

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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

**PETITION FOR CLARIFICATION
AND PARTIAL RECONSIDERATION**

Nashville Public Television, Inc. (“NPT”) submits this Petition for Clarification and Partial Reconsideration of the Commission’s *Seventh Report and Order* in this proceeding.¹ NPT is the licensee of WNPT/WNPT-DT, Nashville, Tennessee (“the Station”). NPT respectfully requests that the Commission amend the post-transition facilities specified for WNPT-DT in Appendix B to the *Seventh Report and Order* as set forth below. Grant of this request would serve the public interest.

I. SPECIFIC REQUEST FOR RELIEF

NPT requests that the Commission clarify that WNPT-DT will be able to use the Station’s analog antenna (at the Station’s analog tower site) for WNPT-DT’s post-transition digital operations. It also requests that the Commission amend the post-transition DTV Table of Allotments, originally published as Appendix B to the *Seventh Report and Order*, accordingly:

¹ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Seventh Report and Order and Eighth Further Notice of Proposed Rule Making*, MB Dkt No. 87-268, FCC 07-138 (rel. August 6, 2007) (“*Seventh Report and Order*”).

WNPT-DT, Facility ID 41398

	Antenna ID	HAAT (m)	Latitude (degrees-minutes-seconds)
From	74578	411	36-02-50
To	79484	390	36-02-49 ²

II. CLARIFICATION AND PARTIAL RECONSIDERATION IS WARRANTED IN THIS CASE

Grant of this Petition would serve the public interest. First, these minor adjustments to the Station's post-transition allotment would facilitate efficient use of already-installed equipment, which is a key consideration in the digital transition.³ Second, these adjustments would not expand the Station's post-transition coverage contour (the proposed contour is very slightly smaller than that established by the currently-specified facilities). Third, grant of the requested relief would satisfy the 0.1% interference criterion.⁴ Finally, grant of this Petition would enable the Station to use the existing analog antenna post-transition. The information necessary to describe the desired facilities (*e.g.*, site coordinates, height above average terrain, power) is a matter of record at the Commission. Therefore, grant of this Petition would enable the Station to plan and achieve an efficient transition.

* * *

For the reasons discussed and in the manner described herein, NPT respectfully requests that the Commission clarify and partially reconsider the *Seventh Report and Order*.

² See *Seventh Report and Order* at ¶ 35 (accepting coordinate corrections of three seconds or less, consistent with the policy that such corrections may be licensed without a construction permit).

³ See Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, *Joint Comments of the Association for Maximum Service Television, Inc. and the National Association of Broadcasters*, MB Dkt No. 07-91, at 2 and 26-27 (filed Aug. 15, 2007) (noting that many stations plan to use their existing analog antennas after the transition, which will mitigate equipment shortages).

⁴ See the engineering analysis attached as Attachment 1.

Respectfully submitted,

**NASHVILLE PUBLIC TELEVISION,
INC.**

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Attachment 1



**Post DTV Transition Planning
WNPT Nashville, TN
September 4, 2007**

WNPT Nashville, TN analog channel 8, DTV channel 46 elected to return to its analog channel 8 for post transition operation. Furthermore, WNPT wishes to utilize its omnidirectional analog antenna for post transition operation instead of the replication pattern specified in the post transition allotment. The analog antenna is on an adjacent tower at a slightly lower elevation. In view of this an analysis was performed to determine if using the analog antenna would have any significant effect on coverage and to insure that it would meet the FCC's proposed criteria for post transition operation. The proposed requirement is that the service contour may not extend beyond that of the allotted facility.

The attached contour plot comparison confirms that the proposed use of the analog antenna will meet the FCC's proposed criteria. In addition, the attached coverage plots and predicted service population comparison also confirms that use of the analog antenna will not significantly impact the WNPT coverage.

The analysis also indicates that both the allotment facility and the proposed use of the analog antenna will cause just under 0.5% interference to channel 8 Louisville, KY. This is noted since the FCC's has proposed limiting any further maximization to the 0.5% limit.



Therefore, if the proposed limit becomes the rule then further expansion of the WNPT facility would require the use of a directional antenna.

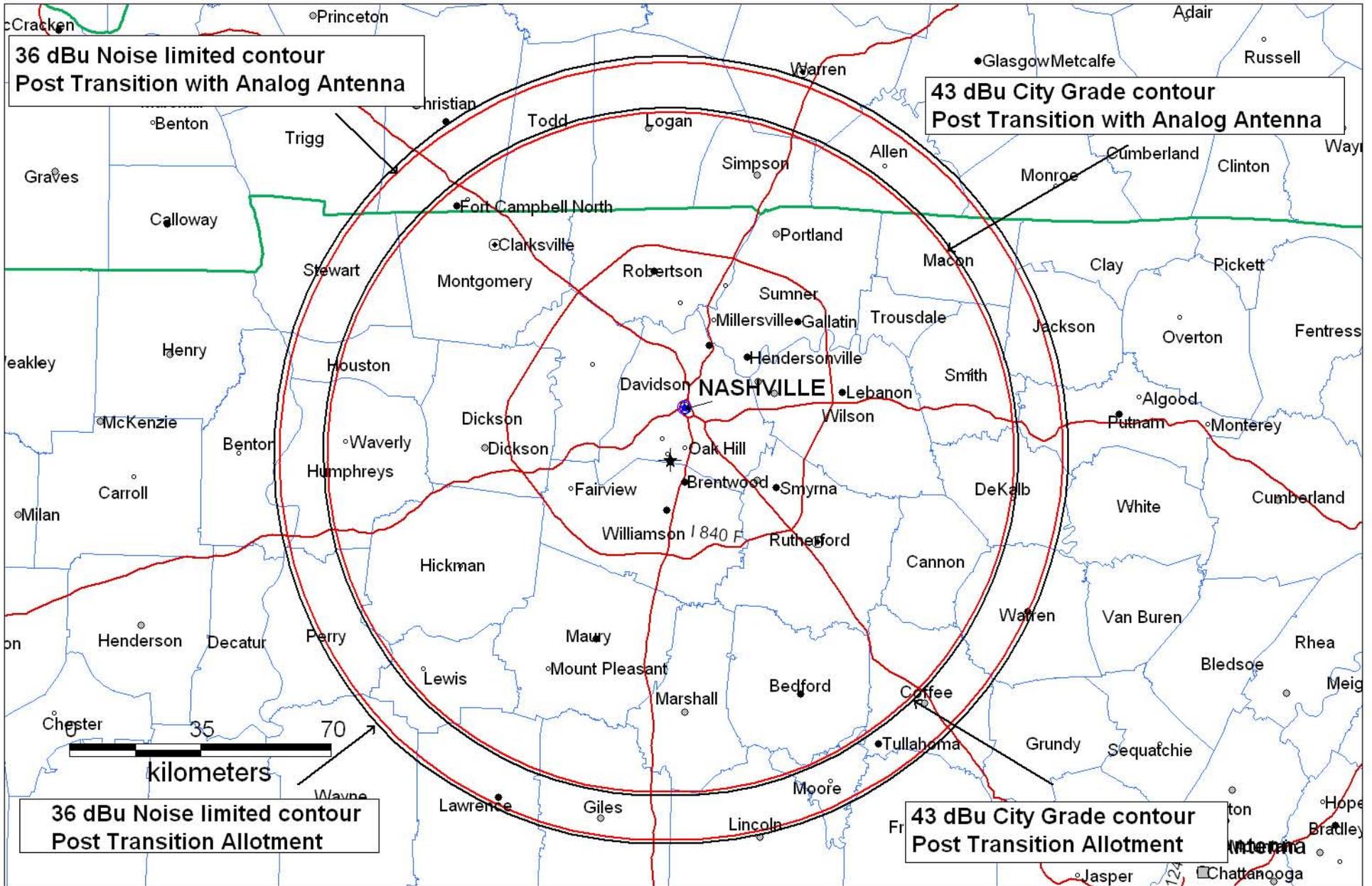
The above was prepared by:

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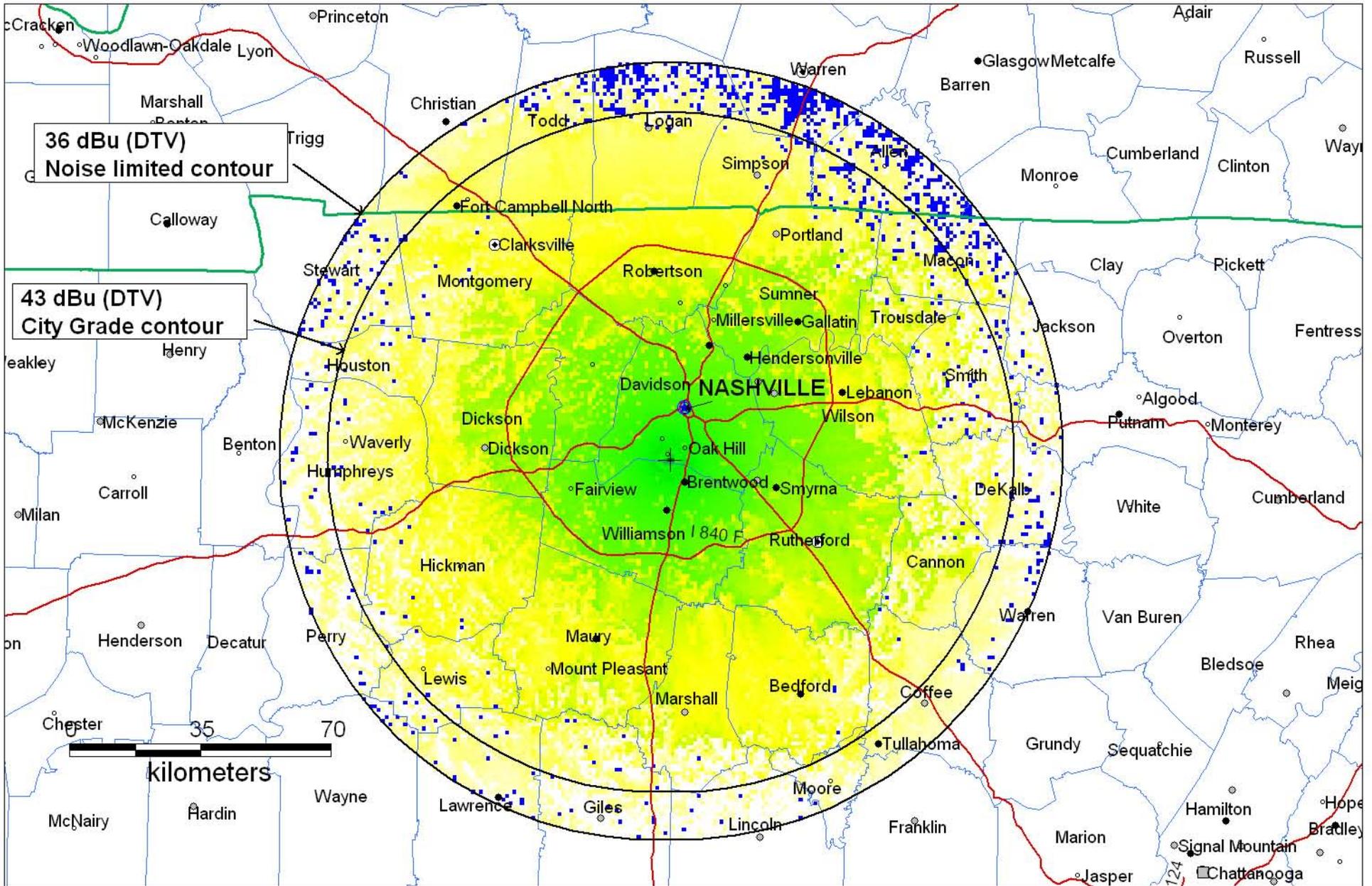
WNPT Nashville, TN - Predicted Service Comparison

State	County	Current Analog Facility		Post Transition DTV Allotment 17.7 kW		Post Transition Channel 8 Using Analog Antenna 17.7 kW	
		Population	Households	Population	Households	Population	Households
KENTUCKY	ALLEN	3,312	1,227	10,031	3,840	8,845	3,392
KENTUCKY	CHRISTIAN	25,568	6,495	36,040	10,596	29,038	7,836
KENTUCKY	LOGAN	12,059	4,826	18,361	7,267	17,790	7,044
KENTUCKY	MONROE	0	0	68	32	1	1
KENTUCKY	SIMPSON	13,601	5,408	16,242	6,354	16,283	6,366
KENTUCKY	TODD	8,990	3,424	10,222	3,895	10,064	3,839
KENTUCKY	WARREN	497	190	8,915	3,265	5,629	2,078
TENNESSEE	BEDFORD	36,971	13,684	37,203	13,772	37,169	13,754
TENNESSEE	BENTON	0	0	222	99	57	20
TENNESSEE	CANNON	11,812	4,580	12,474	4,843	12,429	4,819
TENNESSEE	CHEATHAM	35,912	12,878	35,912	12,878	35,912	12,878
TENNESSEE	CLAY	0	0	70	28	0	0
TENNESSEE	COFFEE	25,693	9,859	43,886	17,381	41,920	16,558
TENNESSEE	DAVIDSON	569,891	237,405	569,891	237,405	569,891	237,405
TENNESSEE	DEKALB	6,205	2,453	11,668	4,621	10,467	4,079
TENNESSEE	DICKSON	42,966	16,404	43,156	16,473	43,156	16,473
TENNESSEE	FRANKLIN	77	31	3,488	1,329	3,288	1,248
TENNESSEE	GILES	7,846	2,946	8,991	3,396	8,803	3,330
TENNESSEE	HICKMAN	20,298	7,744	20,668	7,877	20,578	7,838
TENNESSEE	HOUSTON	4,606	1,761	6,817	2,668	6,740	2,636
TENNESSEE	HUMPHREYS	6,642	2,620	14,461	5,815	14,470	5,806
TENNESSEE	JACKSON	549	233	880	361	793	325
TENNESSEE	LAWRENCE	12,171	4,425	20,302	7,817	17,748	6,776
TENNESSEE	LEWIS	9,391	3,655	10,289	3,976	9,877	3,837
TENNESSEE	LINCOLN	1,374	534	2,916	1,151	2,686	1,048
TENNESSEE	MACON	6,548	2,461	14,352	5,607	13,511	5,276
TENNESSEE	MARSHALL	25,042	9,662	25,717	9,906	25,584	9,838
TENNESSEE	MAURY	69,188	26,331	69,464	26,432	69,402	26,405
TENNESSEE	MONTGOMERY	127,646	45,885	134,638	48,283	132,994	47,754
TENNESSEE	MOORE	2,134	817	3,699	1,369	3,490	1,319
TENNESSEE	PERRY	922	367	2,416	959	1,676	659
TENNESSEE	PUTNAM	1,109	430	2,001	787	1,341	518

TENNESSEE ROBERTSON	54,384	19,882	54,433	19,906	54,433	19,906
TENNESSEE RUTHERFORD	181,961	66,421	182,023	66,443	182,023	66,443
TENNESSEE SMITH	9,787	3,778	14,076	5,464	13,477	5,223
TENNESSEE STEWART	1,681	659	5,579	2,198	4,636	1,819
TENNESSEE SUMNER	128,693	48,294	130,177	48,848	129,919	48,756
TENNESSEE TROUSDALE	6,013	2,259	7,143	2,732	6,583	2,511
TENNESSEE WARREN	7,593	3,018	20,155	7,877	17,713	6,959
TENNESSEE WAYNE	73	31	183	79	90	39
TENNESSEE WILLIAMSON	126,638	44,725	126,638	44,725	126,638	44,725
TENNESSEE WILSON	88,172	32,554	88,771	32,782	88,765	32,780
Total	1,694,015	650,356	1,824,638	701,536	1,795,909	690,316



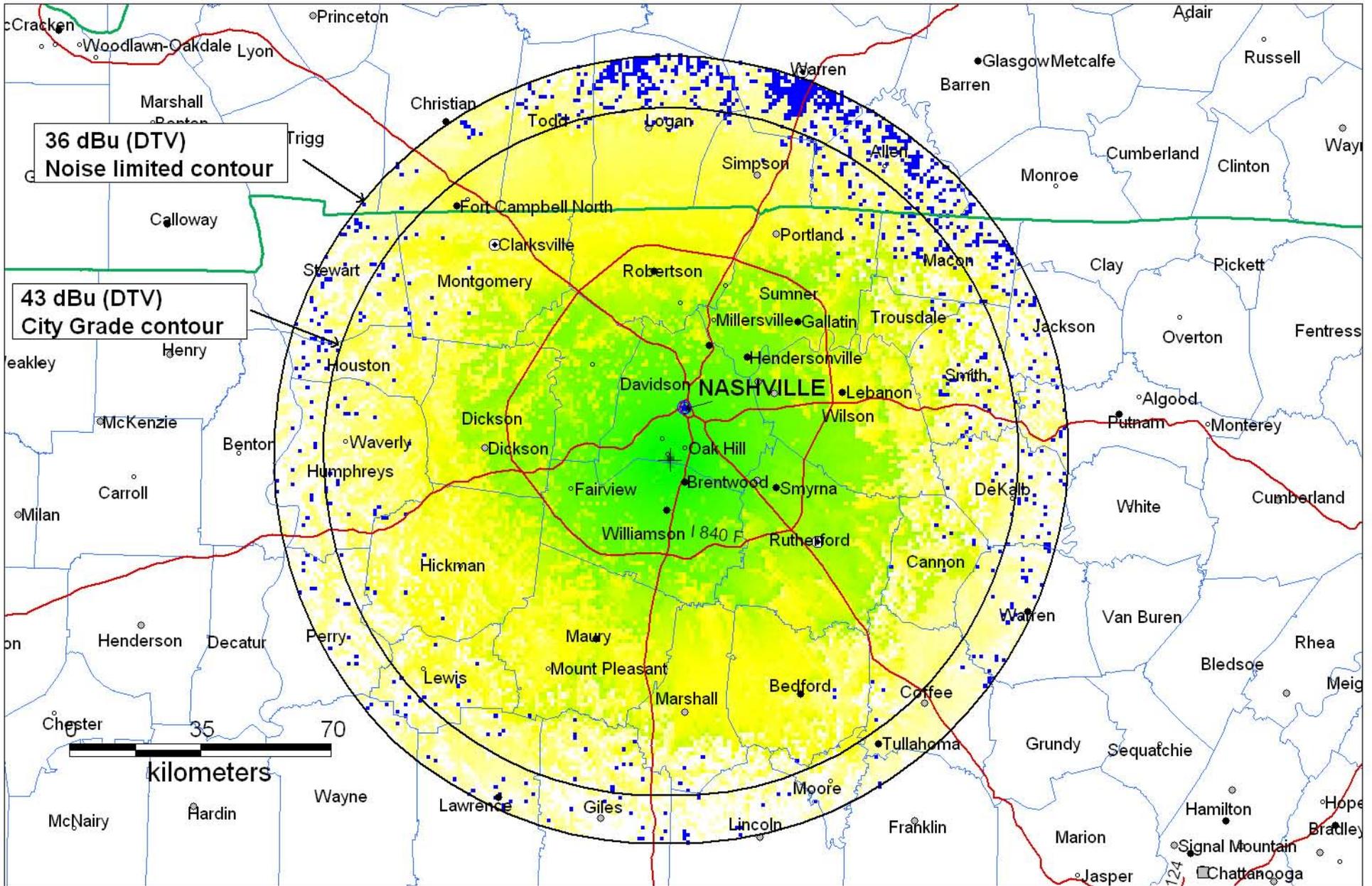
**WNPT Nashville, TN Post Transition DTV Channel 8
Analog Antenna at 17.7 kW (Red)
Allotment Facility 17.7 kW (Black)**



**WNPT Nashville, TN
Post Transition DTV Channel 8 with
Analog Antenna at 17.7 kW**

Blue indicates interference from other DTV stations

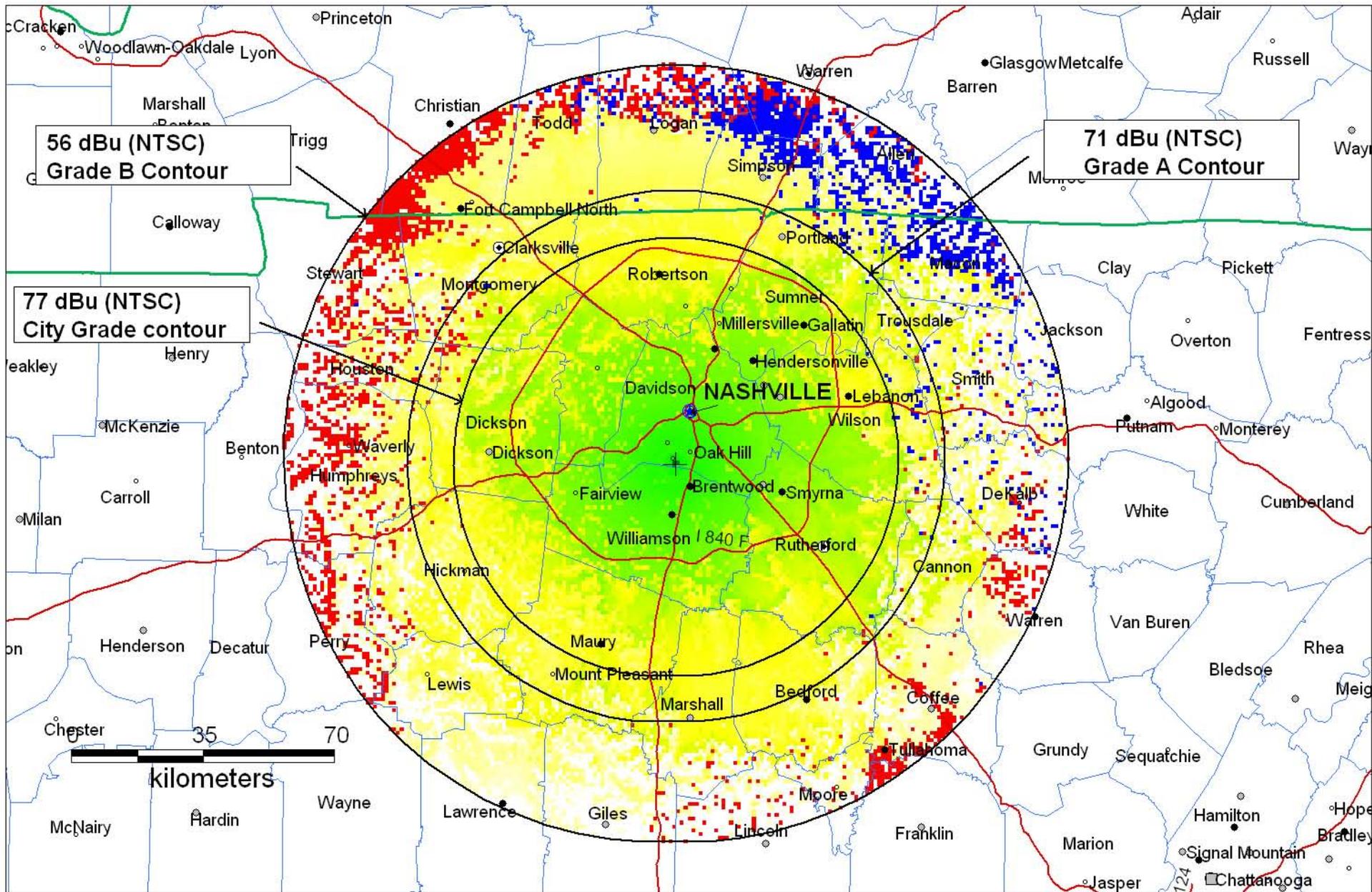
Dark green represents high signal strength fading to yellow and then to white at the noise limited threshold



**WNPT Nashville, TN
Post Transition DTV Channel 8 Allotment**

Blue indicates interference from other DTV stations

Dark green represents high signal strength fading to yellow and then to white at the noise limited threshold



**WNPT Nashville, TN
Current Analog Channel 8**

Blue indicates interference from other DTV stations
Red indicates interference from other Analog stations

Dark green represents high signal strength fading to yellow and then to white at the noise limited threshold