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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

FILED/ACCEPTED

APR - 3 2013

Federal Communications Commission  
Office of the Secretary



**STAMP AND RETURN**

Re: Application of Towson University, Licensee of WMJF-LP, Towson, MD  
(Fac. ID No. 67462) for Digital Companion Channel (File No. BDISDTA-  
20120914ADL)

Dear Ms. Dortch:

Towson University ("Towson"), licensee of WMJF-LP, a Class A television station licensed to Towson, MD, hereby responds to the recent letter from the Video Division of the Commission's Media Bureau concerning the above-referenced application ("Channel 19 displacement application"). See Letter of Hossein Hashemzadeh, Deputy Chief, Video Division, No. 1800E1-SSA (dated Apr. 1, 2012) ("FCC Letter"). The FCC Letter indicates that the Channel 19 displacement application "does not comply with the Commission's interference rules." *Id.* Specifically, the agency's staff determined that the proposed Channel 19 facility in Towson would "cause objectionable interference to "the protected area of the Land Mobile service to the following facilities: Wash[ington] (MD & VA) DC on Channel 18 [and] Philadelphia, PA on Channel 19." *Id.* (indirect reference to 47 C.F.R. § 74.709(c) prohibition on low-power TV facilities "within the protected contour of a co-channel or first adjacent channel land mobile assignment" in certain metropolitan areas).

In light of the FCC's determination that the Channel 19 displacement application implicates co-channel and first adjacent channel interference protections for land mobile licensees in specified locations, see 47 C.F.R. § 74.709(a), Towson requests that the Commission dismiss the Channel 19 application and instead promptly process the new application that Towson has just filed for a digital companion channel (File No. BDCCDTL-20130329ACY). Towson remains eager to complete its transition to digital broadcast operations as quickly as possible.

Respectfully submitted,

John L. MacKerron, Ed.D.  
General Manager, WMJF-LP  
Associate Professor  
Chair, Electronic Media and Film

cc: Hossein Hashemzadeh  
Melvin Collins