## Third Request for Waivers of Deadlines to Discontinue Operations on Pre-Auction Channel and File Construction Permit Application to Channel Share

ZGS Providence, Inc. ("ZGS") hereby respectfully requests that the FCC further extend the deadlines for Class A television station WRIW-CD, Providence, Rhode Island (FIN 70184) ("Station") to file its construction permit application to channel share, and to discontinue operations on its current channel and implement shared channel operations.

Pursuant to the procedures set forth by the FCC, ZGS filed requests for waivers of the channel sharing application filing deadline and the deadline to implement shared channel operations and discontinue operations on its pre-auction channel for the Station. The FCC granted the waiver requests, extending the channel sharing application filing deadline to May 23, 2018 and the deadline to implement shared channel operations and discontinue operations on the Station's pre-auction channel to July 23, 2018 (*See* File No. 0000033993, granted November 1, 2017; and 0000040572, granted January 26, 2018).

On April 3, 2018, ZGS and ION Media Television, Inc. entered into a Channel Sharing Agreement whereby WRIW-CD will be the sharee station and full-power television station WPXQ-TV, Block Island, Rhode Island (FIN 50063) will be the sharer (host) station. On April 30, 2018, ZGS filed a request for special temporary authority for WRIW-CD to channel share with WPXQ-TV (File No. 0000053634) ("STA"). The STA request was filed in lieu of a construction permit application to channel share at the instruction of FCC staff to resolve technical issues with LMS, which prohibited the filing of a construction permit application to channel share.

In addition to including a copy of the Channel Sharing Agreement, the STA request advised the FCC: that as soon as practicable after the FCC grants the STA request, an application seeking the FCC's consent to the assignment of WRIW-CD from ZGS to NBC Telemundo License LLC ("NBCTL") would be filed ("Assignment Application); that after the FCC grants the assignment application, ZGS would comply with the notification requirements for channel sharee stations; that ZGS will notify the FCC that WRIW-CD will discontinue operations on its pre-auction channel by filing a suspension of operations notification; and that the channel share will be implemented and the assignment transaction consummated on the same date, targeted for July 20, 2018. On May 7, 2018, FCC granted the STA request. On May 9, 2018, ZGS and NBCTL filed the Assignment Application (File No. BAL-20180509ABV).

As the technical issues with LMS are ongoing, and the construction permit application to channel share cannot be filed, ZGS hereby requests that the FCC extend the deadline for WRIW-CD to file its construction permit application for 90 days, until August 21, 2018. Although the target date for WRIW-CD to discontinue operations on its pre-auction channel and implement channel sharing with WPXQ-TV pursuant to the STA is July 20, 2018, out of an abundance of caution, ZGS also requests that the FCC extend the deadline for WRIW-CD to discontinue operations on its current channel and implement shared channel operations for 90 days, until October 22, 2018.