

**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: Office of the Secretary

PETITION FOR PARTIAL RECONSIDERATION

Lima Communications Corporation (“Lima”) licensee of WLIO(TV) and permittee of WLIO-DT (Lima, Ohio) (the “Station”), by its attorneys and pursuant to Section 1.429 of the Commission’s rules,¹ hereby respectfully requests that the Commission reconsider portions of the *Seventh Report and Order* (the *Order*) in the above-referenced proceeding in which it adopted a Post-Transition DTV Table of Allotments.²

Lima petitions for change of certified facilities and requests revision of the Station’s allotment as set forth in the *Order*. Specifically, Lima requests that the certification and allotment be made consistent with the Station’s currently authorized facilities, which Lima operates pursuant to automatic program test authority and it intends to maintain post-transition.³

¹ 47 C.F.R. § 1.429 (2006).

² Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service, *Seventh Report and Order*, FCC 07-138 (rel. Aug. 6, 2007) Public notice of the *Order* was given on September 26, 2007. *See* 72 FR 54720 (Sept. 26, 2007). Accordingly, this petition for reconsideration is timely filed. 47 C.F.R. §§ 1.429(d), 1.4(b).

³ *See* FCC File No. BLCDDT-20070305ABB.

Pursuant to this petition, the Post-Transition DTV Table of Allotments in relevant portion as set forth in the *Order* would be changed from:

Facility ID	State and City		NTSC	DTV					
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
37503	OH	LIMA	35	8	30	165	36733	404454	840755

To:

37503	OH	LIMA	35	8	27.5	148	***	404454	840755
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***To be assigned by the FCC based on the antenna identified in the Station's pending application for covering license (FCC File No. BLCDDT-20070305ABB).

Lima has determined that it will be prohibitively expensive to top mount its DTV antenna on the existing tower as had been planned. Currently, the Station's analog antenna is top-mounted on the tower. To remove this antenna and replace it with the DTV antenna, Lima has determined that it would have to reinforce and modify the aging tower extensively at extraordinary costs – costs especially prohibitive for a small-market station such as WLIO(TV) which serves DMA #185.. The tower was built at a time such that it was never designed to permit easy removal of the top-mounted antenna, and installing a new top-mounted antenna would necessitate the addition of relatively numerous struts and braces. For now, Lima believes that keeping the DTV antenna side-mounted at its current location provides for substantial improvement over its existing analog operations and thus is desirable for post-transition operation.

The Station's certification and allotment were based upon the expectation that Lima would top-mount the DTV antenna, so it accordingly seeks revision at this time of the certification and allotment. No party would be prejudiced by the proposed revision of the DTV Table. The proposed modification would not result in increased interference to any other allotment. The maximized DTV service area is significantly larger than the Grade B area, with

