

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 )  
(Birmingham, Alabama) )

MB Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

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

FILED/ACCEPTED

FEB - 3 2012

Federal Communications Commission  
Office of the Secretary

**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,<sup>1</sup> Media General Communications Holdings, LLC ("Licensee"), licensee of WVTM-TV, Birmingham, Alabama (the "Station"), hereby submits this Supplement to the Petition for Rule Making filed on May 13, 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 21 as the Station's allotment in lieu of Channel 13. The Petition explained that, by changing from VHF Channel 13 to UHF Channel 21, 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.

<sup>1</sup> 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 21 would enhance the Station's service area and, thus, serve the public interest. As shown in the attached Technical Statement, according to the Commission's OET-69 model, operation on Channel 21 will allow the Station to serve approximately 59,499 more viewers than the Station currently is able to serve with its facilities on Channel 10. Moreover, although the noise limited contours for Channels 13 and 21 show a small loss area, viewers in that loss area will remain well served. Only 15,820 viewers in the loss area will not be able to access another NBC affiliate over the air. The increase in service to 59,499 viewers far exceeds the loss that might be experienced by 15,820 viewers.<sup>2</sup>

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 enhance 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.<sup>3</sup>

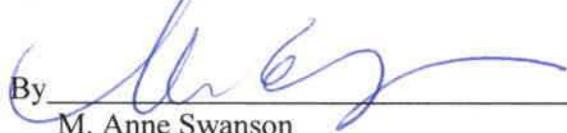
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<sup>2</sup> *KNTV License, Inc.*, 19 FCC Rcd 15479, 15485 n.11 (MB 2004) ("We are less concerned about the withdrawal of service here [to 21,170 viewers], because the vast majority of the people located within the loss area will continue to receive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

<sup>3</sup> *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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of

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**Its Attorneys**

**Dated: February 3, 2012**

**ATTACHMENT A**

**Technical Exhibit**

SUPPLEMENT TO TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV TABLE OF ALLOTMENTS  
STATION WVTM-TV  
BIRMINGHAM, ALABAMA

This Supplement to the Technical Exhibit was prepared on behalf of television station WVTM-TV assigned to Birmingham, Alabama in support of a *Petition for Rule Making* to modify the DTV allotment of WVTM-TV to substitute UHF channel 21 for the current VHF channel 13 DTV allotment.

Figure 1 is a map showing the predicted noise limited contours for the present and proposed WVTM-TV 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 WVTM-TV operation on channel 13 (20 kW-DA, 403 m), and the predicted 41 dBu contour is shown for the proposed WVTM-TV operation on channel 21 (990 kW-DA, 403 m). As shown on Figure 1, the proposed WVTM-TV channel 21 contour substantially replicates the present channel 13 contour.

Although, as shown in Figure 1, the present WVTM-TV contour appears slightly larger than the proposed contour, the proposed WVTM-TV operation on channel 21 will actually provide service to a greater population than the present operation. Figure 3 is a printout from the FCC's OET-69 computer program that calculates the service population for the present WVTM-TV operation using the OET-69 model and the 2000 US Census. As shown, the present WVTM-TV service population is 1,636,648 people. Figure 4 is a similar showing for the proposed WVTM-TV operation on channel 21 (1,696,147 people). The proposed WVTM-TV operation on channel 21 is calculated to provide service to 59,499 more people than the present WVTM-TV 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 WVTM Ch.13, 36 dBu	1,750,400 people
Proposed WVTM Ch.21, 41 dBu	<u>1,715,855</u> people
Predicted loss area	34,545 people

Station WVTM-TV is a NBC television network affiliate. Figure 2 is a map showing the present and proposed WVTM noise limited contours, and the contours for other NBC television network affiliates providing service to the predicted loss area. The following are the other NBC television network affiliates shown on Figure 2.

WAFF, Ch.48, Huntsville, AL.

WSFA, Ch.12, Montgomery, AL.

WTVA, Ch.8, Tupelo, MS.

As shown on Figure 2, there are 3 relatively small and narrow areas to the east, southwest, and northwest that are predicted to lose WVTM NBC network service. The estimated population within this small loss area is 15,820 people.

John A. Lundin

du Treil, Lundin & Rackley, Inc.

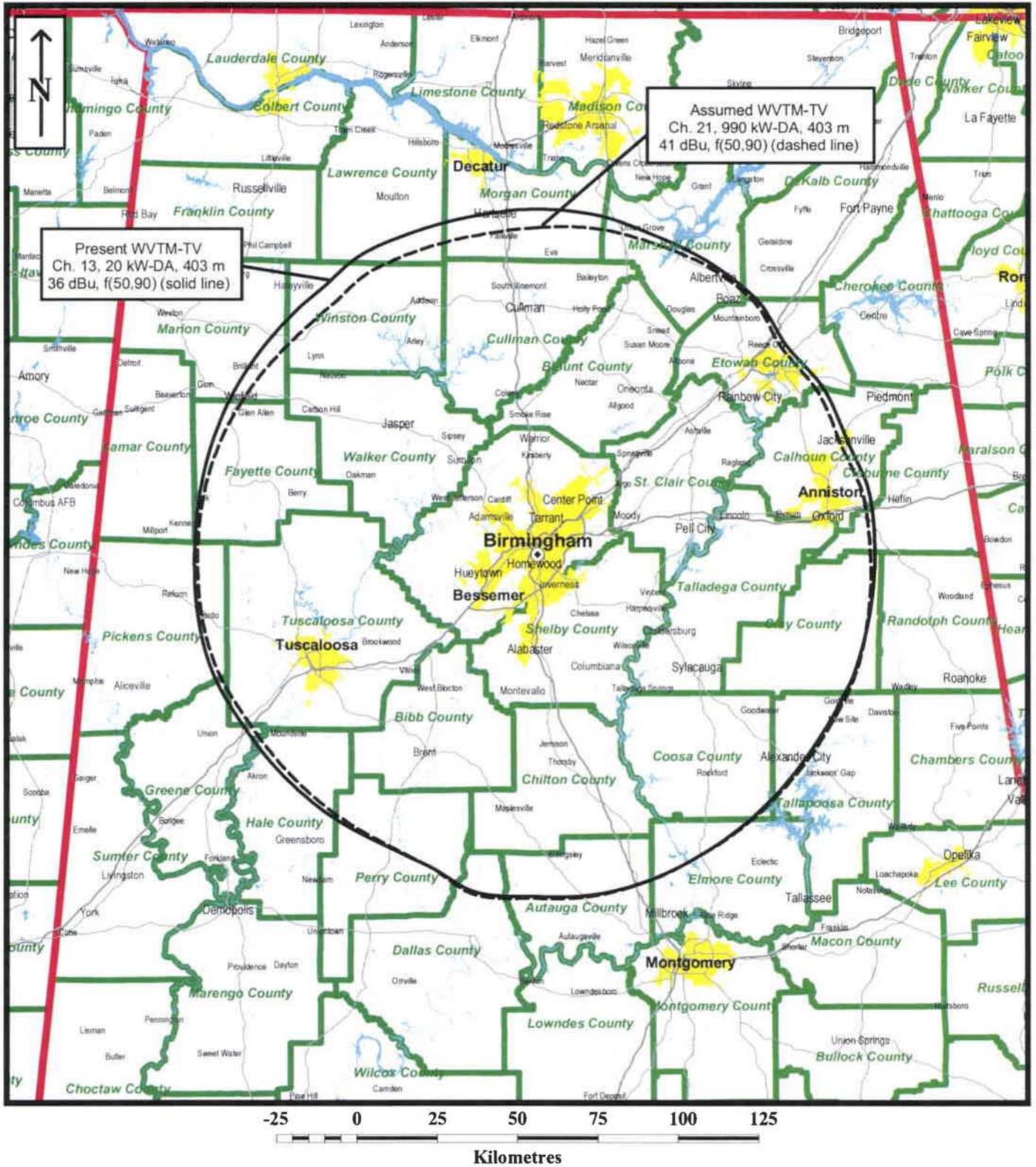
201 Fletcher Avenue

Sarasota, Florida 34237

(941) 329-6011

February 2, 2012

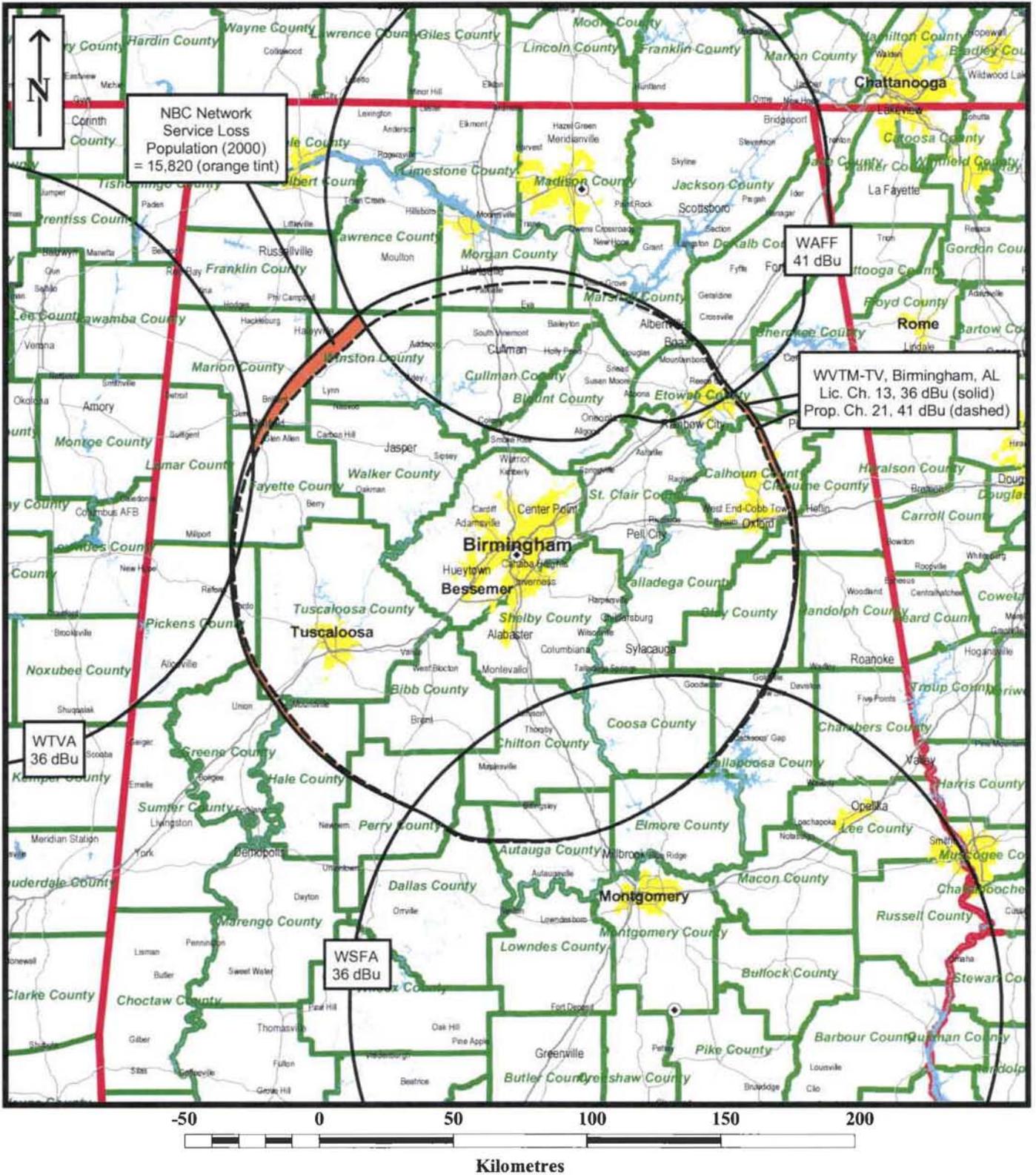
Figure 1



# FCC PREDICTED NOISE-LIMITED COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



## OTHER NBC NETWORK SERVICES TO WVTM-TV 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: 02-01-2012 Time: 08:58:12

Record Selected for Analysis

WVTM-TV BLCDT -20090612AIN BIRMINGHAM AL US  
Channel 13 ERP 20. kW HAAT 00403 m RCAMSL 00598 m  
Latitude 033-29-26 Longitude 0086-47-48  
Status LIC Zone 2 Border Site number: 01  
Dir Antenna Make CDB Model 00000000085966 Beam tilt Y Ref Azimuth 350.0  
Last update 00000000 Cutoff date 00000000 Docket  
Comments  
Applicant MEDIA GENERAL COMMUNICATIONS HOLDING

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 0.20 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	19.920	427.0	107.5	
45.0	19.503	352.3	101.6	
90.0	19.920	401.6	105.5	
135.0	19.503	396.4	104.9	
180.0	19.920	408.3	106.0	
225.0	19.503	393.2	104.7	
270.0	19.920	425.5	107.4	
315.0	19.503	417.8	106.6	

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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Analysis of Interference to Affected Station 13

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
13	WVTM-TV	BIRMINGHAM AL	BLCDT	-20090612AIN

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
12	WSFA	MONTGOMERY AL	178.7	LIC	BLCDT	-20090622ABN
12	WMAE-TV	BOONEVILLE MS	222.4	LIC	BLEDT	-20091222ALO
12	WDEF-TV	CHATTANOOGA TN	227.4	LIC	BLCDT	-20090225ABO
13	WMBB	PANAMA CITY FL	373.2	LIC	BLCDT	-20090220AAF
13	WMAZ-TV	MACON GA	312.3	LIC	BLCDT	-20090617AAN
13	WBKO	BOWLING GREEN KY	398.5	CP	BPCDT	-20110218ABM
13	WBKO	BOWLING GREEN KY	398.5	LIC	BLCDT	-20090423ABM
13	WLOS	ASHEVILLE NC	428.1	CP	BPCDT	-20080317AGL
13	WLOS	ASHEVILLE NC	428.1	CP MOD	BMPCDT	-20080620AKA
13	WLOS	ASHEVILLE NC	428.1	LIC	BLCDT	-20101014ABR
13	WRCB	CHATTANOOGA TN	230.2	LIC	BLCDT	-20110729ACZ
13	WHBQ-TV	MEMPHIS TN	336.6	LIC	BLCDT	-20100917AAC

Total scenarios = 1

Result key: 1  
Scenario 1 Affected station 13  
Before Analysis

Results for: 13A AL BIRMINGHAM BLCDT 20090612AIN LIC

	POPULATION	AREA (sq km)
HAAT 403.0 m, ATV ERP 20.0 kW		
within Noise Limited Contour	1756355	35004.7
not affected by terrain losses	1670362	32043.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	33714	582.4
lost to ATV IX only	33714	582.4
lost to all IX	33714	582.4
Service Population	1636648	

Potential Interfering Stations Included in above Scenario 1

12A AL MONTGOMERY	BLCDT	20090622ABN	LIC
13A FL PANAMA CITY	BLCDT	20090220AAF	LIC
13A GA MACON	BLCDT	20090617AAN	LIC
13A TN CHATTANOOGA	BLCDT	20110729ACZ	LIC
13A TN MEMPHIS	BLCDT	20100917AAC	LIC

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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: 02-01-2012 Time: 08:49:11

Record Selected for Analysis

WVTM-DR BPRM -20110513AER BIRMINGHAM AL US  
Channel 21 ERP 990. kW HAAT 00403 m RCAMSL 00598 m  
Latitude 033-29-26 Longitude 0086-47-48  
Status APP Zone 2 Border Site number: 01  
Dir Antenna Make CDB Model 00000000087531 Beam tilt N Ref Azimuth 200.0  
Last update 00000000 Cutoff date 00000000 Docket  
Comments  
Applicant MEDIA GENERAL COMMUNICATIONS HOLDING

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 21 ERP = 990.00 HAAT = 403.

Site number	1			
Azimuth	ERP	HAAT	41.0	dBu F(50,90)
(Deg)	(kW)	(m)		(km)
0.0	507.529	427.0		101.8
45.0	815.321	352.3		100.2
90.0	810.835	401.6		104.2
135.0	959.548	396.4		105.4
180.0	976.188	408.3		106.7
225.0	785.060	393.2		103.2
270.0	825.233	425.5		106.5
315.0	496.251	417.8		100.9

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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Analysis of Interference to Affected Station 18

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
21	WVTM-DR	BIRMINGHAM AL	BPRM	-20110513AER

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
20	WCOV-DR	MONTGOMERY AL	178.7	APP	BPRM	-20080819ADH
20	WCOV-TV	MONTGOMERY AL	178.7	LIC	BLCDT	-20090312AAO
21	WDHN	DOTHAN AL	286.3	LIC	BLCDT	-20090303ACR
21	WPBA	ATLANTA GA	229.7	LIC	BLEDT	-20041013ABK
21	WAPT	JACKSON MS	353.2	CP	BPCDT	-20091118AFN
21	WAPT	JACKSON MS	353.2	LIC	BLCDT	-20081126ALZ
21	WHNS	GREENVILLE SC	421.8	LIC	BLCDT	-20100430ADX
21	WUXP-TV	NASHVILLE TN	308.3	LIC	BLCDT	-20060414AAU
22	WFIQ	FLORENCE AL	151.3	CP	BPEDT	-20080619AGU
22	WFIQ	FLORENCE AL	151.3	LIC	BLEDT	-20060718ACG
22	WBMM	TUSKEGEE AL	177.0	LIC	BLCDT	-20090428ABH

Total scenarios = 12

Result key: 2  
Scenario 2 Affected station 18  
Before Analysis

Results for: 21A AL BIRMINGHAM BPRM 20110513AER APP  
HAAT 403.0 m, ATV ERP 990.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1774669	36167.9
not affected by terrain losses	1736201	34575.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	40054	1291.1
lost to ATV IX only	40054	1291.1
lost to all IX	<u>40054</u>	1291.1
Service Population	1696147	

Potential Interfering Stations Included in above Scenario 2

20A AL MONTGOMERY	BLCDT	20090312AAO	LIC
21A AL DOTHAN	BLCDT	20090303ACR	LIC
21A GA ATLANTA	BLEDT	20041013ABK	LIC
21A MS JACKSON	BPCDT	20091118AFN	CP
21A TN NASHVILLE	BLCDT	20060414AAU	LIC
22A AL FLORENCE	BLEDT	20060718ACG	LIC
22A AL TUSKEGEE	BLCDT	20090428ABH	LIC

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