

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

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

**TO: OFFICE OF THE SECRETARY  
ELECTRONIC FILING**

**SUPPORTING COMMENTS OF  
SAGA QUAD STATES COMMUNICATIONS, LLC**

Saga Quad States Communications, LLC (“Saga”), respectfully files these supporting comments on the *Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking*, FCC 07-138, released on August 6, 2007 (“*FNPRM*”).<sup>1</sup>

Saga is licensee of Station KOAM-TV, analog channel 7, and KOAM-DT, digital channel 13, Pittsburg, Kansas. In the *FNPRM*, the Commission tentatively concluded that February 17, 2009, will be the construction deadline for stations that are building digital facilities based on their new channel allotments in the new DTV Table of Allotments and accompanying Appendix B which will be established by an order in this docket (*i.e.*, stations whose DTV channel for pre-transition operation is not their channel for post-transition use). The Commission proposed certain amendments to Appendix B which were specified in Appendix G to the *FNPRM*.

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<sup>1</sup> The date for filing Comments is governed by the date of publication of the *FNPRM* in the Federal Register. Interested parties have until October 10, 2007, to file Comments (See 72 Fed. Reg. 51575, published September 10, 2007), so these Comments are timely filed.

Saga hereby states that it supports the proposals set forth in Appendix G to the *FNPRM*. In its Comments filed March 27, 2007, Saga stated that its current Appendix B parameters would allow it to reach only 83 percent of the audience it currently serves with its analog signal. Saga requested a revision of Appendix B to specify directional facilities for KOAM-DT at an ERP of 15.33 kW in order to more closely replicate the KOAM-TV analog Grade B contour. Saga's internal engineering study indicated that use of a directional antenna would prevent any station from receiving impermissible interference, while still allowing KOAM-DT to reach 94.4 percent of people reached by its analog transmitter. In the *FNPRM*, the Commission analyzed Saga's request and recalculated the Appendix B facilities based on replicating the analog coverage that was used to determine KOAM-DT's initial DTV facilities. The Commission proposed to adjust the DTV Table and Appendix B accordingly and solicited comments on the proposal which was set out in Appendix G to the *FNPRM*.

In light of the foregoing, Saga hereby states that it will follow the procedures established by the Commission after it has considered the comments and replies filed in this docket in order to construct the facilities specified in Appendix G.

Specifically, Saga supports the amendment of the proposed Table of Allotments in **Appendix B, Page 150, Line #1**, to include the operating parameters for KOAM-DT as follows:

	<b><u>Present Tentatively Assigned Allotment</u></b>	<b><u>Proposed Allotment</u></b>
<b>City of license:</b>	Pittsburg, KS	Pittsburg, KS
<b>Channel:</b>	7	7
<b>ERP:</b>	4.2 kW (Omni)	<b>15.33 kW (DA)</b>

<b>HAAT:</b>	340m	340m
<b>Latitude:</b>	37°-13'-15"	37°-13'-15"
<b>Longitude:</b>	94°-42'-25"	94°-42'-25"

Saga further expresses its interest in constructing and operating the above-described facilities.

Respectfully submitted,

**SAGA QUAD STATES  
COMMUNICATIONS, LLC**

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September 19, 2007