

ORIGINAL

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)
(Florence, South Carolina))

MB Docket No. _____
RM- _____

FILED/ACCEPTED

FEB - 3 2017

Federal Communications Commission
Office of the Secretary

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

**SUPPLEMENT TO 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 submits this Supplement to the Petition for Rule Making filed on May 2, 2011, to provide information demonstrating how Licensee's proposal advances the public interest.

In the Petition, Licensee requested that the Commission 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. The Petition explained that, by changing from VHF Channel 13 to UHF Channel 41, Licensee would be able to more meaningfully replicate the Station's traditional analog service area and provide more reliable service for viewers within the Station's service area.

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

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With this Supplement, Licensee provides additional information demonstrating that operation on Channel 41 would cause only a *de minimis* loss of service and viewers in the loss area would remain well served. As shown in the attached Technical Statement, according to the Commission's OET-69 model, operation on Channel 41 will cause only 3,484 viewers (approximately 0.2% of the service area) to lose service. Moreover, all of the viewers in the predicted loss area will remain well served because all will continue to receive at least one CBS affiliate over the air. The benefits from the improved, more reliable service from operating on UHF Channel 41 far outweighs the *de minimis* loss of service to viewers who will continue to have access to other sources of CBS programming.²

For the reasons set forth in the Petition and this Supplement, Licensee respectfully requests that the Commission amend the Post-Transition Table of DTV Allotments as proposed. As noted initially, adoption would serve the public interest by permitting the Station to provide a more meaningful replication of service. In addition, because this proposal would allow for more reliable and improved service within the Station's service area, Licensee respectfully requests that the Commission find that good cause exists under Section 553(d)(3) of the Administrative Procedures Act (5 U.S.C. § 553(d)(3)) to make this change effective immediately upon publication in the Federal Register of a Report and Order in this proceeding.³

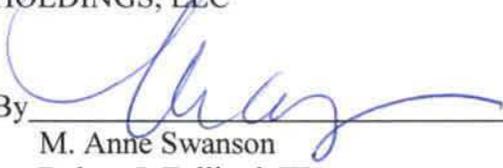
² *KNTV License, Inc.*, 19 FCC Rcd 15479, 15485 n.11 (MB 2004) ("We are less concerned about the withdrawal of service here [to 21,170 viewers], because the vast majority of the people located within the loss area will continue to receive NBC network service from other NBC affiliates, and are also well served by other stations.").

³ *See, e.g., Ann Arbor, Michigan*, 24 FCC Rcd 10856, 10857 (MB 2009) ("An expedited effective date is necessary in this case to ensure that station WPXD-TV can provide improved service to its market as quickly as possible."). *See also Bismark, North Dakota*, 24 FCC Rcd 7534 (MB 2009); *St. Paul, Minnesota*, 24 FCC Rcd 8953 (MB 2009); *Bryan, Texas*, 24 FCC Rcd 4867 (MB 2009).

Respectfully submitted,

**MEDIA GENERAL COMMUNICATIONS
HOLDINGS, LLC**

By


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Dated: February 3, 2012

ATTACHMENT A

Technical Exhibit

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

This Supplement to the 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 VHF channel 13 DTV allotment.

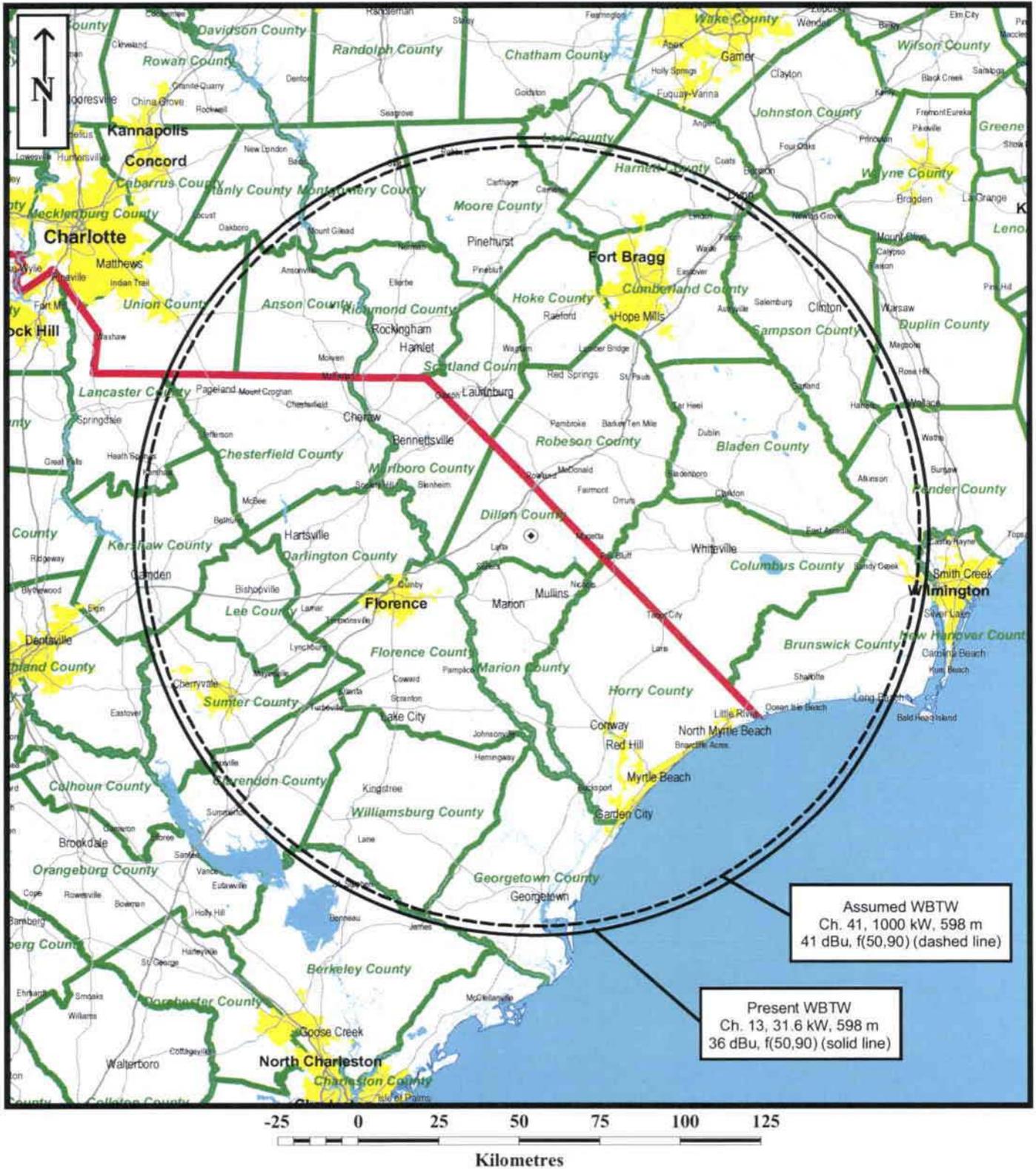
Figure 1 is a map showing the predicted noise limited contours for the present and proposed WBTW digital television operations. The extent of the contours is calculated using the FCC's standard prediction method along 36 evenly spaced radials with a 3 second digitized terrain database. The predicted 36 dBu contour is shown for the present WBTW operation on channel 13 (31.6 kW-ND, 598 m), and the predicted 41 dBu contour is shown for the proposed WBTW operation on channel 41 (1000 kW-ND, 598 m). As shown on Figure 1, the proposed WBTW channel 41 contour substantially replicates the present channel 13 contour.

Figure 3 is a printout from the FCC's OET-69 computer program that calculates the service population for the present WBTW operation using the OET-69 model and the 2000 US Census. As shown, the present WBTW service population is 1,695,034 people. Figure 4 is a similar showing for the proposed WBTW operation on channel 41 (1,691,550 people). The proposed WBTW operation on channel 41 is calculated to provide service to 3,484 fewer people than the present WBTW operation on channel 13.

The following are estimates of the population (2000 US Census) within the 2 predicted noise limited contours shown on Figure 1.

Present WBTW Ch.13, 36 dBu	1,763,862 people
Proposed WBTW Ch.41, 41 dBu	<u>1,702,268</u> people

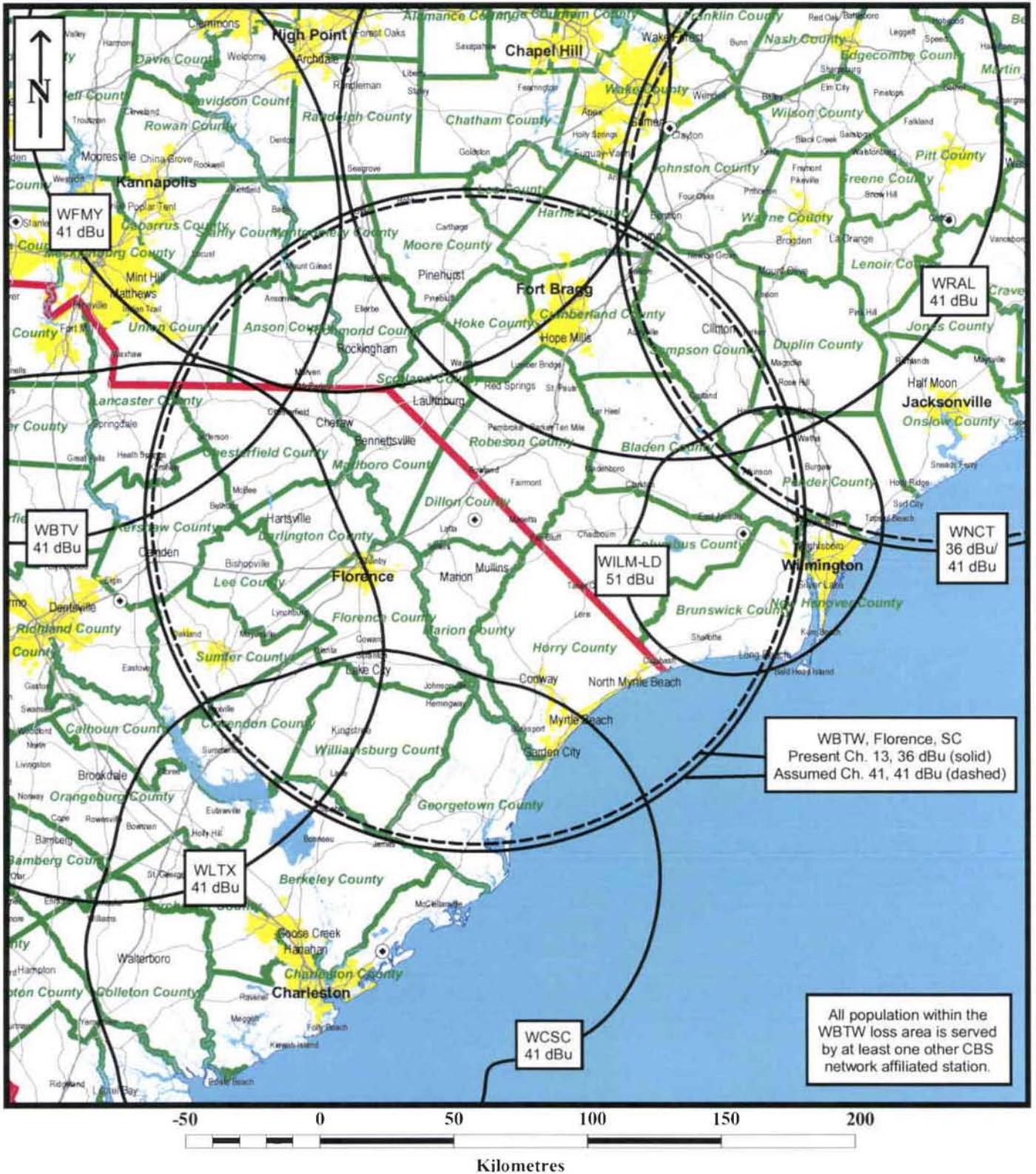
Figure 1



FCC PREDICTED NOISE-LIMITED COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



OTHER CBS NETWORK SERVICES TO WBTW PREDICTED LOSS AREA

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

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: 01-31-2012 Time: 12:35:29

Record Selected for Analysis

WBTW BLCDT -20090612AIR FLORENCE SC US
Channel 13 ERP 31.6 kW HAAT 00598 m RCMSL 00629 m
Latitude 034-22- 4 Longitude 0079-19-21
Status LIC Zone 2 Border Site number: 01
Last update 00000000 Cutoff date 00000000 Docket
Comments
Applicant MEDIA GENERAL COMMUNICATIONS HOLDING

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) meets maximum height/power limits

Site number	1			
Azimuth	ERP	HAAT	36.0	dBu F(50,90)
(Deg)	(kW)	(m)		(km)
0.0	31.600	592.0		122.8
45.0	31.600	591.8		122.8
90.0	31.600	598.0		123.3
135.0	31.600	606.7		123.8
180.0	31.600	599.8		123.4
225.0	31.600	601.9		123.5
270.0	31.600	599.3		123.3
315.0	31.600	595.0		123.1

Evaluation toward Class A Stations from site # 01

Contour overlap to Class A station
WUBX-CA 13 DURHAM, ETC. NC BLTVL 19930223ID

Contour overlap to Class A station
WBXU-CA 13 RALEIGH NC BLTVA 20020321AAD

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

Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
13	WBTW	FLORENCE SC	BLCDT	-20090612AIR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
12	WCTI-TV	NEW BERN NC	199.0	LIC	BLCDT	-20090622ADO
13	WLOS	ASHEVILLE NC	334.4	CP	BPCDT	-20080317AGL
13	WLOS	ASHEVILLE NC	334.4	CP MOD	BMPCDT	-20080620AKA
13	WLOS	ASHEVILLE NC	334.4	LIC	BLCDT	-20101014ABR
13	WVEC	HAMPTON VA	375.0	LIC	BLCDT	-20090612AJJ
13	WSET-TV	LYNCHBURG VA	328.8	LIC	BLCDT	-20091013ABE

Total scenarios = 3

Result key: 3
Scenario 3 Affected station 9
Before Analysis

Results for: 13A SC FLORENCE BLCDT 20090612AIR LIC
HAAT 598.0 m, ATV ERP 31.6 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1768009	47722.0
not affected by terrain losses	1755603	47055.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	60569	1619.7
lost to ATV IX only	60569	1619.7
lost to all IX	60569	1619.7
Service Population	1695034	

Potential Interfering Stations Included in above Scenario 3

13A NC ASHEVILLE	BLCDT	20101014ABR	LIC
13A VA HAMPTON	BLCDT	20090612AJJ	LIC
13A VA LYNCHBURG	BLCDT	20091013ABE	LIC

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

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: 01-31-2012 Time: 12:25:59

Record Selected for Analysis

WBTW-DR BPRM -20110502AEV FLORENCE SC US
Channel 41 ERP 1000. kW HAAT 00598 m RCAMSL 00629 m
Latitude 034-22- 4 Longitude 0079-19-21
Status APP Zone 2 Border Site number: 01
Last update 00000000 Cutoff date 00000000 Docket
Comments
Applicant MEDIA GENERAL COMMUNICATIONS HOLDING

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

Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
41	WBTW-DR	FLORENCE SC	BPRM	-20110502AEV

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 BPRM 20110502AEV APP

HAAT 598.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
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

Service Population 1691550

Potential Interfering Stations Included in above Scenario 1

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED