

**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: The Secretary

REPLY COMMENTS

Sunbelt Multimedia Co. ("Sunbelt"), the permittee of KTLM-DT, Rio Grande City, Texas ("KTLM" or the "Station"), by its attorneys, hereby submits these Reply Comments in response to the Commission's Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking, FCC 07-138, released August 7, 2007 ("*NPRM*") in the above-captioned proceeding. Sunbelt submits these Reply Comments in order to bring to the Commission's attention a discrepancy in the DTV Table of Allotments published in the *NPRM*. In support thereof, Sunbelt states as follows.

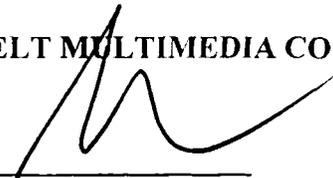
As evidenced by the Engineering Statement attached hereto as Exhibit A, the allotment for KTLM-DT contained in the *NPRM*'s DTV Table of Allotments, while consistent with the previously published DTV Table of Allotments, does not reflect authorizations issued to KTLM-DT in the interim. Sunbelt therefore requests that the Commission revise the DTV Table of Allotments to reflect the

parameters set forth KTLM-DT's authorized construction permit (File No. BPCDT-19991026ACA).¹

WHEREFORE, Sunbelt Multimedia Co. respectfully requests that Commission accept these Reply Comments, provide them with due consideration, and revise the DTV Table of Allotments accordingly.

Respectfully submitted,

SUNBELT MULTIMEDIA CO.

By: 

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Thompson Hine LLP
1920 N. Street, N.W.
Washington, D.C. 20036
(202) 331-8800
Its Attorney

Dated: October 25, 2007

¹ Sunbelt recognizes that this submission should logically have been made at an earlier juncture in this docket. However, it also recognizes that the Commission's intention has always been to finalize the DTV Table of Allotments in a manner that permits stations to complete their DTV build-out. Therefore, Sunbelt submits that the public interest calls for the Commission to take note of the information presented herein and giving that information due consideration.

EXHIBIT A

Engineering Statement

The following engineering statement and attached exhibits have been prepared for Sunbelt Multimedia Co., licensee of television station KTLM-TV at Rio Grande City, Texas, and are in support of their reply comments to the Eighth Further Notice of Proposed Rulemaking issued by the Commission.

During an examination of the table of allotments issued under the Eighth Further Notice, and issue with the allocation for KTLM-DT (Facility ID #62354) at Rio Grande City was identified. Under the table, the facility has a specified effective radiated power of 50 kW at a center of radiation of 113 meters using directional antenna ID #74946. The site specified in the table of allotments is 26-25-47 North Latitude by 98-49-25 West Longitude. Although this information is consistent with the data contained in the previous tables issued by the Commission, it is inconsistent with subsequent authorizations issued by the Commission.

During 1999, KTLM-TV implemented a major upgrade to their facility. This upgrade included construction of a new site including a 2000 foot tower. The maximum effective radiated power of KTLM-TV was increased to 5000 kW at a center of radiation of 577 meters above average terrain. KTLM-TV implemented this construction in order to better serve the residents of the Harlingen-Weslaco-Brownsville-McAllen, TX ADI of which it is a constituent station. KTLM-TV is a Telemundo affiliate, and the Spanish language programming it provides to the residents of region is very much in the public interest as the vast majority of the persons residing in the market speak Spanish.

Subsequent to this construction, KTLM-TV filed a license application to commence operation utilizing the new facility. This license application bears FCC File Number BLCT-19991019AAU. Due to the timing of the submission of the license application relative to the creation of the table of allotments, the upgrade in the NTSC facilities of KTLM-TV was not incorporated into the table of allotments, and the allocation created for KTLM-TV is consistent with the previous facilities of KTLM.

Shortly after the submission of this license application, KTLM-TV submitted an application for construction permit for its DTV facility specifying a different site under FCC File Number BPCDT-19991026ACA. This new site was specified in order to place the transmitting facilities of KTLM-TV in the same general vicinity as the other television facilities providing service to the market. The current NTSC site for KTLM was selected in order to accommodate the spacing considerations at the time of construction, but has remained problematic for KTLM and the residents of the market due to its location at the western end of the ADI. The use of the DTV site specified in the construction permit would provide better service to the residents of the region, especially in the vicinity of Brownsville, TX, as it would be more centrally located within the market and would provide the availability of off-air reception to nearly all residents of the ADI.

This application for construction permit was granted by the Commission, although the facility has been operational with a special temporary authority pending completion of its buildout at the CP specified site. Although this construction permit was granted and issued by the Commission and remains valid today, no appropriate modification of the entry in the table of allotments for KTLM-TV was made. The proponent is now faced with a situation where the allocation in the table of allotments does not approach replication of the authorized NTSC coverage, and leaves the vast

majority of the residents of the ADI without DTV service from KTLM-DT in the post transition environment. This situation is depicted in the contour map attached to this statement as Exhibit E-1.

The applicant therefore respectfully requests that the Commission appropriately modify KTLM-DT entry in the table of allotments to specify the parameters contained in its authorized construction permit. Based on the table of allotments, such a facility is not predicted to cause interference to any domestic facility as indicated in the attached interference study. Furthermore, no unacceptable interference would be caused to any facility authorized by the Mexican Government as concurrence with that Government was clearly received prior to the issuance of the original KTLM-DT construction permit.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature.

Jeremy D. Ruck
Consulting Engineer
October 24, 2007

D.L. Markley & Associates, Inc.

- Licensed KTLM-TV Grade B Contour
- KTLM-DT Noise Limited Contour Based on Allocation

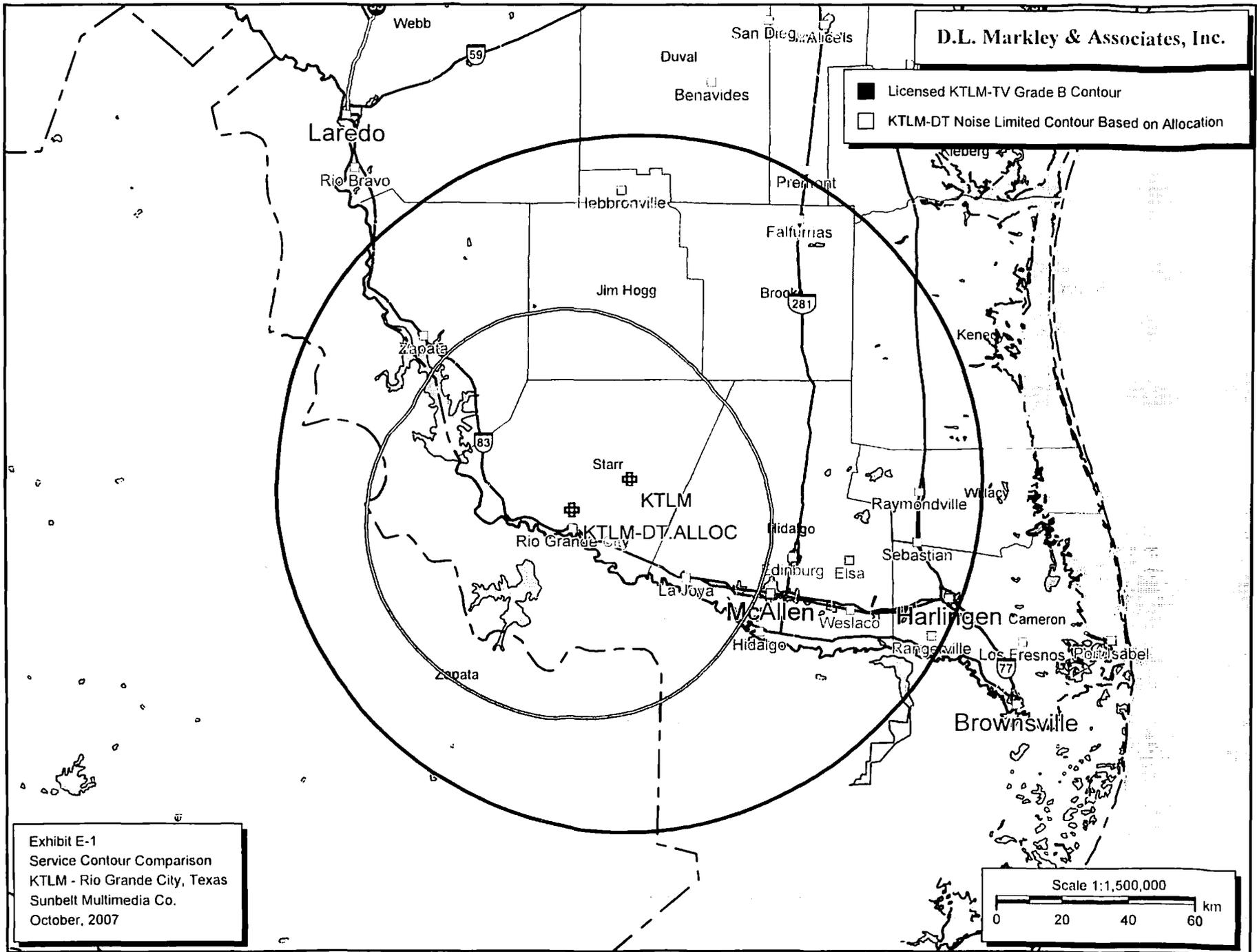
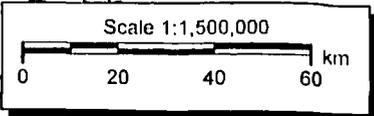


Exhibit E-1
Service Contour Comparison
KTLM - Rio Grande City, Texas
Sunbelt Multimedia Co.
October, 2007



KTLM-D.C
 BPCDT19991026ACA
 Latitude: 26-07-23 N
 Longitude: 098-04-20 W
 ERP: 1000.00 kW
 Channel: 20
 Frequency: 509.0 MHz
 AMSL Height: 310.0 m
 Elevation: 23.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: Yes
 Elec Tilt: 0.0
 Prop Model: Longley/Rice
 Climate: Cont temperate
 Conductivity: 0.0050
 Dielec Const: 15.0
 Refractivity: 301.0
 Receiver Ht AG: 10.0 m
 Receiver Gain: 0 dB
 Time Variability: 10.0%
 Sit. Variability: 50.0%
 ITM Mode: Broadcast

D.L. Markley & Associates, Inc.

- KTLM-D.C
- KAMR-DT
- KXAN-DT
- KTXH-DT
- KLDO-DT
- KIDY-DT
- KTXS-DT
- KWBU-DT

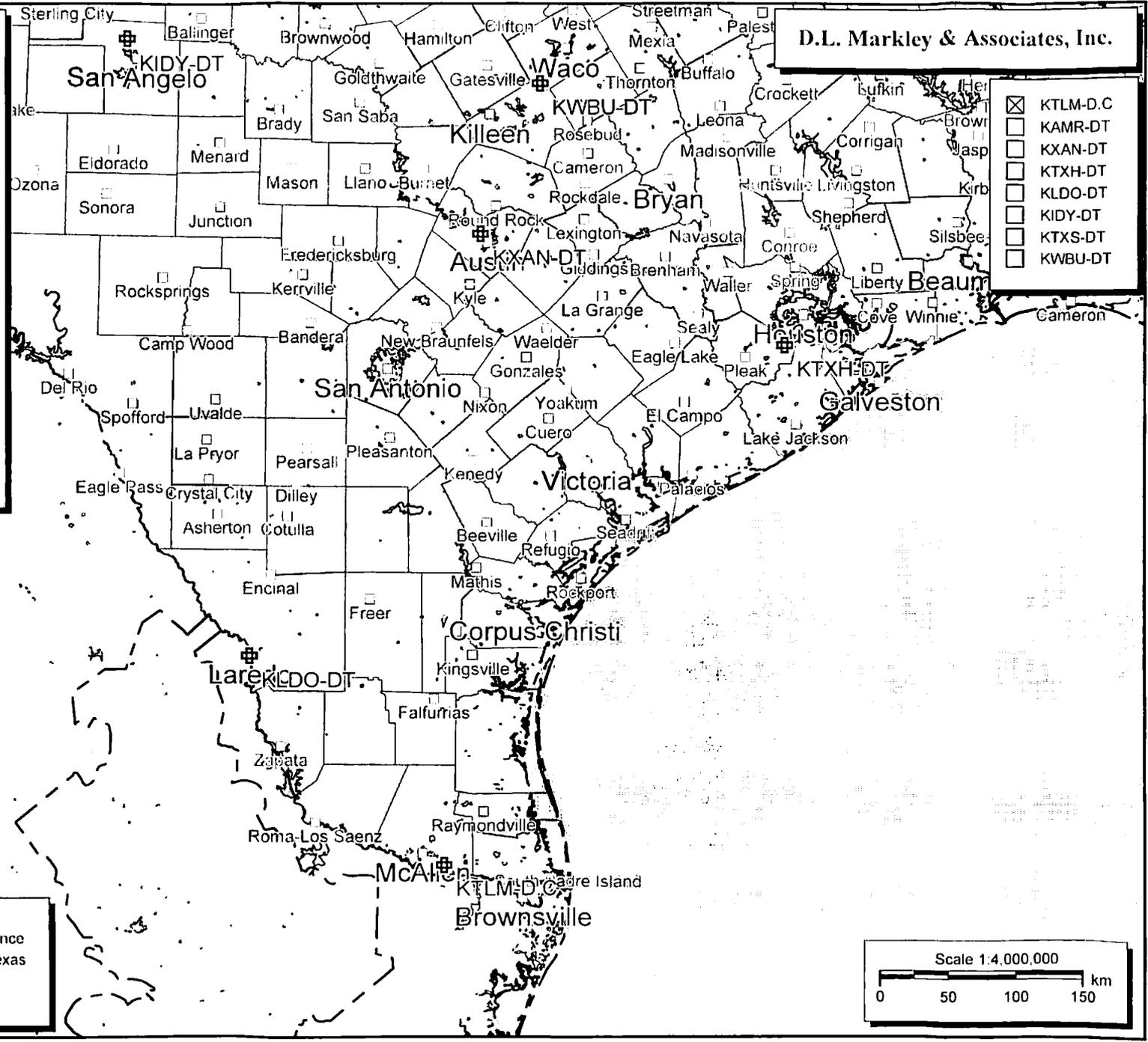
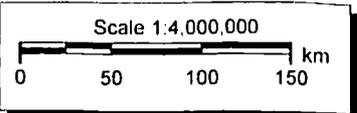


Exhibit E-2
 Areas of Predicted Interference
 KTLM - Rio Grande City, Texas
 Sunbelt Multimedia Co.
 October, 2007



D.L. Markley & Associates, Inc.
 Outgoing Interference Population Report
 Exhibit E-2 - Relative to 1990 Census

KTLM-D.C (20) Rio Grande City, TX - BPCDT19991026ACA
 Broadcast Type: Digital Service: T
 Lat: 26-07-23 N Lng: 098-04-20 W ERP: 1000.0 kW AMSL: 310.0 m
 TV Outgoing Interference Study
 Signal Resolution: 1.0 km
 Consider NTSC Taboo: Yes
 KWX error points are considered to
 be interference free coverage.
 # of radials computed for contours: 72
 Contours calculated using 8 radial HAAT.
 LR Profile Spacing Increment: 0.1 km
 Masked interference points are being counted
 as interference free.
 Pop Centroid DB: 2000 US Census (SF1)

Study Date: 10/24/2007
 TV Database Date: 10/19/2007

Primary Terrain: V-Soft 3 Second US Terrain
 Secondary Terrain: V-Soft 30 Second US Database

Population Database: 1990 US Census

 Stations Considered:

Call Letters	City	State	Dist	Bear
KAMR-DT (19)	Amarillo	TX	1081.8	341.6
KXAN-DT (21)	Austin	TX	466.4	3.2
KTXH-DT (19)	Houston	TX	456.9	32.9
KLDO-DT (19)	Laredo	TX	209.2	317.2
KIDY-DT (19)	San Angelo	TX	650.7	339.1
KTXS-DT (20)	Sweetwater	TX	724.2	344.7
KWBU-DT (20)	Waco	TX	580.3	6.9

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
KAMR-DT (19)	0.0	0	310,380	0	0	0.0
KXAN-DT (21)	0.0	0	1,417,457	0	0	0.0
KTXH-DT (19)	0.0	0	3,891,443	0	0	0.0
KLDO-DT (19)	0.0	0	133,357	0	0	0.0
KIDY-DT (19)	0.0	0	130,902	0	0	0.0
KTXS-DT (20)	0.0	0	243,340	0	0	0.0
KWBU-DT (20)	0.0	0	686,836	0	0	0.0

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KIDY-DT (19)	San Angelo	TX	650.7	339.1
KTXS-DT (20)	Sweetwater	TX	724.2	344.7
KWBU-DT (20)	Waco	TX	580.3	6.9

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
KAMR-DT (19)	0.0	0	341,919	0	0	0.0
KXAN-DT (21)	0.0	0	1,992,173	0	0	0.0
KTXH-DT (19)	0.0	0	4,846,877	0	0	0.0
KLDO-DT (19)	0.0	0	193,546	0	0	0.0
KIDY-DT (19)	0.0	0	137,296	0	0	0.0
KTXS-DT (20)	0.0	0	253,065	0	0	0.0
KWBU-DT (20)	0.0	0	861,918	0	0	0.0