



Federal Communications Commission
Washington, D.C. 20554

September 9, 2010

Philadelphia Television Network, Inc.
P.O. Box 0234
Lafayette Hill, PA. 19444

1800E3-RLG

In re: Low Power Television Application of:
Philadelphia Television Network, Inc.
Channel 48, Philadelphia, PA.
File number BMPDTL-20100809AAA
Facility Id No.: 167606

Dear Applicant:

On August 16, 2010, the licensee as addressed above was sent a 30 day deficiency letter outlining the following issues:

Our preliminary engineering review reveals that your proposed facility does not comply with the Commission's interference rules. Specifically, the proposal is predicted to cause interference to the following facilities:

1. WFMZ-TV, Philadelphia, PA. – BDRTCT-20090604ABI

In addition to the above interference problem, we found a discrepancy with the verification of the proposed facilities antenna registration number (ASRN) in connection to the antenna location, proposed facility coordinates and overall height above ground level (OTHAGL) of the antenna.

The proposed facility antenna registration number is 1231525 which should represent the location of the antenna at coordinates N 40-02-29.6 – W 75-14-11.5 and show the overall height of the antenna as 383.1 meters.

The antenna registration search results of the proposed ASRN number reveal the following:

Specified Search							
Registration Number like 1231525							
	Registration Number	Status	File Number	Owner Name	Latitude/Longitude	Structure City/State	Overall Height Above Ground (AGL)
1	1231525	Terminated	A0231996	TriStar Communications, LLC	45-04-12.9N 092-53-42.3W	Grant, MN	58.8

You were given the opportunity to file a minor amendment to resolve the specified interference problem and the antenna discrepancy within (30) days from the date of this letter. Amendments must be filed electronically. If not so amended, your application will be considered incomplete and subsequently dismissed.

Our records show that an amendment was filed on August 26, 2010, specifically to resolve the above referenced interference problem and antenna discrepancy. Our current engineering analysis taking into account the amended specifications indicate that the amended specifications resolved the antenna discrepancy; however, the same interference problem as outlined in the deficiency letter as shown above dated August 16, 2010, still exist. Further review of the amended specifications show a waiver request as imported below:

Exhibit 11

Description: WAIVER REQUEST FOR PROCESSING UNDER NEW RULES FOR OUTPUT FILTERS

PENDING BEFORE THE COMMISSION IS A PROPOSAL TO ALLOW LPTV APPLICANTS TO SPECIFY A FULL SERVICE MASK OUTPUT FILTER AND HAVE THEIR APPLICATIONS PROCESSED USING THE RESULTANT, BETTER ADJACENT CHANNEL PROTECTION. APPLICANT REQUESTS A WAIVER OF THE EXISTING RULES TO HAVE THE INSTANT APPLICATION PROCESS ON THE BASIS OF AND HIS AMENDED CONSTRUCTION PERMIT SPECIFY A FULL SERVICE MASK FILTER. APPLICANT HAS CONDUCTED A SEARCH FOR OTHER CHANNELS TO USE IN ITS COMMUNITY OF LICENSE ON WHICH IT COULD CONTINUE IT EXISTING SERVICE, BUT NO SUITABLE ALTERNATIVE CHANNEL COULD BE FOUND. AS A RESULT, APPLICANT MUST REQUEST A WAIVER IN ORDER TO PERMIT IT TO UTILIZE THE REQUESTED CHANNEL 48. THIS WAIVER IS IN THE PUBLIC INTEREST, BECAUSE IT PROMOTES MORE EFFICIENT USE OF THE TELEVISION SPECTRUM AND PERMITS CONTINUATION OF THE TV SERVICE PROVIDED TO THE RESIDENTS OF PHILADELPHIA, PA BY DISPLACED LPTV STATION WWJT-LD.

We are not accepting requests for the use of the Full Service Mask in our interference analysis until it becomes part of our technical rules; therefore, your waiver request IS HEREBY DENIED, and as a result of the ongoing interference issue as outlined above the above referenced construction permit is considered incomplete and IS HEREBY DISMISSED.

Sincerely

Hossein Hashemzadeh
Associate Chief
Video Division
Media Bureau

c.c. Philadelphia Television Network, Inc.
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