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December 14, 2007

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Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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RE: Ex Parte Presentation, MB Docket No. 87-268

Dear Ms. Dortch,

The Association of Public Television Stations (APTS), a non-profit organization whose membership comprises the licensees of nearly all of the nation's CPB-qualified noncommercial educational television stations, writes in support of the Opposition to Petition for Reconsideration by Alamo Public Telecommunications Council ("Alamo").

Alamo, licensee of Public Television station KLRN in San Antonio, Texas, is opposing a Petition by Corridor Television LLP, licensee of station KCWX (Fredericksburg, Texas) to change KCWX's tentative channel designation for digital operations from channel 5 to channel 8. As the Commission noted in its denial of Corridor's initial request, the proposal would cause impermissible interference to KLRN, as well as to KTBC (Austin, TX).¹

Though Corridor has modified its request, operation at its proposed specifications would still cause impermissible interference to KLRN and KTBC. Corridor's assertion that an interference level of less than 0.5 percent amounts to zero interference² is illogical. Such an interpretation would render meaningless the Commission's existing 0.1 percent limit on new interference.

Furthermore, Corridor puts forth no credible reason why the grant of a waiver would serve the public interest, since KCWX would be able to operate on either its existing channel 5 or on one

¹ In re Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service, *Seventh Report and Order*, MB Docket No. 87-268, FCC 07-138 (rel. Aug. 6, 2007) at ¶ 78 ("We do not believe that a waiver in these circumstances would promote overall spectrum efficiency or ensure the best possible television service to the public or the local community.")

² See Reply of Corridor Television LLP, Licensee of KCWX, Fredericksburg, Texas to Opposition of Alamo Public Telecommunications Council To Petition for Reconsideration of the Seventh Report and Order, MB Docket No. 87-268 (Nov. 15, 2007).

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of several UHF channels and cause either no or substantially less interference than would result from its operating on channel 8.³ In contrast, KLRN provides the region's viewers with access to meaningful Public Television programming, and interference that limits KLRN's reach, and cuts off American households from access to Public Television, is at odds with Public Television's universal service mandate.

Thank you for your consideration, and please feel free to contact the undersigned if you have any questions or concerns.

Sincerely,



Malena F. Barzilai
Senior Counsel

cc: Richard A. Helmick, Esq.
Molly Pauker, Esq.
James A. Stenger, Esq.
Charles Vaughn

³ See Alamo's Informal Objection to Comments and Waiver Request and Further Comments and Engineering Statement of Corridor Television LLP, MB Docket No. 87-268 (June 27, 2007).