Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

To: Office of the Secretary

PETITION FOR PARTIAL RECONSIDERATION OF MEREDITH CORPORATION

By its attorneys and pursuant to Section 1.429 of the Commission's Rules,[1] Meredith Corporation ("Meredith"), licensee of WHNS-DT (Greenville, South Carolina) (the "Station"), hereby respectfully requests that the Commission reconsider portions of the *Seventh Report and Order* in the above-captioned proceeding in which it adopted the Post-Transition DTV Table of Allotments.[2]

Meredith petitions for change of certified facilities and requests revision of the Station's allotment set forth in the *Seventh R&O*. Specifically, Meredith requests that the certification and allotment be changed to allow the Station to serve as much of its currently allotted and Grade B service area as possible while still complying with the Commission's interference standards.

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[1] 47 C.F.R. § 1.429 (2006).

[2] In the Matter of Advanced Television Systems and Their Impact Upon Existing Television Broadcast Service, *Seventh Report and Order*, MB Docket No. 87-268, FCC 07-138 (rel. Aug. 6, 2007) ("*Seventh R&O*"). The *Seventh R&O* was published in the Federal Register on September 26, 2007. *See* 72 Fed. Reg. 54720. Accordingly, this petition is timely filed. *See* 47 C.F.R. §§ 1.429(d), 1.4(b).

Pursuant to this Petition, the DTV Table of Allotments would be changed from:

Facility ID	State and City		NTSC	DTV					
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
72300	SC	GREENVILLE	21	21	496	744	70350	351056	824056

To:

Facility ID	State and City		NTSC	DTV					
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
72300	SC	GREENVILLE	21	21	**250**	**761**	**35715**	351056	824056

The Commission assigned the Station an out-of-core DTV channel, so the Station as a result will switch DTV operations to its existing analog channel and employ its existing analog antenna after February 18, 2009. Meredith explained in comments filed pursuant to the *Third Periodic DTV Review* that the mismatch between the Station's actual and allotted antenna patterns would result in post-transition service losses if the Commission adopted its proposal to prohibit service expansion beyond the relevant allotted contour.[3] Indeed, the Station only could reach 92 percent of the allotted population under that proposal, which would render it incapable of satisfying the Commission's proposed 95 percent threshold for expedited construction permit processing.[4] Meredith contended that the Commission's proposals effectively would unfairly punish those stations with the most to do to complete the transition. Accordingly, Meredith proposed that the Commission should allow such stations to provide meaningful replication and expand service beyond their allotments (as long as they complied with interference standards).

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[3] *See* Comments of Meredith Corporation in response to Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television, MB Docket No. 07-91, *Notice of Proposed Rule Making*, FCC 07-70 (rel. May 18, 2007), ¶ 99 ("*Third Periodic DTV Review*").

[4] *Id.*, ¶ 94.

Meredith further explained that the Commission should allow stations to rely upon their actual vertical antenna pattern, an approach it believes would result in a more precise representation of the predicted service area and thereby allow for a more efficient use of the spectrum.

In the *Seventh R&*O, the Commission decided to modify the coverage areas of a number of allotments to permit stations to reach the areas served by their analog facilities.[5] Meredith herein seeks similar treatment and thus proposes an allotment for the Station that conforms with the approach outlined in the preceding paragraph by minimizing losses without causing impermissible interference. As can be seen in Exhibit A,[6] the service area of the revised allotment still would not encompass that certified, but it would permit service to practically all of the Grade B service area. Higher power levels than proposed, however, would cause impermissible interference. Meredith should note that it is uncertain what interference standard the Commission would apply to its proposal. The proposed 250 kW presumes that the Commission will apply a 0.1% interference standard.[7] If the Commission instead permits interference up to 0.5%, then Exhibit A demonstrates that 260 kW would comply.[8] The results are based upon use of the Station's actual vertical antenna pattern. Reliance on a presumed standard vertical pattern would produce different results. Because the revised allotment would allow for meaningful replication while minimizing service losses and avoiding impermissible

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[5] *Seventh R&O*, ¶¶ 62-68.

[6] *See* Technical Exhibit, attached as Exhibit A.

[7] *See Seventh R&O*, ¶¶ 62-68.

[8] The results in Exhibit A show the total interference. To obtain the actual amount of new interference, subtract the values for certified interference.

interference, Meredith believes that consideration and grant of this instant petition is in the public interest.[9]

For these reasons, Meredith petitions for change of the Station's certified facilities and revision of the allotment.

Respectfully submitted,

MEREDITH CORPORATION

/s/

By_____
Scott S. Patrick

DOW LOHNES PLLC
1200 New Hampshire Avenue, NW, Suite 800
Washington, DC 20036
202-776-2000

Its Attorneys

Dated: October 26, 2007

[9] *See* 47 C.F.R. § 1.429(b)(3).

EXHIBIT A

Technical Exhibit

WHNS COVERAGE COMPARISON
PROPOSAL 1
CERTIFIED vs. 250kW

	Population		IX Received	Noise Limited Contour Area
Certified:	1,918,280		0.9%	39663.8 sq km
Proposed:	1,876,875		0.5%	37559.3 sq km
Net Loss:	**41,405**	**2.2%**		**2104.5 sq km**

NEW INTERFERENCE CAUSED BY WHNS

	WHNS Certified	WHNS Proposed 200 kW
WPBA, Atlanta, GA	2.3%	1.8%
WUPX, Morehead, KY	0.0%	0.0%
WWMB, Florence, SC	0.1%	0.2%
WCNC, Charlotte, NC	0.3%	0.4%

WHNS CERTIFIED DTV FACILITY

Census data selected 2000
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-16-2007 Time: 15:26:44

Record Selected for Analysis

WHNS BFRCCT -20050815ADB GREENVILLE SC US
Channel 21 ERP 496.4 kW HAAT 00744 m RCAMSL 01510 m
Latitude 035-10-56 Longitude 0082-40-56
Status CP Zone 2 Border
Dir Antenna Make CDB Model 00000000070350 Beam tilt Y Ref Azimuth 0.0
Last update Cutoff date Docket
Comments
Applicant MEREDITH CORPORATION

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility does not meet maximum height/power limits
Channel 21 ERP = 496.40 HAAT = 744.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	177.494	779.6	112.3
45.0	481.131	735.3	120.0
90.0	187.141	676.8	108.7
135.0	65.246	811.5	104.1
180.0	152.281	784.5	111.1
225.0	284.461	646.7	111.1
270.0	80.315	786.0	105.2
315.0	68.316	733.6	101.8

Results for: 21A SC GREENVILLE BFRCCT 20050815ADB CP
HAAT 744.0 m, ATV ERP 496.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2178123	39663.8
not affected by terrain losses	1934796	32803.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	16516	676.1
lost to ATV IX only	16516	676.1
lost to all IX	16516	676.1

Potential Interfering Stations Included in above Scenario 1

21A GA ATLANTA	BDTV	00000167	CP
21A KY MOREHEAD	BPCDT	20040610ABJ	CP
21A SC FLORENCE	BLCDT	20030122AAT	LIC
22A NC CHARLOTTE	BLCDT	20031211ABN	LIC

WHNS PROPOSAL 1 - 250kW DTV FACILITY

Census data selected 2000
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-16-2007 Time: 16:21:06

Record Selected for Analysis

WHNS USERRECORD-01 GREENVILLE SC US
Channel 21 ERP 250. kW HAAT 762. m RCAMSL 01528 m
Latitude 035-10-56 Longitude 0082-40-56
Status APP Zone 2 Border
Dir Antenna Make usr Model 00000000035715 Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility does not meet maximum height/power limits
Channel 21 ERP = 250.00 HAAT = 762.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	182.606	797.6	113.3
45.0	152.277	753.3	109.9
90.0	163.069	694.8	108.2
135.0	143.419	829.5	112.1
180.0	175.509	802.5	113.1
225.0	126.915	664.7	104.7
270.0	8.861	804.0	85.8
315.0	21.784	751.6	92.2

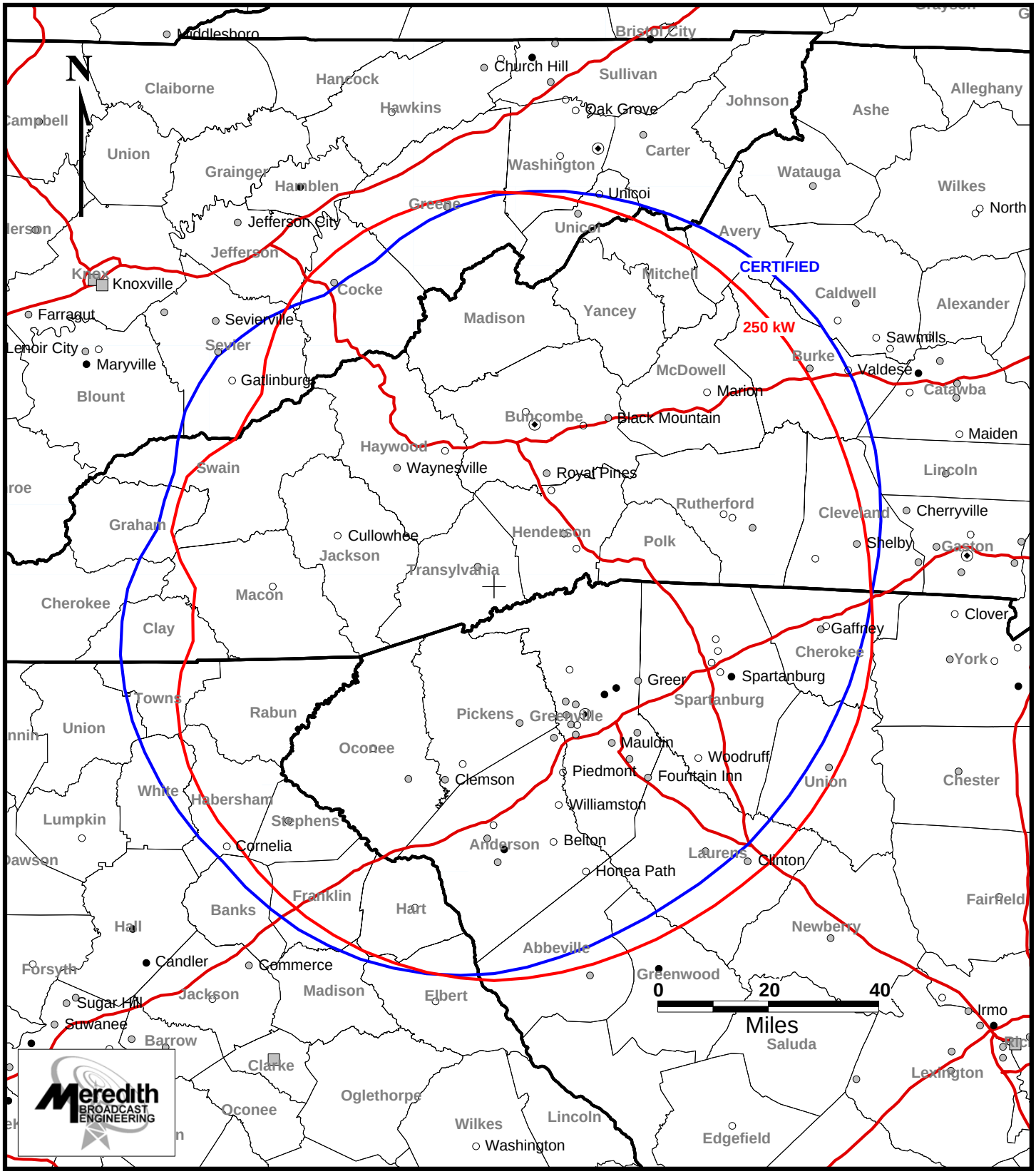
Results for: 21A SC GREENVILLE USERRECORD01 APP
HAAT 762.0 m, ATV ERP 250.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2115926	37559.3
not affected by terrain losses	1887024	30910.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	10149	448.1
lost to ATV IX only	10149	448.1
lost to all IX	10149	448.1

Potential Interfering Stations Included in above Scenario 1

21A GA ATLANTA	BDTV	00000167	CP
21A KY MOREHEAD	BPCDT	20040610ABJ	CP
21A SC FLORENCE	BLCDT	20030122AAT	LIC
22A NC CHARLOTTE	BLCDT	20031211ABN	LIC

WHNS-DT Channel 21
Greenville, SC
Certified 496.4 kW, 744 HAAT, Digital Antenna, FCC Vert Pattern
Scenario: 250 kW, 762 HAAT, Analog Antenna, Actual Vert Pattern



WHNS COVERAGE COMPARISON
PROPOSAL 2
CERTIFIED vs. 260kW

	Population		IX Received	Noise Limited Contour Area
Certified:	1,918,280		0.9%	39663.8 sq km
Proposed:	1,883,788		0.5%	37807.3 sq km
Net Loss:	**34,492**	**1.8%**		**1856.5 sq km**

NEW INTERFERENCE CAUSED BY WHNS

	WHNS Certified	WHNS Proposed 260 kW
WPBA, Atlanta, GA	2.3%	1.8%
WUPX, Morehead, KY	0.0%	0.0%
WWMB, Florence, SC	0.1%	0.2%
WCNC, Charlotte, NC	0.3%	0.5%

WHNS CERTIFIED DTV FACILITY

Census data selected 2000
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-16-2007 Time: 15:26:44

Record Selected for Analysis

WHNS BFRCCT -20050815ADB GREENVILLE SC US
Channel 21 ERP 496.4 kW HAAT 00744 m RCAMSL 01510 m
Latitude 035-10-56 Longitude 0082-40-56
Status CP Zone 2 Border
Dir Antenna Make CDB Model 00000000070350 Beam tilt Y Ref Azimuth 0.0
Last update Cutoff date Docket
Comments
Applicant MEREDITH CORPORATION

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility does not meet maximum height/power limits
Channel 21 ERP = 496.40 HAAT = 744.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	177.494	779.6	112.3
45.0	481.131	735.3	120.0
90.0	187.141	676.8	108.7
135.0	65.246	811.5	104.1
180.0	152.281	784.5	111.1
225.0	284.461	646.7	111.1
270.0	80.315	786.0	105.2
315.0	68.316	733.6	101.8

Results for: 21A SC GREENVILLE BFRCCT 20050815ADB CP
HAAT 744.0 m, ATV ERP 496.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2178123	39663.8
not affected by terrain losses	1934796	32803.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	16516	676.1
lost to ATV IX only	16516	676.1
lost to all IX	16516	676.1

Potential Interfering Stations Included in above Scenario 1

21A GA ATLANTA	BDTV	00000167	CP
21A KY MOREHEAD	BPCDT	20040610ABJ	CP
21A SC FLORENCE	BLCDT	20030122AAT	LIC
22A NC CHARLOTTE	BLCDT	20031211ABN	LIC

WHNS PROPOSAL 2 - 260kW DTV FACILITY

Census data selected 2000
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-17-2007 Time: 07:11:40

Record Selected for Analysis

WHNS USERRECORD-01 GREENVILLE SC US
Channel 21 ERP 260. kW HAAT 762. m RCAMSL 01528 m
Latitude 035-10-56 Longitude 0082-40-56
Status APP Zone 2 Border
Dir Antenna Make usr Model 00000000035715 Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility does not meet maximum height/power limits
Channel 21 ERP = 260.00 HAAT = 762.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	189.903	797.6	113.6
45.0	158.362	753.3	110.2
90.0	169.593	694.8	108.5
135.0	149.140	829.5	112.5
180.0	182.520	802.5	113.4
225.0	131.991	664.7	105.1
270.0	9.210	804.0	86.1
315.0	22.645	751.6	92.5

Results for: 21A SC GREENVILLE USERRECORD01 APP
HAAT 762.0 m, ATV ERP 260.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2126052	37807.3
not affected by terrain losses	1893300	31126.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	9512	440.1
lost to ATV IX only	9512	440.1
lost to all IX	9512	440.1

Potential Interfering Stations Included in above Scenario 1

21A GA ATLANTA	BDTV	00000167	CP
21A KY MOREHEAD	BPCDT	20040610ABJ	CP
21A SC FLORENCE	BLCDT	20030122AAT	LIC
22A NC CHARLOTTE	BLCDT	20031211ABN	LIC

WHNS-DT Channel 21
Greenville, SC
Certified 496.4 kW, 744 HAAT, Digital Antenna, FCC Vert Pattern
Scenario: 260 kW, 762 HAAT, Analog Antenna, Actual Vert Pattern