

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Amendment of Section 73.622(i),) MB Docket No. 09-118
Final DTV Table of Allotments,) RM-11545
Television Broadcast Stations.)
(Ann Arbor, Michigan))
)

FILED/ACCEPTED

JUL 30 2009

Federal Communications Commission
Office of the Secretary

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

COMMENTS OF ION MEDIA LICENSE COMPANY, LLC, DEBTOR-IN-POSSESSION

ION Media License Company, LLC, Debtor-In-Possession (“Licensee”),¹ licensee of television station WPXD-TV, Ann Arbor, Michigan, (the “Station”) 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 regarding the above-captioned *Notice of Proposed Rule Making* (“*Notice*”) released July 8, 2009. The *Notice* seeks comment on Licensee’s request, as set forth in its *Petition for Rule Making* dated April 8, 2009 (“*Petition*”), that the Commission amend the post-transition DTV Table of Allotments by substituting Channel 50 as the Station’s DTV channel in lieu of Channel 31.

Licensee hereby confirms its continuing interest in the proposal as set forth in the *Petition*, which is incorporated herein by reference. As noted in the *Petition*, Licensee seeks this channel substitution because operation on Channel 50 would allow the Station to better serve the

¹ On June 5, 2009, the Commission granted the *pro forma* applications for the assignment of licenses from ION Media License Company, LLC to ION Media License Company, LLC, Debtor-In-Possession. The licensee submitted a consummation notice on the same day. See FCC File Nos. BALCT-20090520AGP, *et al.*

Detroit Designated Market Area (“DMA”), to which it belongs. Licensee previously proposed to substitute Channel 19 as the Station’s post-transition DTV allotment,² but the Canadian government did not approve and the Commission therefore rejected that proposal.³ Licensee thus has responded by proposing the alternative Channel 50 allotment. If the Commission adopts the proposed channel change, Licensee intends to apply for authorization to operate WPXD-DT on Channel 50 and implement the change in accordance with the Commission’s rules.

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

Respectfully Submitted,

ION MEDIA LICENSE COMPANY, LLC,
DEBTOR-IN-POSSESSION

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² See *Petition for Rule Making*, FCC File No. BPRM-20080619ALV (June 19, 2008).

³ Ann Arbor, Michigan, DA-09-650 (rel. March 20, 2009).