



WASHINGTON, DC

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November 7, 2018

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: Request for Different Virtual Channel  
for Station WNDT-CD, Manhattan, NY**

Dear Ms. Dortch:

This letter is filed on behalf of WNET, licensee of Class A station WNDT-CD, Manhattan, NY (Fac. ID 67866). Station WNDT-CD is licensed to share a channel with Station WNET(TV), Newark, NJ, (Fac. ID 18795). (See File No. 0000057445). WNDT-CD's is assigned PSIP or virtual Channel 17. The contour of WNET overlaps with the contour of Station WPHL-TV, Philadelphia, PA, which also operates on virtual Channel 17. Because WNDT-CD now operates from the Station WNET facilities, operation on PSIP Channel 17 would be inconsistent with the PSIP standard incorporated in the Commission's rules. Specifically, as the Commission has acknowledged, Section 73.682(d) of its rules requires digital television broadcast television stations to comply with ATSC A/65C, known as the PSIP Standard, and the PSIP Standard is meant to "Guarantee that the two-part channel number combinations used by a broadcaster will be different from those used by any other broadcaster with an overlapping DTV service area." *Tara M. Corvo, Esq.*, 29 FCC Rcd 9102 (Media Bureau 2015), *citing* PSIP Standard, Annex B at 1.8. Because of the overlap between the WNET and WPHL service areas, WNET respectfully requests authority to change the virtual channel of Station WNDT-CD to Channel 14. WNET respectfully submits that the requested virtual channel change is necessary to ensure compliance with the PSIP Standard.

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In the event there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sally B", with a long horizontal flourish extending to the right.

Sally A. Buckman

cc: Hossein Hashemzadeh  
Bob Feinberg, Esq.