

Elliott B. Block
FRN 0003-7547-10

WBQC-LD
Facility ID 168413

JUSTIFICATION FOR SPECIAL TEMPORARY AUTHORITY

WBQC-LD operates on Channel 47. It has received a letter from T-Mobile (copy attached) requiring it to vacate its licensed Channel 47 by **August 17, 2018**.

The station has filed a displacement application, still pending, to move to Channel 28, LMS File No. 0000052535. The licensee believes that the displacement is not mutually exclusive with any other application and should be granted soon. Even if the application is granted before August 17, 2018, however, the station cannot operate on Channel 28 until WPTO, Facility ID 25065, currently transmitting on Channel 28, moves to Channel 29 under LMS File No. 0000034602, which WPTO in turn cannot do until WXIX-TV, FID 39738, moves from Channel 29 to Channel 15 under LMS File No 0000034169. The transition date for WPTO and WXIX-TV is October 18, 2019, more than a year after WBQC-LD's T-Mobile deadline.

WBQC-LD is requesting an STA so that it can vacate Channel 47 in time to meet the T-Mobile deadline, moving temporarily to Channel 20 until it can move to Channel 28. Channel 20 will be available until October 18, 2019, when it will be taken over by WLWT, FID ID 46979 under LMS File No. 0000034539.

Channel 20 was occupied by DWOTH-CD, FID 168414 (originally WOTH-LD), which was licensed to Elliott B. Block but sold in the incentive auction and shut down earlier this year. That station's equipment is still in place, so Mr. Block can operate WBQC-LD on Channel 20 without new construction.

While the proposed STA facilities will cause more than 2% interference to stations WLWD-LD, Facility ID 68026, and W20CT-D, Facility ID 16757, Mr. Block's use of Channel 20 was first in time.

WOTH-LD initial authorization:	BDCCDTL-20070403ACT
W20CT-D initial authorization:	BDCCDTT-20070809AAZ
WLWD-LD initial digital (flash cut):	BDFCDTL-20111121ADU

Since WLWD-LD and W20CT-D applied for Channel 20 later than WOTH-LD, they necessarily accepted incoming interference from WOTH-LD. Temporary operation of WBQC-LD on Channel 20 will not cause any more interference than the other stations previously accepted. Moreover, all three stations operated for many years on Channel 20 with no complaints of actual interference. If any *bona fide* complaints of actual interference are received, WBQC-LD's STA will be secondary; so WBQC-LD will have to resolve those complaints.

Finally, the Channel 20 operation will be temporary not only for WBQC-LD but also for WLWD-LD and W20CT-D, both of which are being displaced by WLWT and have applied to move:

W20CT-D's application to move to Channel 16 is LMS File No. 0000053659.
WLWD-LD's application to move to Channel 5 is LMS File No. 0000054940.

Since the three full power stations that must move to permit WBQC-LD to operate on Channel 28 will all transition on or about October 18, 2019, WBQC-LD will need a six-month STA, which it will have to renew at least twice before it is able to complete construction on its new permanent channel.



VIA CERTIFIED MAIL & EMAIL

4/9/2018

ELLIOTT B. BLOCK
PO Box 37770
Cincinnati, OH 45222-0770

RE: Notification of Intent to Begin 600MHz Operations

Dear WBQC-LD Licensee/ Facility ID: 168413:

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") # 25 by 8/17/2018 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 procedures²¹, 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 # 25 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 # 25 market on 8/17/2018. This letter provides the 120 days' advance notification required by FCC regulations, 47 CFR §73.3700(g)(4). 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 # 25 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.²²

Please email SpectrumClearing@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 SpectrumClearing@T-Mobile.com.

Sincerely,
/s/ Mark Bishop
Sr. Manager, Spectrum Engineering, T-Mobile USA, Inc.

²¹ See 30 FCC Rcd 12049, 12071, para. 49 (2015)

²² See <https://www.fcc.gov/document/iatf-mb-set-forth-tools-available-lptvtranslator-stations>