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August 29, 2008

Our File No. 20890-00101-66

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
c/o Natek, Inc.
236 Massachusetts Avenue, NE, Suite 110
Washington, DC 20002

FILED/ACCEPTED

AUG 29 2008

Federal Communications Commission
Office of the Secretary

Re: Comments in Support of Rulemaking
for Digital Channel Substitution and Maximization
Amendment of Section 73.622(i)
Final DTV Table of Allotments
KSPS-TV, Facility Id. No. 61956, Spokane, Washington

Dear Ms. Dortch:

Transmitted herewith behalf of Spokane School District #81, licensee of noncommercial educational Television Station KSPS-TV, Spokane, Washington, are an original and four copies of its Comments in Support of Rulemaking for Digital Channel Substitution and Maximization.

If there are any questions concerning this submission, please contact the undersigned directly.

Sincerely,

Melodie A. Virtue

Enclosures

- cc: Ms. Joyce Bernstein (via email at joyce.bernstein@fcc.gov)
- Mr. Ron Grasser (via email at ron.grasser@fcc.gov)
- Mr. David J. Brown (via email at david.brown@fcc.gov)
- David H. Pawlik, Esq. (via email at david.pawlik@skadden.com)

MAV:cll

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

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

In the Matter of)
)
Amendment of Section 73.622(i)) MM Docket No. 08-129
Final DTV Table of Allotments,) RM-11461
Television Broadcast Stations)
(Spokane, Washington))

To: Chief, Video Division
Media Bureau

**COMMENTS IN SUPPORT OF RULEMAKING
FOR DIGITAL CHANNEL SUBSTITUTION
AND MAXIMIZATION**

Spokane School District #81 ("Spokane School District"), licensee of noncommercial educational Television Station KSPS-DT, Facility ID Number 61956, Spokane, Washington, by its attorneys and pursuant to Sections 1.420 and 73.622 of the Commission's Rules (47 C.F.R. §§1.420 and 73.622), hereby respectfully comments in support of the Commission's *Notice of Proposed Rule Making ("NPRM")*, DA 08-1712, released July 23, 2008, in the above-captioned proceeding. The *NPRM* proposes to amend the DTV Table of Allotments as follows:

	<u>Present</u>	<u>Proposed</u>
Spokane, Washington	7, *8, 13, 20, 28, 34, 36	*7, 13, 15, 20, 28, 34, 36

On June 19, 2008, Spokane School District filed a Petition for Rulemaking, supplemented on July 7, 2008 (collectively, the "Petition"), seeking substitution of DTV Channel *7, its current analog channel, for its assigned DTV Channel *8 at Spokane. KHQ, Incorporated, licensee of station KHQ-DT, Spokane, Washington, filed a related petition seeking substitution of DTV Channel 15 for its assigned DTV Channel 7. Together, they formed the basis for the *NPRM*. Spokane School District hereby incorporates by reference its Petition, as supplemented.

That Petition set forth the public interest reasons for adopting the proposed amendments to the DTV Table of Allotments.

Spokane School District hereby states its present intention to apply for a channel change if it is allotted and to build the station promptly on DTV Channel *7 at Spokane, Washington, in accordance with the facilities specified below and in the *NPRM*.

<u>State and City</u>	<u>DTV Channel</u>	<u>DTV Power (kW)</u>	<u>Antenna HAAT (m)</u>
Spokane, Washington	*7	45.1	558

Wherefore, the premises considered, Spokane School District #81 respectfully requests that the Commission substitute digital Channel *7 for Channel *8 at Spokane, Washington.

Respectfully submitted,

SPOKANE SCHOOL DISTRICT #81

By: 
John Crigler
Melodie A. Virtue
Its Attorneys

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August 29, 2008

CERTIFICATE OF SERVICE

The undersigned, an employee of Garvey Schubert Barer, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered*, to the following:

David H. Pawlik, Esquire
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005

*Barbara A. Kreisman, Chief
Chief, Video Division
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