

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

In the Matter of)
)
Request for Waiver of Certain TV Tuner) MB Docket No. 10-111
Requirements in Order to Import and Distribute)
Mobile DTV Receivers without Analog Tuners)
)

To: Office of the Secretary
Attention: Chief, Media Bureau

REPLY COMMENTS OF GRAY TELEVISION, INC.

Gray Television, Inc. (“Gray”) submits these reply comments in strong support of the petitions for waiver of 47 C.F.R. § 15.117 submitted by Dell Inc., LG Electronics USA, Inc., and Hauppauge Computer Works, Inc. (the “Petitions”). Expedient grant of the Petitions will well-serve the public interest.

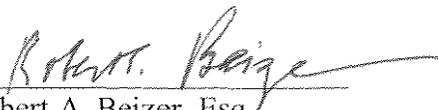
Gray is the owner and operator of thirty-four full-power television stations and twenty-four low-power television, Class A and translator stations in thirty markets located primarily in Midwest, Southern and Mid-Atlantic regions. As an early adopter of Mobile DTV, Gray has two stations currently testing Mobile DTV services and another four stations planning to begin Mobile DTV broadcasts this year. Gray is a member of the Open Mobile Video Coalition (“OMVC”) and was actively involved in the development and adoption of the Mobile DTV standard. Mobile DTV will allow Gray and other broadcasters to reach out to viewers in a new and exciting way to provide emergency notices, news, information and entertainment. Many of Gray’s stations are located in the tornado-prone areas of the Midwest and Gray feels strongly that Mobile

DTV will be a valuable means of providing emergency information to viewers during catastrophic weather events.

While broadcasters are taking important steps in preparation for the launch of Mobile DTV programming, these investments will be a wasted effort unless viewers can obtain Mobile DTV devices. The Petitions and the many comments filed in this proceeding thoroughly discuss the many technical reasons why the inclusion of the analog tuners in Mobile DTV receivers are unnecessary, provide no added value to consumers and would slow the deployment of Mobile DTV service to the public. In short, as OMVC points out, “[r]equiring Mobile DTV devices – which, by definition, are designed for nomadic use – to include an analog tuner section only adds design complexity, bulk and cost to consumer devices, with no corresponding public benefit.”¹

The limited waiver requested in the Petitions will serve the public interest by allowing manufacturers to expeditiously bring Mobile DTV devices to the marketplace. Gray strongly encourages the Commission to act quickly in favor of the limited waiver requested in the Petitions.

Respectfully submitted,


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¹ Comments of OMVC, MB Docket No. 10-111 at p. 1.