

ORIGINAL

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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Federal Communications Commission  
Office of the Secretary

In the Matter of )  
)  
Amendment of Section 73.622(i), ) MM Docket No. 08-30  
Final DTV Table of Allotments, ) RM-11419  
Television Broadcast Stations. )  
(Riverside, California) )  
)

To: Office of the Secretary, Federal Communications Commission  
Attn: Media Bureau, Video Division

**COMMENTS OF UNIVERSITY OF CALIFORNIA, SAN DIEGO**

The Regents of the University of California, for the University of California, San Diego ("the University"), by its attorneys, hereby submits its comments in the above captioned proceeding. The University is a public institution of higher education and is the licensee of Class A television station K35DG, La Jolla, California (Facility ID No. 66321), which currently operates on analog Channel 35. The University understands that Station KRCA-DT ("KRCA") is in a very difficult situation, but the loss or displacement of Class A station K35DG – when no channel is available – is not an acceptable solution.

**I. Introduction**

The channel substitution proposed for KRCA would violate the Commission's Rules, subvert the purpose of the Community Broadcasters Protection Act ("CBPA")<sup>1</sup>, and leave Station K35DG ("K35DG") with no available channel for displacement. The proposed channel substitution is contrary to Section 73.625(c)(5) of the Commission's Rules, which requires protection of Class A television stations like K35DG. The proposal is also inconsistent with the

<sup>1</sup> Community Broadcasters Protection Act of 1999, 47 U.S.C. § 336(f); see also *In the Matter of Establishment of Class A Television Service*, Report and Order, 15 FCC Rcd 6355 (Rel. Apr. 4, 2000) ("Class A Report & Order").

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purpose of the CBPA, which only provides an exception to protection of Class A facilities for adjustments to the DTV allotment for full-service stations when necessitated by a "technical problem." Finally, the channel substitution proposed for KRCA is contrary to the public interest because there are no available displacement channels in the San Diego area for K35DG – use of channel 35 by KRCA effectively "kills off" K35DG.

## **II. Relevant Background**

Class A station K35DG is located in La Jolla, California and serves the greater San Diego metropolitan area. K35DG has always been operated by the University as a noncommercial station associated with the University's campus in San Diego. In keeping with the University's general mission to educate, inform and enrich the lives of California residents, K35DG provides educational and informative programming via regionally focused, locally produced television programs designed to appeal to a wide cross-section of local citizens,

K35DG serves a vital role in the local broadcasting community, delivering educational programming – with a particular emphasis on addressing matters of local and regional concern – for which there is no substitute and that cannot be obtained from any other local broadcasting source. Station K35DG regularly receives national and regional awards for programming excellence, including regional Emmy® Awards.

K35DG's programming reflects San Diego's rich intellectual and cultural diversity through television programs that are unique in their intent and scope. The University's operation of K35DG as a non-commercial educational television service allows the University to create content based strictly on relevance, interest and merit. The University devotes significant airtime to in-depth coverage of new ideas, key issues and emerging talent. The purpose of K35DG is to

serve the public's interest in new ideas and key issues by connecting the civic, scientific, intellectual and artistic resources of the University and the region to the San Diego community.

K35DG provides access to a multitude of cultural, educational, informational and civic issues through a mix of programs with regional significance. K35DG produces more than one hundred and fifty (150) original programs annually in five main thematic areas, namely, (a) art and music; (b) health and medicine; (c) humanities; (d) public affairs; and (e) science. A representative listing of Station K35DG's independently produced programming during 2006 is attached at Exhibit B.

Among the programs that have been produced for broadcast on K35DG is a program devoted to AIDS and HIV awareness for teens through the use of dance narrative; a documentary on the canyons of San Diego and how they affect the urban environment; two long-running series in partnership with the San Diego Opera (one focused on the history of various operas, the other an actual production at the San Diego Opera); a series of lecture-based programs specifically addressing health concerns for the elderly, and another focusing on diabetes.

K35DG has also produced programs on coping with brain injury and on many health-related issues ranging from post traumatic stress disorder to women's cardiovascular health to raising children. In addition, fulfilling a need that is sorely lacking in today's local broadcasting landscape, K35DG has also devoted significant time and resources to covering local elections before and after the votes are cast, and has produced programs devoted to examining the impact of national and international events and policies on citizens in San Diego. K35DG also produces programs that showcase and explore the local natural environment.

To serve San Diego County's large Spanish speaking population, many programs aired by K35DG are offered in Spanish (either broadcast in Spanish or available online via the UCSD-

TV website). Other programs are accompanied by robust web sites for teachers and students. These sites are designed to provide teachers with the tools needed to incorporate new scientific breakthroughs into their curriculum. They also provide students with an opportunity to explore cutting edge research and learn more about the people doing the science. These websites are often available in Spanish as well as English.

As a broadcast operation affiliated with the world-renowned University of California system, K35DG has an unusual level of access to people and events that affect both the campus community and the greater San Diego region. Due to its close association with the University of California system, K35DG also enjoys the enviable position of being at the center of new thinking, scientific breakthroughs and fresh ideas. Moreover, its affiliation with the University offers students attending the University an opportunity to gain valuable broadcasting experience first-hand through the K35DG's academic internship program. Thus, in addition to serving the general community with top-notch original programming, K35DG serves to train up the next generation of broadcast professionals and instills in them a sense of value of local public broadcasting.

The University has achieved more than a decade of broadcasting success by presenting programming that adheres to the philosophy that enlightenment and entertainment need not be mutually exclusive, and provides a unique and valuable service to the local communities it serves. The University partners with dozens of San Diego's best and brightest performing arts organizations, museums, civic organizations, and the University's academic departments. With a university base and a regional focus, K35DG delivers programming that reflects the intellectual and cultural diversity of the San Diego region in a way that no other local television station can provide. Through collaborations with distinguished community institutions and a combination of

production strategies, K35DG creates cutting edge information and entertainment programs for people throughout San Diego County.

In 2001, the University elected to convert K35DG from an LPTV to a Class A Station.<sup>2</sup> The motivating factor for the University's decision to do so was its desire to protect K35DG and ensure that local citizens could continue to enjoy the unique local and regional specialty public television programming that K35DG delivers.

### **III. The Proposed Channel Substitution Violates the Commission's Rules**

The channel substitution proposed for KRCA is not permissible under the Commission's Rules. Section 73.623(c)(5) of the Commission's Rules requires that DTV stations protect Class A stations from interference. As the Commission has already determined, KRCA's proposed channel substitution would not comply with Section 73.623(c)(5).<sup>3</sup> Indeed, KRCA's digital facility would potentially cause interference to over 25 percent of K35DG's contour population (approximately 270,000 persons).<sup>4</sup> This level of interference would severely and negatively impact the ability of television viewers in the San Diego metropolitan area to access K35DG's local and regional programming – a result that is clearly prohibited by Section 73.623(c)(5) of the Commission's Rules.

### **IV. The Proposed Channel Substitution is Inconsistent with the CBPA**

The channel substitution proposed for KRCA is also inconsistent with the Community Broadcasters Protection Act. The CPBA was intended to provide "primary" spectrum use status

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<sup>2</sup> See FCC 302-CA application in FCC File No. BLTTA-20010212AAS.

<sup>3</sup> See *In the Matter of Amendment of Section 3.622(i), Final DTV Table of Allotments, Television Broadcast Stations. (Riverside, California)*, Notice of Proposed Rule Making, DA 08-504 (Rel. Mar. 5, 2008) ("NPRM").

<sup>4</sup> See Exhibit E1 to Technical Statement at Attachment A.

and protection to LPTV stations such as K35DG.<sup>5</sup> Consistent with this mandate, the Commission created Class A protected service areas when it implemented that CPBA.<sup>6</sup> As a potential justification for the proposed channel substitution, KRCA points to Section 337(f)(1)(D) of the CBPA, which provides an exception to the protection of Class A television stations when necessary to resolve “*technical* problems ... requiring an *engineering solution* to a full-power station’s allotment parameters or channel assignment in the digital television Table of Allotments” (emphasis added).

The University submits, however, that Section 336(f)(1)(D) is inapplicable to the proposed channel substitution for at least two reasons. First, the proposal is motivated by a *legal* problem – KRCA’s inability to obtain Mexican clearance – not a technical problem.<sup>7</sup> Second, there is no guarantee that the proposed channel substitution would resolve KRCA’s legal problem – because Mexican clearance would still be required for KRCA to operate on channel 35.<sup>8</sup> Application of Section 336(f)(1)(D) in this case – where neither a technical problem nor an engineering solution exist – would thus be contrary to the explicit language of Section 336(f)(1)(D) and inconsistent with Congress’s goal of according primary status protection to Class A licensees under the CBPA.

#### **V. The Proposed Channel Substitution is Contrary to the Public Interest**

The channel substitution proposed for KRCA would be contrary to the public interest because it would leave K35DG with no available displacement channel. As illustrated in the attached Technical Statement, there are no channels available in the Southern California area for

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<sup>5</sup> See CBPA, 47 U.S.C. 336(f)(1)(A)(ii); Class A Report & Order at ¶ 5.

<sup>6</sup> See Class A Report & Order at ¶ 37.

<sup>7</sup> See NPRM at ¶¶ 1-2, 5-7.

<sup>8</sup> See *id.*

displacement of K35DG.<sup>9</sup> Consequently, if KRCA is permitted to operate on channel 35, K35DG will be forced to accept a wholly unacceptable level of interference from KRCA – potentially greater than 25 percent of its contour population. Such a population loss would essentially be the death knell for K35DG, a noncommercial station dedicated to providing unique local and regional programming to residents of the San Diego metropolitan area.

The University is not unsympathetic to the plight of KRCA and its DTV conversion. However, the University does not believe that displacing K35DG with no available channel is the solution to KRCA's inability to obtain Mexican clearance. Indeed, as the Commission has acknowledged, substituting KRCA's DTV channel would not obviate the need for obtaining Mexican clearance for KRCA to operate on channel 35. Given KRCA's dire circumstances, however, K35DG would be willing to consider creative alternatives that would resolve KRCA's Mexican clearance issues while still allowing K35DG to continue to provide the same level of coverage (and at least equivalent service quality) to the San Diego area residents that currently rely on K35DG.

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<sup>9</sup> See Technical Statement at Attachment A.

**CONCLUSION**

For the reasons described above, the Regents of the University of California, for the University of California, San Diego, respectfully requests that the Commission reject the proposed channel substitution for KRCA. Rejection of the channel substitution proposal would best serve the public interest, ensure compliance with the Commission's Rules, and promote Congress's goal of protecting Class A television stations.

Respectfully submitted,

**REGENTS OF THE  
UNIVERSITY OF CALIFORNIA**

By: \_\_\_\_\_

  
Margaret L. Miller  
Mario J. Weber

Its Attorneys

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April 10, 2008

ATTACHMENT A

CHANNEL DISPLACEMENT ANALYSIS PREPARED FOR  
THE REGENTS OF THE UNIVERSITY OF CALIFORNIA  
K35DG  
LA JOLLA, CALIFORNIA

This engineering statement has been prepared on behalf of The Regents of the University of California, licensee of Class A facility K35DG (Facility ID No. 66321). A comprehensive in-core frequency search has been conducted using the licensed K35DG transmitter site, ERP, effective antenna height and pattern.

**K35DG CHANNEL PRECLUSION STUDY**

An initial channel preclusion study was conducted in order to filter channels from further consideration. A channel is considered precluded if K35DG has its transmitter site located within or very near the FCC protected contour of a co-channel, or 1<sup>st</sup> adjacent channel licensed, permitted, pending, or allotted facility. The table lists the most critical issue, but not limited to the only issue for each channel.

**Preclusion Table:**

Channel	Reason for Preclusion
2	The K35DG transmitter site is located 42.5 km from a 1st adjacent channel allotment in Tijuana.
3	The K35DG transmitter site is located 42.5 km from a co-channel allotment in Tijuana.
4	The K35DG transmitter site is located 42.5 km from a 1st adjacent channel allotment in Tijuana.
5	The K35DG transmitter site lies within the 1st adjacent channel XETV protected contour.
6	The K35DG transmitter site lies within the co-channel XETV protected contour.
7	The K35DG transmitter site lies within the co-channel K63EN protected contour.
8	The K35DG transmitter site lies within the co-channel KFMB protected contour.
9	The K35DG transmitter site lies within the co-channel facility ID 168107 protected contour.
10	The K35DG transmitter site lies within the co-channel KGTU protected contour.
11	The K35DG transmitter site lies within the 1st adjacent channel KGTU protected contour.
12	The K35DG transmitter site lies within the co-channel XEWT protected contour.
13	The K35DG transmitter site lies within the 1st adjacent channel XEWT protected contour.
14	The K35DG transmitter site lies within the co-channel facility ID 167362 protected contour.
15	The K35DG transmitter site lies within the co-channel KPBS protected contour.
16	The K35DG transmitter site lies within the 1st adjacent channel KPBS protected contour.
17	The K35DG transmitter site lies within the 1st adjacent channel KUSI protected contour.
18	The K35DG transmitter site lies within the co-channel KUSI protected contour.
19	The K35DG transmitter site lies within the co-channel KSWB protected contour.
20	The K35DG transmitter site lies within the co-channel DKSZZ protected contour.
21	The K35DG transmitter site lies within the co-channel XHTI protected contour.
22	The K35DG transmitter site is located 42.3 km from a co-channel allotment in Tijuana.
23	The K35DG transmitter site lies within the co-channel XETV protected contour.
24	The K35DG transmitter site lies within the 1st adjacent channel KGTU protected contour.
25	The K35DG transmitter site lies within the co-channel KGTU protected contour.
26	The K35DG transmitter site lies within the co-channel K26FA protected contour.
27	The K35DG transmitter site lies within the co-channel XHJK protected contour.
28	The K35DG transmitter site lies within the co-channel XHJK protected contour.
29	The K35DG transmitter site is located 52.4 km from a co-channel allotment in Tijuana.
30	The K35DG transmitter site lies within the co-channel KPBS protected contour.

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31	The K35DG transmitter site lies within the 1st adjacent channel KPBS protected contour.
32	The K35DG transmitter site is located 42.5 km from a co-channel allotment in Tijuana.
33	The K35DG transmitter site is located 40.1 km from a co-channel allotment in Tijuana.
34	The K35DG transmitter site is located 40.1 km from a 1st adjacent channel allotment in Tijuana.
35	The K35DG analog facility resides on this channel.
36	K35DG is taboo to XHTI and lies within their protected contour.
37	This channel is reserved nationwide for astronomy.
38	The K35DG transmitter site is located 52.4 km from a co-channel allotment in Tijuana.
39	The K35DG transmitter site lies within the co-channel KNSD(TV) protected contour.
40	The K35DG transmitter site lies within the co-channel KNSD(DT) protected contour.
41	The K35DG transmitter site lies within the co-channel facility ID 162046 protected contour.
42	The K35DG transmitter site lies within the co-channel facility ID 168607 protected contour.
43	The K35DG transmitter site is located 32km from KSKT and would cause them impermissible mutual interference.
44	The K35DG transmitter site is located 46.7 km from a 1st adjacent channel allotment in Tijuana.
45	The K35DG transmitter site is located 46.7 km from a co-channel allotment in Tijuana.
46	The K35DG transmitter site lies within the co-channel facility ID 164336 protected contour.
47	The K35DG transmitter site lies within the co-channel facility ID 164337 protected contour.
48	The K35DG transmitter site lies 5km outside the co-channel KUAN protected contour.
49	The K35DG transmitter site is located 81.5 km from a co-channel allotment in Mexicali and predicted to be within the co-channel protected contour.
50	The K35DG transmitter site lies within the co-channel facility ID 168474 protected contour.
51	The K35DG transmitter site lies within the co-channel KUSI(TV) protected contour.

As clearly demonstrated every in-core channel in the market has inherently critical issues and therefore further comprehensive OET69 studies were not conducted. As demonstrated there are no alternative channels available for K35DG.

## KRCA-DT INTERFERENCE ANALYSIS

K35DG is currently licensed to channel 35. Exhibit E1 demonstrates that KRCA -DT operating on channel 35 has the potential to cause impermissible OET69 interference to the K35DG service area.

## CONCLUSION

As demonstrated above, KRCA operating on channel 35 would cause impermissible interference to K35DG for which no alternative channels are available for displacement.

**CERTIFICATION**

I, Ryan Wilhour, am an associate of Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and have been working in the field of radio and television broadcast consulting since 1996. I am a graduate of the University of Florida with a Bachelor of Science degree in electrical engineering. The foregoing statement and the report regarding the aforementioned engineering work are true and correct to the best of my knowledge.



Ryan Wilhour

A handwritten signature in black ink that reads 'Ryan Wilhour'. The signature is written in a cursive style with a prominent 'R' and 'W'.

Consulting Engineer  
April 8, 2008

Population Database: 2000 US Census (SF1)

Total Population Within Contour: 1,056,615

 KRCA-DT Causes 25.6% unmasked population interference to Analog K35DG

Lake San Marcos

Escondido

Encinitas

Ramona

Solana Beach

Poway

Del Mar

K35DG

Lakeside

Santee

Harbison

Bostonia

El Cajon

La Mesa

Spring Valley

Jamul

San Diego

Coronado

National City

Bonita

Chula Vista

Imperial Beach

Scale 1:354,167

0 4 8 12 km

### K35DG

BLTTA20060621AAL

Latitude: 32-50-25 N

Longitude: 117-14-56 W

ERP: 24.10 kW

Channel: 35-

AMSL Height: 251.0 m

HAAT: 251.0 m

Horiz. Pattern: Directional

Vert. Pattern: Yes

Elec Tilt: 0.0

Prop Model: Longley/Rice

Climate: Cont temperate

Conductivity: 0.0050

Dielec Const: 15.0

Refractivity: 301.0

Receiver Ht AG: 10.0 m

Receiver Gain: 0 dB

Time Variability: 50.0%

Sit. Variability: 50.0%

ITM Mode: Broadcast

### KRCA-D

Allotted on CH 35

Latitude: 34-12-50 N

Longitude: 118-03-40 W

ERP: 670.00 kW

Channel: 35

AMSL Height: 1711.95 m

HAAT: 907.0 m

Horiz. Pattern: Directional

Vert. Pattern: Yes

Elec Tilt: 0.0

Prop Model: Longley/Rice

Climate: Cont temperate

Conductivity: 0.0050

Dielec Const: 15.0

Refractivity: 301.0

Receiver Ht AG: 10.0 m

Receiver Gain: 0 dB

Time Variability: 10.0%

Sit. Variability: 50.0%

ITM Mode: Broadcast

Exhibit E1

**ATTACHMENT B**

## *UCSD-TV Independently Produced Programming*

The following pages include a list of programs that were locally produced by K35DG and broadcast by the station in 2006.

- A Tribute to Will Ogdon
- Algae: The World's Most Important "Plants"
- An Evening with Donald Miller: Point Loma Writer's Symposium 2006
- Analyzing the Air we Breathe
- Australia: The Under-Valued Ally
- Backstage at the Globe: Summer Shakespeare 2006
- Border Cities: Tactics of Encroachment
- Brain Development
- Burke Lecture: John Haught, "Evolution and Divine Providence: Are They Really Compatible?"
- CCIS: Language Politics & Immigration Policies
- City Club Presents Ann Wright & David Swanson
- City Club Presents Christopher Kennedy Lawford
- City Club Presents Doris Kearns Goodwin on Abraham Lincoln
- City Club Presents Michael Gordon
- City Club Presents Richard Reeves on Ronald Reagan
- City Club Presents the FBI's Robert Mueller
- Conscious and Unconscious Memory Systems of the Mammalian Brain
- Convocation on Intelligent Design Creationism with Robert Pennock
- Coping with Brain Injury: Brain Injury & School Success
- Coping with Brain Injury: Life After Brain Injury
- Coping with Brain Injury: Caregiving Strategies
- Coping with Brain Injury: Robots & Rehabilitation
- Critical Elections in Palestine and Israel
- Decisions, Responsibility and the Brain
- Decisions: How Do We Animals Decide What To Do?
- Disaster Epidemiology Tools Workshop-Rapid Needs Assessments after Disasters
- Earthquake History of the Salton Sea
- Economics Roundtable: The California Economy -- Housing Boom or Bubble?
- Encuentros: The Challenge of U.S. Diplomacy in Latin America
- Encuentros: Amb. Joao Abdenur of Brazil and Jeffrey Davidow
- Encuentros: Toledo and Davidow
- Experts on Demand
- Forum Fronterizo: Borderless Innovation
- Fred Kent: 34 Great Waterfronts of the World
- Fred Kent: Creating Public Spaces
- Frederic Wakeman: Ming Nativism and the Local Turn
- Gary Hart: Point Loma Writer's Symposium by the Sea 2006
- George J. Borjas: Costs of Immigration

- *Gordon Moore: Behind the Ubiquitous Microchip*
- Grey Matters: Understanding Language
- Health Matters: Emergency Preparedness
- Health Matters: Healthful Benefits of Pets
- Health Matters: Medical Myths
- Health Matters: Post-Traumatic Stress Disorder
- Health Matters: Raising Boys
- Health Matters: Women's Cardiovascular Health
- Health Matters: Exploring Alzheimer's Disease
- HemiScope: Grass Roots Leaders
- HIV/AIDS: Where Are We Now? A Report-Back to the Community from UCSD's AIDS Research Institute & Antiviral Research Center
- Human Teratology Conference: Human Embryology
- Human Teratology: Environmental Causes of Birth Defects - Preclinical Evaluation of Reproductive & Developmental Toxicity
- Into The Light of Day: Torture, Human Rights and Bush's State of Exception
- Lytle Memorial Scholarship Concert: The Naked Gershwin
- Molecules for the Media: Nanotechnology--Science Fiction Meets Reality
- Molecules for the Media: Understanding Disease at the Level of Individual Molecules
- Music and the Mind
- Mysteries of Adaptation to Hypoxia and Pressure in Marine Mammals
- Navigating Medicare's New "Part D"
- Norman Pearlstine: "Off the Record: Using Anonymous Sources in the Media"
- Olara Otunnu: "Saving our Children from Scourge of War"
- On Beyond: Coastal Erosion, Smart Environments, Coastal Monitoring
- Onward to Where: Your Votes Will Tell
- Onward to Where? Summer 2006 with Neil Morgan and Mary Walshok
- Osher UCSD: "Presidential Accountability in War or the Hippopotamus and the Butterfly"
- Osher UCSD: "Global Warming: Climate Change Science and Public Policy"
- Osher UCSD: "Science, Politics and the Future of Democracy"
- Pain Management in Women: Keynote Speaker
- Paul Jacobs: The Impact of Engineering and the Future of Education
- Perspectives on Ocean Science: California Sea Grant: Marine Science Applied to Contemporary Issues
- Perspectives on Ocean Science: Deep Sea Hydrothermal Vents: Exploring Life in the Extreme
- Perspectives on Ocean Science: Exploring 1,000 Years of Earthquake History Along the San Andreas Fault
- Perspectives on Ocean Science: Marine Genomics: Discovering the Secrets of Survival in the Abyss
- Perspectives on Ocean Science: The Future Stewards of Our Planet
- Perspectives on Ocean Science: Winds, Currents and the Voyages of Discovery

- Pharmaceutical Treasures From Marine Pond Scum? Discovery Of New Drugs From *The Sea*
- President Carter at UCSD
- Profiles in Discovery: Biologist Donald Helinski
- Rabbi Michael Lerner: Taking Back Our Country From the Religious Right
- Revealing a Hidden Universe: The Legacies of the Spitzer Space Telescope
- Revelle Forum: Kevin Phillips on Religion, Oil and Debt
- San Diego Canyonlands
- San Diego Opera Education Video 2006
- San Diego Opera Spotlight: Wozzeck
- San Diego Opera Spotlight: Carmen
- San Diego Opera Spotlight: Julius Caesar in Egypt
- San Diego Opera Spotlight: Lucia di Lammermoor
- San Diego Opera Spotlight: The Barber of Seville
- San Diego Opera Spotlight: The Magic Flute
- San Diego OperaTalk! with Nick Reveles: Boris Godunov
- San Diego OperaTalk! with Nick Reveles: Samson & Delilah
- San Diego OperaTalk! with Nick Reveles: The Marriage of Figaro
- San Diego OperaTalk! with Nick Reveles: Wozzeck
- Sea Level Rise and Its Impact on Southern California Beaches
- Separating Church & State: The Mt. Soledad Cross Debate
- Shirin Ebadi: Iran Awakening: Human Rights, Women & Islam
- SIRA: Advantage of Robotic Surgery
- SIRA: Breast Cancer - Unique Issues In The Chronologically Gifted
- SIRA: Could Stem Cell Therapy Renew Your Body Cells?
- SIRA: Depression in Later Life & What You Should Do About It
- SIRA: DNA Mismatch Repair: From Basic Mechanisms to the Genetics of Cancer Susceptibility
- SIRA: Effective Support for Each Other's Health Concerns
- SIRA: Final Results of the Women's Health Initiative
- SIRA: Update on Palliative Care
- SIRA: Prostate 'Cancer': When Language Obscures Reality
- SIRA: Recent Advances in Cancer Vaccine Development
- SIRA: The Ins & Outs of Calorie Restriction as an Anti-Aging Therapy
- SIRA: Your Bones & Parathyroid Glands: What Goes Wrong & What Can Be Done About It
- Social Justice and Stem Cell Research: Who gains? Who loses?
- State of Minds: Fall 2006 UCLA
- Status of Asthma & Effective Interventions in San Diego
- Steve Erie: "Beyond Chinatown"
- Stuart Collection: Tim Hawkinson's "Bear"
- SummerFest 2006: An American in Paris
- SummerFest 2006: Dancing at SummerFest
- SummerFest 2006: Dvorak's Piano Quintet in A Major

- SummerFest 2006: Encounter with Wayne Shorter
- SummerFest 2006: Modern Composers at SummerFest
- The Body Politic: California's 50th Congressional District 2006
- The Body Politic: Election 2006
- The Body Politic: Iran & China 2006
- The Body Politic: Nuclear Politics in North Korea 2006
- The Body Politic: The Year Ahead 2006
- The Convergence of Information Technology and Network Centric Warfare
- The Life and Times of Marine Cores and Dredged Rocks
- The Line Islands Expedition: Journey to a Prehistoric Coral Reef
- The Making of Place: Fred Kent in Solana Beach
- The Republican War on Science
- The Rhythm of Her Step: A Song of San Diego
- U.S. Immigration Reform: Can The System Be Repaired?
- UCSD Guestbook - Neuroscientist Mark Konishi
- Visual Arts New Faculty Exhibition
- Voices of Women Presents: "Iraq & The U.S. Elections" with Naba Saleem Hamid & James Goldsborough
- Von Liebig Forum: Bill Wulf
- Von Liebig Forum: Ivor Royston
- Wakeman: China's Longue Durée and the Mongol Occupation
- Wakeman: Qing Culturalism and Manchu Identity
- War Talk: "Don't Ask, Don't Tell"
- William Schulz: "Tainted Legacy: 9/11 and the Ruin of Human Rights"
- Women, War, Peace: The Politics of Peacebuilding

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing "Comments" was served on April 10, 2008, by first class mail, postage prepaid, upon the following:

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*Sue Foxku*

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