

ORIGINAL

November 23, 2011

**VIA COURIER**

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, DC 20554

FILED/ACCEPTED

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Federal Communications Commission  
Office of the Secretary

Attention: Video Division, Media Bureau

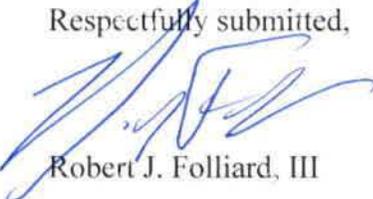
Re: MB Docket No. 11-159, RM-11644  
WJW(TV), Cleveland, Ohio  
Facility I.D. No. 73150  
Comments in Support of NPRM to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of Community Television of Ohio License, LLC, licensee of commercial television station WJW(TV), Cleveland, Ohio, we hereby transmit an original and four copies of *Comments* in support of the Notice of Proposed Rulemaking to substitute Channel 31 for Channel 8 at Cleveland, Ohio in the DTV Table of Allotments.

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

Respectfully submitted,



Robert J. Folliard, III

Enclosure

cc: Ms. Joyce Bernstein (*via e-mail*)

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Amendment of Section 73.622(i), ) MB Docket No. 11-159  
Post-Transition Table of DTV Allotments, ) RM-11644  
Television Broadcast Stations. )  
(Cleveland, Ohio) )  
 )

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

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**COMMENTS OF COMMUNITY TELEVISION OF OHIO LICENSE, LLC**

Community Television of Ohio License, LLC (“Licensee”), licensee of television station WJW(TV), Cleveland, Ohio (the “Station”), by its attorneys and pursuant to Sections 1.415, 1.419 and 1.420 of the Commission’s Rules (47 C.F.R. §§ 1.415, 1.419, 1.420), hereby submits these comments regarding the above-captioned *Notice of Proposed Rule Making* (“Notice”). The *Notice* seeks comment on Licensee’s request, as set forth in its *Petition for Rule Making* dated January 11, 2011 (“*Petition*”), that the Commission amend the post-transition Table of DTV Allotments to substitute Channel 31 as the Station’s post-transition DTV channel in lieu of Channel 8.

Licensee hereby confirms its continuing interest in the proposal set forth in the *Petition*, which is incorporated herein by reference. As explained in the *Petition*, the Station has experienced significant technical difficulties associated with its operation on VHF Channel 8. Licensee has determined that it can better serve the community if allowed to operate on its pre-

transition DTV Channel – Channel 31. As explained in the *Notice*, the channel change fully satisfies the Commission’s coverage and interference requirements.<sup>1</sup>

If the channel change is adopted, Licensee hereby expresses its intention to apply for authorization to operate as proposed and to implement the change in accordance with the Commission’s rules.

For the foregoing reasons and those previously set forth in the *Petition*, Licensee respectfully requests that the Commission promptly adopt the changes proposed in the *Notice*.

Respectfully submitted,

COMMUNITY TELEVISION OF OHIO  
LICENSE, LLC

By:

  
\_\_\_\_\_  
Robert J. Folliard, III

**Dow Lohnes PLLC**  
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202-776-2000

Its Attorney

Dated: November 23, 2011

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<sup>1</sup> *Notice*, ¶ 3.