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April 27, 2011

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

FILED/ACCEPTED

APR 27 2011

Federal Communications Commission  
Office of the Secretary

Attention: Video Division  
Media Bureau

Re: WJTV(TV), Jackson, Mississippi  
Facility I.D. No. 48667  
Petition to Amend the Table of DTV Allotments

Dear Ms. Dortch:

On behalf of Media General Communications Holdings, LLC, licensee of commercial television station WJTV(TV), Jackson, Mississippi, we hereby transmit an original and four copies of a *Petition for Rule Making* requesting the substitution of Channel 28 for Channel 12 at Jackson, Mississippi in the Table of DTV Allotments.

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

Very truly yours,

M. Anne Swanson  
Scott S. Patrick

Enclosure

No. of Copies rec'd 0 + 4  
List ABCDE  
MB Video 11-19

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

In the Matter of	)	
	)	
Amendment of Section 73.622(i)	)	MB Docket No. _____
Post-Transition Table of Allotments,	)	RM- _____
Digital Television Broadcast Stations	)	
(Jackson, Mississippi)	)	

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

**PETITION FOR RULE MAKING  
TO AMEND THE DTV TABLE OF ALLOTMENTS**

By its attorneys and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules,<sup>1</sup> Media General Communications Holdings, LLC ("Licensee"), licensee of WJTV(TV), Jackson, Mississippi (the "Station"), hereby respectfully petitions the Commission to institute a rulemaking to amend Section 73.622(i), the Post-Transition Table of DTV Allotments, by substituting Channel 28 as the Station's allotment in lieu of Channel 12.

Specifically, the Post-Transition Table of DTV Allotments would be amended as follows:

	<b><u>Present</u></b>	<b><u>Proposed</u></b>
Jackson, Mississippi	7, <u>12</u> , *20, 21, 40, 51	7, *20, 21, <u>28</u> , 40, 51

Having operated on DTV Channel 12 now for over a year-and-a-half, Licensee believes operation on Channel 28 would offer more meaningful replication of the traditional analog

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<sup>1</sup> 47 C.F.R. §§ 1.401, 73.616, 73.622(a).

service area. As set forth in the attached Technical Exhibit, the proposed operation is not predicted to cause impermissible interference to any other station and complies with the Commission's other rules and policies.<sup>2</sup>

For the convenience of the Commission, the chart below shows the proposed parameters:

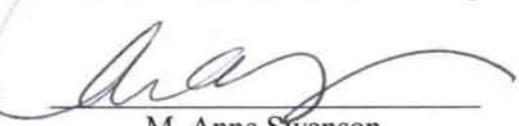
Facility ID	State and City		DTV					
			Ch	ERP kW	HAAT (m)	RCAMSL (m)	Latitude (DDMMSS)	Longitude (DDMMSS)
48667	MS	JACKSON	28	1000	491	581	321426	0902415

For the foregoing reasons, Licensee respectfully requests that the Commission amend the Post-Transition Table of DTV Allotments as proposed. Adoption would serve the public interest by permitting the Station to provide a more meaningful replication of service.

Very truly yours,

Media General Communications Holdings, LLC

By:

  
M. Anne Swanson

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

Its Attorneys

Dated: April 27, 2011

<sup>2</sup> As explained in the Technical Exhibit, the proposed ERP and HAAT exceed the maximums normally permitted in Section 73.622(f)(8), but because the proposed service area will not exceed the current service area, the proposal is permissible under 73.622(f)(5). To the extent necessary, a waiver is requested.

**ATTACHMENT A**

**Technical Exhibit**

TECHNICAL EXHIBIT  
 PETITION FOR RULE MAKING TO  
 MODIFY THE DTV TABLE OF ALLOTMENTS  
 STATION WJTV(TV)  
 JACKSON, MISSISSIPPI

This Technical Exhibit was prepared on behalf of television station WJTV(TV) assigned to Jackson, Mississippi in support of a *Petition for Rule Making* to modify the DTV allotment of WJTV to substitute UHF channel 28 for the current high VHF channel 12 DTV allotment.

Station WJTV proposes to operate on UHF channel 28 at its current site (32-14-26, 90-24-15, NAD-27) with an effective radiated power (ERP) of 1000 kilowatts (kW) employing a non-directional (ND) antenna system with an antenna height above average terrain (HAAT) of 491 meters. This is the transmitter site, antenna pattern, and antenna radiation center elevation that WJTV employs for its current post transition digital facility on channel 12.

The following details the WJTV proposed DTV allotment facilities:

Facility ID	State & City		DTV								
			NTSC Chan	Chan	ERP (kW)	HAAT (m)	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	Percent IX Received
48667	MS	Jackson	--	28	1000	491	32-14-26	90-24-15	41336	888	1.3
Non-Directional Antenna, Rc = 581 m AMSL											

Although the proposed WJTV effective radiated power and antenna height above average terrain exceeds the maximum normally permitted height/power combination contained in Section 73.622(f)(8) of the Commission's Rules, the proposed facilities replicate without exceeding the present WJTV noise limited coverage.

Domestic Allocation Concerns

The proposed WJTV allotment facilities comply with the 0.5 percent interference standard adopted by the FCC for post-transition DTV operations as shown in Figure 1 to all other known stations.

Population Served

The herein proposed WJTV Channel 28 facility will provide principal city coverage to all of Jackson, Mississippi and is predicted to serve 888,064 persons, post-transition over an area of 41,336 square kilometers.<sup>1</sup>

John A. Lundin  
du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237  
(941) 329-6000

April 27, 2011

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<sup>1</sup> These population and area served values are based upon the OET-69 DTV coverage and interference prediction model using the standard cell size (2 km) and terrain increment (1 km). All population values reported in this technical exhibit are based upon the 2000 Census.

TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV TABLE OF ALLOTMENTS  
STATION WJTV(TV)  
JACKSON, MISSISSIPPI

OET-69 Allocation Analysis

Percent allowed new interference: 0.500  
Percent allowed new interference to non Class A LPTV: 2.000  
TW Census data selected 2000  
Data Base Selected  
/export/home/cdbs/pt\_tvdb.sff  
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 04-21-2011 Time: 11:27:55

Record Selected for Analysis

WJTV-DT USERRECORD-01 JACKSON MS US  
Channel 28 ERP 1000. kW HAAT 491. m RCAMSL 00581 m  
Latitude 032-14-26 Longitude 0090-24-15  
Status APP Zone 2 Border Site number: 01  
Last update Cutoff date Docket  
Comments  
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) does not meet maximum height/power limits  
Channel 28 ERP = 1000.00 HAAT = 491.

Site number	1			
Azimuth	ERP	HAAT	41.0	dBu F(50,90)
(Deg)	(kW)	(m)		(km)
0.0	1000.000	501.7		114.6
45.0	1000.000	485.7		113.5
90.0	1000.000	478.8		113.0
135.0	1000.000	466.9		112.0
180.0	1000.000	480.4		113.1
225.0	1000.000	498.9		114.4
270.0	1000.000	517.4		115.7
315.0	1000.000	496.1		114.2

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap  
to Class A stations from site # 01

Class A Evaluation Complete

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

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Start of Interference Analysis

	Proposed Station			
Channel	Call	City/State	ARN	
28	WJTV-DT	JACKSON MS	USERRECORD01	

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
27	KTVE	EL DORADO AR	194.4	LIC	BLCDDT	20070105ABH
28	WTTO	HOMEWOOD AL	363.2	CP MOD	BMPCDDT	20041104AMB
28	KJLR-LP	LITTLE ROCK AR	327.9	CP	BDFCDDA	20100615AGX
28	KJLR-LP	LITTLE ROCK, ETC. AR	327.9	LIC	BLTTL	19960424JF
28	KATC	LAFAYETTE LA	278.4	CP MOD	BMPCDDT	20060906AAW
28	KTBS-TV	SHREVEPORT LA	334.6	LIC	BLCDDT	20020911ABZ
28	WREG-TV	MEMPHIS TN	331.1	LIC	BLCDDT	20050513AAE

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Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
27	KTVE	EL DORADO AR	BLCDDT	-20070105ABH

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
26	KVTH-DT	HOT SPRINGS AR	162.5	LIC	BLCDDT	-20090209ANJ
26	KLPA-TV	ALEXANDRIA LA	170.8	LIC	BLEDDT	-20031212ABA
26	KLPA-TV	ALEXANDRIA LA	170.8	CP	BPEDT	-20091020AAH
27	KFTA-TV	FORT SMITH AR	340.9	APP	BMPCDDT	-20040803ABV
27	KFTA-TV	FORT SMITH AR	340.9	LIC	BLCDDT	-20090331AEC
28	KTBS-TV	SHREVEPORT LA	165.0	LIC	BLCDDT	-20020911ABZ
28	WJTV-DT	JACKSON MS	194.4	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
28	WTTO	HOMEWOOD AL	BMPCDDT	-20041104AMB

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
27	WAIQ	MONTGOMERY AL	131.6	LIC	BLEDDT	-20060706ACK
28	WREG-TV	MEMPHIS TN	335.6	LIC	BLCDDT	-20050513AAE
29	WBIH	SELMA AL	105.0	LIC	BLCDDT	-20090619AAY
28	WJTV-DT	JACKSON MS	363.2	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1  
Scenario 1 Affected station 2  
Before Analysis



Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
28	KJLR-LP	LITTLE ROCK, ETC. AR	BLTTL -19960424JF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
24	KVIN-DT	PINE BLUFF AR	31.6	LIC	BLCDT -20071231AFB
26	KVTH-DT	HOT SPRINGS AR	81.8	LIC	BLCDT -20090209ANJ
27	K27JP-D	LITTLE ROCK AR	0.0	LIC	BLDTL -20080625ABK
28	KTBS-TV	SHREVEPORT LA	275.4	LIC	BLCDT -20020911ABZ
28	KSFY-TV	SPRINGFIELD MO	281.7	CP MOD	BMPCDT -20070116AAC
28	KTPX-TV	OKMULGEE OK	369.6	LIC	BLCDT -20020510AAQ
28	WREG-TV	MEMPHIS TN	227.8	LIC	BLCDT -20050513AAE
30	KLRT-TV	LITTLE ROCK AR	20.6	LIC	BLCDT -20020507AAK
32	KARK-TV	LITTLE ROCK AR	21.4	CP	BPCDT -19990614KE
36	KKAP	LITTLE ROCK AR	21.0	LIC	BLEDT -20090522AFW
36	KKAP	LITTLE ROCK AR	21.0	CP	BPEDT -20080618AUA
28	WJTV-DT	JACKSON MS	327.9	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
28	KATC	LAFAYETTE LA	BMPCDT -20060906AAW

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
28	KTBS-TV	SHREVEPORT LA	305.2	LIC	BLCDT -20020911ABZ
28	KYLE-TV	BRYAN TX	398.2	LIC	BLCDT -20090612ABZ
28	KYLE-DR	BRYAN TX	398.2	APP	BPRM -20090203AEO
29	WVUE-DR	NEW ORLEANS LA	228.7	APP	BPRM -20090528AFA
29	WVUE-DT	NEW ORLEANS LA	228.7	LIC	BLCDT -20050614AAH
29	WVUE-DT	NEW ORLEANS LA	228.7	CP MOD	BMPCDT -20091028AAP
28	WJTV-DT	JACKSON MS	278.4	APP	USERRECORD-01

Total scenarios = 1

Result key: 2  
 Scenario 1 Affected station 5  
 Before Analysis

Results for: 28A LA LAFAYETTE BMPCDT 20060906AAW CP  
 HAAT 537.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1281338	42306.4
not affected by terrain losses	1281338	42306.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1851	80.2
lost to ATV IX only	1851	80.2
lost to all IX	1851	80.2

Potential Interfering Stations Included in above Scenario 1

28A LA SHREVEPORT BLCDT 20020911ABZ LIC

After Analysis

Results for: 28A LA LAFAYETTE BMPCDT 20060906AAW CP  
HAAT 537.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1281338	42306.4
not affected by terrain losses	1281338	42306.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2075	104.3
lost to ATV IX only	2075	104.3
lost to all IX	2075	104.3

Potential Interfering Stations Included in above Scenario 1

28A LA SHREVEPORT BLCDT 20020911ABZ LIC  
28A MS JACKSON USERRECORD01 APP

Percent new IX = 0.0175%

Worst case new IX 0.0175% Scenario 1

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
28	KTBS-TV	SHREVEPORT LA	BLCDT	-20020911ABZ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
27	KTVE	EL DORADO AR	165.0	LIC	BLCDT	-20070105ABH
28	KATC	LAFAYETTE LA	305.2	CP MOD	BMPCDT	-20060906AAW
28	KTPX-TV	OKMULGEE OK	403.7	LIC	BLCDT	-20020510AAQ
28	KYLE-TV	BRYAN TX	323.8	LIC	BLCDT	-20090612ABZ
28	KYLE-DR	BRYAN TX	323.8	APP	BPRM	-20090203AEO
28	WJTV-DT	JACKSON MS	334.6	APP	USERRECORD-01	

Total scenarios = 3

Result key: 3

Scenario 1 Affected station 6 (Worst case scenario)

Before Analysis

Results for: 28A LA SHREVEPORT BLCDT 20020911ABZ LIC  
HAAT 563.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1105815	45454.3
not affected by terrain losses	1104209	45241.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	20988	1517.8
lost to ATV IX only	20988	1517.8
lost to all IX	20988	1517.8

Potential Interfering Stations Included in above Scenario 1

27A AR EL DORADO	BLCDT	20070105ABH	LIC
28A LA LAFAYETTE	BMPCDT	20060906AAW	CP
28A TX BRYAN	BLCDT	20090612ABZ	LIC

After Analysis

Results for: 28A LA SHREVEPORT BLCDT 20020911ABZ LIC  
 HAAT 563.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1105815	45454.3
not affected by terrain losses	1104209	45241.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	21323	1594.1
lost to ATV IX only	21323	1594.1
lost to all IX	21323	1594.1

Potential Interfering Stations Included in above Scenario 1

27A AR EL DORADO	BLCDT	20070105ABH	LIC
28A LA LAFAYETTE	BMPCDT	20060906AAW	CP
28A TX BRYAN	BLCDT	20090612ABZ	LIC
28A MS JACKSON	USERRECORD01		APP

Percent new IX = 0.0309%

Worst case new IX 0.0309% Scenario 1

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
28	WREG-TV	MEMPHIS TN	BLCDT	-20050513AAE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
28	WTTO	HOMEWOOD AL	335.6	CP MOD	BMPCDT	-20041104AMB
28	WTVW	EVANSVILLE IN	385.2	CP	BPCDT	-19991101ACY
28	KSPX-TV	SPRINGFIELD MO	359.7	CP MOD	BMPCDT	-20070116AAC
29	WKNO	MEMPHIS TN	3.1	CP MOD	BMPCDT	-20021112ACA
29	WKNO	MEMPHIS TN	3.1	LIC	BLEDT	-20060627ABE
28	WJTV-DT	JACKSON MS	331.1	APP	USERRECORD-01	

Total scenarios = 2

Result key: 6  
 Scenario 1 Affected station 7 (Worst case scenario)  
 Before Analysis

Results for: 28A TN MEMPHIS BLCDT 20050513AAE LIC  
 HAAT 313.0 m, ATV ERP 906.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1532815	30850.4
not affected by terrain losses	1530798	30726.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	5047	332.1

lost to ATV IX only 5047 332.1  
 lost to all IX 5047 332.1

Potential Interfering Stations Included in above Scenario 1

28A AL HOMEWOOD	BMPCDT	20041104AMB	CP
28A IN EVANSVILLE	BPCDT	19991101ACY	CP
28A MO SPRINGFIELD	BMPCDT	20070116AAC	CP
29A TN MEMPHIS	BMPEDT	20021112ACA	CP

After Analysis

Results for: 28A TN MEMPHIS BLCDT 20050513AAE LIC

HAAT 313.0 m, ATV ERP 906.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1532815	30850.4
not affected by terrain losses	1530798	30726.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	5969	388.1
lost to ATV IX only	5969	388.1
lost to all IX	5969	388.1

Potential Interfering Stations Included in above Scenario 1

28A AL HOMEWOOD	BMPCDT	20041104AMB	CP
28A IN EVANSVILLE	BPCDT	19991101ACY	CP
28A MO SPRINGFIELD	BMPCDT	20070116AAC	CP
29A TN MEMPHIS	BMPEDT	20021112ACA	CP
28A MS JACKSON	USERRECORD01		APP

Percent new IX = 0.0604%

Worst case new IX 0.0604% Scenario 1

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application Ref. No.
28	WJTV-DT	JACKSON MS	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
27	KTVE	EL DORADO AR	194.4	LIC	BLCDT -20070105ABH
28	WTTO	HOMEWOOD AL	363.2	CP MOD	BMPCDT -20041104AMB
28	KATC	LAFAYETTE LA	278.4	CP MOD	BMPCDT -20060906AAW
28	KTBS-TV	SHREVEPORT LA	334.6	LIC	BLCDT -20020911ABZ
28	WREG-TV	MEMPHIS TN	331.1	LIC	BLCDT -20050513AAE

Total scenarios = 1

Result key: 8  
 Scenario 1 Affected station 8  
 Before Analysis

Results for: 28A MS JACKSON USERRECORD01 APP

HAAT 491.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	901228	42167.5
not affected by terrain losses	899529	41973.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	11465	637.6
lost to ATV IX only	11465	637.6
lost to all IX	11465	637.6

Potential Interfering Stations Included in above Scenario 1

28A AL HOMEWOOD	BMPCDT	20041104AMB	CP
28A LA LAFAYETTE	BMPCDT	20060906AAW	CP
28A LA SHREVEPORT	BLCDT	20020911ABZ	LIC
28A TN MEMPHIS	BLCDT	20050513AAE	LIC

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