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

In re: _____ }
Pappas Telecasting of Central Nebraska, L.P. }
Petition For Rulemaking to Amend DTV }
Table Of Allotments for }
(Hayes Center, Nebraska) }

MB Docket No. 08-193

RM-11489

To: The Secretary
Attn: Chief, Media Bureau

FILED/ACCEPTED

NOV 13 2008

Federal Communications Commission
Office of the Secretary

COMMENTS

Pappas Telecasting of Central Nebraska, L.P. ("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 KWNB (TV), Hayes Center, Nebraska, (the "Station") to Channel 6, 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 6 will permit the Petitioner to convert its present analog transmitter on Channel 6, 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. In addition, the proposed Channel 6 will serve 687 more persons than the authorized facility on Channel 18. 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 Telecasting of Central Nebraska, L.P., respectfully requests that the Commission grant the Petition for Rulemaking.

Respectfully submitted,

**PAPPAS TELECASTING OF
CENTRAL NEBRASKA, L.P**

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November 12, 2008