

**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 OKLAHOMA  
EDUCATIONAL TV AUTHORITY**

By its attorneys and pursuant to Section 1.429 of the Commission's Rules,<sup>1</sup> the Oklahoma Educational Television Authority ("OETA"), licensee of noncommercial educational stations KOED-DT (Tulsa, Oklahoma) and KETA-DT (Oklahoma City, Oklahoma), hereby respectfully requests that the Commission reconsider certain parameters of the allotments for the stations in the Final DTV Table of Allotments adopted in the *Seventh Report and Order* in the above-captioned proceeding.<sup>2</sup>

OETA requests that the allotment for KOED-DT allow an increased antenna height to match the KOED-TV analog antenna height at the same tower site with an appropriate reduction in ERP.<sup>3</sup> OETA also requests the KETA-DT allotment allow the use of a different transmission site (the current KETA-TV analog site).<sup>4</sup>

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<sup>1</sup> 47 C.F.R. § 1.429 (2006).

<sup>2</sup> 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).

<sup>3</sup> See FCC License No. BLET-19850403KI.

## **KOED-DT**

Station KOED is currently operating on analog Channel 11 and DTV Channel 38. Post-transition, KOED will move to the current analog Channel 11 for digital broadcasts.

KOED-DT's current interim digital facilities are located on the same tower as its analog license and is the basis for the KOED-DT allotment in the *Seventh Report and Order* Final DTV Table of Allotments. In late February 2007, OETA learned that the tower owner would allow KOED-DT to move its antenna from a side-mounted position at 396 meters to the top-mounted position at 521 meters where KOED-TV's analog antenna currently sits. The top-mounted antenna sits 125 meters higher than the KOED-DT licensed parameters<sup>5</sup> and the KOED-DT allotment.

Upon learning of the top-mount availability, OETA filed reply comments to the *Seventh Notice of Proposed Rulemaking* in this proceeding.<sup>6</sup> The Commission's analysis of those Reply Comments in the *Seventh Report and Order* found the requested increased HAAT to 521 meters without a decrease in power would cause impermissible interference to a Tulsa station.<sup>7</sup>

OETA now respectfully requests the Commission reconsider the increase in HAAT, but this time with a decreased ERP of 20 kW. As reflected in the attached Technical Exhibit A, OETA believes the decrease in power to 20 kW will ensure that KOED-DT can reach a wider

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<sup>4</sup> See FCC License No. BLET-19860929KE.

<sup>5</sup> See FCC License No. BLEDT-20060601BLN.

<sup>6</sup> Reply Comments of Oklahoma Educational Television Authority and Request for Acceptance of Late-Filed Pleading, In the Matter of Advanced Television Systems and Their Impact Upon Existing Television Broadcast Service, *Seventh Further Notice of Proposed Rulemaking*, 21 FCC Rcd 12100 (2006).

<sup>7</sup> 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, ¶ 71 (rel. Aug. 6, 2007).

audience with its noncommercial educational programming while staying below the Commission’s 0.1% interference threshold.<sup>8</sup>

Pursuant to this Petition, the DTV Table of Allotments for **KOED-DT** would be changed from:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
66195	OK	TULSA	11	11	22.2	396	74534	360115	954032

To:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
66195	OK	TULSA	11	11	<b>20</b>	<b>521</b>	74534	360115	954032

**KETA-DT**

KETA currently operates on analog Channel 13 and interim DTV Channel 32. OETA will move KETA-DT to the station’s analog Channel 13 post-transition.

The *Seventh Report and Order* Final Table of Allotments specifies parameters based on KETA-DT’s current interim site, 5.4 kilometers (3.35 miles) from the KETA-TV analog transmission site. Post-transition, OETA now wishes to broadcast KETA-DT from the analog site using the licensed analog antenna.<sup>9</sup> OETA respectfully requests the Commission allow the use of parameters associated with the currently licensed analog antenna site to simplify the

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<sup>8</sup> See Attached Technical Exhibit A.

<sup>9</sup> In its DTV Pre-Election Certification Form, KETA-DT certified that it would operate its post-transition DTV station at the parameters specified in its DTV license at the interim DTV facility. OETA does not own the tower or the antenna that currently hosts KETA-TV’s analog operation and that OETA plans to use for KETA-DT’s post-transition “final” operations. Since OETA leases this tower and equipment from a collocated licensee (Griffin OKC Licensing, LCC, licensee of KWTV(TV)/DT), it was unable to certify its return to the analog site. OETA and Griffin OKC Licensing have since agreed to use a shared, diplexed antenna for both of their post-transition DTV operations, at the shared tower site.

transition for both the Commission and Licensee while allowing OETA to provide improved coverage for noncommercial educational programming.

The attached Technical Exhibit B<sup>10</sup> indicates that using a non-directional antenna at the current analog site will provide the appropriate coverage area while still using the same ERP and HAAT parameters listed in the Final DTV Table of Allotments. As noted in the attached Technical Exhibit, this change in the allotment will not cause interference beyond the Commission’s 0.1% threshold.<sup>11</sup> OETA thus requests the Commission insert the coordinates of the KETA-DT antenna site and remove Antenna ID 74494 from the Final DTV Table of Allotments.

Pursuant to this Petition, the DTV Table of Allotments for **KETA-DT** would be changed from:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
50205	OK	OKLAHOMA CITY	13	13	26.4	465	74494	353552	50205

To:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
50205	OK	OKLAHOMA CITY	13	13	26.4	465	<b>Blank</b>	<b>353258</b>	<b>972950</b>

Amending the DTV Table of Allotments to reflect a top-mounted antenna for KOED-DT and the use of the current analog site for KETA-DT would advance the Commission’s interest in

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<sup>10</sup> See Attached Technical Exhibit B.

<sup>11</sup> *Id.*

an efficient and effective transition and provide improved service to the public. OETA accordingly believes that consideration and grant of this instant petition is in the public interest.<sup>12</sup>

For these reasons, OETA petitions for change of the Stations' allotments as discussed above.

Respectfully submitted,

OKLAHOMA EDUCATIONAL TELEVISION AUTHORITY

By \_\_\_\_\_ /s/

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<sup>12</sup> See 47 C.F.R. § 1.429(b)(3).