

**SCRIPPS BROADCASTING HOLDINGS LLC**  
**REQUEST FOR WAIVER**  
**FOR**  
**DISPLACEMENT OF DIGITAL TRANSLATOR**  
**K44CN-D**  
**COTTONWOOD, AZ**

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of digital television translator station K44CN-D (BLDTT-20111201MLK, Facility ID. 53432) near Cottonwood, AZ. The station currently operate on Ch. 44, which is outside the new core of channels allocated for television broadcasting in the US (Ch. 2-36) following the results of the 2016/2017 Incentive Auction.

The translator recently received a 120-day notice from T-Mobile (copy attached hereto) informing it that T-Mobile is preparing to commence operations on its 600 MHz spectrum by 10/31/2017 and that K44CN is likely to cause harmful interference to its operations. K44CN will be required to terminate operation on Ch. 44 before the opening of the Special Displacement Window for translators.

Given the circumstances, Scripps respectfully requests a waiver of the Displacement Freeze for K44CN, according to the procedures detailed in the FCC Public Notice released on June 14, 2017 ([DA 17-584, Incentive Auction Task Force and Media Bureau Set Forth Tools Available to LPTV/Translator Stations Displaced Prior to the Special Displacement Window](#)).

Attached:  
T-Mobile 120 Day Notice



**VIA CERTIFIED MAIL & EMAIL**

June 29, 2017

SCRIPPS MEDIA, INC.  
312 WALNUT STREET 28TH FLOOR  
CINCINNATI, OH 45202

RE: Notification of Intent to Begin 600MHz Operations

Dear K44CN-D Licensee:

T-Mobile USA, Inc. ("T-Mobile") is notifying you that T-Mobile is preparing to commence operations on its 600MHz spectrum in the Partial Economic Area ("PEA") # 180 by 10/31/2017 and your station is likely to cause harmful interference to T-Mobile's operations.

To determine if your station(s) is likely to cause interference, an interference analysis has been performed, as specified by the Federal Communications Commissions' ("FCC") Inter-service Interference procedures<sup>1</sup>, using publicly available information in the FCC's Licensing and Management System ("LMS") for your facility. This analysis predicts field strength at T-Mobile's base station and user equipment locations in the PEA # 180 market from your facility. The FCC has set the thresholds at which the predicted field strength from low power TV and translator stations creates a sufficient interference risk to wireless facilities. T-Mobile has determined that your facility exceeds those thresholds and is an interference risk to its wireless operations.

T-Mobile will commence its operations in the PEA # 180 market on 10/31/2017. This letter provides the 120 days' advance notification required by FCC regulations, 47 CFR §73.3700(g)(4).

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<sup>1</sup> See 30 FCC Rcd 12049, 12071, para. 49 (2015)

The FCC regulations also require you to cease operations or eliminate the potential for harmful interference to T-Mobile's wireless facilities in the PEA # 180 market.

The FCC will work with you to attempt find a new television channel outside of the new 600 MHz mobile band that will not interfere with T-Mobile's network. You should review the FCC's Tools Available to LPTV/Translator Station Public Notice (enclosed) released on June 14, 2017 and contact Hossein Hashemzadeh, Melvin Collins, or Barbara Kreisman at the FCC for more information about the options available in your area.<sup>2</sup>

Please email [600MhzFC@T-Mobile.com](mailto:600MhzFC@T-Mobile.com) once you have determined when you will eliminate the interference. If you would like additional information regarding our findings or if it might be possible to coordinate our operations, please submit a request to Dan Wilson, Sr. Manager, Spectrum Engineering, at [600MhzFC@T-Mobile.com](mailto:600MhzFC@T-Mobile.com).

Sincerely,

/s/ Dan Wilson

Sr. Manager, Spectrum Engineering, T-Mobile USA, Inc.

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<sup>2</sup> See <https://www.fcc.gov/document/iatf-mb-set-forth-tools-available-lptvtranslator-stations>