

November 20, 2009

VIA COURIER

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

FILED/ACCEPTED
NOV 20 2009
Federal Communications Commission
Office of the Secretary

Attention: Video Division, Media Bureau

Re: MM Docket No. 09-196: WGHP-DT, High Point, North Carolina
Facility I.D. No. 72106
Comments in Support of NPRM to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of Community Television of North Carolina, LLC, licensee of commercial television station WGHP-DT, High Point, North Carolina, we hereby transmit an original and four copies of *Comments* in support of the Notice of Proposed Rulemaking to substitute Channel 35 for Channel 8 at High Point, North Carolina in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,



Scott S. Patrick

Enclosure

cc: Ms. Joyce Bernstein (via e-mail)
Mr. Ron Graser (via e-mail)

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

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Federal Communications Commission
Office of the Secretary

In the Matter of)	
)	
Amendment of Section 73.622(i))	MM Docket No. 09-196
Post-Transition Table of DTV Allotments,)	RM-11578
Television Broadcast Stations)	
(High Point, North Carolina))	
)	

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

COMMENTS

Community Television of North Carolina, LLC (“CTNC”), licensee of WGHP-DT, High Point, North Carolina (the “Station”), by its attorneys and pursuant to Sections 1.415 and 1.419 of the Commission’s Rules,¹ hereby submits these comments in response to the Commission’s *Notice of Public Rulemaking* (“NPRM”) in the above-captioned proceeding.² The *NPRM* proposes to substitute DTV Channel 35 for DTV Channel 8 at High Point, North Carolina. CTNC strongly supports the proposed rulemaking and channel substitution.

Substitution of DTV Channel 35 for DTV Channel 8 will allow CTNC to overcome technical difficulties that have plagued viewers since the Station’s transition to VHF operation on DTV Channel 8, pursuant to termination of analog service on June 12, 2009. The proposed channel substitution will help ensure continued service to a sizable number of the Station’s viewers that cannot receive the Station’s over-the-air signal on DTV Channel 8.

¹ 47 C.F.R. §§ 1.415, 1.419.

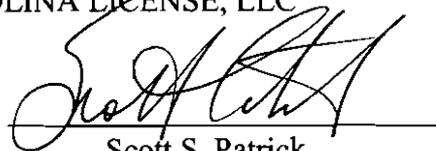
CTNC respectfully submits that the proposed substitution of the Station's pre-transition UHF channel, DTV Channel 35, for its post-transition VHF channel, DTV Channel 8, will provide the best solution to the reception problems. The proposed channel substitution also meets the technical requirements set forth in Sections 73.616, 73.622(f)(5) and 73.623 of the Commission's Rules.³

For the foregoing reasons, CTNC strongly supports the proposed rulemaking to substitute DTV Channel 35 for DTV Channel 8 at High Point, North Carolina. The substitution would best serve the public interest by permitting the Station to continue to provide service to viewers that have come to rely upon the Station. If the rulemaking is granted, CTNC intends to apply for and promptly license the Station's facilities on DTV Channel 35.

Respectfully submitted,

COMMUNITY TELEVISION OF NORTH
CAROLINA LICENSE, LLC

By:



Scott S. Patrick
Mario J. Weber

Its Attorneys

Dow Lohnes PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
(202) 776-2000

Dated: November 20, 2009

² See Notice of Public Rulemaking, DA 09-2239, MM Docket No. 09-196 (rel. Oct. 29, 2009).

³ NPRM at ¶ 3.