

June 23, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Station KSMV-LP
Los Angeles, California
FIN: 140002
File No. BSTA-20090616ABZ

Dear Ms. Dortch:

This office is counsel to KJLA, LLC ("KJLA"), the licensee of Station KSMV-LP, Los Angeles, California, and the applicant in the above-referenced application for Special Temporary Authority to flash-cut KSMV-LP to digital service on Channel 33.

We are writing to state our opinion as to why the instant application need not be referred to the Mexican Government for coordination under the terms of the existing treaty between the United States and Mexico governing the low-power television service.

KSMV-LP proposes to operate on Channel 33 at Los Angeles, California. In MB Docket No. 08-250, the Commission proposed and ultimately adopted a change in the Post-Transition Table of DTV Allotments. Effective as of March 23, 2009, the Table of Allotments was amended to add Channel 33 at Santa Ana, California. *74 Fed. Reg. 7657 (2009)*. Santa Ana and Los Angeles, California are located in Southern California, with Los Angeles being farther from the Mexican border than Santa Ana.

It is KJLA's understanding that the Commission will not refer applications to the Mexican Government where they are for channels that have been already been coordinated with Mexico for use as full-service digital channels in the United States. Channel 33 qualifies under this policy.

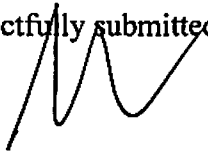
Accordingly, KJLA submits that the Commission may grant the KSMV-LP STA request without further referral to Mexico for coordination.

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Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Barry A. Friedman', written over the text 'Respectfully submitted,'.

Barry A. Friedman

cc: Mohammad Habib