

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

In re:

AMENDMENT OF SECTION 73.622)
TABLE OF ALLOTMENTS)
DTV BROADCAST STATIONS)
WASHINGTON, DISTRICT OF COLUMBIA)

MM Docket No.

To: Secretary, FCC
Attn: Chief, Video Division, Media Bureau

FILED/ACCEPTED
JUN 20 2008
Federal Communications Commission
Office of the Secretary

PETITION FOR RULEMAKING

The Greater Washington Educational Telecommunications Association, Inc. ("GWETA"), licensee of noncommercial educational television station WETA-DT, DTV Channel *27, Washington, D.C., by its attorneys and pursuant to the Commission's Rules, hereby requests that the Commission institute a rulemaking proceeding to amend Section 73.622 of its Rules to substitute DTV Channel *51 in lieu of DTV Channel *27 as WETA-DT's post-transition DTV channel. The WETA-DT channel would remain reserved for noncommercial educational use. This substitution of digital channels would serve the public interest and would not cause impermissible interference to any other stations.

Background

GWETA is a private, non-profit organization committed to providing quality noncommercial educational programming to residents of the greater Washington, D.C. region. GWETA owns and operates WETA-TV/DT in Washington, D.C (the subject of the instant application).

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GWETA proposes the following amendment to Section 73.622(i) of the Commission's

Rules:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Washington, District of Columbia	*27	*51

Argument

A. The Proposed Change Will Improve the Ability of GWETA to Serve Residents of the Greater Washington, D.C. Region

The substitution of DTV Channel *51 for DTV Channel *27 as WETA-DT's post-transition DTV channel will allow GWETA to better serve residents of the greater Washington, D.C. region by improving signal strength and increasing the population coverage of WETA-DT. GWETA estimates that the operation of WETA-DT on DTV Channel *51 will permit a significant increase in signal strength and in the population served by WETA-DT.

Accordingly, GWETA proposes to substitute DTV Channel *51 instead of DTV Channel *27 at Washington, D.C. As demonstrated in the Engineering Statement (attached as Attachment A), operation of WETA-DT on DTV Channel *51 at the proposed transmitter site is possible at an ERP of 674 kW and HAAT of 258 meters.

B. The Proposed Change to the Table of Allotments Will Serve the Public Interest

The proposed change to the DTV Table of Allotments will serve the public interest by enhancing GWETA's ability to provide high quality noncommercial educational programming to residents of the greater Washington, D.C. region. In particular, the proposed substitution will allow GWETA to improve signal strength to the area and expand the population coverage area of WETA-DT.

The ability to increase the signal strength and population coverage area for WETA-DT is important to GWETA because of its commitment to serve a broad community with high-quality and compelling public television programming. Operation of WETA-DT on DTV Channel *51 would allow GWETA to meet this commitment by permitting enhanced signal penetration and expanding the breadth of the community served by WETA-DT in the greater Washington, D.C. region.

C. The Proposed Change to the Table of Allotments Meets the Requirements For Interference Protection Set Forth in the Commission's Rules

The channel substitution proposed by GWETA meets the interference protection requirements set forth in Section 73.623 of the Commission's Rules. As the Engineering Statement demonstrates, the proposed operation of WETA-DT on DTV Channel *51 will not cause greater than 0.5 percent additional interference to other affected stations and will comply with the principal community coverage requirements of Section 73.625(a). See Attachment A.

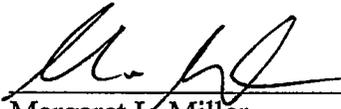
Conclusion

For all of these reasons, GWETA requests that the Commission institute a rulemaking proceeding to amend Section 73.622 of its Rules to substitute DTV Channel *51 for DTV Channel *27 as the post-transition DTV channel for WETA-DT in Washington, D.C. If the Commission grants this petition and modifies the DTV Table of Allotments accordingly, GWETA is prepared to apply for and construct WETA-DT on Channel *51.

Respectfully Submitted,

GREATER WASHINGTON EDUCATIONAL
TELECOMMUNICATIONS ASSOCIATION, INC..

By:



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June 19, 2008

Attachment A

**ENGINEERING STATEMENT
Of
Dennis Wallace**

**In Support of Petition for Rulemaking
Non-Commercial Digital Television Allotment
For Petitioner**

**Greater Washington Educational
Telecommunications Association Inc.**

WETA-DT

**Washington, DC
CHANNEL 51**

June 18, 2008

Prepared By:



**Dennis Wallace
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WETA-DT

Washington, DC.

Background

The Greater Washington Educational Telecommunications Association Inc. (WETA), licensee of WETA-DT, currently holds a license for a Digital Television station on Channel 27 at Washington, DC. Pursuant to the post-transition maximization of DTV facilities, WETA desires to change channels from channel 27 to channel 51 in order to provide an increase in power (ERP) which will allow WETA-DT to more effectively cover the Washington, DC area. This increase in power will allow WETA-DT to better serve its audience and would be in public interest as stated in the accompanying Petition for Rulemaking.

This statement details the results of a search for a DTV channel on which the facility could transition its Digital (DTV) operations and which would allow WETA-DT to maximize its coverage and power. WETA is requesting through this Petition for Rulemaking to amend the DTV Table of allotments at Washington, DC and substitute UHF Channel 51 for its current UHF Channel 27 allotment and allow WETA to increase its effective radiated power from 90 KW on channel 27 to 674 KW on channel 51.

This engineering statement has been prepared in support of a petition to amend the DTV allotment table as set forth in Section 73.622 (b) and, more specifically,

	Channel Number	
	Present	Proposed
District of Columbia		
•		
•		
• Washington*27....*51.....
•		

Allotment Study

It is proposed to change the current digital allotment from channel *27 to digital channel *51 while maintaining the other allotment parameters regarding transmitter and tower location.

A study has been conducted using TechWare software utilizing the parameters and criteria from the Commission's OET Bulletin 69 to evaluate potential interference, which would be caused by operation on channel 51 at Washington, DC. The study appended hereto (Table 1) demonstrates that use of the existing directional antenna pattern (Table 2) will permit a maximum ERP of 674 KW while maintaining the interference within the *de minimus* limits set forth in Section 73.623 (c) (2) to other effected stations.

The study indicates that the proposed operation would only increase the service loss to WDCW-DT, Washington, DC by 0.49%. Hence, no significant increase in service loss would be expected by the proposed DTV operation on channel 51 at Washington.

ENGINEERING STATEMENT

WETA-DT

Washington, DC.

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Thus, it is believed that the grant of this petition would not materially effect the service of WDCW-DT since the predicted service loss is less than the *de minimus* requirements.

Further, the study indicates that the proposed operation would increase the service loss to WNJN-DT, Montclair, New Jersey, by 0.01%. Hence, no significant increase in service loss would be expected by the proposed operation on channel 51 at Washington. Thus, it is believed that the grant of this petition would not materially effect the service of WNJN-DT, since the predicted service loss is less than the *de minimus* requirements.

Also, the study indicates that the proposed operation would increase the service loss to WTAE-DT, Pittsburgh, Pennsylvania, by 0.01%. Hence, no significant increase in service loss would be expected by the proposed operation on channel 51 at Washington. Thus, it is believed that the grant of this petition would not materially effect the service of WTAE-DT since the predicted service loss is less than the *de minimus* requirements.

In addition to meeting the interference criteria, a DTV facility constructed on channel *51 at the reference coordinates would also comply with the principal city coverage requirements.

Conclusion

Channel 51 can be operated at Washington, DC for DTV Service while complying with the Commission's service and interference requirements with the following parameters:

Channel:	51
Reference Coordinates:	38-57-01 N, 77-04-47 W
Antenna Height (RCAMSL)	327 Meters
Antenna Height above Avg. Terrain (HAAT)	258 Meters
Maximum ERP	674 KW
Antenna Pattern:	Directional Per Table 2
Antenna FCC ID:	66360
Tower Registration Number:	1051670
Zone:	1

Certification

This statement with associated exhibits was prepared by me or under my direction. All assertions in this statement are true of my own personal knowledge except where otherwise indicated and these latter assertions are based on information from sources known reliable and believed to be true.

Submitted this 18th day of June, 2008.

By: _____
Dennis Wallace
Meintel, Sgrignoli, & Wallace

WETA-DT

Washington, DC.

WETA-DT Channel 51 Washington, DC

Post-Transition DTV Channel Change & Maximization Analysis Results

Potentially Affected Stations Included in the Analysis

Table 1

Ch.	Call	City/State	Dist KM	Status	App. Ref.	File #	% New IX
47	WMDO-CA	WASHINGTON DC	1.2	LIC	BLTTA	20080428AAQ	0.00
48	WAZW-CA	WINCHESTER VA	98.7	LIC	BLTT	19990105JC	0.00
50	WDCW	WASHINGTON DC	4.8	PLN	DTVPLN	DTVP1762	0.49
50	WDCW	WASHINGTON DC	4.8	APP	BPCDT	20080229ACH	0.49
51	WFMY-TV	GREENSBORO NC	420.2	LIC	BLCDT	20050628AAB	0.00
51	WFMY-TV	GREENSBORO NC	420.2	PLN	DTVPLN	DTVP1801	0.00
51	WEPX	GREENVILLE NC	395.5	CP	BPCDT	20080317ABS	0.00
51	WEPX	GREENVILLE NC	395.5	PLN	DTVPLN	DTVP1802	0.00
51	WNJN	MONTCLAIR NJ	324.8	LIC	BLEDT	20061121ADG	0.00
51	WNJN	MONTCLAIR NJ	324.8	PLN	DTVPLN	DTVP1805	0.01
51	WTAE-TV	PITTSBURGH PA	1.2	LIC	BLCDT	20041014AEY	0.01
51	WTAE-TV	PITTSBURGH PA	98.7	LIC	DTVPLN	DTVP1809	0.01

WETA-DT Channel 51 Washington, DC
 Post-Transition DTV Channel Change & Maximization Analysis Results
 Antenna Pattern Used for Channel 51 Study
 FCC Antenna ID: 66360

Table 2

Azimuth	Relative Field	Special Azimuths
0	0.948	
3	0.954	S
10	0.909	
20	0.755	
30	0.728	
40	0.887	
45	0.916	S
50	0.883	
60	0.696	
70	0.642	
80	0.828	
90	0.968	
93	0.975	S
100	0.928	
110	0.762	
120	0.727	
130	0.886	
135	0.916	
140	0.884	
150	0.698	
160	0.643	
170	0.827	
180	0.967	
183	0.974	S
190	0.927	
200	0.762	
210	0.729	
220	0.887	
225	0.916	
230	0.883	
240	0.695	
250	0.641	
260	0.828	
270	0.986	
274	1.000	S
280	0.960	
290	0.769	
300	0.599	
310	0.773	
320	0.911	
322	0.921	
330	0.835	
340	0.740	
350	0.830	