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February 16, 2010

VIA HAND DELIVERY

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554  
*Attn: Video Division, Media Bureau*

FILED/AC/DE

FEB 16 2010  
Federal Communications Commission  
Office of the Secretary

Re: MB Docket No. 10-19  
RM-11589  
KWTW-DT, Oklahoma City, OK, Facility ID No. 25382  
*Comments of Griffin Licensing, L.L.C.*

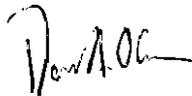
Dear Ms. Dortch:

Transmitted herewith, on behalf of Griffin Licensing, L.L.C. ("Griffin"), are an original and four (4) copies of Griffin's comments filed in support of the January 21, 2010 *Notice of Proposed Rulemaking* issued in the above-captioned proceeding.

Should you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP



David A. O'Connor  
Counsel for Griffin Licensing, L.L.C.

Enclosure

cc via e-mail: Adrienne Denysyk, FCC

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

In the Matter of )  
)  
Amendment of Section 73.622(i) ) MB Docket No. 10-19  
Post-Transition Table of DTV Allotments, ) RM-11589  
Television Broadcast Stations. )  
(Oklahoma City, Oklahoma) )

To: Office of the Secretary  
For: Video Division, Media Bureau

FEB 10 2010  
Federal Communications Commission  
Office of the Secretary

**COMMENTS OF GRIFFIN LICENSING, L.L.C.**

On December 2, 2009, Griffin Licensing, L.L.C. (“Griffin”), the licensee of KWTW-DT, Oklahoma City, Oklahoma, Facility ID No. 25382 (“KWTW-DT”), filed a petition requesting that the Commission institute a rulemaking proceeding to amend the Post-Transition Table of DTV Allotments set forth in Section 73.622(i) by substituting channel 39 as KWTW-DT’s channel allotment in lieu of channel 9. In a *Notice of Proposed Rulemaking* (“NPRM”) released on January 21, 2010, the Media Bureau proposed to adopt Griffin’s request and sought comment on the proposed amendment to the Post-Transition Table of DTV Allotments.<sup>1</sup>

In support of the rule change proposed in the *NPRM*, Griffin hereby submits these comments and incorporates by reference herein the statements made in Griffin’s December 2,

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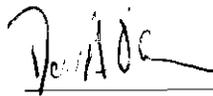
<sup>1</sup> *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Oklahoma City, Oklahoma)*, Notice of Proposed Rulemaking, MB Docket No. 10-19, DA 10-109 (Assoc. Chief, Video Div., MB rel. Jan. 21, 2010) (“NPRM”). The *NPRM* was published in the *Federal Register* on February 1, 2010, setting the comment and reply comment deadlines as February 16, 2010 and February 26, 2010, respectively. See 75 Fed. Reg. 5015 (Feb. 1, 2010). Accordingly, these comments are being timely filed.

2009 Petition for Rulemaking. In addition, Griffin hereby restates its present intention to apply for channel 39 if it is allotted and, if authorized, to build a channel 39 station promptly.<sup>2</sup>

Accordingly, for the reasons set forth herein and as incorporated by reference, Griffin respectfully requests that the Media Bureau adopt the proposals set forth in the *NPRM*.

Respectfully submitted,

GRIFFIN LICENSING, L.L.C.



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*Its Counsel*

Dated: February 16, 2010

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<sup>2</sup> As noted in the *NPRM*, KWTW-DT is currently operating on channel 39 pursuant to Special Temporary Authority (“STA”). See File No. BDSTA-20090721AFN (granted Aug. 31, 2009), File No. BDSTA-20091008ADE (granted Oct. 19, 2009); see also *NPRM* at 1 & n.2. A request for extension of the STA is being filed concurrently via the Commission’s CDBS filing system.