

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Section 73.622(i),	)	MB Docket No. 08-155
Final DTV Table of Allotments,	)	RM-11479
Television Broadcast Stations.	)	
(Honolulu, Hawaii)	)	
	)	

To: Office of the Secretary  
Attn: Chief, Video Division  
Media Bureau

FILED/ACCEPTED  
SEP - 8 2008  
Federal Communications Commission  
Office of the Secretary

**COMMENTS OF HITV LICENSE SUBSIDIARY, INC.**

HITV License Subsidiary, Inc. ("HITV"), licensee of television station KGMB(TV), analog Channel 9 and pre-transition DTV Channel 22, Honolulu, Hawaii, by its attorneys and pursuant to Sections 1.415, 1.419 and 1.420 of the Commission's Rules (47 C.F.R. §§ 1.415, 1.419, 1.420), hereby submits these comments in response to the above-captioned *Notice of Proposed Rule Making* ("Notice") released July 28, 2008. The *Notice* seeks comment on HITV's request, as set forth in its *Petition for Rule Making* dated June 19, 2008 ("*Petition*"), that the Commission amend the post-transition DTV Table of Allotments to substitute Channel 22 – KGMB-DT's current DTV channel – as its post-transition allotment in lieu of Channel 9.

HITV hereby confirms its continuing interest in the proposal as set forth in the *Petition*. HITV explained in the *Petition* that the currently allotted Channel 9 is wedged in Honolulu between stations on both Channel 8 and Channel 10, but that the proposed Channel 22 was not similarly constrained. Operations on Channel 22 thus would minimize received interference and permit KGMB-DT to serve existing analog viewers. If the Commission adopts the proposed

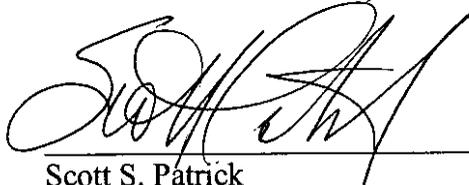
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channel change, HITV accordingly intends to apply for authorization to keep KGMB-DT on Channel 22 and operate in accordance with the Commission's rules.

THEREFORE, for the reasons herein and previously set forth in the *Petition*, HITV respectfully requests that the Commission promptly adopt the changes proposed in the *Notice*.

Respectfully Submitted,

HITV LICENSE SUBSIDIARY, INC.

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Dated: September 8, 2008