

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of ) Third Periodic Review of the ) Commission's Rules and Policies ) Affecting the Conversion to Digital Television )	MB Docket No. 07-91
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**COMMENTS OF 54 BROADCASTING, INC.**

54 Broadcasting, Inc., licensee of KNVA(TV), Austin, Texas (Facility ID No. 144) (the Station and the licensee are collectively referred to herein as "KNVA") submits these Comments in response to the Commission's commencement of the Third Periodic Review of the transition to digital television.<sup>1</sup> In Appendix D to the *NPRM*, the Commission has published a list of stations that it believes to be "ready, or very close to ready," to make the transition.<sup>2</sup> The Commission has asked licensees with Stations on the list to respond as to whether the listed Stations are in fact already prepared for the transition. KNVA is identified on that list and files these Comments to confirm that it is, in fact, prepared to operate at its licensed facilities post-transition.

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<sup>1</sup> See *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 07-91, Notice of Proposed Rulemaking, FCC 07-70 (rel. May 18, 2007) ("*NPRM*").

<sup>2</sup> See *NPRM* at ¶ 18 (explaining that the Appendix "includes those stations whose post-transition channel is the same as their pre-transition DTV channel and that have constructed their full, authorized DTV facilities") and at Appendix D.

KNVA files these Comments to confirm that it is operating licensed facilities (File No. BLCDT-20060721ABF), that serve approximately 96.6% of the population covered by the facilities specified in the recently released DTV Table of Allotments with a service contour that is nearly contiguous with the contour of the facilities specified in the DTV Table.<sup>3</sup> KNVA's licensed facilities reproduce the authorized DTV Table service contour as nearly as reasonably possible using KNVA's existing transmission equipment.<sup>4</sup>

As KNVA indicated in comments concerning the DTV Table,<sup>5</sup> it intends to apply to serve even more viewers using an effective radiated power of 475 kW with an omnidirectional antenna as soon as the DTV Freeze<sup>6</sup> is lifted and the Commission permits the appropriate application to be filed and then acted upon. KNVA has already acquired the equipment necessary to provide this service and is ready to modify expeditiously its facilities in order to provide expanded

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<sup>3</sup> See *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking, MB Docket No. 87-268, FCC 07-138 ("*DTV Table Order*") (rel. Aug. 6, 2007).

<sup>4</sup> KNVA's transmitter is located 0.4 meters higher than the height above average terrain ("HAAT") specified in the DTV Table. This *de minimis* discrepancy likely occurred when KNVA's HAAT was calculated and rounded to whole numbers, but KNVA notes it here for the sake of completeness.

<sup>5</sup> Comments of 54 Broadcasting, Inc., MB Docket No. 87-268 (filed Jan. 16, 2007).

<sup>6</sup> See *Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes*, Public Notice, DA 04-2446 (rel. Aug. 3, 2004).

service as soon as such a change is authorized.

Respectfully submitted,



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