

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

In the Matter of)
)
)
Amendment of Section 73.622(i),) MB Docket No. 11-29
Post-Transition Table of DTV Allotments,) RM-11622
Television Broadcast Stations.)
(Nashville, Tennessee))

FILED/ACCEPTED

APR 18 2011

**Federal Communications Commission
Office of the Secretary**

COMMENTS

NewsChannel 5 Network, LLC (“NewsChannel 5”), licensee of full-power commercial television station WTVF(TV), Nashville, Tennessee (Facility ID No. 36504) (“WTVF”), hereby submits these comments in the above-captioned proceeding proposing to amend Section 73.622(i) of the rules, the post-transition DTV Table of Allotments, to substitute Channel 25 for Channel 5 at Nashville.¹

As explained in its petition for rulemaking, NewsChannel 5 requests to change the digital channel allotment for WTVF to Channel 25 in order to ensure long-term continuity of service to its market and, in particular, television households within the 15-mile radius “core” service area of the station that lost service following the station’s digital transition. Grant of the requested allotment change will serve the public interest and is warranted to remedy the extraordinary and widespread loss of digital service that viewers in WTVF’s central service area suffered following the station’s

¹ See *Amendment of Section 73.622(i), Final DTV Table of Allotments, Television Broadcast Stations (Nashville, Tennessee)*, Notice of Proposed Rulemaking, MB Docket No. 11-29, RM-11622, DA 11-335 (rel. Feb. 23, 2011) (“NPRM”).

No. of Copies rec'd 0+3
List # 11-29

transition from out-of-core UHF Channel 56 to in-core VHF Channel 5. WTVF's migration to digital Channel 25, in the UHF band, will result in improved service to the more than half-a-million persons residing in the station's 15-mile radius "core" service area, many of whom have been unable to receive an adequate, or any, signal on digital VHF Channel 5.²

As an interim solution to the reception problem, WTVF has been able to reach viewers in its "core" service area through the operation of a high-power replacement digital translator on Channel 50 on a temporary and unprotected basis. The licensing of digital Channel 25 will obviate the need for continued operation on Channel 50 and ensure long-term and dependable over-the-air television service to viewers residing in WTVF's central service area.

NewsChannel 5 has carefully studied and selected digital Channel 25 as the best available alternative to digital Channel 5 in the Nashville market. Digital Channel 25 presents no interference issues with respect to any co- or adjacent channel television facilities in the market and comes closest to replicating the service WTVF currently provides on digital Channel 5.³

² NewsChannel 5 estimates, based on 2000 census data, that approximately 573,000 individuals reside within 15 miles of WTVF's transmitter site.

³ It is anticipated that the switch to Channel 25 will result in the loss of service to approximately 248,000 persons in WTVF's service area on Channel 5, principally at the outer edge of the station's service area. This predicted service loss is less than half of the number of viewers who reside within WTVF's central service area and who have experienced reception difficulties or total loss of service on Channel 5. NewsChannel 5 hopes to maintain service in the predicted outer-edge loss area through the operation of a high-power replacement digital translator on Channel 5, similar to the station's current replacement digital translator service on Channel 50. NewsChannel 5 recognizes that the operation of a replacement digital translator will be subject to the grant of a separate authorization for which it will apply at a later time. NewsChannel 5's request to change its channel allotment to Channel 25 is not contingent upon WTVF's operation of a

Accordingly, NewsChannel 5 supports the proposal in the NPRM and hereby re-affirms its intention to apply for Channel 25 at Nashville. If the Commission allots Channel 25 to Nashville, NewsChannel 5 will promptly implement operation on Channel 25.

Respectfully submitted,

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replacement digital translator, and that issue does not need be addressed in this proceeding.