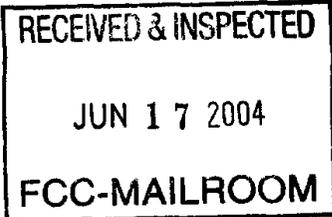


**DOCKET FILE COPY ORIGINAL**

**HOLSTON VALLEY BROADCASTING CORPORATION**

AM Radio WKPT WKTP WOPI WMEV  
FM Radio WTFM WMEV-FM WRZK (LMA)  
Television WKPT-TV WAPK-LP WOPI-LP

222 COMMERCE STREET  
KINGSPORT, TENNESSEE 37660  
PHONE: (423) 246-9578  
FAX: (423) 246-6261



June 2, 2004

Barbara Kreisman  
Chief, Video Services Division  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC

RE: Digital Maximization on Current Analog Channel  
MB Docket No. 03-15

Dear Barbara:

I am writing to summarize the points I made in our telephone discussion of a few days ago. As you'll recall, I am concerned that there is currently no mechanism or window of opportunity provided by the Commission in the digital television transition for a licensee, which elects to move its station's digital transmission to the station's current analog channel at the end of the transition, to maximize the digital station's power on the former analog channel.

Many stations have circumstances similar to our WKPT-TV, channel 19 analog/WKPT-DT, currently channel 27. We were unable to maximize to a full 1,000,000 watts digital on the loaned channel 27 due to co-channel channel 27 analog stations in adjoining markets. Our current analog channel 19, however, is fully spaced to all surrounding analog channel 19 stations. The only digital station on channel 19 that is not fully spaced from us is over 135 miles away, and it is our understanding that it plans to move its digital off of channel 19 and onto its present analog channel at the end of the transition. (That station's tower site is also separated from WKPT-TV's by some of the most rugged mountains in eastern America.)

Although I have not authorized a full technical study, for the reasons stated herein at the end of the transition WKPT-DT could almost assuredly operate with a full 1,000,000 watts on channel 19 without creating interference to any other station. (In the unlikely event the digital station 135 miles from WKPT-TV elects to remain on channel 19, a combination of terrain shielding and a reduction in power radiated toward that station's market should still allow WKPT-DT to radiate 1,000,000 watts ERP in most directions.)

No. of Copies rec'd 0  
List ABCDE

My concerns in this matter were recently heightened by the special submission made to the Commission by the Association of Maximum service Telecasters (MST) earlier this month. In that filing MST proposed its plan and timetable for getting the industry the rest of the way through the digital transition. The way we read the MST plan, there is no provision for a station planning to move its digital operation to its old analog channel following the transition to file for maximized digital power on its old analog channel. Indeed MST appears to advocate limiting the future digital operation on the old analog channel to the lower power level to which the station was able to operate digitally on its present loaned channel. In cases like ours and we believe most other stations' there would of course be no technical basis for that limitation. MST's proposal would have us limited to 200 kilowatts on channel 19, when that power limitation was actually created by co-channel stations on channel 27.

Thanks for your attention in this matter.

Sincerely,

HOLSTON VALLEY BROADCASTING COPORATION



George B. DeVault, Jr.

President

cc. Rick Chessen  
Associate Bureau Chief  
Digital Television Task Force  
Federal Communications Commission

Secretary  
Federal Communications Commission