

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

In the Matter of)
)
ADVANCED TELEVISION SYSTEMS) MB Docket No. 87-268
AND THEIR IMPACT UPON THE)
EXISTING TELEVISION BROADCAST)
SERVICE)

TO: Honorable Marlene H. Dortch
Secretary of the Commission

ATTN: The Commission

**SUPPLEMENT TO
PETITION FOR RECONSIDERATION
TO SEVENTH REPORT AND ORDER**

Holston Valley Broadcasting Corporation, licensee of Television Broadcast Station WKPT-TV and WKPT-DT, Kingsport, Tennessee ("Holston" or "WKPT"), by its attorney, hereby respectfully files this Supplement to its October 10, 2007 "Petition for Reconsideration of the Seventh Report and Order" in this proceeding. A petition for leave to file this supplement is being electronically filed within the same hour as this Supplement. In so doing, the following is shown:

1. In our petition for reconsideration, we asked the Commission to modify WKPT-DT's post-transition allocation so

that WKPT-DT could operate on Channel 19 at 200 kilowatts effective radiated power with the "skull" pattern directional antenna currently used on the same channel by analog WKPT-TV. In the ***Seventh Report and Order***, the Commission indicated that the post-transition WKPT-DT would have to reduce power from 200 kW to 167 kW on Channel 19 and would have to install a directional antenna with a narrower radiation pattern than the antenna pattern currently in use on WKPT-TV's analog Channel 19 operation.

2. The gist of our supplement is to request that, should the Commission be unable to accommodate our request as stated in our Petition for Reconsideration, and only in that event, that it permit WKPT-DT to continue operation on its transition facility on Channel 27, as authorized in File No. BMPCDT-20050303AAJ, granted March 30, 2005, in the post-transition digital era. This facility is authorized with effective radiated power of 200 kW and antenna height 695 meters above average terrain, with a directional antenna. Consulting engineer Jules Cohen, P. E., whose qualifications are well known to the Commission, has prepared a coverage map for the Channel 27 digital operation, which is attached hereto as Exhibit A¹.

¹WKPT's transmitter site is on Holston Mountain in Carter County, Tennessee, NAD27 coordinates 36° 25' 54.00" North Latitude by 82° 08' 15.00" West Longitude.

3. This request is made in order to serve the public interest, convenience and necessity, and also to conserve scarce resources. Were Holston to accept the parameters for post-transition operation on Channel 19 stated in the **Seventh Report and Order**, Holston would have to spend about \$100,000.00 to modify its transmitting facilities² for no service benefit to the public. WKPT-DT's current installation on digital Channel 27 essentially replicates WKPT-TV's current analog coverage. It would be in the public interest for the Commission to permit Holston to remain on Channel 27, particularly, as will be shown below, no other Commission licensee would be adversely affected by WKPT-DT's post-transition operation on Channel 27.

4. Mr. Cohen's analysis shows that the only critical allocation consideration to WKPT-DT operating on Channel 27 in the post-transition period is the adjacent channel (26) operation of WATE-DT, Knoxville, Tennessee, already licensed to operate on channel 26 with ERP of 930 kW and HAAT at 529 meters. Interference without WKPT-DT on channel 27 amounts to 1.6585% of the population not affected by terrain losses. With WKPT-DT continuing to operate on Channel 27 with the

²This figure is derived from the following estimates: (1) a new narrow pattern Channel 19 antenna would cost about \$35,000.00; (2) the conversion of WKPT-DT's transmitter from Channel 27 to Channel 19, including the purchase of a new output filter for Channel 19, would cost about \$50,000.00; and (3) tower work, taxes and miscellaneous expenses would cost about \$15,000.00.

facilities described above, the interference percentage remains 1.9029%, a figure which appears to be acceptable under digital television allocation rules. WATE-DT is currently licensed to operate in the same fashion as specified in Appendix B of the Seventh Further Notice of Proposed Rulemaking. Consequently the amount of interference with WKPT-DT operating on channel 27 already exists and has presumably been accommodated by WATE-DT viewers if any.

5. Mr. Cohen's analysis also included the following post-transition digital allocations: WAGA-DT, Atlanta, Georgia, Channel 27 - no interference; WCCB-DT, Charlotte, North Carolina, Channel 27 - no interference; WLFL-DT, Raleigh, North Carolina, Channel 27 - no interference; WOUB-DT, Athens, Ohio, Channel 27 - 0.0006% interference; and WKRN-TV, Nashville, Tennessee, Channel 27 - "beyond the site to nearest cell evaluation distance."

6. Mr. Cohen has determined that, in the post-transition period, a WKPT-DT operation on channel 27 with ERP of 200 kW and antenna height 695 meters above average terrain, would have an interference-free area of 19,837 square kilometers encompassing 806,377 persons (2000 Census).

7. To summarize, the public interest, convenience and necessity will be well served by this modification of the

WKPT-DT post transition facility, because the licensee would save approximately \$100,000.00 in modifications that it would no longer have to make to satisfy the FCC's truncated Channel 19 facility for WKPT-DT announced in the Seventh Report and Order, and WKPT-TV's analog facility will be at least fully replicated by the WKPT-DT digital facility on Channel 27, and there will be no interference conditions contrary to procedures adopted by the Commission in the formulation of the new digital channel allotment table with respect to co-channel digital facilities. The minor variation with respect to an adjacent channel digital facility already exists and is believed to be tolerable.

WHEREFORE, Holston Valley Broadcasting Corporation urges that its Petition for Reconsideration as supplemented by the matters presented herein **BE GRANTED** and that should the Commission be unable to permit WKPT-DT to operate in the post-transition era on Channel 19 with effective radiated power of 200 kW at antenna height of 707 meters with the same directional antenna pattern as currently used by analog WKPT-TV, the Commission should permit WKPT-DT, Kingsport, Tennessee to operate in the post-transition era on Channel 27 with its present facilities of 200 kilowatts effective radiated power and antenna height 695 meters above average terrain, with the directional antenna generating the coverage depicted in the attached coverage map.

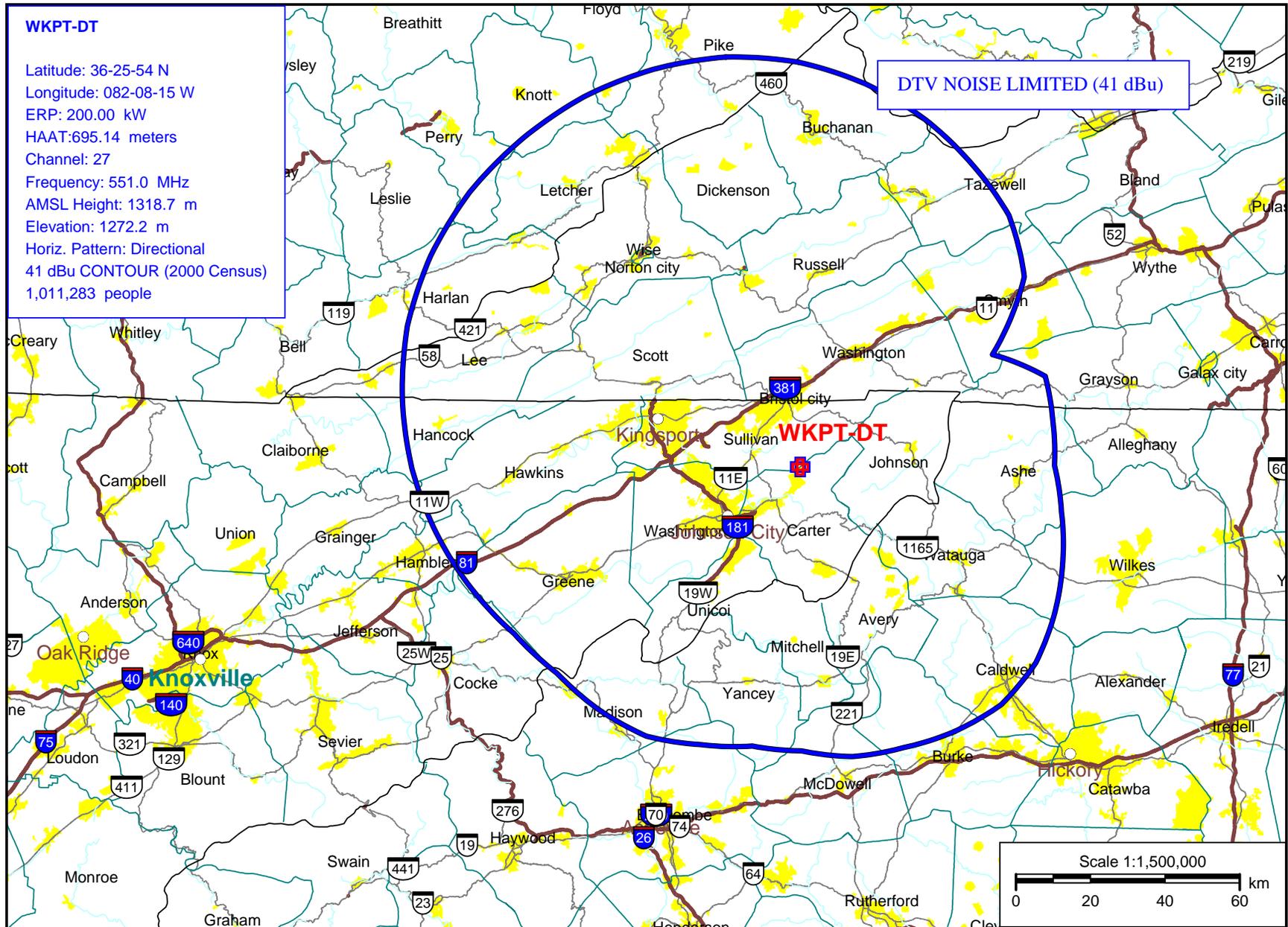
Respectfully submitted,

**HOLSTON VALLEY BROADCASTING
CORPORATION**

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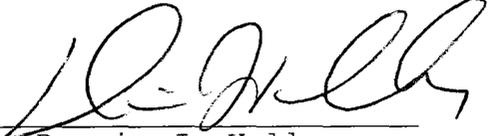
DATED AND FILED: November 8, 2007



CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing pleading was served by e-mail on this 8th day of November, 2007 upon the following:

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