

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Promoting Diversification of Ownership In the Broadcasting Services	)	MB Docket No. 07-294
	)	
2006 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996	)	MB Docket No. 06-121
	)	
2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996	)	MB Docket No. 02-277
	)	
Cross-Ownership of Broadcast Stations and Newspapers	)	MM Docket No. 01-235
	)	
Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets	)	MM Docket No. 01-317
	)	
Definition of Radio Markets	)	MM Docket No. 00-244
	)	
Ways to Further Section 257 Mandate and To Build on Earlier Studies	)	MB Docket No. 04-228
	)	

To: The Commission

**REPLY COMMENTS OF  
BONTEN MEDIA GROUP, INC.**

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In the Matter of )  
 ) MB Docket No. 07-294, *et al.*  
Promoting Diversification of Ownership )  
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Bonten Media Group, Inc. (“Bonten”) hereby replies to those commenters who have urged the Commission to reallocate channels 5 and 6 from television broadcasting to radio broadcasting. Forcing these television stations to move to new channels at this stage of the digital transition would harm viewers, would be inequitable, and would not be in the public interest. Bonten is the indirect parent of BlueStone License Holdings, Inc., the licensee of two television stations with post-transition allotments on channels 5 and 6: WCYB-DT, Bristol, Virginia, and KTVM-DT, Butte, Montana. Bonten also has filed an application for consent to take control of NewsChannel 5 Network, LLC, the licensee of WTVF-DT, Nashville, Tennessee. WTVF-DT’s post-transition allotment is on channel 5. Bonten respectfully requests that the Commission protect these stations’ post-transition allotments.

WCYB-DT, KTVM-DT, and WTVF-DT (collectively, the “Stations”) are all moving to channels 5 and 6 from different pre-transition digital channels. Each of the Stations carefully studied the options available to it and chose channel 5 or 6 as the option that would best serve its viewers after the transition. The Broadcast Maximization Committee’s proposed substitute channels would harm the Stations’ viewers because they would result in significantly reduced service areas. For example, due to mountainous terrain, WCYB-DT and KTVM-DT would lose up to 20% of the viewers currently served by their analog facilities if they were

forced to move to a UHF channel.<sup>1</sup> Conversely, VHF channels 3 and 4 would create impulse noise problems that would interfere with the Stations' digital service to viewers.

Forcing the Stations to move to new channels would create a serious risk of service disruptions. All of the Stations anticipate using their already-installed analog antennas for their post-transition operations. WCYB-DT and KTVM-DT would need to remove these antennas (and other equipment) in order to switch to new channels, and Bonten understands that WTVF-DT would need to do so as well. Bonten expects that the Stations would need to reduce or terminate digital operations for a significant period in order to replace the equipment and move to substitute channels. Unlike pre-transition digital service reductions or terminations, there would be no analog signal available as an alternative for viewers. They would lose the critical programming that the Stations provide, including emergency information, breaking news, and network programming. Bonten also notes that the VHF channel proposed for WCYB-DT is contingent on another station (WBRA-DT) moving to a new channel; thus, there is a chance that the VHF option would not even be available.

The reallocation proposal would impose an unfair burden on the Stations. Bonten has already purchased expensive equipment for WCYB-DT and KTVM-DT. Indeed, it has already installed and completed a proof of performance for the equipment at both of these stations. WTVF-DT has also already purchased and installed new equipment in anticipation of post-transition operations on channel 5. Bonten estimates that the total equipment, installation, and testing costs for the three Stations will ultimately total over \$1,800,000. All of this equipment would need to be replaced if the Stations had to move to new channels. Moreover,

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<sup>1</sup> On the UHF channels, WCYB-DT would be able to provide coverage to only 86% of the station's analog viewers, while KTVM-DT would be able to provide coverage to only 80% of the station's analog viewers, regardless of the stations' ERPs. The Commission has recognized the challenges posed by difficult terrain. *See DTV Build-Out, Requests for Waiver of July 1, 2005 and July 1, 2006 "Use or Lose" Deadlines*, Order, 22 FCC Rcd 9750, at para. 110-111 (2007).

the Stations would not be able to use their existing analog antennas for post-transition operations on either the UHF or VHF substitute channels. Bonten estimates that the equipment and installation costs for each station would total more than a million dollars if they were forced to move to new channels.

Finally, Bonten notes that KTVM-DT is in a border zone, and that its post-transition allotment required international coordination with Canada. The Commission would need to complete this process again if KTVM-DT were required to move to a new channel. Completing the coordination process again would impose burdens on the Commission's resources. Further, there is a risk that the coordinated facilities would be significantly reduced, thus harming the station's viewers.

\* \* \*

The reallocation of channels 5 and 6 would cause viewers to lose digital television service and would impose heavy burdens on the Stations. Bonten respectfully requests that the Commission protect the post-transition allotments of WCYB-DT, KTVM-DT, and WTVF-DT.

Respectfully submitted,

**BONTEN MEDIA GROUP, INC.**

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