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

FILED/ACCEPTED  
SEP - 3 2008  
Federal Communications Commission  
Office of the Secretary

In the Matter of )  
)  
Amendment of Section 73.622(i), ) MB Docket No. 08-139  
Final DTV Table of Allotments, ) RM-11469  
Television Broadcast Stations. )  
(Bainbridge, Georgia) )

**COMMENTS OF THE PROPOONENT,  
NEW AGE MEDIA OF TALLAHASSEE LICENSE, LLC**

New Age Media of Tallahassee License, LLC ("Proponent"), by and through its attorneys, hereby submits comments in the above-referenced rulemaking in compliance with procedures set forth in the Notice of Proposed Rule Making, DA 08-1631, Rel. Jul. 10, 2008, 23 FCC Rcd 10587 (2008), 73 Fed. Reg. 45,375-6 (Aug. 5, 2008) (the "Notice").

As directed in the *Notice*, app. at para. 2, the Proponent hereby restates its present intention to operate WTLH-DT on Channel 50. In support thereof, the Proponent also resubmits and incorporates by reference its Petition for Rulemaking in this matter, as submitted originally on June 18, 2008 (the "Petition"). The Petition provides documentation demonstrating the how the proposed amendment, to Post-Digital Transition Television Table of Allotments for Station WTLH-DT (Facility ID No. 23486), Bainbridge, Georgia, would serve the public interest.

The Petition, itself, is submitted herewith as Attachment 1.

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For all the reasons stated therein, the Commission should AMEND 47 C.F.R. Sec. 73.3623, as described in the Petition; as such amendment would enable the Proponent to better serve the public interest by improving WTLH-DT's technical operations.

Respectfully submitted,

NEW AGE MEDIA OF TALLAHASSEE  
LICENSE, LLC

By: Michael W. Richards

Joseph M. Di Scipio  
Michael W. Richards  
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*Its Attorneys*

September 3, 2008

**ATTACHMENT 1 – PETITION FOR RULEMAKING**

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

PLEASE STAMP  
AND RETURN  
THIS COPY TO  
FLETCHER, HEALD & HILDRETH

In re Application of: )

NEW AGE MEDIA OF TALLAHASSEE )  
LICENSE, LLC (Petitioner) )

To Amend the Post-Transition Digital )  
Television Table of Allotments for Station )  
WTLH-DT, Bainbridge, GA, )  
Facility ID#23486 )

MB Docket No.: \_\_\_\_\_

RM- \_\_\_\_\_

FILED/ACCEPTED

JUN 19 2008

Federal Communications Commission  
Office of the Secretary

To: The Secretary, Federal Communications Commission  
Attn: Chief, Video Division, Media Bureau

**PETITION FOR RULEMAKING**

New Age Media of Tallahassee License, LLC ("Petitioner"), by and through its attorneys, and pursuant to Section 73.623 of the Commission's rules, 47 C.F.R. § 73.623 (2007), hereby submits this Petition for Rulemaking to change the post-transition digital television ("DTV") channel allotment of Station WTLH-DT/23486, Bainbridge, Georgia (the "Station") to Channel 50, and to make related technical changes to the Station's technical parameters. This Petition is

submitted pursuant to the Public Notice, dated May 30, 2008, lifting the freeze on the submission of DTV "maximization" applications and petitions for digital channel substitutions.<sup>1</sup>

Currently, the Station has been allotted Channel 49 in the post-transition DTV Table of Allotments.<sup>2</sup> As set forth in the Technical Exhibit prepared by W. Jeffrey Reynolds of du Treil, Lundin & Rackley, Inc. (attached hereto as Exhibit A), Petitioner has determined that the requested change in the post-transition DTV allotment to Channel 50 for the Station complies with the Commission's technical rules. Furthermore, the change in channel will comport with the Commission's requirement that any change to a post-transition DTV facility does not result in the loss of more than 5% of the currently-authorized post-transition service area and population.<sup>3</sup> Specifically, the facilities proposed herein will result in the loss of just 0.2%. Petitioner is merely seeking to change its post-transition digital operation to its currently licensed pre-transition digital operation (File No. BLCDDT-20061020ACP). No further construction or authorization is necessary, just a change in the DTV Table of Allotments to reflect its currently authorized pre-transition facilities. Finally, the proposed facility complies with the Commission's processing guidelines established in the DTV Order regarding the permissible change in a post-transition DTV facility.

Therefore, Petitioner respectfully requests that the post-transition DTV Table of Allotments be amended for the Station to specify the technical parameters as described in the Technical Exhibit attached at Exhibit A.

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<sup>1</sup> *Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately*, Public Notice, DA 08-1213 (May 30, 2008).

<sup>2</sup> *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order, Appendix B, 22 FCC Rcd 15,581 (2007) ("DTV Order"). The post-transition parameters for DTV facilities specified in Appendix B will be codified at 47 C.F.R. § 73.622(i). *Id.*, nt. 2.

<sup>3</sup> *DTV Order*, ¶ 140.

New Age Media of Tallahassee License, LLC submits that the requested changes comply with all applicable legal and technical requirements and would serve the public interest.

Respectfully submitted,

NEW AGE MEDIA OF TALLAHASSEE  
LICENSE, LLC

By: 

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Its Attorney

June 19, 2008

TECHNICAL EXHIBIT  
 PETITION FOR RULE MAKING TO  
 MODIFY THE DTV TABLE OF ALLOTMENTS  
 NEW AGE MEDIA OF TALLAHASSEE LICENSE, LLC  
 STATION WTLH-DT  
 BAINBRIDGE, GEORGIA

This Technical Exhibit was prepared on behalf of New Age Media of Tallahassee License, LLC ("New Age"), licensee of station WTLH-TV (analog channel 49, pre-transition digital channel 50, and current post-transition digital channel 49), Bainbridge, Georgia in support of a Petition for Rule Making to modify the DTV allotment of WTLH-DT to substitute channel 50 for the current channel 49 DTV allotment.

The Commission adopted channel 49 for WTLH-TV's post-transition digital operation. Specifically, WTLH-DT was assigned channel 49 for its post-transition Appendix B operation with a nondirectional antenna maximum effective radiated power (ERP) of 226.01 kilowatts (kW) and an antenna height above average terrain (HAAT) of 597 meters. However, in order to continue to utilize its currently licensed DTV operation on channel 50 (BLCDT-20061020ACP) for its post-transition operation, New Age proposes to substitute channel 50 for the current channel 49 DTV allotment and operate from its licensed DTV channel 50 site location using its licensed nondirectional antenna with an ERP of 230 kW, an HAAT of 597 meters and an antenna radiation center height above mean sea level (RCAMSL) of 645 meters. The following details the proposed modification of the WTLH-TV Appendix B facilities.

Fac. ID	State & City		NTSC		DTV							
			Ch	Ch	ERP (kW)	HAAT <sup>1</sup> (m)	Antenna ID	Lat (DDMMSS)	Long (DDMMSS)	Area (sq km)	Pop. (thousand)	Percent IX Rcvd
23486	GA	Bainbridge	49	50	230	597		304051	835821	34,493	871	0.3

The noise-limited 41 dBu and 48 dBu contours for the proposed WTLH-TV DTV channel 50 operation are depicted on Figure 1. The proposed WTLH-DT Appendix B facilities will comply with the 0.5 percent interference standard adopted by the FCC for post-transition DTV operations<sup>2</sup> and will also comply with the FCC's city coverage requirements.

<sup>1</sup> Antenna radiation center height above mean sea level 645 meters.

<sup>2</sup> See paragraph 155 of the Report and Order in the Third DTV Periodic Review (MB Docket No. 07-91).

Below is a tabulation of the predicted service population and area based on WTLH-DT's current Appendix B facilities and the herein proposed WTLH-DT Appendix B facilities:

Facility	Service Population	Service Area
Current Appendix B (Ch. 49 226 kW/597 m, ND)	873,000	34,589 km <sup>2</sup>
Proposed Appendix B (Ch. 50 230 kW/597 m, DA)	871,225	34,493 km <sup>2</sup>

As indicated above, the herein proposed Appendix B facilities will replicate 99.8% of the current Appendix B population. Based on the foregoing, New Age respectfully requests that the Commission modify Appendix B to specify operation on channel 50 from its licensed DTV site and employing its existing facilities.

The attached technical statement has been prepared by or under the direct supervision of W. Jeffrey Reynolds with the firm of du Treil, Lundin and Rackley, Inc., a telecommunications consulting firm located in Sarasota, Florida, who states that his qualifications are a matter of record with the Federal Communications Commission, having been presented on previous occasions. All data and statements contained herein are true and correct to the best of his knowledge and belief.

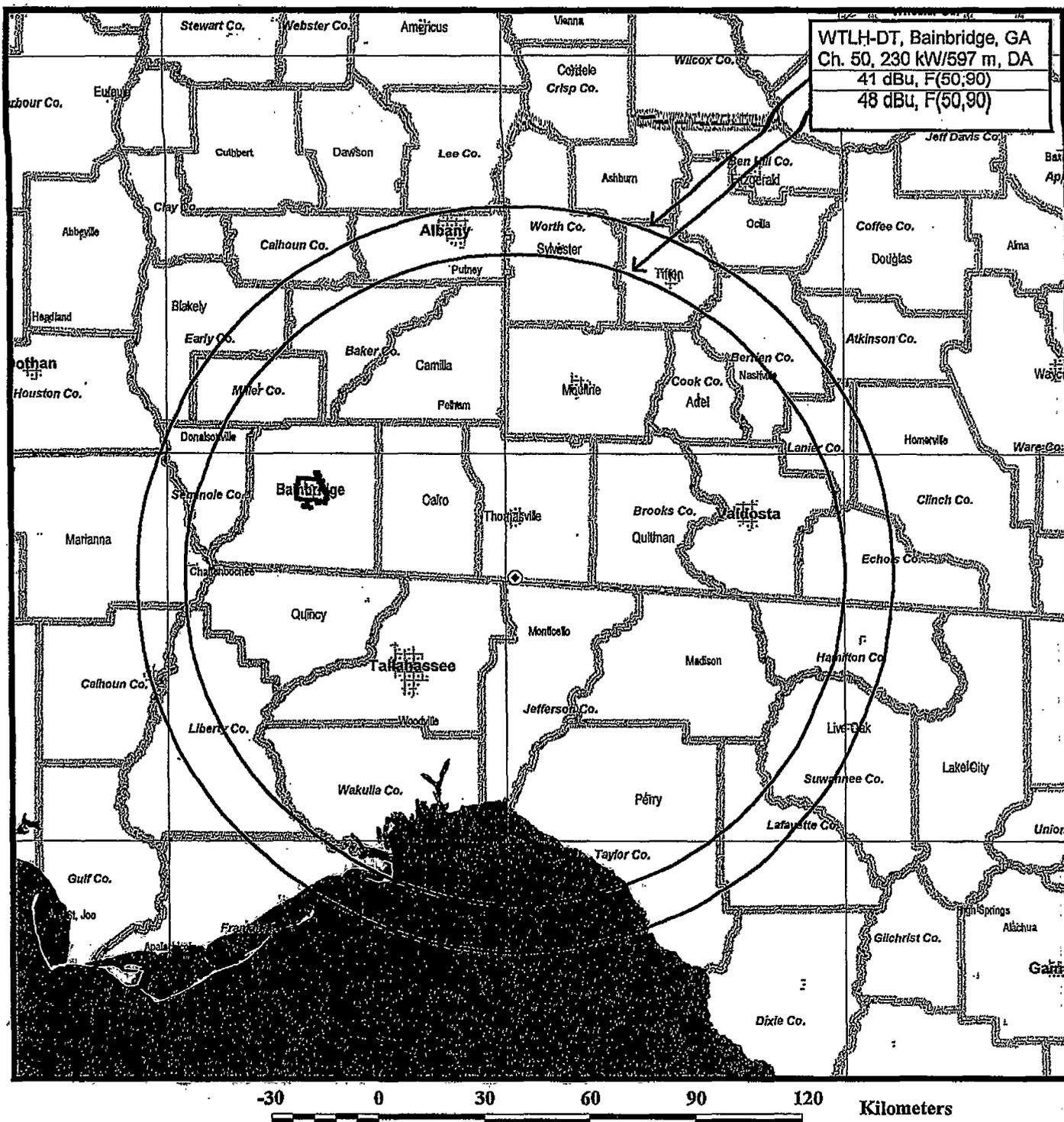


W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237

June 18, 2008

Figure 1



## FCC PREDICTED COVERAGE CONTOURS

STATION WTLH-DT  
BAINBRIDGE, GEORGIA  
DTV CHANNEL 50

du Treil, Lundin & Rackley, Inc. Sarasota, Florida