

Sunbelt South Tele-Communications, Ltd.
Request for Extension and Modification
Of Special Temporary Authority
FCC File No. BEDSTA-20051007ADG
June 2006
Exhibit 8

Sunbelt South Tele-Communications, Ltd. ("Sunbelt"), by its attorneys and pursuant to Section 73.1635 of the Commission's rules, hereby requests an **extension of and modification to** its Special Temporary Authority in FCC File No. BEDSTA-20051007ADG.¹ Sunbelt is the licensee of Station WSST-TV, licensed to operate on Channel 51 at Cordele, Georgia ("Station"). Sunbelt has been diligent in its efforts to resolve outstanding obstacles to complete construction of its digital operations on the Station since the grant of its STA authority. In fact, as is detailed below, the instant request also seeks to modify its special temporary authority to increase the Station's operating parameters, bringing it closer to completion of its outstanding construction permit for digital operations (FCC File No. 20000501ABJ). However, until the Commission can approve the engineering and technical improvements sought in this modification request, Sunbelt, in an abundance of caution, also requests that its current STA be extended until such grant.

Sunbelt received its initial authority to construct DTV facilities on Channel 51 at Cordele in December of 1999 in FCC File No. BPCDT-19991015AAH. As has been previously reported to the Commission, Sunbelt began fulfilling its commitment to DTV operations and in 2002 purchased and took delivery of a digital transmitter from EMCEE Broadcast Products, Inc. at a cost of \$177,389.41. However, as installation began and testing commenced, problems with the equipment quickly became apparent. As has been detailed in Sunbelt's earlier requests for special temporary authority, faulty and damaged equipment was delivered by EMCEE and over the course of several months and at great further expense to Sunbelt, engineers and personnel from EMCEE came to Cordele to attempt to repair the equipment. Sunbelt was able to commence digital operations in July of 2003 pursuant to an STA at a lesser power than authorized by its CP because the faulty equipment did not function consistently at full power. Meanwhile negotiations with EMCEE continued to seek repair of the faulty equipment. Finally, in March of 2003, Sunbelt learned that EMCEE had filed for Chapter 7 liquidation in Bankruptcy Court. Sunbelt contacted the bankruptcy trustee who advised that the warranties on the EMCEE equipment would not be honored and no further repairs were possible by EMCEE employees.

¹ Sunbelt's special temporary authority was extended to July 1, 2006 pursuant to the FCC's grant of DTV STAs to allow stations that were experiencing financial and technical difficulties transitioning to digital to commence digital operations with minimal initial DTV facilities until such time as the Commission set a firm deadline requiring complete construction. See, First DTV Periodic Review MM&O, 16 FCC Rcd 20594 (2001).

Sunbelt's application to modify its DTV CP to increase power to 200 kw (File No. BMPCDT-20000501ABJ) was granted in September 2003. Sunbelt's operation under Special Temporary Authority has, at all times, maintained city grade coverage of its community of license.² The persistent problems with the EMCEE equipment and difficulty locating technicians that could work to repair the equipment have limited Sunbelt's ability to complete its digital facility build out and commence operation at the full power authorized in its CP.

In early 2005, Sunbelt made the business decision that it would re-purchase the equipment necessary to complete its DTV facilities, specifically a new digital transmitter. The company negotiated with Harris Corporation and at the end of 2005, Sunbelt purchased a new Harris Diamond Series Solid State digital transmitter. The transmitter has now been installed and a Proof-of-Performance has been run. As is detailed in the attached engineering, the transmitter is capable of running with an effective radiated power of 91 kw. This power will allow the Station to replicate its analog power and almost double it. The added power will provide a signal that will serve more than 111,000 additional viewers. See attached coverage map.

Sunbelt has been diligent in its efforts to comply with its digital conversion responsibilities but finds that additional time is necessary to complete the process³. It has spent nearly \$500,000 to purchase equipment – twice – to complete its conversion. Good cause exists for the FCC to grant Sunbelt's requests for an extension of its existing special temporary authority and for a further modification of the authority as detailed in the attached engineering. Since the grant of the last STA extension, Sunbelt has spent a great deal of money to overcome many obstacles and has made a great deal of progress toward resolving outstanding issues concerning its digital conversion. The newly installed transmitter will allow the Station to achieve its analog signal replication requirements and dramatically increase the population served by the Station. Additionally, Sunbelt serves a very small, rural market in Georgia where there are few stores that sell DTV receivers, still fewer residents that own one. Sunbelt is truly doing the best it can to complete the digital conversion process given all of the obstacles that have been put in its way and requests that the Commission grant its request for additional time to do so, and the instant extension and modification of Special Temporary Authority.

² See also, FCC File Nos. BEDSTA-20051007ADG, BEDSTA-20050314ANP, BEDSTA-20040819ACJ, BEDSTA-20040220AEB.

³ Sunbelt is also filing a request for a waiver of the Commission's July 1, 2006 "Use or Lose" deadline, pursuant to FCC Public Notice, DA 06-1372, released June 29, 2006, to extend the Station's replication/maximization interference protection.