

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

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

**PETITION FOR CLARIFICATION OR RECONSIDERATION**

Raycom Media, Inc. (“Raycom”), parent of the licensees or permittees of the stations listed in Appendix A (the “Stations”), pursuant to Section 1.429(a) of the Commission’s rules, respectfully requests that the Commission amend the recently-published DTV Table of Allotments (the “Table”) to ensure that the Table is consistent with certain of the Stations’ current authorizations. In addition, out of an abundance of caution, this Petition informs the Commission of Raycom’s plans with respect to certain Stations’ DTV construction in order to ensure that the Table is consistent with those plans.

**A. Corrections to Transmitter Site Coordinates**

**KHNL-DT, Honolulu, Hawaii** (Facility ID 34867) has constructed and is licensed to operate facilities at 453 meters height above average terrain (“HAAT”) that transmit at 5.9 kW effective radiated power (“ERP”) from a site located at 21° 22’ 55” north latitude and 158° 6’ 19” west longitude, and using an antenna identified by Antenna ID 66970.<sup>1</sup> Raycom respectfully requests that the Commission amend the Table to conform KHNL-DT’s specifications to its licensed facilities.

<sup>1</sup> See File No. BLCDDT-20070220ABH.

**KFVE-DT, Honolulu, Hawaii** (Facility ID 34445) currently is operating pursuant to Special Temporary Authority at KHNL-DT's transmitter site.<sup>2</sup> As Raycom previously has reported to the Commission,<sup>3</sup> it has experienced substantial difficulty in securing a site for KFVE-DT's digital facilities and has been unsuccessful in its extensive efforts to arrange to provide comparable digital service from an alternate location. Raycom has constructed KFVE-DT's STA facilities and plans to maintain those facilities after the transition. Accordingly, Raycom respectfully requests that the Commission amend the Table to specify a site located at 21° 22' 55" north latitude and 158° 6' 19" west longitude, 5.4 kW ERP, 453 meters HAAT, and Antenna ID 67839. Because the contour of KFVE-DT's STA facilities is entirely encompassed by the contour of the facilities described in the Table, grant of this request will not result in increased interference to any other facility.<sup>4</sup>

**WMC-DT, Memphis, Tennessee** (Facility ID 19184) is licensed to operate at a temporary site distant from the site currently being used for its analog service. When it returns to its analog channel for post-transition operation, WMC-DT plans to transmit from its existing analog site, located at 35° 10' 9" north latitude and 89° 53' 12" west longitude. WMC-DT proposes to reduce the HAAT of its post-transition facility to 309 meters and to use its current analog antenna, identified with Antenna ID 36323.

WMC-DT's interim DTV facilities are fixed to the top-mounted position on a leased candelabra tower. WMC-DT's interim facilities transmit on out-of-core Channel

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<sup>2</sup> See File No. BDSTA-20041012AKF.

<sup>3</sup> See, e.g., Letter from Robert M. Sherman, Counsel to KHNL/KFVE License Subsidiary, LLC, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 03-15 (Jul. 7, 2006).

<sup>4</sup> See File No. BDSTA-20041012AKF, Technical Exhibit.

52, and WMC-DT must therefore discontinue service on that channel before the transition date. In order to avoid loss of digital service, WMC-DT's post-transition DTV service on Channel 5 must be brought online nearly simultaneously, but Raycom has determined that it would not be reasonably possible to simultaneously remove the Channel 52 antenna and transmission line and install new Channel 5 equipment if the two facilities are to occupy the same position on the same tower. Because the station's Channel 5 analog service would also be operating during the construction period, Raycom would be forced to purchase a duplicate Channel 5 antenna for use with WMC-DT's final DTV facilities.

In light of the substantial construction delays and inefficiencies that would be caused by Channel 5 construction at the interim site and the unprecedented demand for tower crews on February 17, 2009, Raycom believes that it could avoid loss of service to WMC-DT's viewers and complete construction most efficiently by discontinuing Channel 52 service at the interim site and launching Channel 5 digital service – using the existing Channel 5 antenna and transmission line – at the existing Channel 5 site.

As illustrated in the attached diagram, Raycom has evaluated two alternative contours for WMC-DT's post-transition operation from the Channel 5 site. In order to ensure that service is maintained to as many viewers as possible, Raycom would prefer to construct post-transition facilities that replicate, as nearly as possible, the contour of WMC-TV's analog service area. These facilities, which would operate at 6.9 kW ERP, would create interference to one neighboring station, WTVF, Nashville, TN. That interference would be received by 0.28% of the WTVF post-transition service population, which represents a dramatic decrease from the 27,709 people (1.32%) who receive WMC-

TV interference to the licensed WTVF analog service.<sup>5</sup> In other words, this proposal would reduce interference overall by 1.04% as compared to the analog interference baseline. In addition, the proposed allotment would not cause interference to more people than the facilities described for WMC-DT in the Table would cause to any other post-transition allotment, and the proposed allotment's noise-limited contour would not extend beyond WMC-TV's licensed analog Grade B contour.<sup>6</sup>

Alternatively, Raycom has calculated that facilities with a service area remaining within WMC-DT's current licensed service contour (0.31 kW ERP) would cause no interference to WTVF or any other neighboring station. In light of the substantial public interest benefits of returning to the existing Channel 5 site for post-transition Channel 5 operation, however, Raycom would prefer, to the extent possible, to avoid any loss of service to viewers who currently receive WMC-DT service.

Because WMC-DT is presently operating on out-of-core digital channel, it is critically important that the Commission promptly confirm that the station will be permitted to operate using the specified parameters so that Raycom can undertake the substantial planning necessary to construct digital service at the analog site on a timely basis. Accordingly, Raycom respectfully requests that the Commission conform the Table to WMC-DT's planned post-transition operation.

## **B. Antenna Changes**

Raycom intends to use the existing analog antennas for certain Stations' post-transition operations where those Stations plan to return to their analog channels for

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<sup>5</sup> The total interference from the proposed operation would be to 5,884 people, or 0.28% of WTVF's total population served.

<sup>6</sup> See Technical Exhibit, attached hereto, at 1.

digital operation. Accordingly, Raycom respectfully requests that the Commission modify the Table to reflect the following antenna changes:

<b>Station</b>	<b>New Antenna ID</b>
<b>WTVM-DT (595) Columbus, GA</b>	29573 (omnidirectional)
<b>WFIE-DT (13991) Evansville, IN</b>	42878 (omnidirectional)
<b>WAFB-DT (589) Baton Rouge, LA</b>	60260 (omnidirectional)
<b>KPLC-DT (13994) Lake Charles, LA</b>	69312 (omnidirectional)

Finally, certain Raycom stations intend, after ceasing analog service at the end of the digital transition, to relocate their existing digital antennas to the top-mounted position on their respective towers and to make consistent changes to each Station's operating power. In some instances, Raycom intends to use Stations' existing analog antennas for post-transition DTV operation.

One of these stations is **KFVS-DT, Cape Girardeau, Missouri** (Facility ID 592), which is presently operating on out-of-core digital channel 57 and must discontinue digital service on that channel no later than the transition date. Raycom wishes to use KFVS-DT's omnidirectional analog antenna (Antenna ID 63942)<sup>7</sup> for post-transition operation from the top-mounted position on its tower (610 m HAAT). While it will not be possible to exactly match the coverage contour described in the Table, as the attached contour map illustrates, Raycom could keep KFVS-DT's post-transition contour within the

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<sup>7</sup> Because the analog antenna is omnidirectional, Raycom requests that the Commission simply delete the antenna specification for KFVS-DT and the other Stations listed in this section for which omnidirectional antennas are requested from the Table. *See DTV Table Order* at ¶ 82.

area served by KFVS-DT’s licensed DTV facilities – the authorization to which it certified<sup>8</sup> – by operating at 4 kW ERP from the top-mounted position on KFVS-DT’s tower. These facilities would serve nearly all of the viewers presently receiving KFVS-DT digital service and would create only *de minimis* interference – 140 people, or 0.02% of total population served – to only one station, KRCG, Jefferson City, Missouri.<sup>9</sup> This change would ensure Raycom’s ability to efficiently construct KFVS-DT’s post-transition facilities and would prevent the loss of service to a substantial number of KFVS-DT viewers.

Similarly, with respect to top-mounting, Raycom intends to request the following changes once the procedures for such requests are established in the Commission’s *Third Periodic Review* of the digital transition:

<b>Station</b>	<b>New HAAT</b>	<b>New Antenna ID</b>
<b>WSFA-DT (13993) Montgomery, AL</b>	610	68582 (omnidirectional)
<b>KAIT-DT (13988) Jonesboro, AR</b>	533	69215 (omnidirectional)
<b>WALB-DT (70713) Albany, GA</b>	297	77910 (omnidirectional)
<b>WTOC-DT (590) Savannah, GA</b>	445	(omnidirectional)
<b>WLOX-DT (13995) Biloxi, MS</b>	403	33127 (omnidirectional)
<b>WTOL-DT (13992) Toledo, OH</b>	305	65671 (omnidirectional)

<sup>8</sup> See File No. BCERCT-20041103AFH.

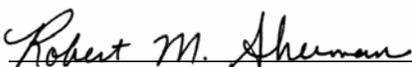
<sup>9</sup> This proposal would substantially *reduce* the interference currently accepted by KRCG’s analog viewers. Specifically, it would reduce interference from 18,465 people (analog) to only 140 people (digital).

Station	New HAAT	New Antenna ID
<b>WIS-DT (13990) Columbia, SC</b>	479	44622 (omnidirectional)
<b>WMC-DT (19184)<sup>10</sup> Memphis, TN</b>	309	36323 (omnidirectional)

Grant of this Petition would serve the public interest. The adjustments requested herein will conform the Commission's records to the previously approved and constructed facilities for each Station or allow the Station to complete construction of the post-transition facilities that will best serve its community. Accordingly, Raycom respectfully requests reconsideration of the *DTV Table Order* for the limited purposes described herein.

Respectfully submitted,

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<sup>10</sup> As described above, Raycom also asks the Commission to modify the listed site for WMC-DT's post-transition facilities.

**APPENDIX A**

<b>Station</b>	<b>Licensee or Permittee</b>	<b>Nature of Change Requested</b>
KHNL-DT (34867) Honolulu, HI	KHNL/KFVE License Subsidiary, LLC	Conform Table to licensed facilities: 453 m HAAT, 5.9 kW ERP, site at 21° 22' 55" N / 158° 6' 19" W
KFVE-DT (34445) Honolulu, HI	KHNL/KFVE License Subsidiary, LLC	Reflect site at 21° 22' 55" N / 158° 6' 19" W, 5.4 kW ERP, 453 m HAAT, Antenna ID 67839
WMC-DT (19184) Memphis, TN	WMC License Subsidiary, LLC	Reflect operation at 309 m HAAT, site at 35° 10' 9" N / 89° 53' 12" W, Antenna ID 36323
WTVM-DT (595) Columbus, GA	WTVM License Subsidiary, LLC	Delete Antenna ID or specify Antenna ID 29573
WFIE-DT (13991) Evansville, IN	WFIE License Subsidiary, LLC	Delete Antenna ID or specify Antenna ID 42878
WAFB-DT (589) Baton Rouge, LA	WAFB License Subsidiary, LLC	Delete Antenna ID or specify Antenna ID 60260
KPLC-DT (13994) Lake Charles, LA	KPLC License Subsidiary, LLC	Delete Antenna ID or specify Antenna ID 69312
KFVS-DT (592) Cape Girardeau, MO	KFVS License Subsidiary, LLC	Specify 610 m HAAT and delete Antenna ID or specify Antenna ID 63942
WSFA-DT (13993) Montgomery, AL	WSFA License Subsidiary, LLC	Specify 610 m HAAT and delete Antenna ID or specify Antenna ID 68582
KAIT-DT (13988) Jonesboro, AR	KAIT License Subsidiary, LLC	Specify 533 m HAAT and delete Antenna ID or specify Antenna ID 69215
WALB-DT (70713) Albany, GA	WALB License Subsidiary, LLC	Specify 297 m HAAT and delete Antenna ID or specify Antenna ID 77910
WTOC-DT (590) Savannah, GA	WTOC License Subsidiary, LLC	Specify 445 m HAAT and delete Antenna ID
WLOX-DT (13995) Biloxi, MS	WLOX License Subsidiary, LLC	Specify 403 m HAAT and delete Antenna ID or specify Antenna ID 33127
WTOL-DT (13992) Toledo, OH	WTOL License Subsidiary, LLC	Specify 305 m HAAT and delete Antenna ID or specify Antenna ID 65671
WIS-DT (13990) Columbia, SC	WIS License Subsidiary, LLC	Specify 479 m HAAT and delete Antenna ID or specify Antenna ID 44622