

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

In the Matter of)
)
ADVANCED TELEVISION SYSTEMS) MB Docket No. 87-268
AND THEIR IMPACT UPON THE)
EXISTING TELEVISION BROADCAST)
SERVICE)

TO: Honorable Marlene H. Dortch
Secretary of the Commission

ATTN: The Commission

**PETITION FOR RECONSIDERATION
TO SEVENTH REPORT AND ORDER**

Holston Valley Broadcasting Corporation, licensee of Television Broadcast Station WKPT-TV and WKPT-DT, Kingsport, Tennessee ("Holston" or "WKPT"), by its attorney, pursuant to Section 405 of the Communications Act of 1934, as amended, hereby respectfully files this Petition for Reconsideration of the Seventh Report and Order in this proceeding.

1. Earlier this evening, Holston filed Comments in the related Eighth Further Notice. Out of an abundance of caution, Holston also seeks reconsideration of the Seventh Report and Order as it affects the digital allocation for WKPT-DT, Kingsport, Tennessee.

1. Holston has been the licensee of WKPT-TV, analog channel 19, since 1969. It is the ABC affiliate for the Bristol-Kingsport-Johnson City television market in northeast Tennessee and southwest Virginia. It has been allocated digital channel 27 during the transition period (WKPT-DT was the first operational digital television station in its market). WKPT-DT is set to return to channel 19 for the post-transition period.

2. The allocation proposal for WKPT-DT in the most recent FCC document dealing with the conversion from analog to digital broadcasting does not allow post-transition coverage to match the existing primary service contour of WKPT-TV's analog operations. Therefore, Holston respectfully requests the FCC to adopt the technical parameters stated in the following paragraph for post-transition WKPT-DT, which Holston believed it was entitled to use prior to the release of the "Eighth Further Notice".

3. Holston desires to operate in the post-transition period on Channel 19 with visual effective radiated power of 200 kilowatts (versus the 1.255 MW peak visual effective radiated power currently used at WKPT-TV's analog facility). WKPT-DT proposes to use the same "skull" pattern RCA antenna currently used by WKPT-TV. Holston urges the FCC to permit WKPT-DT to operate in this manner, rather than the lower effective radiated power (167 kW) and having to use the

narrow directional antenna pattern that WKPT-DT was required to use during the transition period.

4. It is in the public interest for Holston to be able to operate at 200 kW visual effective radiated power with its present antenna, as this will ensure that WKPT-DT will replicate the service area of WKPT-TV's analog facility.

WHEREFORE, Holston Valley Broadcasting Corporation urges that this Petition for Reconsideration **BE GRANTED** and that the Commission permit WKPT-DT, Kingsport, Tennessee to operate in the post-transition era on Channel 19 at 200 kilowatts effective radiated power with the "skull" pattern antenna currently used by analog WKPT-TV.

Respectfully submitted,

**HOLSTON VALLEY BROADCASTING
CORPORATION**

By


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DATED AND FILED: October 10, 2007