

October 9, 2007

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VIA HAND DELIVERY & ECFS

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
236 Massachusetts Ave., NE
Suite 110
Washington, DC 20002

Re: MB Docket No. 87-268
Advanced Television Systems and their Impact Upon the Existing
Television Broadcast Service, FCC 07-138
Petition for Limited Reconsideration

Dear Ms. Dortch:

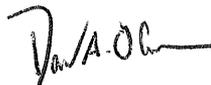
Transmitted herewith, on behalf of Radio Perry, Inc., are an original and four (4) copies of its Petition for Limited Reconsideration of the *Seventh Report and Order* issued on August 6, 2007 in the above-captioned proceeding.

An extra copy of the filing is enclosed. Please date-stamp the extra copy and return it to the courier.

Should you have any questions about this matter, please contact the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP



David A. O'Connor
Counsel for Radio Perry, Inc.

Enclosure
cc (via e-mail): Eloise Gore, FCC

facilities of 50 kW and an antenna HAAT of 247 meters.³ Radio Perry submits that the DTV Table is in error on both points and that the Construction Permit is correct. In fact, it would be impossible for WPGA-DT to operate at 247 meters HAAT because the WPGA-DT tower is not that high.

In addition, the Construction Permit contains the correct geographic coordinates for WPGA-DT's tower at 32° 45' 04" N Latitude, 83° 33' 27" W Longitude, while the DTV Table incorrectly provides geographic coordinates of 32° 45' 09" N Latitude, 83° 33' 35" W Longitude.

Radio Perry is unaware of the reason for the discrepancy between the Construction Permit and the DTV Table adopted in the *Order*, but submits that the Construction Permit, which was issued prior to the *Order*, should be controlling and that the *Order* should be revised to comport with the parameters set forth in the Construction Permit. These corrections potentially could alter WPGA-DT's area, population figures and interference percentage set forth in the DTV Table, and Radio Perry respectfully requests that those figures also be corrected by the Commission as needed.

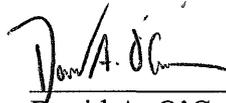
Radio Perry submits that the public interest would be served by a grant of this limited request for reconsideration, because it will help ensure the accuracy of the DTV Table and will advance the nation's transition to digital television. Radio Perry intends to complete construction of the facilities authorized in the WPGA-DT Construction Permit in the very near

³ *Order*, Appendix B, at 13. A copy of the relevant portion of the DTV Table adopted in the *Order* is attached hereto as Exhibit 2.

future, and therefore requests expedited consideration of this request.

Respectfully submitted,

RADIO PERRY, INC.



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Its Counsel

October 9, 2007

EXHIBIT 1

WPGA-DT
CONSTRUCTION PERMIT

United States of America
FEDERAL COMMUNICATIONS COMMISSION
DIGITAL TELEVISION BROADCAST STATION
CONSTRUCTION PERMIT

Authorizing Official:

Official Mailing Address:

RADIO PERRY, INC.
1691 FORSYTH STREET
PERRY GA 31201

Clay C. Pendarvis
Associate Chief
Video Division
Media Bureau

Facility Id: 54728

Grant Date: December 15, 2004

Call Sign: WPGA-DT

This permit expires 3:00 a.m.
local time, December 15, 2007.

Permit File Number: BMPCDT-20041203ADW

This permit modifies permit no.: BMPCDT-20021004AAY

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Name of Permittee: RADIO PERRY, INC.

Station Location: GA-PERRY

Frequency (MHz): 578 - 584

Channel: 32

Hours of Operation: Unlimited

EXHIBIT 2

RELEVANT PORTION OF
DTV TABLE
ADOPTED AUGUST 6, 2007

4842563_v1

Facility ID	State and City		NTSC	DTV								
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	% Interference Received
63867	GA	CORDELE	55	51	200	109		315335	834818	14405	356	0.3
60825	GA	DALTON	23	16	300	425	28422	345707	852258	24445	1157	2.7
23930	GA	DAWSON	25	8	6	313	44505	315615	843315	19618	471	21
46991	GA	MACON	13	13	30	238		324510	833332	27301	820	4.2
58262	GA	MACON	24	16	1000	216	77955	324458	833335	21248	676	0.3
43847	GA	MACON	41	40	110	189		324512	833346	15105	538	0
24618	GA	MACON	64	45	1000	223	60980	324551	833332	19160	655	0.8
68058	GA	MONROE	63	44	700	303		334441	842136	25422	4531	0.2
23917	GA	PELHAM	14	6	3.8	474	74339	304013	835626	30535	844	0
* 54728	GA	PERRY	58	32	50	247	74842	324509	833335	15647	553	0
51969	GA	ROME	14	51	1000	622	32746	341848	843855	35465	5192	0.4
23947	GA	SAVANNAH	9	9	15.2	320	80230	320848	813705	28965	759	0.3
590	GA	SAVANNAH	11	11	14.8	420	74380	320314	812101	28682	752	0
37174	GA	SAVANNAH	22	22	166	436	74457	320330	812020	25120	667	0
48662	GA	SAVANNAH	3	39	1000	442		320331	811755	37667	832	0.1
31590	GA	THOMASVILLE	6	46	1000	619		304013	835626	45196	972	0.1
63329	GA	TOCCOA	32	24	600	209		343644	832205	20917	1161	1.8
28155	GA	VALDOSTA	44	43	50	253	40583	311018	832157	13316	328	0
23929	GA	WAYCROSS	8	8	20	286		311317	823424	28624	426	5.9
23937	GA	WRENS	20	6	30	436	74332	331533	821709	25555	782	0
36914	HI	HILO	9	9	3.2	33	74970	194300	1550813	10655	79	0
4146	HI	HILO	11	11	3.35	33	74440	194357	1550404	5336	78	0
64544	HI	HILO	13	13	3.73	1	74413	194357	1550404	6703	79	0
34846	HI	HILO	2	22	8	1	44792	194351	1550411	1638	64	0.5
37103	HI	HILO	14	23	35	33	28420	194300	1550813	7064	78	0
4144	HI	HONOLULU	2	8	7.2	1		211746	1575036	11570	817	0
36917	HI	HONOLULU	9	9	7	33	74971	211746	1575036	9210	826	0
51241	HI	HONOLULU	38	10	14.3	577	66350	212345	1580558	26942	812	7.5
26431	HI	HONOLULU	11	11	3.2	637	74414	212403	1580610	22766	862	0
34527	HI	HONOLULU	20	19	60.7	606	43104	212351	1580600	16294	788	0
34445	HI	HONOLULU	5	23	1000	629	74843	212403	1580610	31295	852	0.4
3246	HI	HONOLULU	26	27	262	580	45219	212345	1580558	14530	829	0
36846	HI	HONOLULU	14	31	50	33	28782	211849	1575143	6227	746	0
65395	HI	HONOLULU	32	33	49.6	1	77218	211849	1575143	5500	751	0