



M. Anne Swanson

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May 25, 2011

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

FILED/ACCEPTED

MAY 25 2011

Federal Communications Commission
Office of the Secretary

Attention: Video Division
Media Bureau

Re: WFLA-TV, Tampa, Florida
Facility I.D. No. 64592
Petition to Amend the Table of DTV Allotments

Dear Ms. Dortch:

On behalf of Media General Communications Holdings, LLC, licensee of commercial television station WFLA-TV, Tampa, Florida, we hereby transmit an original and four copies of a *Petition for Rule Making* requesting the substitution of Channel 14 for Channel 7 at Tampa, Florida in the Table of DTV Allotments.

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

Very truly yours,

M. Anne Swanson
Scott S. Patrick

Enclosure

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

In the Matter of)
)
Amendment of Section 73.622(i))
Post-Transition Table of Allotments,)
Digital Television Broadcast Stations)
(Tampa, Florida))

MB Docket No. _____
RM- _____ **FILED/ACCEPTED**

MAY 25 2011

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

Federal Communications Commission
Office of the Secretary

**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 WFLA-TV, Tampa, Florida (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 14 as the Station's allotment in lieu of Channel 7.

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

	<u>Present</u>	<u>Proposed</u>
Tampa, Florida	7, 12, *13, 29, *34, 47	12, *13, <u>14</u> , 29, *34, 47

Licensee believes operation on UHF Channel 14 would offer more meaningful replication of the traditional VHF analog service area. As set forth in the attached Technical

¹ 47 C.F.R. §§ 1.401, 73.616, 73.622(a).

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. The antenna pattern is directional.²

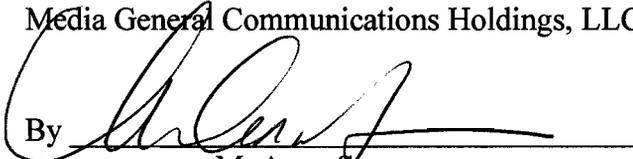
For the convenience of the Commission, the chart below shows the proposed parameters:

Facility ID	State and City		DTV					
			Ch	ERP kW	HAAT (m)	RCAMSL (m)	Latitude (DDMMSS)	Longitude (DDMMSS)
64592	FL	TAMPA	14	740	465	485.9	275022	0821545

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) 776-2534

Its Attorneys

Dated: May 25, 2011

² The pattern details are provided in the Technical Exhibit. As explained therein, the proposed ERP and HAAT exceed the maximums normally permitted in Section 73.622(f)(8), but because the proposed service area approximates but does 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 WFLA-TV
TAMPA, FLORIDA**

This Technical Exhibit was prepared on behalf of television station WFLA-TV assigned to Tampa, Florida in support of a *Petition for Rule Making* to modify the DTV allotment of WFLA-TV to substitute UHF channel 14 for the current high VHF channel 7 DTV allotment.

Station WFLA-TV proposes to operate on UHF channel 14 at its current site (27-50-32, 82-15-45, NAD-27) with maximum effective radiated power (ERP) of 740 kilowatts (kW) employing a directional antenna (DA) system. The antenna height above average terrain (HAAT) is 465 meters. This is the same transmitter site and radiation center elevation that WFLA-TV employs for its current post transition digital facility on channel 7.

The following details the WFLA-TV 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
64592	FL	Tampa	--	14	740	465	27-50-32	82-15-45	34325	4007	1.7
Rc = 485.9 m AMSL, Directional Antenna = # 83340 rotated 335 degrees (see Figure 2)											

Although the proposed WFLA-TV 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 approximate without exceeding the present WFLA-TV noise limited coverage.

Domestic Allocation Concerns

The proposed WFLA-TV 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. It is noted that the interference study is based on a cell size of 1 kilometer and terrain increment of 0.2 kilometer.

Population Served

The herein proposed WFLA-TV Channel 14 facility will provide principal city coverage to all of Tampa, Florida and is predicted to serve 4,007,301 persons, post-transition over an area of 34,325 square kilometers.¹

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

May 24, 2011

¹ These population and area served values are based upon the OET-69 DTV coverage and interference prediction model using the greater resolution cell size (1 km) and terrain increment (0.2 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 WFLA-TV
TAMPA, FLORIDA**

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: 05-24-2011 Time: 16:56:12

Record Selected for Analysis

WFLA-DT USERRECORD-01 TAMPA FL US
 Channel 14 ERP 740. kW HAAT 465. m RCAMSL 00486 m
 Latitude 027-50-32 Longitude 0082-15-45
 Status APP Zone 3 Border Site number: 01
 Dir Antenna Make CDB Model 00000000083340 Beam tilt N Ref Azimuth 335.
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 0.20 km

Facility (site # 01) does not meet maximum height/power limits
 Channel 14 ERP = 740.00 HAAT = 465.

Site number	1			
Azimuth	ERP	HAAT	41.0 dBu F(50,90)	
(Deg)	(kW)	(m)	(km)	
0.0	681.274	465.9	108.1	
45.0	376.193	467.7	102.3	
90.0	116.044	453.6	91.3	
135.0	175.505	451.5	94.3	
180.0	172.991	456.6	94.6	
225.0	143.264	467.0	93.8	
270.0	453.686	478.5	105.1	
315.0	710.696	479.2	109.6	

Evaluation toward Class A Stations from site # 01

Station inside contour of Class A station
 WSVT-CA 18 TAMPA FL BLTTA 20040303ABP

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

Channel	Proposed Station Call	City/State	ARN
14	WFLA-DT	TAMPA FL	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	WBBH-TV	FORT MYERS FL	123.5	LIC	BLCDT	20030620AAA
15	WKME-CA	KISSIMMEE FL	93.3	LIC	BLTTA	20050930BNB
15	WKME-CA	KISSIMMEE FL	93.3	CP	BDFCDTA	20080804ABP
17	WHRT-CA	SEBRING FL	91.8	LIC	BLTTA	20041217AAA
18	WSVT-CA	TAMPA FL	22.6	LIC	BLTTA	20040303ABP

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
15	WBBH-TV	FORT MYERS FL	BLCDT	-20030620AAA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
16	WPBF	TEQUESTA FL	139.7	LIC	BLCDT	-20100216ADP
14	WFLA-DT	TAMPA FL	123.5	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 15A FL FORT MYERS BLCDT 20030620AAA LIC

HAAT 454.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1644891	36075.7
not affected by terrain losses	1644891	36075.7
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

After Analysis

Results for: 15A FL FORT MYERS BLCDT 20030620AAA LIC

HAAT 454.0 m, ATV ERP 1000.0 kW

POPULATION	AREA (sq km)
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within Noise Limited Contour	1644891	36075.7
not affected by terrain losses	1644891	36075.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	8141	423.4
lost to ATV IX only	8141	423.4
lost to all IX	8141	423.4

Potential Interfering Stations Included in above Scenario 1

14A FL TAMPA USERRECORD01 APP

Percent new IX = 0.4949%

Worst case new IX 0.4949% Scenario 1

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.
15	WKME-CA	KISSIMMEE FL	BLTTA -20050930BNB

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
15	WBBH-TV	FORT MYERS FL	172.5	LIC	BLCDT -20030620AAA
15	WVVQ-LP	JACKSONVILLE FL	213.7	LIC	BLTTL -20070322ACS
15	W15CM-D	ORIENT CITY FL	97.1	LIC	BLDTL -20100625AAA
16	WVCI-LP	ORLANDO FL	27.6	LIC	BLTTL -20030522AGC
17	WKCF	CLERMONT FL	49.0	LIC	BLCDT -20020718AAR
19	WMOR-TV	LAKELAND FL	94.7	LIC	BLCDT -20050726ABO
22	WOFL	ORLANDO FL	49.7	LIC	BLCDT -20000706AEZ
22	WOFL	ORLANDO FL	49.7	CP	BPCDT -20080618ADS
23	WMFE-TV	ORLANDO FL	49.1	LIC	BLEDT -20090225ABF
29	WFTS-TV	TAMPA FL	93.3	LIC	BLCDT -20090320AGN
30	WBCC	COCOA FL	52.3	LIC	BLEDT -20030429ABH
14	WFLA-DT	TAMPA FL	93.3	APP	USERRECORD-01

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.
15	WKME-CA	KISSIMMEE FL	BDFCDTA -20080804ABP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
15	WBBH-TV	FORT MYERS FL	172.5	LIC	BLCDT -20030620AAA
15	WNFT-LD	GAINESVILLE FL	174.9	CP	BDISDTL -20070329ACI
15	WNFT-LD	GAINESVILLE FL	174.9	CP MOD	BMPDTL -20081110AAI
15	WVVQ-LP	JACKSONVILLE FL	213.7	LIC	BLTTL -20070322ACS
15	W15CM-D	ORIENT CITY FL	97.1	LIC	BLDTL -20100625AAA
16	WVCI-LP	ORLANDO FL	27.6	LIC	BLTTL -20030522AGC

14 WFLA-DT TAMPA FL 93.3 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.
17	WHRT-CA	SEBRING FL	BLTTA -20041217AAA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
15	WBBH-TV	FORT MYERS FL	82.2	LIC	BLCDT -20030620AAA
16	WPBF	TEQUESTA FL	109.1	LIC	BLCDT -20100216ADP
17	WKCF	CLERMONT FL	125.8	LIC	BLCDT -20020718AAR
17	W17CK	PORT CHARLOTTE FL	86.0	LIC	BLTT -20010427AAS
19	WMOR-TV	LAKELAND FL	90.6	LIC	BLCDT -20050726ABO
21	WCLF	CLEARWATER FL	90.6	CP	BPCDT -20080619AHV
21	WCLF	CLEARWATER FL	90.6	LIC	BLCDT -20060627AAQ
24	WWSB	SARASOTA FL	93.6	LIC	BLCDT -20090612AAG
25	WVEA-TV	VENICE FL	90.6	LIC	BLCDT -20060627ABX
31	WGPU	FORT MYERS FL	82.9	LIC	BLEDT -20080922AEM
31	WGPU	FORT MYERS FL	82.9	CP	BPEDT -20100505AFP
32	WTTA	ST. PETERSBURG FL	91.8	LIC	BLCDT -20101110AAI
32	WTTA-DR	ST. PETERSBURG FL	91.8	APP	BPRM -20090820ADU
14	WFLA-DT	TAMPA FL	91.8	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
18	WSVT-CA	TAMPA FL	BLTTA -20040303ABP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
15	WBBH-TV	FORT MYERS FL	142.5	LIC	BLCDT -20030620AAA
18	WPBT	MIAMI FL	313.7	LIC	BLEDT -20010712AGD
18	WESH	ORANGE CITY FL	156.9	CP	BDRTCDT -20090819AAB
18	W63DB	WILLISTON FL	176.8	CP	BDISTTL -20071205ABG
19	WMOR-TV	LAKELAND FL	24.1	LIC	BLCDT -20050726ABO
21	WCLF	CLEARWATER FL	24.1	CP	BPCDT -20080619AHV
21	WCLF	CLEARWATER FL	24.1	LIC	BLCDT -20060627AAQ
25	WVEA-TV	VENICE FL	24.1	LIC	BLCDT -20060627ABX
32	WTTA	ST. PETERSBURG FL	22.6	LIC	BLCDT -20101110AAI
32	WTTA-DR	ST. PETERSBURG FL	22.6	APP	BPRM -20090820ADU
33	WRXY-TV	TICE FL	144.7	CP	BPCDT -20080619ADR
33	WRXY-TV	TICE FL	144.8	LIC	BLCDT -20060627ABA
14	WFLA-DT	TAMPA FL	22.6	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
14	WFLA-DT	TAMPA FL	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
15	WBBH-TV	FORT MYERS FL	123.5	LIC	BLCDT -20030620AAA

Total scenarios = 1

Result key: 2
Scenario 1 Affected station 6
Before Analysis

Results for: 14A FL TAMPA USERRECORD01 APP

HAAT 465.0 m, ATV ERP 740.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	4075833	34655.5
not affected by terrain losses	4075833	34653.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	68532	328.2
lost to ATV IX only	68532	328.2
lost to all IX	68532	328.2

Potential Interfering Stations Included in above Scenario 1

15A FL FORT MYERS BLCDT 20030620AAA LIC

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

Figure 2

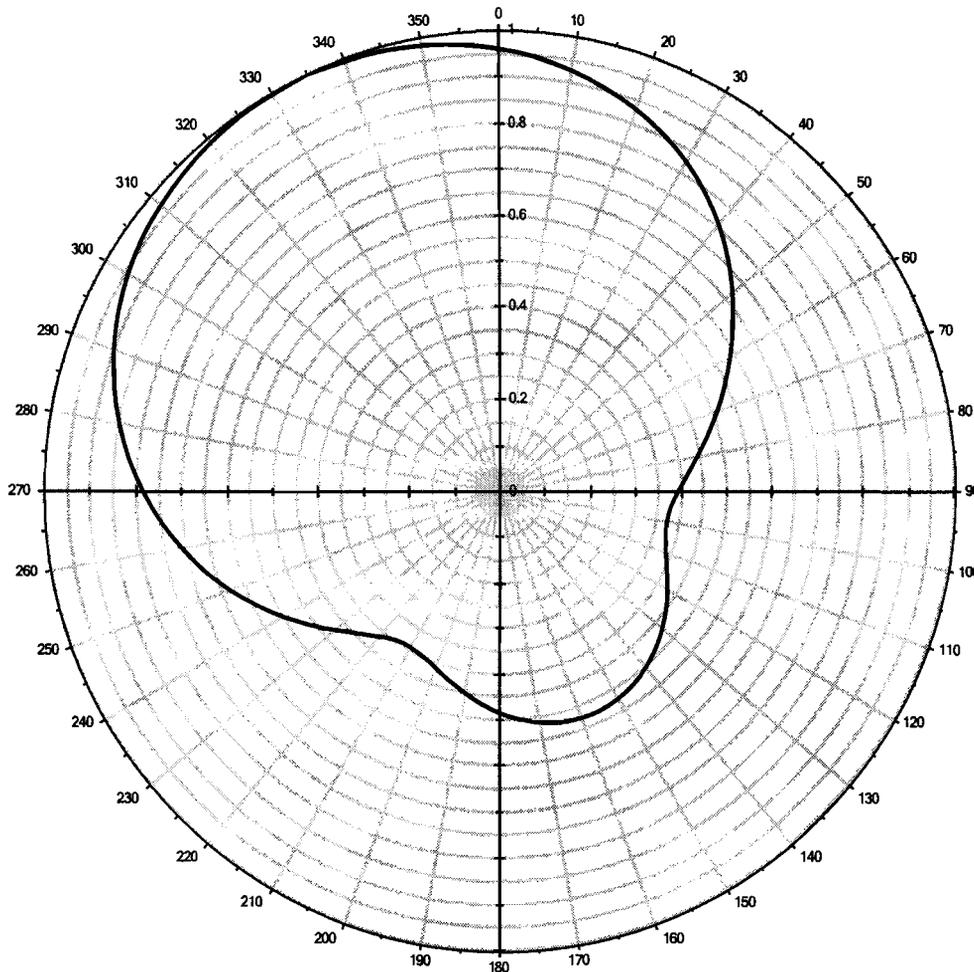
DA Inquiry

du Treil, Lundin, & Rackley, Inc., Sarasota, Florida



Antenna ID: 83340

Proposed WFLA-DT
Tampa, Florida
Ch.14, 740 kW-DA, 465 m



Note: display reflects rotation of 335.00°

0°	1.000	60°	0.792	120°	0.378	180°	0.527	240°	0.398	300°	0.818
10°	0.990	70°	0.713	130°	0.378	190°	0.522	250°	0.440	310°	0.877
20°	0.973	80°	0.628	140°	0.408	200°	0.500	260°	0.510	320°	0.924
30°	0.946	90°	0.547	150°	0.449	210°	0.467	270°	0.590	330°	0.958
40°	0.907	100°	0.474	160°	0.487	220°	0.430	280°	0.671	340°	0.980
50°	0.857	110°	0.414	170°	0.515	230°	0.400	290°	0.748	350°	0.994

Antenna Make: DIE

Standard Pattern:

Antenna Model: TFU-14DSB-C (SP)

Last Change Date: