

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20445**

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

COMMENTS IN SUPPORT OF GRAY TELEVISION LICENSEE, INC.

Gray Television Licensee, Inc. (“Gray Television”), licensee of digital television station KOLO-DT, Reno, Nevada (Facility ID 63331), hereby submits Comments in response to the *Eighth Notice of Proposed Rulemaking* (“Notice”) in the above-referenced proceeding.¹ Gray Television supports the Commission’s proposal set forth in para. 145 of the Notice to change the post-transition digital channel allotment for KOLO-DT from Channel 9 to Channel 8.² As acknowledged in the Notice, Gray Television is concerned that retuning its antenna for use only on Channel 9 could lead to serious engineering difficulties and interrupt service to the public.³

Currently, KOLO operates on NTSC Channel 8 and DTV Channel 9. The station has been granted a license for its digital facility and is operating within the parameters specified in that license (BMLCDT-20031106AFM). Since KOLO began digital operations in late 2003, it has employed a “common” antenna for both its digital Channel 9 and analog Channel 8 operations. This antenna is more than 45 years old and located at

¹ *Advanced Television Systems and Their Impact Upon Existing Television Broadcast Service*, MB Docket No. 87-268, Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking, FCC 07-138 (rel. Aug. 6, 2007).

² *Id.* at ¶145.

³ *Id.*

a mountaintop tower site in the Toiyabe National Forest, which is administered by the U.S. Forest Service.

Due to the fact that KOLO's antenna is tuned for Channel 8 operations and this antenna originally was not designed to cover multiple channels, the antenna's bandwidth for Channel 9 operations is not uniform. It has become apparent that this lack of uniformity reduces the ability of television receivers to correct for propagation effects such as multipath interference or receiver antenna misalignments. Therefore, if KOLO stays on Channel 9 for post-transition DTV operations, its antenna must be retuned or replaced to provide for better quality service to the public.

Based upon its consultations with equipment engineers, the Station believes that attempts to adjust the antenna's tuning rods may result in one or more of these rods becoming stuck in an undesired configuration. Any problems encountered while adjusting these rods would only worsen the antenna's performance for Channel 9 operations.

KOLO has investigated the option of replacing the existing antenna with a new Channel 9 antenna. However, this option also carries a significant risk of compromising service to the public because of the long delay inherent in the process by which KOLO must obtain approval from the U.S. Forest Service to make any modifications to its tower. Thus, KOLO determined that operating in digital on Channel 8 after the DTV transition is its best option for ensuring uninterrupted high-quality digital service to the public.

This proposal will not cause any additional interference, as stated by the Commission in the *Notice*.⁴ Furthermore, the Commission proposes to grant this request and adjust the DTV Table and Appendix B accordingly.

Therefore, for the reasons provided herein Gray Television supports the Commission's proposal to revise the DTV Table of Allotments to specify Channel 8 as KOLO's post-transition digital operations. The grant of this proposal will serve the public interest by ensuring that KOLO-DT can continue to provide uninterrupted digital services to the public.

Respectfully submitted,

GRAY TELEVISION LICENSEE, INC.

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⁴ *Notice* at ¶145.