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May 26, 2004

**EDWARD W. HUMMERS, JR.**  
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VIA HAND DELIVERY

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

**RECEIVED**

**MAY 26 2004**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex-Parte Written Communication  
MB Docket 03-15

Dear Ms. Dortch:

New York Times Management Services ("NYT")<sup>1</sup> hereby advises the Commission that it supports the Association for Maximum Service Television, Inc.'s ("MSTV") special submission on the digital channel election and repacking process filed on May 6, 2004. The purpose of the MSTV filing is to recommend to the FCC a procedure to ensure an orderly and successful migration to digital television.

In its filing, MSTV urges a five-step channel election process. The special submission fully explains the five steps and proposes a time table for the implementation of each step. The NYT stations' channel assignments include low band VHF analog channels and an out-of-core digital assignment. MSTV recognizes that the completion of the transition will be a complicated process and

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<sup>1</sup> New York Times Management Services, owns and operates the following television stations: WREG, Memphis, TN; WHNT, Huntsville, AL; KF5M, Ft. Smith, AR; WNEP-TV, Scranton, PA; WTKR, Norfolk, VA; WHO, Des Moines, IA; KFOR, Oklahoma City, OK; and WQAD, Moline, IL.

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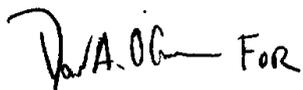
Ms. Marlene H. Dortch

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NYT submits that MSTV proposes a rational plan for proceeding to the conclusion of the digital conversion. Thus, NYT supports MSTV in its filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "E. W. Hummers, Jr." with a stylized flourish at the end.

Edward W. Hummers, Jr.  
Counsel for New York Times Management  
Services

cc: MSTV

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