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

In the Matter of _____)
_____))
Amendment of Section 73.622(i), _____)
Final DTV Table of Allotments, _____)
Television Broadcast Stations _____)
(Huntsville, Alabama) _____)
_____)

MB Docket No. 08-105
RM-11444

FILED/ACCEPTED
AUG 25 2008
Federal Communications Commission
Office of the Secretary

COMMENTS

WAFF License Subsidiary, LLC, licensee of television station WAFF, analog channel 48 and digital channel 49, Huntsville, Alabama (“WAFF” or the “Station”) supports the Media Bureau’s proposal to allot Channel 48 at Huntsville, Alabama for WAFF’s final, post-transition DTV facility.¹ On adoption of the NPRM, the Station is committed to filing an application for a permit to construct its post-transition digital facility on channel 48 and promptly thereafter constructing that facility.

As the NPRM notes, this change in channel allotment is necessary to allow WAFF to construct a facility that “will [ensure] service to 96% of the viewers in the station’s television market.”² Moreover, as the NPRM further notes, WAFF currently cannot “provide service to about 17 percent of the population of the Huntsville-Decatur-Florence DMA.”³ Specifically, the Station would use a Channel 48 facility to provide service to about 285,000

¹ *Amendment of Section 73.622(i), Final DTV Table of Allotments, Television Broadcast Stations (Huntsville, Alabama)*, Notice of Proposed Rulemaking, MB Docket No. 08-105, RM-11444, DA 08-1497 (rel. Jul. 15, 2008) (“NPRM”).

² *Id.* at ¶ 2.

³ *Id.*

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local viewers who cannot be served by a Channel 49 DTV facility because of interference concerns.⁴

The Media Bureau properly finds that “the Petition warrants consideration” in view of these public interest benefits.⁵ It also concludes that the proposed facility would comply with the principal community coverage and technical requirements in the Commission’s rules.⁶

WAFF encourages the Commission to adopt the proposed allotment change as expeditiously as possible after the comment period closes. Given the short amount of time remaining before the close of the DTV transition, the public interest would be well served by finalizing WAFF’s post-transition channel allotment and allowing the Station to begin construction of its final facility as quickly as possible.

Respectfully submitted,



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⁴ WAFF License Subsidiary, LLC, Petition for Rulemaking, RM-11444, at 1-2 (Jun. 20, 2008) (“Petition”).

⁵ *Id.* at ¶ 3.

⁶ *Id.* See 47 C.F.R. §§ 73.625(a), 73.616, 73.623.