

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

In the Matter of)
)
)
Third Periodic Review of the) MB Docket No. 07-91
Commission's Rules and Policies)
Affecting the Conversion)
to Digital Television)

REPLY COMMENTS OF CAPITOL BROADCASTING COMPANY, INC.

Capitol Broadcasting Company, Inc. ("Capitol")¹ hereby respectfully submits these reply comments through its counsel on behalf of WMYT-TV, Inc., a wholly-owned subsidiary of Capitol, in response to comments filed by Long Communications, LLC ("Long") in the *Notice of Proposed Rulemaking* ("*Notice*") in the Third Periodic Digital Television Review proceeding.²

In its comments, Long advocates that the Federal Communications Commission lift its filing freeze for expansion/maximization applications for channels in the top 2% of allotted digital channels ranked by amount of interference received.³ If lifted, Long plans to file an expansion application for station WHKY-DT, Hickory, North Carolina (Channel 40).⁴ The proposal will cause additional interference to WMYT-DT, Rock Hill, South Carolina (Channel

¹ Capitol is the licensee, by itself or through wholly-owned subsidiaries, of WRAL-TV/DT and WRAZ-TV/DT, Raleigh, North Carolina, WJZY-TV/DT, Belmont, North Carolina and WMYT-TV/DT, Rock Hill, South Carolina.

² *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, MB Docket No. 07-91, FCC 07-70 (rel. May 18, 2007).

³ Comments of Long at page 2. "Expansion/maximization applications should be allowed as an exception to the freeze for channels in the top 2% of allotted digital channels ranked by interference received."

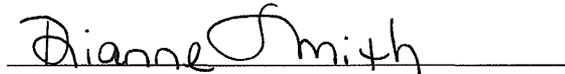
⁴ *Id.* at 3-4.

39).⁵ Long's consulting engineers' interference analysis admits that the expansion proposal will violate the Commission's proposed 0.5% interference criteria.⁶

Capitol takes no position on whether the Commission should lift the freeze in these specific instances. Whether or not the Commission lifts the freeze, Capitol will oppose a WHKY-DT expansion application, when filed, that will cause additional interference to WMYT-DT's over-the-air audience and/or exceeds the Commission's proposed 0.5% interference standard.

Respectfully submitted,

CAPITOL BROADCASTING COMPANY, INC.



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August 30, 2007

⁵ Id. at page 2 of the Engineering Statement in Support of Comments of Long Communications, LLC prepared by du Treil, Lundin, Rackley, Inc. ("Engineering Statement").

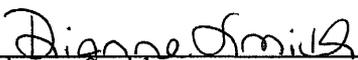
⁶ Id. at 2-3 of the Engineering Statement.

CERTIFICATE OF SERVICE

I, Dianne Smith, hereby certify that a true and correct copy of the foregoing was furnished by U.S. Mail to:

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This 30th day of August, 2007.



Dianne Smith