

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

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

**To: Office of the Secretary
Federal Communications Commission**

**PETITION FOR LEAVE TO FILE SUPPLEMENT
TO PETITION FOR RECONSIDERATION
(FOR WTSP-DT, ST. PETERSBURG, FL)**

Gannett Co., Inc (“Gannett”), by its attorneys and pursuant to § 1.106 of the Commission’s rules, hereby petitions for leave to file the attached supplement to its Petition for Reconsideration filed October 25, 2007 in the above-captioned proceeding (“*Initial Petition*”). The supplement provides detailed information essential to the FCC’s determination of final DTV allotment parameters for Station WTSP-DT, St. Petersburg, Florida. WTSP-DT is one of 23 television stations indirectly owned by Gannett. As discussed in the *Initial Petition*, 11 of those stations were initially assigned a UHF DTV channel but will revert to a VHF channel at the end of the DTV transition. Shortly before the deadline for filing the *Initial Petition*, it was determined that each such station required careful engineering review to determine if it would be able to reach with its digital signal the areas served by its analog facilities. On the advice of FCC staff following meetings with Commission personnel, the *Initial Petition* was submitted with a promise to file supplemental information following a review of each station’s allotted

facilities.¹ That review has been completed for WTSP-DT and the results are provided in the attached supplement. The public interest would be served by FCC consideration of this information.

Therefore, Gannett respectfully requests grant of this Petition and acceptance of the supplemental technical showing provided in the attached Supplement to Petition for Reconsideration.

Respectfully submitted,

GANNETT CO., INC.

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November 15, 2007

Its Attorneys

¹ On November 7, 2007, Gannett requested an additional week until November 16, 2007 to submit the supplemental information, to give its engineer sufficient time to complete the studies.

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**SUPPLEMENT TO PETITION FOR RECONSIDERATION
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Gannett Co., Inc (“Gannett”), by its attorneys, hereby supplements its Petition for Reconsideration (“*Petition*”) filed October 25, 2007 in the above proceeding. The *Petition* noted that 11 of the 23 stations indirectly owned by Gannett, including WTSP-DT, St. Petersburg, Florida, would require careful study to determine if the facilities allotted in the DTV Table would permit each station to serve the area served by its analog signal. The stations requiring study were, specifically, those that were allotted UHF DTV channels for their interim DTV operations and have elected to return to their analog VHF channels for post-transition operation. WTSP-DT is currently operating on DTV Channel 24 and will revert to Channel 10 at the end of the transition.

The attached Engineering Statement by Richard H. Mertz of Cavell, Mertz & Associates, Gannett’s consulting engineers (“*Engineering Statement*”), contains the results of the study of the allotted WTSP-DT facilities. Based on Mr. Mertz’s findings, Gannett respectfully requests that the allotment facilities in the DTV Table be revised to reflect those set forth in the *Engineering Statement*. The revised parameters, which

specify use of WTSP's existing top-mounted directional antenna, will allow WTSP-DT to closely match the coverage of the WTSP analog Grade B coverage and maintain service to existing analog viewers when it converts to digital operations on Channel 10. An interference study indicates that use of the proposed directional antenna results in no new interference, and interference to one station, WJXX in Orange Park, Florida, is reduced, as compared to the allotment facility. Therefore, to accommodate this service improvement at WTSP-DT, Gannett requests a change in the certification made in its Form 381 to specify operation with the post-transition facilities requested herein in order to more closely replicate its analog Grade B contour and avoid a reduction in service to the public. In addition, use of the existing Channel 10 antenna will facilitate a smoother, more efficient transition to permanent digital operations at WTSP.

Respectfully submitted,

GANNETT CO., INC.

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