

KTSM-TV, El Paso, Texas (Facility ID No. 67760)
Special Temporary Authority Request for
Early Digital Operation on Post-Transition Channel
(and Termination of Pre-Transition DTV Operation)
February 2009

KTSM-TV, El Paso, Texas (the “Station”) respectfully requests appropriate authority to commence early digital operation on Post-Transition Channel 9 beginning February 17, 2009, and terminate digital operation on Pre-Transition Channel 16 pursuant to the policies adopted in the *Third DTV Periodic Review*.¹ Beginning February 17, the Station would operate at the parameters authorized in its post-transition construction permit.²

In the *Third DTV Periodic Review*, the Commission established the standards for such requests. The Commission said that it would allow stations to begin operating on their new channels before the transition date if (1) there was no impermissible interference; and (2) existing viewers would continue to be served.³ The Station believes this request effectively satisfies these standards. The proposed early digital operation would not cause impermissible interference and would reach all of the Station’s analog viewers and all of the Station’s existing digital service area population.

The Station previously notified the Commission that it plans to terminate analog service on February 17, 2009.⁴ Terminating analog service and transitioning early to the Station’s post-transition DTV facilities on February 17, 2009 alleviates the potential for significant financial hardship and allows the Station to implement its DTV construction plan consistent with sound engineering, logistical, and financial priorities.

¹ Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television, *Report and Order*, 23 FCC Rcd 2994, ¶ 121 (2007) (“*Third DTV Periodic Review*”)

² See FCC File No. BPCDT-20080619AEW.

³ *Third DTV Periodic Review*, ¶ 121.

⁴ See FCC File No. BLSTA-20090122ACV.