



NARRATIVE

In support of a request for

MODIFICATION AND WAIVER OF PHASE ASSIGNMENT

KWTV-DT CH 25

Oklahoma City, Oklahoma

Facility ID: 25382

PURPOSE

Griffin Licensing, L.L.C is requesting to the Commission to move the KWTV-DT CH39 phase transition deadline for CH 25 from Phase "2", 4/12/2019, up to a Phase "1" transition deadline of 11/30/2018.

The purpose of this request is to move KWTV-DT to a new interim side mounted auxiliary antenna ahead of schedule to avoid going dark during the transition of our top mounted main antenna. Our current and only broadcast antenna is on a shared candelabra level tower structure leased from American Tower Corporation.

If KWTV-DT remains in Phase "2" the risk presents itself that CBS along with local content such as severe weather coverage will go dark for our DMA due to multiple facilities transmitting from the candelabra level. Currently KWTV-DT does not have an auxiliary system to transition to in the interim.

The approval of this request will also allow for an expedited transition of the 600 MHz band to mobile broadband by clearing an additional TV station from the 600 MHz band earlier in the transition.

DISCUSSION

KWTV-DT CH 39 is currently assigned FCC Phase "2" with a deadline of 4/12/2019 transitioning to KWTV-DT CH 25. Currently KWTV-DT CH25 is not in a linked station group nor will it create a new linked station group upon approval of this request to move up to a Phase "1" transition deadline. This request will not impact other stations, nor will it impact interference patterns of other stations.

To accomplish this Griffin Licensing, L.L.C. will file an STA to provide post-auction channel service on a side mounted antenna to be shared with KSBI (Facility ID: 38214) on the current tower space leased from American Tower Corp. The current KSBI antenna would be replaced by a two-channel antenna to support both KSBI main CH 23 and KWTV's post-auction CH 25 as an interim aux. Griffin Licensing, L.L.C. will cease transmitting KWTV-DT CH 39 from the main top mounted antenna by 11/30/2018.

Griffin Licensing, L.L.C plans to replace the current top mounted main antenna and line with a new main KWTV-DT CH25 antenna and line to transition CH 25 back to current elevation. This will be accomplished post phase "1" in line with the other market tenants during phase "2". Please refer to the engineering statement in FCC Television Broadcast Station Construction Permit KWTV-DT - 0000028029.

CONCLUSION

It is respectfully requested that the Commission grant this request for modification and waiver of phase assignment for these facilities as specified herein.