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May 26, 2004

VIA COURIER

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Proposed MSTV Channel Election Plan
MB Docket No. 03-15

Dear Chairman Powell:

Cox Broadcasting, Inc. ("Cox"), by its attorneys, wishes to express its support of MSTV's proposed DTV channel election and repack "blueprint" as specified in its May 6, 2004 submission in the above-referenced docket. MSTV's proposal would provide valuable structure to the complex channel election process and help expedite completion of the digital transition.

Broadcasters' channel elections are important decisions. For the vast majority of television stations, their elected channel will be their permanent channel. Furthermore, with broadcast television spectrum being reduced by about 25%, the resulting post-transition spectrum congestion raises the stakes for broadcasters to make the right channel choice. Moreover, many television broadcasters will make these elections just as they begin to use their channels for the additional purpose of delivering many innovative over-the-air digital services.

Absent election procedures, uncertainties will overwhelm these important election decisions and inevitably result in deficient channel allocations. Cox believes, for example, that the election choice for a sizable number of television stations will depend entirely on the choices of other stations. The election plan that MSTV proposes would help eliminate many uncertainties that otherwise would needlessly complicate channel allocations and extend the transition. Broadcasters could make an informed election choice.

MSTV's proposal offers other substantial benefits. Under the election plan, television broadcasters can provide digital service to as many people as possible, enhancing viewers' experience and fulfilling broadcasters' promise. The MSTV proposal also ensures that channel elections are completed expeditiously, so broadcasters accordingly can complete the digital transition without further delay. The proposal also would minimize conflicts between television

Chairman Michael K. Powell

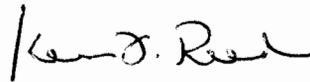
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stations, conserving the Commission's administrative resources and generally facilitating broadcast service.

Section 307(b) of the Communications Act obliges the Commission "to provide a fair, efficient, and equitable distribution" of broadcast spectrum, but the agency surely cannot do this without establishing a coherent set of rules for the channel election process. Cox accordingly urges the Commission to adopt MSTV's proposal. These interdependent channel election decisions are too important to abandon to a random process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kevin F. Reed". The signature is written in a cursive style with a large initial "K".

Kevin F. Reed
Scott S. Patrick

cc: The Honorable Kathleen Q. Abernathy
The Honorable Michael J. Copps
The Honorable Kevin J. Martin
The Honorable Jonathan S. Adelstein
Mr. W. Kenneth Ferree
Mr. David Donovan