

 **Fletcher, Heald & Hildreth**

KARYN K. ABLIN  
KEENAN P. ADAMCHAK  
ROBERT J. BUTLER  
HARRY F. COLE  
ANNE GOODWIN CRUMP  
MARK C. DeSANTIS  
DONALD J. EVANS  
PAUL J. FELDMAN  
KEVIN M. GOLDBERG  
DAVID M. JANET  
FRANK R. JAZZO  
M. SCOTT JOHNSON  
DANIEL A. KIRKPATRICK  
TONY S. LEE  
CHENG-YI LIU  
STEPHEN T. LOVELADY  
SUSAN A. MARSHALL  
MICHELLE A. McCLURE  
MATTHEW H. McCORMICK  
FRANCISCO R. MONTERO  
DAVINA SASHKIN  
LAURA A. STEFANI  
JAMES U. TROUP  
KATHLEEN VICTORY

1300 NORTH 17th STREET, 11th FLOOR  
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400  
FAX: (703) 812-0486  
www.fhhlaw.com  
www.commlawblog.com

August 14, 2017

RETIRED MEMBERS  
VINCENT J. CURTIS, JR.  
RICHARD HILDRETH  
HARRY C. MARTIN  
GEORGE PETRUTSAS  
JAMES P. RILEY

OF COUNSEL  
THOMAS J. DOUGHERTY, JR.  
ROBERT M. GURSS\*  
KATHRYN A. KLEIMAN  
MITCHELL LAZARUS  
PETER TANNENWALD  
ROBERT M. WINTERINGHAM

PETER TANNENWALD  
(703) 812-0404  
TANNENWALD@FHHLAW.COM

\* NOT ADMITTED IN VIRGINIA

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Application of WatchTV, Inc.  
LMS File No. 0000024542  
KOXO-CD, Facility ID 71080, Portland, OR

Attention: Video Division, Media Bureau

Dear Ms. Dortch:

On behalf of WatchTV, Inc. ("WatchTV"), this is to request that the Commission hold the above-referenced application for legal special temporary authority ("STA") for Class A television station KOXO-CD in abeyance until 30 days after release of the anticipated Report and Order in GN Docket No. 16-142.<sup>1</sup>

The application requests a service rule waiver, pursuant to Section 73.3700(f) of the Commission's Rules, to allow KOXO-CD to operate with flexible technology in lieu of receiving reimbursement of the station's costs of moving to a new channel under Section 6403(b)(1)(B)(i) of the Spectrum Act.

---

<sup>1</sup> *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard*, 32 FCC Red. 1670 (2017).

**Fletcher, Heald & Hildreth**

Marlene H. Dortch, Secretary

Re: Application of WatchTV, Inc. – KOXO-CD

August 14, 2017

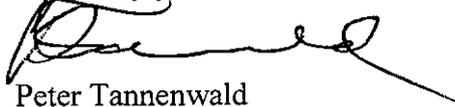
Page 2

In GN Docket No. 16-142, the Commission is considering authorizing television broadcast stations, including Class A stations, to transmit using the new ATSC 3.0 technical standard, which within itself will allow the provision of new types of services to the public. When WatchTV learns the final parameters of whatever rules the Commission may adopt, it will be in a better position to evaluate whether the new rules will be sufficient to enable WatchTV to provide flexible services to the public or whether additional flexibility is still desired. If additional flexibility is not needed, WatchTV may dismiss the pending STA request. If additional flexibility is still desired, WatchTV will be in a position to provide more details about what technologies it may wish to implement.

While the application is being held in abeyance, WatchTV will continue to keep its pending Form 399 reimbursement request up to date.

If there are any questions about this request, please contact the undersigned.

Very truly yours,



Peter Tannenwald

cc: Evan Morris, Esq. (FCC)  
Mr. Gregory J. Herman  
Mr. Jesus M. Ortega