

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
)
Amendment of Section 73.622(i))
Final DTV Table of Allotments,)
Television Broadcast Stations)
(Chicago, Illinois))
_____)

MB Docket No. 09-146

RM-11553

To: The Secretary

Attn: Chief, Video Division
Media Bureau

FILED/ACCEPTED
SEP - 3 2009
Federal Communications Commission
Office of the Secretary

COMMENTS OF WOOD LICENSE COMPANY, LLC

WOOD License Company, LLC, licensee of commercial digital television (“DTV”) station WOOD-TV (“WOOD”), operating on Channel 7 in Grand Rapids, Michigan, hereby submits these comments on the above-referenced Notice of Proposed Rulemaking (“Notice”) to change the post-transition channel assignment of Station WLS-TV, Chicago, Illinois from Channel 7 to Channel 44. WOOD supports the Commission’s proposal and urges the Commission to adopt the proposed assignment promptly.

WOOD-TV and WLS-TV were both assigned channel 7 as post-transition channels. Because Chicago and Grand Rapids are relatively close to each other, separated by 127 miles (205 kilometers), the assignment of both stations to the same channel inevitably resulted in interference to each station’s service area. This

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interference was exacerbated by the presence of Lake Michigan which lies between the two cities.

As described in the Notice and in WLS-TV's Petition for Rulemaking,¹ after WLS-TV began digital service on channel 7 at its assigned 4.75 kW power level, many viewers in the Chicago area complained that they could not receive the WLS-TV signal. With WOOD's consent, the Commission granted an experimental license allowing WLS-TV to increase power to 9.5 kW on a short-term basis, even though it would result in 0.825% additional predicted interference to WOOD.² WOOD and WLS-TV cooperated in studies to determine the effect of the increased power on the reception of both stations. While additional viewers were able to receive WLS-TV, WOOD – as expected – experienced increased interference to its reception in the Southeastern part of its service area.

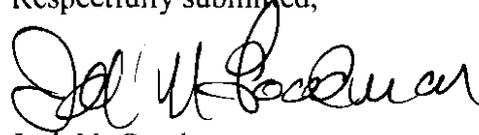
The Commission now proposes to change WLS-TV's assignment to channel 44. That assignment would not result in prohibited levels of interference to any station. The power level that is proposed for WLS-TV is also likely to enable WLS-TV to reach most, if not all, of the locations which were able to receive its analog signal. At the same time, by eliminating a nearby signal on channel 7, interference to reception of the WOOD signal will also diminish, increasing television service in the Grand Rapids market.

¹ WLS Television, Inc., *Petition for Rulemaking*, RM-11543 (filed July 24, 2009).

² FCC File No. BEXP-20090619ADB (granted June 19, 2009).

WOOD strongly supports the proposed assignment.³ It will serve the public interest by improving television service in both Chicago and Grand Rapids, while eliminating existing levels of interference and the additional interference that would have resulted from a permanent power increase on WLS-TV.

Respectfully submitted,



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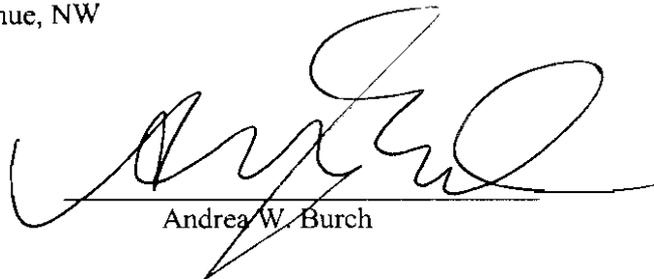
September 3, 2009

³ In order to avoid loss of service to Chicago viewers, WOOD also reached an agreement with WLS-TV to allow WLS-TV to increase power on channel 7 to 9.5 kW for a short period pending construction of its new facilities on channel 44.

Certificate of Service

I hereby certify that a copy of the foregoing "Comments of WOOD License Company, LLC" was sent, this 3rd day of September 2009, by first-class mail, postage prepaid to:

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