

June 19, 2008

VIA COURIER

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

FILED/ACCEPTED
JUN 19 2008
Federal Communications Commission
Office of the Secretary

Attention: Video Division
Media Bureau

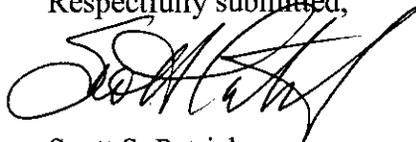
Re: WPXD-DT, Ann Arbor, Michigan
Facility I.D. No. 5800
Petition to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of Paxson Communications License Company, LLC, licensee of commercial television station WPXD-DT, Ann Arbor, Michigan, we hereby transmit an original and four copies of a *Petition for Rule Making* requesting the substitution of Channel 19 for Channel 31 at Ann Arbor, Michigan in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,



Scott S. Patrick

Enclosure

cc: Ms. Joyce Bernstein (via e-mail)
Mr. Ron Graser (via e-mail)

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

**FILED/ACCEPTED
JUN 19 2008
Federal Communications Commission
Office of the Secretary**

In the Matter of)
)
Amendment of Section 73.622(i)) MB Docket No. _____
Post-Transition Table of Allotments,) RM- _____
Digital Television Broadcast Stations)
(Ann Arbor, Michigan))
)

To: Office of the Secretary
Attn: Chief, Video Division
Media Bureau

**PETITION FOR RULE MAKING
TO AMEND THE DTV TABLE OF ALLOTMENTS**

By its attorney and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules,¹ Paxson Communications License Company, LLC ("Licensee"), licensee of WPXD-DT, Ann Arbor, Michigan (the "Station"), hereby respectfully petitions the Commission to institute a rulemaking to amend Section 73.622(i), the Post-Transition DTV Table of Allotments, by substituting Channel 19 as the Station's post-transition DTV channel in lieu of Channel 31. This instant petition is submitted following the Commission's announcement that it would resume acceptance of channel change petitions.²

¹ 47 C.F.R. §§ 1.401, 73.616, 73.622(a) as amended by Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, 23 FCC Rcd 2994, ¶ 128 (rel. Dec. 31, 2007).

² See Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions Effective Immediately, *Public Notice*, DA 08-1213 at 2 (rel. May 30, 2008).

Specifically, the Post-Transition DTV Table of Allotments would be amended as follows:

	<u>Present</u>	<u>Proposed</u>
Ann Arbor, MI	<u>31</u>	<u>19</u>

Licensee is seeking the channel substitution because operation on Channel 19 would allow the Station to better serve the Detroit DMA, to which it belongs. As the attached Technical Exhibit demonstrates, the proposed facility complies with the Commission's rules for post-transition DTV operation. The Station's proposed service area encompasses its community of license, and the proposed parameters comply with the Commission's interference standards.³ The Technical Exhibit also demonstrates that the proposed facility would reach approximately 145% of the currently allotted post-transition DTV service area population.⁴

For the convenience of the Commission, we hereby provide the present and proposed "Appendix B" parameters:

Present:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
5800	MI	ANN ARBOR	31	31	106	328	74499	422225	840410

Proposed:

5800	MI	ANN ARBOR	31	<u>19</u>	<u>1000</u>	<u>293</u>	<u>TBA</u> ⁵	<u>422901</u>	<u>831844</u>
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³ See Attachment A, Technical Exhibit at 1-2; 47 C.F.R. §§ 73.616(b),(e), 73.623(d), 73.625(a).

⁴ See Attachment A, Technical Exhibit at 1.

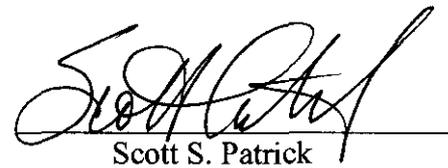
⁵ To be assigned by the Commission.

For the foregoing reasons, Licensee respectfully requests that the Commission amend the Post-Transition DTV Table of Allotments as proposed. Adoption would serve the public interest by permitting the Station to improve service to its DMA.

Respectfully submitted,

PAXSON COMMUNICATIONS
LICENSE COMPANY, LLC

By:



Scott S. Patrick

Its Attorney

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1200 New Hampshire Avenue, N.W.
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Dated: June 19, 2008

ATTACHMENT A

Technical Exhibit

TECHNICAL EXHIBIT
PETITION FOR RULE MAKING TO
MODIFY THE DTV TABLE OF ALLOTMENTS
STATION WPXD-DT
ANN ARBOR, MICHIGAN

This Technical Exhibit was prepared on behalf of television station WPXD-DT assigned to Ann Arbor, Michigan (analog channel 31, pre-transition digital channel 33, and current post-transition digital channel 31) in support of a *Petition for Rule Making* to modify the DTV allotment of WPXD-DT to substitute channel 19 for the current channel 31 DTV allotment.

Station WPXD-DT was assigned channel 31 for its post-transition Appendix B operation with a directional antenna maximum effective radiated power (ERP) of 105.6 kilowatts (kW) and an antenna height above average terrain (HAAT) of 328 meters. However, the Appendix B facilities will not permit WPXD-DT to adequately serve the Detroit designated market area (DMA) to which it belongs. Below are a tabulation of the predicted service population and area based on the current WPXD analog and DTV operations, proposed post transition Appendix B allotment, and the herein proposed WPXD-DT Appendix B facilities:

Facility	Service Population	Service Area
Licensed WPXD(TV) Analog (Ch. 31 2880 kW-ND/329 m)	3,416,352	15,471 km ²
Licensed WPXD-DT Digital (Ch. 33 48 kW-ND/327 m)	3,421,769	17,268 km ²
WPXD-DT CP Appendix B (Ch. 31 105.6 kW-DA/328 m)	4,073,000	18,881 km ²
Proposed WPXD-DT Appendix B (Ch. 19 1000 kW-DA/293 m)	5,967,198	29,023 km ²

As indicated above, the herein proposed Appendix B facilities will allow a substantial improvement in service as compared to the present facilities. The proposal will also provide the required principal city coverage to Ann Arbor, Michigan.

Therefore, WPXD-DT respectfully requests that the Commission modify Appendix B to specify operation on Channel 19 from its proposed site using a "cardioid" type

directional antenna pattern. The following provides details of WPXD-DT's proposed modification of its Appendix B facilities.

Facility ID	State & City		DTV								
			NTSC Chan	Chan	ERP (kW)	HAAT (m)	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	Percent IX Received
5800	MI	Ann Arbor	31	31	1000	293	422901	831844	29,023	5967	0.26
Directional Antenna Pattern : Antenna ID : 43009 with a rotation of 278° ; Antenna Rc=524 m AMSL											

The proposed WPXD-DT effective radiated power and antenna height above average terrain does not exceed that permitted by Section 73.622(f)(8) of the Commission Rules. The proposed WPXD-DT Appendix B facilities will comply with the 0.5 percent interference standard adopted by the FCC for post-transition DTV operations. Interference calculations were made using the FCC's OET-69 post transition interference with a 1 kilometer grid, a 1 kilometer terrain increment, and the 2000 US Census.

Consideration was given to the US-Canada Letter of Understanding (LOU) concerning DTV in the border zone. The proposed WPXD-DT channel 19 allotment would be considered as a Class VL station. The proposed WPXD-DT allotment meets all of the separation requirements to Canadian allotments contained in the LOU except for CHWI-TV on channel 16 at Wheatley, Ontario and CIII-TV on channel 22 at Stevenson, Ontario. With respect to CHWI-TV and CIII-TV, interference calculations have been made using the Longley-Rice propagation model, a 1 kilometer grid, a 0.2 kilometer terrain increment, and the 2006 Canadian population. The proposed WPXD-DT channel 19 operation (1000 kW-DA, 293 m) causes no interference (ie, 0 people and 0 sq km) to CHWI-TV and CIII-TV service.

John A. Lundin

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June 18, 2008