith believes that grant of this request for leave and the underlying proposal is in the public interest as it would allow the Commission to efficiently conform the post-transition allotment to the actual facilities and avoid re-visiting this matter at a later date.

For these reasons, Smith respectfully requests that the Commission change the Station's certified facilities and allotment in the *FNPRM* as specified.

Respectfully submitted,

SMITH MEDIA LICENSE HOLDINGS, LLC

/s/

By _____
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February 26, 2007

³ FCC File No. BMPCDT-20070222AAL.

⁴ See Attachment A, Technical Exhibit.