

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

In re:

Pappas Telecasting of Central Nebraska, L.P.

MB Docket No. 08-199

Petition For Rulemaking to Amend DTV  
Table Of Allotments for  
(Kearney, Nebraska)

RM-11486

FILED/ACCEPTED

NOV 13 2008

Federal Communications Commission  
Office of the Secretary

To: The Secretary  
Attn: Chief, Media Bureau

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 KHGI-TV, Kearney, Nebraska (the "Station") to Channel 13, and to make related technical changes to the Station's technical parameters.

As discussed in the Petition, the proposed substitution of the Station's post-transition DTV channel from Channel 36 to 13 will permit the Petitioner to convert its present analog transmitter on Channel 13, and use its presently-licensed analog antenna. Thus, the proposed channel substitution will permit the Petitioner to save substantial expenses. 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