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

Federal Communications Commission
Office of the Secretary

In re:

Pappas Arizona License, LLC

MB Docket No. 08-163

Petition For Rulemaking to Amend DTV
Table Of Allotments for
Station KSWT-DT, Yuma, Arizona

RM-11482

To: The Secretary
Attn: Chief, Media Bureau

COMMENTS

Pappas Arizona License, LLC ("Petitioner"), by and through its attorneys, and pursuant to Section 1.415 and 1.419 of the Commission's rules, 47 C.F.R. §1.415, 1.419 (2007), hereby submits these Comments in support of its Petition for Rulemaking (the "Petition") to amend the DTV Table of Allotments (47 C.F.R. § 73.622(i)) to change the post-transition, DTV channel assignment of Station KSWT-DT, Yuma, Arizona (the "Station") to Channel 13, and to make related technical changes to the Station's technical parameters.

As discussed in the Petition, the proposed change of the Station's post-transition DTV channel to its current analog Channel 13 will permit the Petitioner to convert its present analog transmitter on Channel 13, and use the presently-licensed analog antenna. This will permit the Petitioner to save substantial expenses, and will permit the completion of the construction of the Station's post-transition prior to the end of the DTV transition. 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.

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Therefore, Pappas Arizona License, LLC, respectfully requests that the Commission grant the Petition for Rulemaking.

Respectfully submitted,

PAPPAS ARIZONA LICENSE, LLC

By: 

Kathleen Victory, Esquire
Lee G. Petro, Esquire
FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, 11th Floor
Arlington, Virginia 22209
703-812-0400 - Telephone

Its Attorneys

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