

**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 THE UNIVERSITY OF ALASKA

By its attorneys and pursuant to Section 1.429 of the Commission's Rules,¹ the University of Alaska ("University"), licensee of noncommercial educational station KUAC-DT (Fairbanks, Alaska) (the "Station"), hereby respectfully requests that the Commission reconsider certain specific parameters of the allotment for Station KUAC-DT in the Final DTV Table of Allotments in the *Seventh Report and Order* in the above-captioned proceeding.²

The University requests that the Station's allotment permit KUAC-DT to continue utilizing a non-directional antenna and HAAT of 163 meters as listed in the current analog license³ and the current interim DTV license.⁴ The University also requests the allotment include an ERP of 147.9 kW to ensure reliable reception of the KUAC-DT signal at four currently utilized translator stations. These changes to the DTV Table of Allotments would allow KUAC-DT to more closely replicate its analog coverage area and provide service via its

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). The *Seventh Report and Order* 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).

³ See License No. BLET-319.

⁴ See License No. BLEDT-20040525ADP.

translators, which themselves provide critical over-the-air television service to otherwise unserved or underserved communities.

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)
69315	AK	FAIRBANKS	9	9	3.2	152	80229	645442	1474638

To:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
69315	AK	FAIRBANKS	9	9	148	163	Blank	645442	1474638

The University currently maintains three translators in Delta Junction, Healy, and Nenana, which are fed by KUAC-TV’s off-air signal. A fourth unaffiliated translator in Manley Hot Springs also rebroadcasts KUAC-TV’s signal. In two of these communities, KUAC-TV’s signal via the translator is the only off-air television signal available, and the other communities only receive one or two commercial broadcast television signals in addition to KUAC-TV signal via the translator.

These translators will not work within the parameters of the current DTV Table of Allotments because of the “cliff effect” of DTV signals. The University thus requests the Commission amend the DTV Table of Allotments to allow KUAC-DT to utilize a HAAT of 163 meters, consistent with the KUAC-TV analog license, and a non-directional antenna with an ERP of 147.9 kW.

No party would be prejudiced by this revision of the Table. As demonstrated in the attached Technical Exhibit,⁵ this change satisfies the standard in the *Seventh Further Notice of*

⁵ See Technical Exhibit, attached as Exhibit A.

Proposed Rulemaking that modifications to the Table not cause interference in excess of 0.1 percent to other allotments.⁶

Amending the DTV Table of Allotments to include a non-directional antenna at the current HAAT and an increase ERP of 147.9 kW would permit the Station after the end of the DTV transition to continue operating with a coverage area as presently authorized and thus avoid causing service disruptions in rural Alaska. The University accordingly believes that consideration and grant of this instant petition is in the public interest.⁷

For these reasons, the University petitions for change of the Station's certified facilities and revision of the allotment to include the current HAAT and an increased ERP.

Respectfully submitted,
UNIVERSITY OF ALASKA

By _____ /s/_____
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Dated: October 26, 2007

⁶ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Seventh Further Notice of Proposed Rulemaking*, 21 FCC Rcd 12100 (2006).

⁷ See 47 C.F.R. § 1.429(b)(3).