

EXPLANATION OF APPLICATION
APPLICATION FOR CONSTRUCTION PERMIT
DIGITAL CLASS A STATION WRIW-CD
PROVIDENCE, RHODE ISLAND
CHANNEL 36 15 KW (MAX-DA) 250 M AMSL

The licensee of WRIW-CD has reached a voluntary relocation agreement with the licensee of the lower 700 MHz A-Block in the Providence, Rhode Island area (T-Mobile). The agreement contemplates the migration of WRIW-CD from Channel 50 to Channel 36 in conjunction with the migration of full-service station, WJAR(TV), Providence, Rhode Island, from Channel 51 to Channel 50. The licensee of WJAR(TV) is filing a Petition for Rulemaking to change WJAR(TV) from Channel 51 to Channel 50 concurrently with the submission of the instant application.

The agreement is believed to be compliant with the policy of the FCC regarding construction permits to relocate from Channel 51 since the instant proposal is a necessary and crucial component of the overall plan to migrate WJAR(TV) from Channel 51 to Channel 50.* Accordingly, we do not believe any waiver of the freeze on Class A displacement applications is required. However, to the extent such a waiver is necessary, we hereby request it.

In the *Report and Order* the FCC stated that it would 'protect the substitute channel facilities of former Channel 51 licensees if they are licensed by the pre-auction licensing deadline.' in addition it was stated that 'We conclude that the minimal impact that protection of these relocated Channel 51 facilities would have on our repacking flexibility is outweighed by the public interest benefit of clearing broadcast operations from Channel 51 as expeditiously as possible in order to promote deployment of wireless broadband service in the 700 MHz A-Block.' The instant proposal fulfills the FCC intent of clearing Channel 51 for deployment of broadband service in the 700 MHz A-Block.

* See Paragraph 203 of the *Report and Order*, In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268, FCC 14-50, Released: June 2, 2014

As indicated in the attached exhibit entitled 'Interference Analysis,' the instant proposal is fully compliant with the FCC's de minimis interference protection requirements.

The proposal does not require coordination with Canada since it is located more than 300 km from the U.S.-Canadian border. In addition, the exhibit entitled 'Canadian Coordination Map' demonstrates that the predicted 19.5 dBu, f(50,10), interfering contour does not enter Canadian territory.

The attached exhibit entitled 'Contour Map' shows the predicted 51 dBu f(50,90) contour for the proposed WRIW-CD Channel-36 facility, which is shown to be identical to that of the licensed WRIW-CD facility on Channel 50.

Based on the foregoing, and in consideration of the overall plan to clear Channel 51 in the Providence, Rhode Island market, the instant proposal is believed to serve the public interest, and approval is respectfully requested.