

April 26, 2016

**Via Hand Delivery**

**RECEIVED - FCC**

Mr. Hossein Hashemzadeh  
Media Bureau, Video Division  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

APR 26 2016

Federal Communications Commission  
Bureau / Office

**Re: Channel 21 PSIP Request for KGSA-LD, San Antonio, Texas**

Dear Mr. Hashemzadeh:

Our firm is counsel to the City of San Antonio, the licensee of low power digital station KGSA-LD, San Antonio, Texas. The station reaches much of the city of San Antonio and gets out vital public service information to its citizens, particularly vulnerable low-income Hispanic populations who rely on over-the-air television signals rather than cable or satellite providers.

We are submitting this letter on the City's behalf to request a PSIP channel for KGSA-LD of 21 in San Antonio pursuant to the ATSC A/65C Program and System Information Protocol, Annex B: Additional Constraints on Virtual Channel Table for the U.S. (Normative) (2006). On March 24, 2016, KGSA-LD began digital operations pursuant to a flash cut permit on Channel 23. At the same time, we, as counsel for the City, filed a request with the FCC for a PSIP identifier for KGSA-LD for channel 21.

Pursuant to Annex B rules, since KGSA-LD's NTSC channel is 23, its default PSIP channel should be channel 23. However, Virtual Channel 23 is unavailable in San Antonio because it is already assigned to KHCE-TV. In this situation, under Rule 4, KGSA-LD's next PSIP channel assignment should be Channel 16, the NTSC channel of KHCE-TV since it is KHCE-TV's virtual channel that is blocking KGSA's default PSIP. However, this assignment is also unavailable due to KADT-LD which is using virtual Channel 16 in Austin, Texas, a mere 56 miles away.

In light of these constraints and to avoid any possible confusion or interference with KADT's PSIP, the City found virtual Channel 21 was available and unused in San Antonio.<sup>1</sup> Moreover, Channel 21 is consistent with the City's long standing government channel on Time

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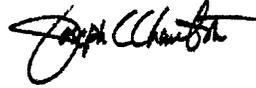
<sup>1</sup> The closest virtual channel 21 is over 90 miles away.

Warner in San Antonio as well as its prior advertising. The City has also already expended a great deal of resources in branding Channel 21 for this new over-the-air channel.

For these reasons, we respectfully request that KGSA-LD be assigned virtual Channel 16 in San Antonio, Texas for PSIP.

If there are any questions, please contact me.

Kindest regards,

A handwritten signature in black ink, appearing to read "Joseph C. Chautin, III". The signature is written in a cursive, flowing style.

Joseph C. Chautin, III

cc: City of San Antonio

4823-6335-9792, v. 1