

**REQUEST TO WAIVE CONSTRUCTION PERMIT APPLICATION 90-DAY FILING
DEADLINE FOR STATION WZDX(DT) PURSUANT TO SECTION 73.3700(B)(1)(I) OF
THE FCC RULES FOR POST-INCENTIVE AUCTION LICENSING AND OPERATION**

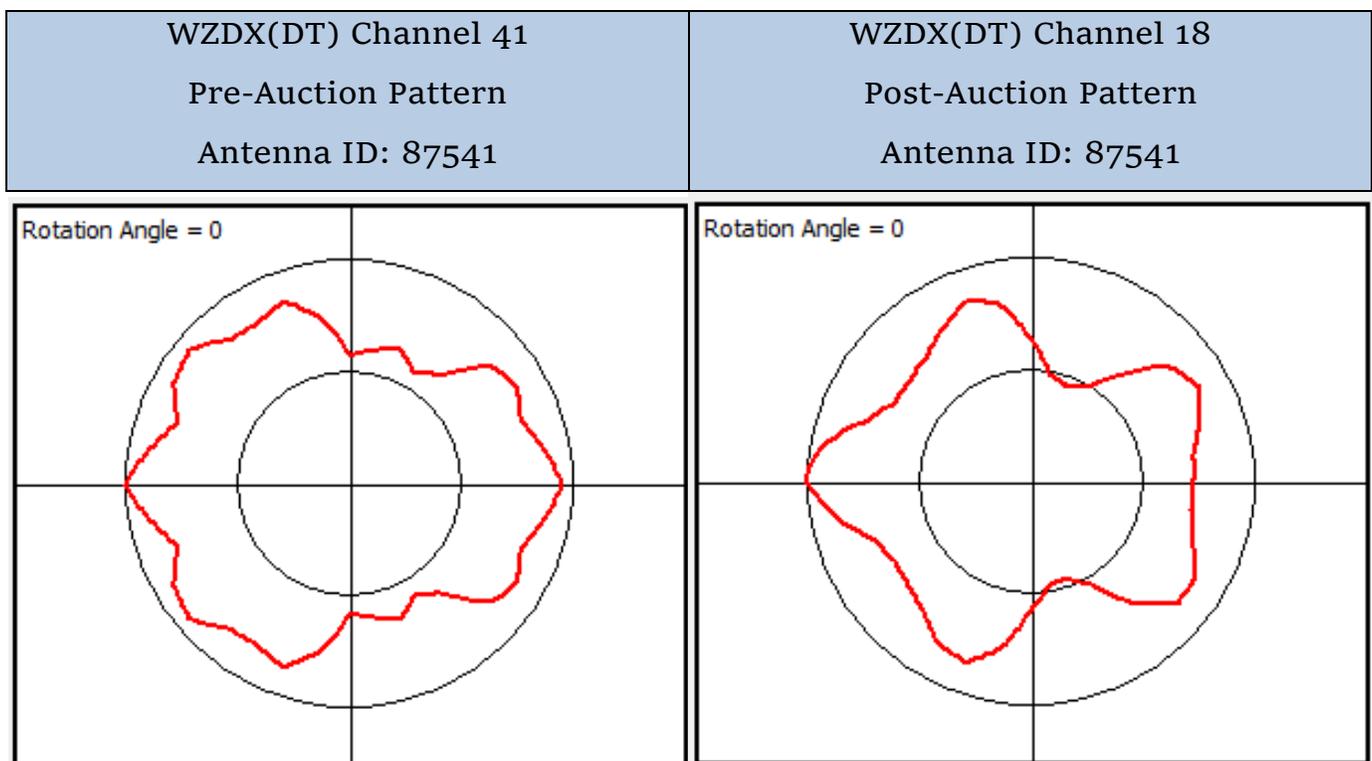
Nexstar Broadcasting, Inc. (“Nexstar”), licensee of television stations WZDX(DT), Huntsville, Alabama, is unable to construct the post-Incentive Auction facilities assigned to WZDX(DT) in the Closing and Channel Reassignment Public Notice ¹(“CCRPN”). The CCRPN specifies the new channel assignment, assigned transition phase and technical parameters for the WZDX(DT) post-auction television broadcast facility which involuntarily reassigned WZDX(DT) from Channel 41 to Channel 18. The parameters specified in the CCRPN are based on the WZDX(DT) station’s post-transition replication technical parameters extracted from the October 20, 2015 edition of the FCC database. As such, WZDX(DT) was assigned technical parameters from a granted license application having FCC File No.: BLCDT-20090706AEV. The license application covered a construction permit having FCC File No.: BPCDT-20080619AJV.

The WZDX(DT) construction permit (authorization) specified a Dielectric model TUD-S5B-14/70H-1-T directional panel antenna having Antenna ID No: 87541 which was used by the FCC to replicate the WZDX(DT) facility’s pre-auction coverage on Channel 41 for post-auction operation on Channel 18 as closely as possible. Due to the antenna pattern variations between channels 18 and 41 and the pattern scalloping that occurs with panel antennas, it was determined that WZDX(DT) on post-auction Channel 18 will not be able to achieve the coverage contour specified in the CCRPN using its licensed antenna even making use of the one-percent expansion allowance to extend the coverage contour.

¹ Released April 13, 2017 - DA No. 17-314 Docket No 12-268 16-306 12-269 14-252

The relative field azimuth patterns shown below illustrate the difference between the post-transition replication pattern on Chanel 18 and the licensed pre-auction antenna pattern on Channel 41:

FacID	Call Sign	Pre-CH	Post-CH	City	State	HAAT (M)	ERP (kW)	DA	AntID	Az
28119	WZDX	41	18	HUNTSVILLE	AL	517.9	429.0	DA	87541	0



The licensed antenna pattern on Channel 41 has increased scalloping compared to the licensed antenna pattern on Channel 18. The relative field values for the antenna patterns on Channels 41 and 18 are included as exhibits (See Exhibits 2 and 3). Exhibit 1 demonstrates that the F(50,90) 41.28 dBu Protected Noise Limited Contour (PNLC) of the licensed WZDX(DT) Channel 41 pre-auction facility (green contour) encompasses the PNLC of the assigned WZDX(DT) Channel 18 post-auction facility (red contour) in almost all azimuthal

directions with many coverage losses along multiple radials. The 1% expansion allowance did very little to reduce the coverage loss gap. In fact, calculations demonstrated that the ERP of the post-transition Channel 18 facility would need to be increased by 271 kW, from the assigned 429 kW to 700 kW, in order to fully replicate the coverage area that the pre-auction Channel 41 facility served. Based on the post-auction assigned parameters compared to the licensed parameters, the WZDX(DT) facility is predicted to lose 17,292 potential viewers from 7,040 households within a 791.62 km² area of loss within its PNLC. Since WZDX(DT)'s post-auction antenna pattern on Channel 18 cannot replicate the assigned antenna pattern depicted in the CCRPN, it has been demonstrated that WZDX(DT) is unable to construct facilities that meet the technical parameters specified in the CCRPN, even by utilizing the contour coverage variance permitted pursuant to 47 CFR § 73.3700(b)(1)(ii) and (iii) of the FCC Rules.

Granting this waiver request would serve the public interest since it would prevent potential losses of services to thousands of public viewers in the Huntsville, AL area who depend on the WZDX(DT) programming for many services, including such things as emergency notifications and alerts as well as local news, traffic and weather. A First Priority Window filing would allow WZDX(DT) the opportunity to expand the assigned coverage contour beyond the current 1% limitation so that it can recover areas of loss resulting from a 22-channel move from the upper end of the UHF band to the lower end.

Accordingly, Nexstar hereby requests a waiver of the initial construction permit application deadline for reassigned stations so that the WZDX(DT) facility can participate in the first priority filing window in order to expand its coverage contour sufficiently to recover areas of loss that will result if WZDX(DT) operates with the parameters assigned in the CCRPN.

EXHIBITS

EXHIBIT 1

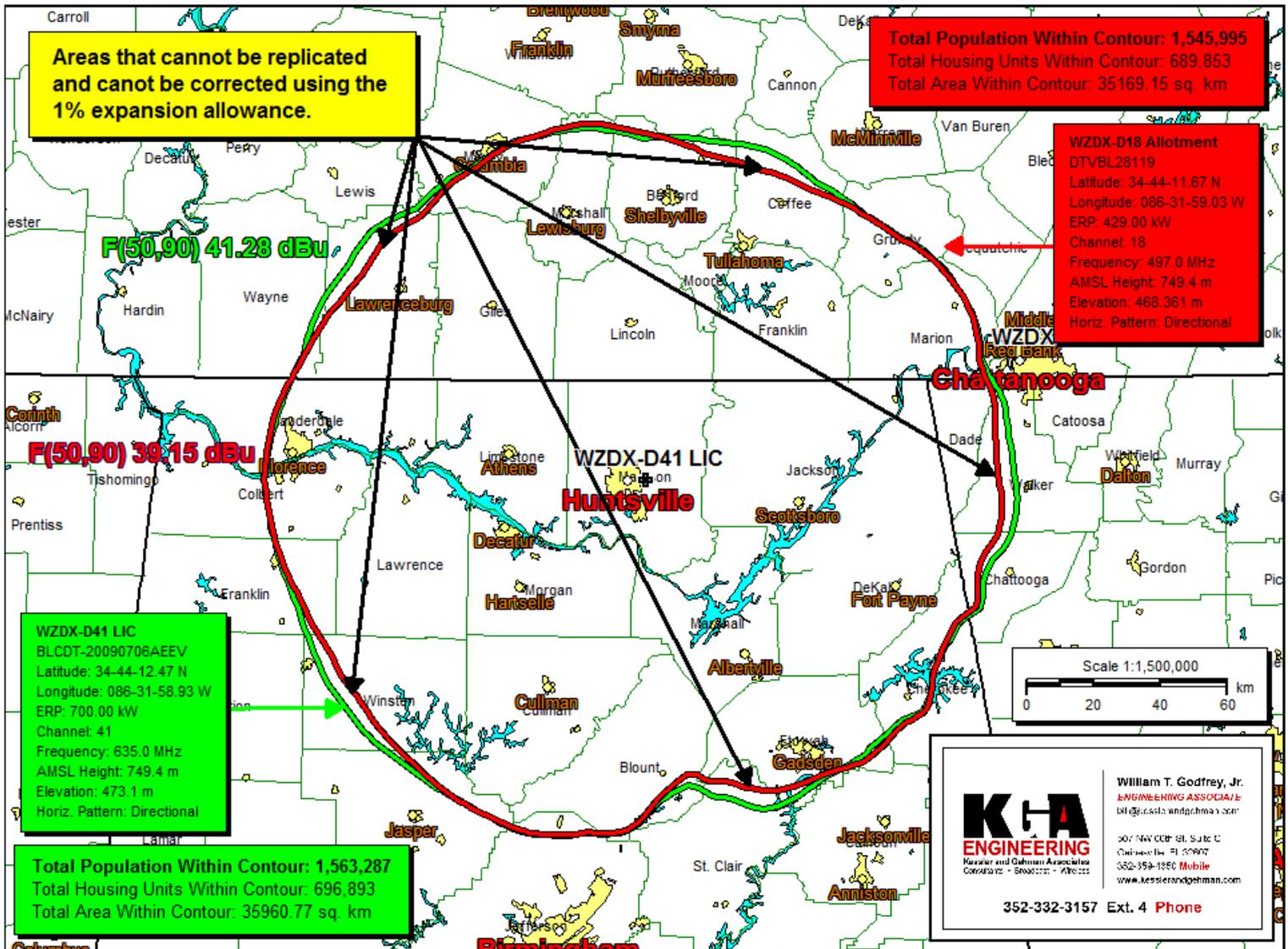


EXHIBIT 2 – Pre-Auction (Licensed Antenna Relative Field Values on Channel 41)

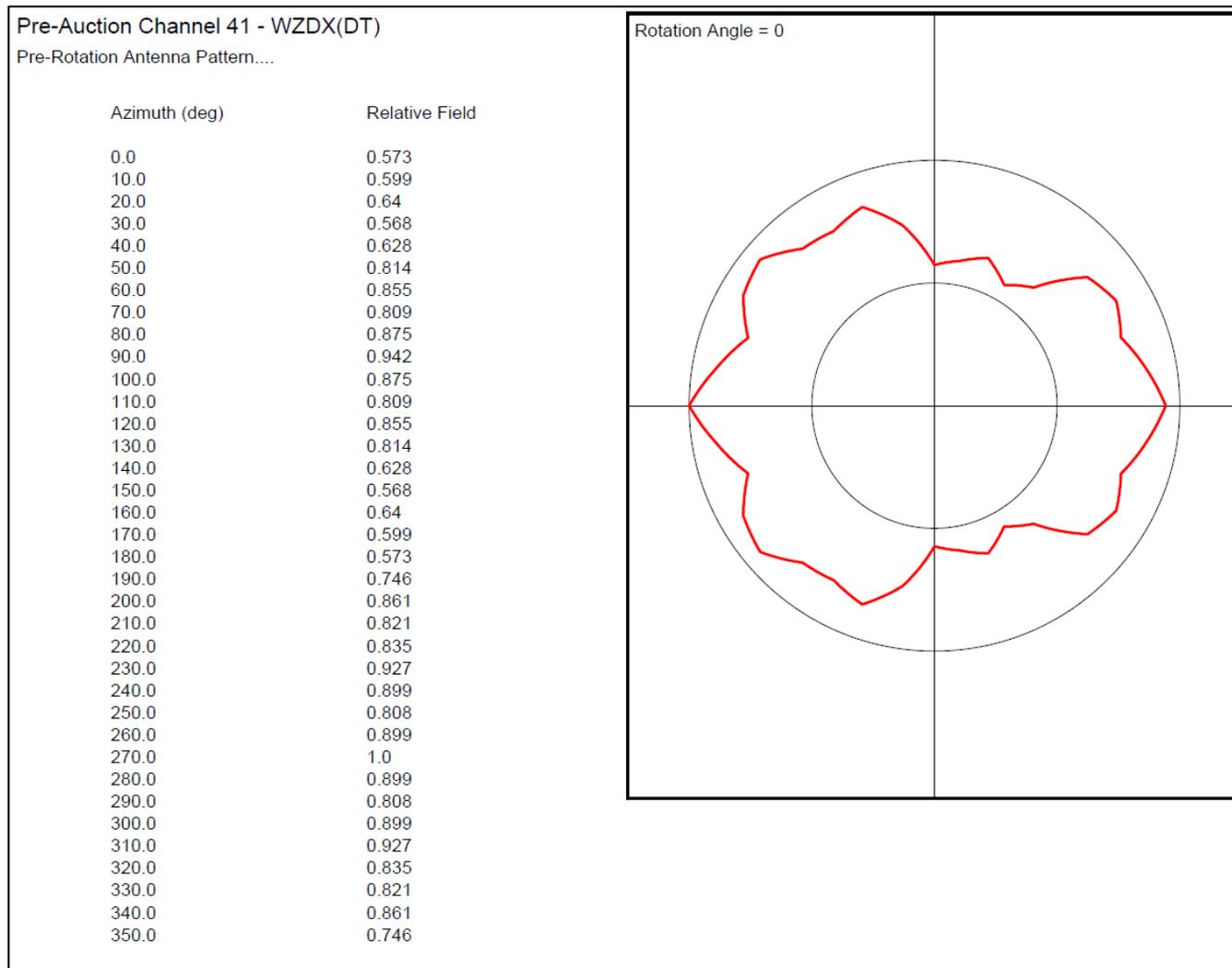
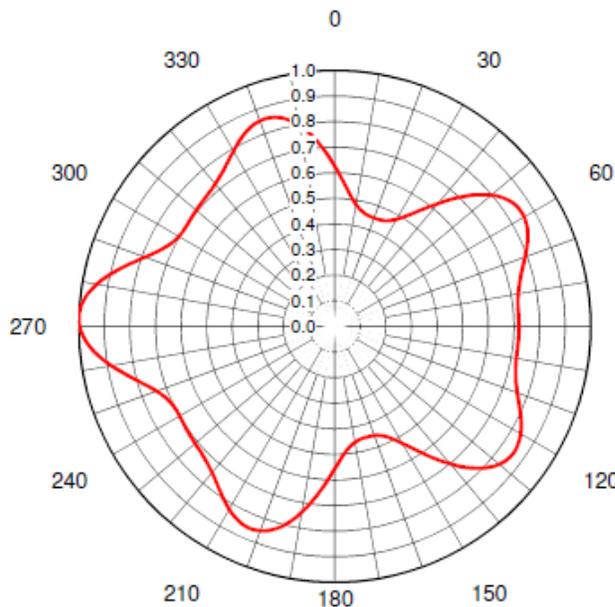


EXHIBIT 3 – Post-Auction (Licensed Antenna Relative Field Values on Channel 18)



**AZIMUTH PATTERN
Horizontal Polarization**

Proposal No. **C-70516**
 Date **23-Mar-17**
 Call Letters **WZDX**
 Channel **18**
 Frequency **497 MHz**
 Antenna Type **TUD-S5B-14/70H-1-T**
 Gain **1.86 (2.7dB)**
 Calculated

Deg	Value																		
0	0.626	36	0.557	72	0.774	108	0.746	144	0.626	180	0.557	216	0.774	252	0.763	288	0.820	324	0.746
1	0.608	37	0.573	73	0.766	109	0.752	145	0.608	181	0.573	217	0.766	253	0.776	289	0.805	325	0.752
2	0.590	38	0.590	74	0.759	110	0.759	146	0.590	182	0.590	218	0.759	254	0.790	290	0.790	326	0.759
3	0.573	39	0.608	75	0.752	111	0.766	147	0.573	183	0.608	219	0.752	255	0.805	291	0.776	327	0.766
4	0.557	40	0.626	76	0.746	112	0.774	148	0.557	184	0.626	220	0.746	256	0.820	292	0.763	328	0.774
5	0.542	41	0.645	77	0.740	113	0.783	149	0.542	185	0.645	221	0.740	257	0.836	293	0.751	329	0.783
6	0.527	42	0.664	78	0.736	114	0.791	150	0.527	186	0.664	222	0.735	258	0.853	294	0.740	330	0.791
7	0.514	43	0.683	79	0.731	115	0.800	151	0.514	187	0.683	223	0.730	259	0.869	295	0.731	331	0.800
8	0.502	44	0.701	80	0.728	116	0.808	152	0.502	188	0.701	224	0.726	260	0.885	296	0.723	332	0.808
9	0.492	45	0.720	81	0.725	117	0.817	153	0.492	189	0.720	225	0.723	261	0.901	297	0.716	333	0.817
10	0.483	46	0.737	82	0.723	118	0.825	154	0.483	190	0.737	226	0.720	262	0.917	298	0.710	334	0.825
11	0.475	47	0.754	83	0.721	119	0.832	155	0.475	191	0.754	227	0.717	263	0.931	299	0.706	335	0.832
12	0.469	48	0.770	84	0.720	120	0.839	156	0.469	192	0.770	228	0.715	264	0.945	300	0.703	336	0.839
13	0.463	49	0.784	85	0.720	121	0.844	157	0.463	193	0.784	229	0.713	265	0.957	301	0.701	337	0.844
14	0.459	50	0.798	86	0.719	122	0.849	158	0.459	194	0.798	230	0.712	266	0.968	302	0.700	338	0.849
15	0.456	51	0.810	87	0.719	123	0.852	159	0.456	195	0.810	231	0.710	267	0.977	303	0.699	339	0.852
16	0.454	52	0.821	88	0.719	124	0.855	160	0.454	196	0.821	232	0.709	268	0.985	304	0.700	340	0.855
17	0.452	53	0.831	89	0.719	125	0.856	161	0.452	197	0.831	233	0.708	269	0.992	305	0.700	341	0.856
18	0.451	54	0.839	90	0.719	126	0.855	162	0.451	198	0.839	234	0.706	270	0.996	306	0.701	342	0.855
19	0.450	55	0.845	91	0.720	127	0.853	163	0.450	199	0.845	235	0.705	271	0.999	307	0.702	343	0.853
20	0.450	56	0.850	92	0.720	128	0.850	164	0.450	200	0.850	236	0.704	272	1.000	308	0.704	344	0.850
21	0.450	57	0.853	93	0.720	129	0.845	165	0.450	201	0.853	237	0.702	273	0.999	309	0.705	345	0.845
22	0.451	58	0.855	94	0.719	130	0.839	166	0.451	202	0.855	238	0.701	274	0.996	310	0.706	346	0.839
23	0.452	59	0.856	95	0.719	131	0.831	167	0.452	203	0.856	239	0.700	275	0.992	311	0.708	347	0.831
24	0.454	60	0.855	96	0.719	132	0.821	168	0.454	204	0.855	240	0.700	276	0.985	312	0.709	348	0.821
25	0.456	61	0.852	97	0.719	133	0.810	169	0.456	205	0.852	241	0.699	277	0.977	313	0.710	349	0.810
26	0.459	62	0.849	98	0.719	134	0.798	170	0.459	206	0.849	242	0.700	278	0.968	314	0.712	350	0.798
27	0.463	63	0.844	99	0.720	135	0.784	171	0.463	207	0.844	243	0.701	279	0.957	315	0.713	351	0.784
28	0.469	64	0.839	100	0.720	136	0.770	172	0.469	208	0.839	244	0.703	280	0.945	316	0.715	352	0.770
29	0.475	65	0.832	101	0.721	137	0.754	173	0.475	209	0.832	245	0.706	281	0.931	317	0.717	353	0.754
30	0.483	66	0.825	102	0.723	138	0.737	174	0.483	210	0.825	246	0.710	282	0.917	318	0.720	354	0.737
31	0.492	67	0.817	103	0.725	139	0.720	175	0.492	211	0.817	247	0.716	283	0.901	319	0.723	355	0.720
32	0.502	68	0.808	104	0.728	140	0.701	176	0.502	212	0.808	248	0.723	284	0.885	320	0.726	356	0.701
33	0.514	69	0.800	105	0.731	141	0.683	177	0.514	213	0.800	249	0.731	285	0.869	321	0.730	357	0.683
34	0.527	70	0.791	106	0.736	142	0.664	178	0.527	214	0.791	250	0.740	286	0.853	322	0.735	358	0.664
35	0.542	71	0.783	107	0.740	143	0.645	179	0.542	215	0.783	251	0.751	287	0.836	323	0.740	359	0.645

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