

ORIGINAL



May 2, 2011

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

FILED/ACCEPTED

MAY - 2 2011

Federal Communications Commission
Office of the Secretary

Attention: Video Division
Media Bureau

Re: WBTW(TV), Florence, South Carolina
Facility I.D. No. 66407
Petition to Amend the Table of DTV Allotments

Dear Ms. Dortch:

On behalf of Media General Communications Holdings, LLC, licensee of commercial television station WBTW(TV), Florence, South Carolina, we hereby transmit an original and four copies of a *Petition for Rule Making* requesting the substitution of Channel 41 for Channel 13 at Florence, South Carolina 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 A B C D E
MB Video 11-20

**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)
(Florence, South Carolina))

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

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

By its attorneys and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules,¹ Media General Communications Holdings, LLC ("Licensee"), licensee of WBTW(TV), Florence, South Carolina (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 41 as the Station's allotment in lieu of Channel 13.

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

	<u>Present</u>	<u>Proposed</u>
Florence, South Carolina	<u>13</u> , 16, 21, *45	16, 21, <u>41</u> , *45

Having operated on DTV Channel 13 now for over a year-and-a-half, Licensee believes operation on Channel 41 would offer more meaningful replication of the traditional analog

¹ 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.²

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)
66407	SC	FLORENCE	41	1000	598	629	342204	0791921

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
Scott S. Patrick

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

Its Attorneys

Dated: May 2, 2011

² 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, waiver is requested.

ATTACHMENT A

Technical Exhibit

**TECHNICAL EXHIBIT
 PETITION FOR RULE MAKING TO
 MODIFY THE DTV TABLE OF ALLOTMENTS
 STATION WBTW(TV)
 FLORENCE, SOUTH CAROLINA**

This Technical Exhibit was prepared on behalf of television station WBTW(TV) assigned to Florence, South Carolina in support of a *Petition for Rule Making* to modify the DTV allotment of WBTW to substitute UHF channel 41 for the current high VHF channel 13 DTV allotment.

Station WBTW proposes to operate on UHF channel 41 at its current site (34-22-04, 79-19-21, 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 598 meters. This is the same transmitter site, antenna pattern, and radiation center elevation that WBTW employs for its current post transition digital facility on channel 13.

The following details the WBTW proposed DTV allotment facilities:

Facility ID	State & City		NTSC		DTV						
			Chan	Chan	ERP (kW)	HAAT (m)	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	Percent IX Received
66407	SC	Florence	--	41	1000	598	34-22-04	79-19-21	44909	1692	0.0
Non-Directional Antenna, Rc = 629 m AMSL											

Although the proposed WBTW 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 closely replicate without exceeding the present WBTW noise limited coverage.

Domestic Allocation Concerns

The proposed WBTW 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 WBTW Channel 41 facility will provide principal city coverage to all of Florence, South Carolina and is predicted to serve 1,691,550 persons, post-transition over an area of 44,909 square kilometers.¹

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

April 27, 2011

¹ 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 WBTW(TV)
FLORENCE, SOUTH CAROLINA

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: 16:02:25

Record Selected for Analysis

WBTW-DT USERRECORD-01 FLORENCE SC US
 Channel 41 ERP 1000. kW HAAT 598. m RCAMSL 00629 m
 Latitude 034-22-04 Longitude 0079-19-21
 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 41 ERP = 1000.00 HAAT = 598.

Site number 1			
Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	1000.000	592.0	120.1
45.0	1000.000	591.8	120.1
90.0	1000.000	598.0	120.5
135.0	1000.000	606.7	121.0
180.0	1000.000	599.8	120.6
225.0	1000.000	601.9	120.7
270.0	1000.000	599.3	120.5
315.0	1000.000	595.0	120.3

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

Start of Interference Analysis

Proposed Station			
Channel	Call	City/State	ARN

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WHKY-TV	HICKORY NC	161.7	CP MOD	BMPCDT	20090310ADE +
41	WETP-TV	SNEEDVILLE TN	415.1	LIC	BLEDT	20050916AAX
41	WLFB-CA	WYTHEVILLE VA	323.4	LIC	BLTTA	20021210ACE
42	WRAY-TV	WILSON NC	194.6	LIC	BLCDDT	20060609AAX
44	WYBE-CA	PINEHURST NC	89.1	LIC	BLTTL	19990811JH

+ Indicates station is part of a DTS

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

DTS STATION

Channel	Call	City/State	Application	Ref. No.
40	WHKY-TV	HICKORY NC	BMPCDT	-20090310ADE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
39	WMYT-TV	ROCK HILL SC	40.0	LIC	BLCDDT	-20090619ACX
39	WKTC	SUMTER SC	181.1	LIC	BLCDDT	-20071022BDD
40	WMGT-TV	MACON GA	378.8	LIC	BLCDDT	-20070112AHJ
40	WTVQ-DT	LEXINGTON KY	374.6	CP	BPCDDT	-20081216BJH
40	WTVQ-DT	LEXINGTON KY	374.6	LIC	BLCDDT	-20050728AMX
40	WDSI-TV	CHATTANOOGA TN	354.1	LIC	BLCDDT	-20051011ABS
40	WLFB	BLUEFIELD WV	174.0	LIC	BLCDDT	-20090622ADS
41	WETP-TV	SNEEDVILLE TN	178.6	LIC	BLEDT	-20050916AAX
41	WBTW-DT	FLORENCE SC	237.8	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.
41	WETP-TV	SNEEDVILLE TN	BLEDT	-20050916AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WTVQ-DT	LEXINGTON KY	212.8	CP	BPCDDT	-20081216BJH
40	WTVQ-DT	LEXINGTON KY	212.8	LIC	BLCDDT	-20050728AMX
40	WHKY-TV	HICKORY NC	178.6	CP	BPCDDT	-20080619AAH
40	WHKY-TV	HICKORY NC	181.1	LIC	BLCDDT	-20060630ABW
40	WHKY-TV	HICKORY NC	178.6	CP MOD	BMPCDT	-20090310ADE
40	WLFB	BLUEFIELD WV	194.6	LIC	BLCDDT	-20090622ADS
41	WZDX	HUNTSVILLE AL	354.0	CP	BPCDDT	-20080619AJV
41	WATC-DT	ATLANTA GA	282.1	CP	BPEDT	-20080619AIR
41	WATC-DT	ATLANTA GA	282.1	LIC	BLEDT	-20070912AAT
41	WHIO-TV	DAYTON OH	384.2	CP	BPCDDT	-20080619ACK
41	WHIO-TV	DAYTON OH	384.2	LIC	BLCDDT	-20040614AEY
41	WCHS-TV	CHARLESTON WV	251.9	LIC	BLCDDT	-20050621AAQ
42	WKLE	LEXINGTON KY	195.0	LIC	BLEDT	-20060926AJQ

42 WMSY-TV MARION VA 157.1 LIC BLEDT -20030428ABS
 41 WBTW-DT FLORENCE SC 415.1 APP USERRECORD-01
 40 WHKY-TV HICKORY NC CP MOD BMPCDT -20090310ADE
 Proposal causes no interference

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
41	WLFB-CA	WYTHEVILLE VA	BLTTA -20021210ACE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
38	WEMT	GREENEVILLE TN	105.8	CP	BPCDT -20090521ADA
40	WHKY-TV	HICKORY NC	132.7	LIC	BLCDDT -20060630ABW
40	WLFB	BLUEFIELD WV	38.6	LIC	BLCDDT -20090622ADS
41	W41DL-D	BOONE NC	93.9	LIC	BLDDT -20090615AAT
41	WETP-TV	SNEEDVILLE TN	197.2	LIC	BLEDT -20050916AAX
41	WCHS-TV	CHARLESTON WV	182.2	LIC	BLCDDT -20050621AAQ
42	WMSY-TV	MARION VA	42.1	LIC	BLEDT -20030428ABS
49	WLFQ	GRUNDY VA	90.3	LIC	BLCDDT -20071025ACW
41	WBTW-DT	FLORENCE SC	323.4	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
42	WRAY-TV	WILSON NC	BLCDDT -20060609AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
42	WMPT	ANNAPOLIS MD	378.5	CP	BPEDT -20080620AIA
42	WMPT	ANNAPOLIS MD	378.5	LIC	BLEDT -20030903ABC
42	WMSY-TV	MARION VA	326.3	LIC	BLEDT -20030428ABS
42	WCVE-TV	RICHMOND VA	193.1	CP	BPEDT -20080610AAQ
42	WCVE-TV	RICHMOND VA	193.1	LIC	BLCDDT -20050606AHG
43	WLXI	GREENSBORO NC	151.1	LIC	BLCDDT -20090204ABD
41	WBTW-DT	FLORENCE SC	194.6	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.
44	WYBE-CA	PINEHURST NC	BLTTL -19990811JH

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
36	WFPX-TV	FAYETTEVILLE NC	44.3	LIC	BLCDDT -20021025AAD
40	WHKY-TV	HICKORY NC	116.6	CP MOD	BMPCDT -20090310ADE

42	WRAY-TV	WILSON NC	136.9	LIC	BLCDT	-20060609AAX
43	WLXI	GREENSBORO NC	86.1	LIC	BLCDT	-20090204ABD
44	WUNG-TV	CONCORD NC	110.1	CP	BPEDT	-20080616ACB
44	WUNG-TV	CONCORD NC	110.1	LIC	BLEDT	-20010814ABF
44	WZGS-CA	RALEIGH NC	93.3	LIC	BLTTA	-20090127ACI
44	WZGS-CA	RALEIGH NC	93.3	STA	BSTA	-20050324AIS
44	WZGS-CA	RALEIGH NC	93.3	CP	BDFCDTA	-20090714ABH
44	WECT	WILMINGTON NC	161.0	LIC	BLCDT	-20081031ABJ
44	WJWJ-TV	BEAUFORT SC	296.5	LIC	BLEDT	-20060221AEJ
44	W44CU-D	FLORENCE SC	102.8	CP MOD	BMPDTL	-20110321ADB
44	WCVW	RICHMOND VA	307.5	LIC	BLEDT	-20080820ABK
45	WJPM-TV	FLORENCE SC	102.8	LIC	BLEDT	-20090622ADM
48	WRAL-TV	RALEIGH NC	98.6	LIC	BLCDT	-20090710AKG
51	WFMY-TV	GREENSBORO NC	87.0	LIC	BLCDT	-20050628AAB
41	WBTW-DT	FLORENCE SC	89.1	APP	USERRECORD-01	
40	WHKY-TV	HICKORY NC		CP MOD	BMPCDT	-20090310ADE

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
41	WBTW-DT	FLORENCE SC	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
40	WHKY-TV	HICKORY NC	161.7	CP MOD	BMPCDT -20090310ADE
41	WETP-TV	SNEEDVILLE TN	415.1	LIC	BLEDT -20050916AAX
42	WRAY-TV	WILSON NC	194.6	LIC	BLCDT -20060609AAX
40	WHKY-TV	HICKORY NC		CP MOD	BMPCDT -20090310ADE

Total scenarios = 1

Result key: 1
Scenario 1 Affected station 6
Before Analysis

Results for: 41A SC FLORENCE USERRECORD01 APP

	POPULATION	AREA (sq km)
HAAT 598.0 m, ATV ERP 1000.0 kW		
within Noise Limited Contour	1694284	45160.5
not affected by terrain losses	1691550	44909.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

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