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

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

Directed to: The Commission

COMMENTS

The Board of Trustees of The University of Alabama ("University"), licensee of Television Station WUOA(TV), Channel 23, Tuscaloosa, Alabama, by its attorneys, hereby respectfully submits its Comments in response to the Commission's *Seventh Further Notice of Proposed Rule Making*, FCC 06-150, released October 20, 2006 ("*SFNPRM*"). With respect thereto, the following is stated:

1. WUOA is licensed to operate on analog Channel 23, and it has no companion digital channel assigned to it. University notes that LIN of Alabama, LLC, licensee of a similarly situated station, has filed Comments in which it proposes to change to maximized facilities. As set forth by LIN, single channel, analog-only stations have been recognized to present a special case in the certification process. Furthermore, the proposed maximization facilities would serve the public interest by providing increased DTV service without any countervailing interference concerns. University likewise seeks herein to modify the WUOA DTV allotment technical specifications to provide for a maximized facility.

2. As noted above, WUOA is a single-channel, analog-only station. Accordingly, at the time of filing certifications on FCC Form 381, the station's former licensee certified that it did not have a DTV channel allotment, and would operate its post-transition DTV station based on

its currently authorized NTSC license or construction permit. Based on its certification the Commission allotted DTV facilities for an operation on Channel 23 with 50 kW ERP and 266 meters HAAT using a directional TV antenna. The data in the draft DTV Table of Allotments thus reflects replication facilities serving a population of 355,000 people in an area of 13,651 square kilometers.

3. As set forth in the attached Engineering Statement, however, it is possible to increase the station's Effective Radiated Power ("ERP") to 500 kW and its antenna height above average terrain ("HAAT") to 300 meters without causing impermissible interference. This would enable the station to serve a population of 1,276,000, an increase of 921,000 people or approximately 259 percent. This more than tripling of the population served clear would further the public interest.

4. This tremendous gain in coverage area without a corresponding loss in numbers covered is in and of itself a public interest benefit sufficient to justify grant of the requested modification. The substantial increase in population served is especially important for WUOA, an independent, university-operated television station. The station offers a unique blend of cultural, news, public affairs, entertainment, and sports programming geared to the local community. The University produces local newscasts, local sports, coverage of local special events such as West Alabama's Christmas Parade, and local feature programs. In order for such an operation to remain economically viable through and beyond the digital TV transition, it is important that the station reach as many viewers in the market as possible.

5. Even with the modifications proposed herein, WUOA would still have population coverage less than those of other stations in the market. WUOA is included in the Birmingham

Nielsen Designated Market Area ("DMA"), which takes in stations licensed not only to Birmingham but also to Anniston, Bessemer, Gadsden, Homewood, and Tuscaloosa. A review of the Commission's draft DTV Table of Allotments attached to the *SFNPRM* shows that the smallest population coverage figure among the other stations in the market, which figure is applicable to both WCFT-DT (Tuscaloosa) and WPXH-DT (Gadsden), is 1,357,000. Thus, even with the improvements proposed herein, WUOA would provide service to 81,000 fewer people than will the next smallest station in the market. The disadvantage is even greater when the comparison is made with the facilities of WBRC-DT, which will provide service to 1,692,000 people, a difference of 416,000 people. Thus, WUOA clearly would not receive any unfair competitive advantage from the proposed modifications but rather would only have the opportunity to become a viable competitor in the market.

6. Moreover, there would be no offsetting detriment to the public interest. As demonstrated in the attached Engineering Statement, the proposed facilities would not cause interference exceeding 0.1 percent to any licensee's tentative channel designation ("TCD"). Additionally, WUOA-DT will not suffer excessive interference from any TCD. University is willing to accept any interference that it might receive from any approved TCD. Finally, the proposed facilities are in compliance with the Commission's technical rules for DTV facilities. Therefore, there would be no harm to the public interest as a result of allowing WUOA-DT to proceed as outlined in the Engineering Statement.

7. While University recognizes the concern that the technical database remain stable during the channel allotment process, so that a change in one facility does not create a domino effect of required changes in other facilities, that concern is not applicable here. At this point,

the TCD's for virtually all stations are known, and the changes proposed herein would not require any change in other facility. Rather, as set forth herein and in the attached Engineering Statement, the modifications proposed herein would have no appreciable impact on any other station's TCD, and the improved WUOA facilities would continue to fit within the draft DTV Table of Allotments.

8. Accordingly, given the substantial benefits to be realized from the increase in service, and the lack of any countervailing detriment, University hereby requests that its TCD be specified as set forth in the attached Engineering Statement. It must be remembered that the proposed modifications would allow WUOA to more than triple the number of persons reached without creating prohibited interference to any TCD. Thus, no other changes to the draft Table of Allotments would be required to effectuate the proposal herein. Therefore, the public interest clearly dictates approval of the modifications proposed.

Respectfully submitted,

THE BOARD OF TRUSTEES OF THE
UNIVERSITY OF ALABAMA

By: M. Scott Johnson
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February 26, 2007

ENGINEERING STATEMENT
IN SUPPORT OF COMMENTS OF
THE BOARD OF TRUSTEES OF THE UNIVERSITY OF ALABAMA
SEVENTH FURTHER NOTICE OF PROPOSED RULE MAKING
MB DOCKET NO. 87-268
FEBRUARY 2007

This engineering statement has been prepared on behalf of The Board of Trustees of the University of Alabama, licensee of station WUOA-TV, Tuscaloosa, Alabama and is in support of comments in the Seventh Further Notice Of Proposed Rule Making to the FCC proceeding in MB Docket No, 87-268.

At present, WUOA-TV operates on analog Channel 23 (524-530 MHz) with 890 kW effective radiated power (ERP) and 266 meters antenna height above average terrain (HAAT) using a directional TV antenna. The geographic coordinates (NAD-27) of the license site are as follows: N 33° 03' 15", W 87° 32' 57".

In 2004 by filing the FCC Form 381, the previous licensee certified that it does not have a DTV channel allotment, and will operate its post-transition DTV station based on its currently authorized NTSC license or construction permit. Based on its certification the Commission allotted DTV facilities for an operation on Channel 23 with 50 kW ERP and 266 meters HAAT using a directional TV antenna. Since WUOA-TV is a single-channel analog only TV station it is requesting modification of its allotted DTV facilities, which are based on its certification, in accordance with paragraph 28 of the Seventh Further Notice of Proposed Rule making in MB Docket No. 87-268.

WUOA-DT respectively requests the Commission to modify the proposed Appendix B Proposed DTV Table of Allotments Information to reflect the following:

Facility ID: 77496
State and City: AL, Tuscaloosa
NTSC Channel: 23
<u>DTV:</u>
Channel: 23
Maximum ERP (kW): 500
HAAT (m): 300
Antenna ID: see attached pattern
Latitude: 332745
Longitude: 865059

Area (sq. km): 19934
Population (thousand): 1276
Percent Interference Received: 0.6

The proposed WUOA-DT facilities will not exceed the "Maximum allowable ERP and antenna height for DTV stations on Channels 14-59, all zones" in accordance with Section 73.622 of the Commission's Rules. In addition, station WUOA-TV, licensed to Tuscaloosa, in Tuscaloosa County is located in the Birmingham Nielsen Designated Market Area. Its current site is in the southern portion of the DMA and the current allotted facilities only provide service to approximately 22 percent of the population when compared to the average population served by the other nine stations within the Birmingham DMA. The proposed allotment is more centrally located within Birmingham and provides more comprehensive coverage of the DMA.

FCC OET Bulletin 69 Study

Electromagnetic interference studies were conducted according to the FCC OET Bulletin 69 to determine whether the proposed facilities would result in interference in excess of 0.1% to any licensee's existing "tentative channel designations" (TCDs). The FCC OET Bulletin 69 study was conducted for cell sizes 2 km/side and 1 km terrain interval.

The results of the FCC OET Bulletin 69 interference study are summarized as follows:

1. WFIQ-DT, Ch 22, Florence, AL – percent of new interference 0.039%
2. WBMM-DT, Ch 22, Tuskegee, AL - proposal causes no interference
3. NEW-DT, Ch 23, Mobile, AL - percent of new interference 0.045%
4. WPAK-DT, Ch 23, Jellico, TN – proposal causes no interference
5. WNAB-DT, Ch 23, Nashville, TN - percent of new interference 0.008%
6. WJSP-DT, Ch 23, Columbus, GA - percent of new interference 0.100%

7. WHIQ-DT, Ch 24, Huntsville, AL - percent of new interference 0.0%

The interference studies indicate that the proposed Channel 23 DTV operation would not cause harmful interference to more than 0.1% population to any licensee's existing "tentative channel designations" (TCDs). Additionally, WUOA-DT will accept any interference from those TCDs already approved.

Principal Community Coverage

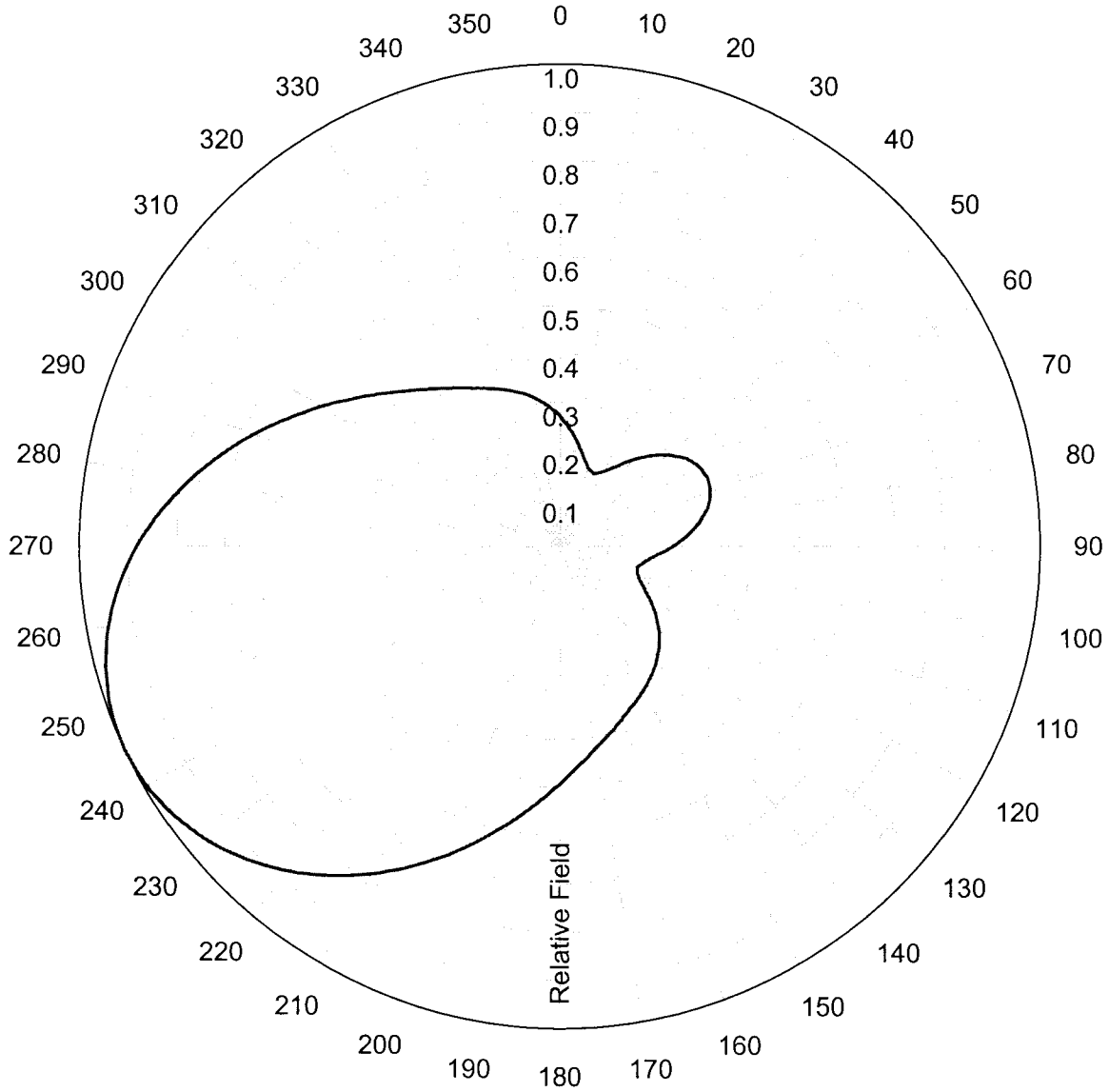
The predicted 48 dBu contour for the proposed WUOA-DT operation on Channel 23 with 500 kW maximum ERP and 300 meters HAAT using a directional antenna would cover 100% of Tuscaloosa, Alabama.

26 February 2007

S. K. Khanna
Professional Engineer
District of Columbia 8057

AZIMUTH PATTERN

Type:	ATW-C5	
	Numeric	dBd
Directivity:	3.40	5.31
Peak(s) at:		
Polarization:	Horizontal	
Channel:	23	
Location:	TUSCALOOSA, ALABAMA	
Note:		



Electronics Research, Inc.
7777 Gardner Road
Chandler, Indiana U.S.A 47610

2.23.07

AZIMUTH TABULATED DATA

Type: ATW-C5

Polarization: Horizontal

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
0	0.269	-11.40	92	0.222	-13.07	184	0.524	-5.61	276	0.824	-1.68
2	0.259	-11.73	94	0.209	-13.60	186	0.541	-5.34	278	0.804	-1.89
4	0.248	-12.11	96	0.197	-14.11	188	0.559	-5.05	280	0.784	-2.11
6	0.238	-12.47	98	0.188	-14.52	190	0.578	-4.76	282	0.764	-2.34
8	0.227	-12.88	100	0.180	-14.89	192	0.597	-4.48	284	0.743	-2.58
10	0.216	-13.31	102	0.174	-15.19	194	0.617	-4.19	286	0.722	-2.83
12	0.205	-13.76	104	0.169	-15.44	196	0.638	-3.90	288	0.701	-3.09
14	0.195	-14.20	106	0.167	-15.55	198	0.659	-3.62	290	0.680	-3.35
16	0.186	-14.61	108	0.169	-15.44	200	0.680	-3.35	292	0.659	-3.62
18	0.179	-14.94	110	0.173	-15.24	202	0.700	-3.10	294	0.638	-3.90
20	0.172	-15.29	112	0.178	-14.99	204	0.721	-2.84	296	0.617	-4.19
22	0.169	-15.44	114	0.186	-14.61	206	0.743	-2.58	298	0.597	-4.48
24	0.167	-15.55	116	0.195	-14.20	208	0.763	-2.35	300	0.579	-4.75
26	0.169	-15.44	118	0.205	-13.76	210	0.784	-2.11	302	0.560	-5.04
28	0.174	-15.19	120	0.216	-13.31	212	0.804	-1.89	304	0.541	-5.34
30	0.179	-14.94	122	0.227	-12.88	214	0.824	-1.68	306	0.524	-5.61
32	0.188	-14.52	124	0.238	-12.47	216	0.843	-1.48	308	0.508	-5.88
34	0.197	-14.11	126	0.248	-12.11	218	0.862	-1.29	310	0.492	-6.16
36	0.208	-13.64	128	0.258	-11.77	220	0.880	-1.11	312	0.477	-6.43
38	0.222	-13.07	130	0.269	-11.40	222	0.897	-0.94	314	0.462	-6.71
40	0.234	-12.62	132	0.278	-11.12	224	0.913	-0.79	316	0.449	-6.96
42	0.247	-12.15	134	0.287	-10.84	226	0.928	-0.65	318	0.437	-7.19
44	0.260	-11.70	136	0.296	-10.57	228	0.942	-0.52	320	0.426	-7.41
46	0.273	-11.28	138	0.304	-10.34	230	0.954	-0.41	322	0.415	-7.64
48	0.285	-10.90	140	0.312	-10.12	232	0.965	-0.31	324	0.405	-7.85
50	0.296	-10.57	142	0.320	-9.90	234	0.974	-0.23	326	0.396	-8.05
52	0.305	-10.31	144	0.327	-9.71	236	0.982	-0.16	328	0.388	-8.22
54	0.315	-10.03	146	0.333	-9.55	238	0.989	-0.10	330	0.379	-8.43
56	0.323	-9.82	148	0.340	-9.37	240	0.994	-0.05	332	0.372	-8.59
58	0.329	-9.66	150	0.346	-9.22	242	0.997	-0.03	334	0.365	-8.75
60	0.333	-9.55	152	0.352	-9.07	244	0.999	-0.01	336	0.358	-8.92
62	0.336	-9.47	154	0.358	-8.92	246	0.999	-0.01	338	0.352	-9.07
64	0.338	-9.42	156	0.364	-8.78	248	0.997	-0.03	340	0.346	-9.22
66	0.338	-9.42	158	0.371	-8.61	250	0.994	-0.05	342	0.340	-9.37
68	0.336	-9.47	160	0.379	-8.43	252	0.989	-0.10	344	0.333	-9.55
70	0.333	-9.55	162	0.387	-8.25	254	0.982	-0.16	346	0.327	-9.71
72	0.329	-9.66	164	0.396	-8.05	256	0.974	-0.23	348	0.320	-9.90
74	0.323	-9.82	166	0.405	-7.85	258	0.965	-0.31	350	0.312	-10.12
76	0.315	-10.03	168	0.415	-7.64	260	0.954	-0.41	352	0.304	-10.34
78	0.305	-10.31	170	0.425	-7.43	262	0.942	-0.52	354	0.296	-10.57
80	0.296	-10.57	172	0.437	-7.19	264	0.928	-0.65	356	0.288	-10.81
82	0.285	-10.90	174	0.449	-6.96	266	0.913	-0.79	358	0.279	-11.09
84	0.273	-11.28	176	0.462	-6.71	268	0.897	-0.94	360	0.269	-11.40
86	0.260	-11.70	178	0.476	-6.45	270	0.881	-1.10			
88	0.247	-12.15	180	0.492	-6.16	272	0.863	-1.28			
90	0.235	-12.58	182	0.507	-5.90	274	0.844	-1.47			

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2.23.07