

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

FILED/ACCEPTED

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Federal Communications Commission  
Office of the Secretary

In the Matter of )

Amendment of Section 73.622(i), )  
Final DTV Table of Allotments, )  
Television Broadcast Stations )  
(Columbus, Georgia) )

MB Docket No. 08-100  
RM-11437

COMMENTS

WTVM License Subsidiary, LLC, licensee of television station WTVM, analog channel 11 and digital channel 9, Columbus, Georgia ("WTVM" or the "Station") supports the Media Bureau's proposal to allot channel 11 at Columbus, Georgia for WTVM's final, post-transition DTV facility.<sup>1</sup> On adoption of the NPRM, the Station is committed to filing an application for a permit to construct its post-transition digital facility on channel 11 and promptly thereafter constructing that facility.

As the NPRM notes, this change in channel allotment is necessary to allow WTVM to construct a facility that will "provide service to all of its viewers who currently receive the station's analog service."<sup>2</sup> Moreover, as the NPRM further notes, WTVM's "ability to increase its contour is constrained by the presence of a full-power digital station which would receive interference from a fully-maximized WTVM operation on channel 9."<sup>3</sup> To address this constraint and ensure ongoing service to its community, the Station has proposed to use a

<sup>1</sup> *Amendment of Section 73.622(i), Final DTV Table of Allotments, Television Broadcast Stations (Columbus, Georgia)*, Notice of Proposed Rulemaking, MB Docket No. 08-100, RM-11437, DA 08-1503 (rel. Sep. 30, 2008) ("NPRM").

<sup>2</sup> *Id.* at ¶ 2.

<sup>3</sup> *Id.*

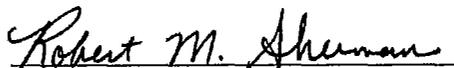
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Channel 11 facility to provide service to 169% of its current analog population and 196% of the Station's pre-transition digital population.<sup>4</sup>

The Media Bureau properly found that "the Petition warrants consideration" in view of these public interest benefits.<sup>5</sup> It also concluded that the proposed facility would comply with the principal community coverage and technical requirements in the Commission's rules.<sup>6</sup>

WTVM encourages the Commission to adopt the proposed allotment change as expeditiously as possible after the comment period closes. Given the short amount of time remaining before the close of the DTV transition, the public interest would be well served by finalizing WTVM's post-transition channel allotment and allowing the Station to begin construction of its final facility as quickly as possible.

Respectfully submitted,



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<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at ¶ 3.

<sup>6</sup> *Id.* See 47 C.F.R. §§ 73.625(a), 73.616, 73.623.