

Modified Request for STA for Interim Pre-Transition Channel Operations
EXPEDITED PROCESSING REQUESTED

The instant request for STA seeks authority for KTIV to operate from a side-mount interim antenna on its pre-transition channel 41 for a period of several weeks during the completion of the construction of KTIV's repack project to transition from its existing channel 41 to its post-transition channel 14. KTIV anticipates needing to commence the interim operations as early as August 22, 2018. KTIV initially filed an STA application for interim operations on August 17 (granted August 20) in LMS File No. [0000058946](#), and subsequently learned that the interim antenna would be installed at a higher level on the tower. Hence the need for this modified request for STA for interim pre-transition channel operations. The Technical Statement attached to the instant request contains the actual, as-installed antenna height for the interim facility.

KTIV's repack project is subject to the Transition Phase 1 deadline (i.e., November 30, 2018). As part of KTIV's repack construction, its pre-transition top-mount channel 41 antenna will need to be removed from the tower so that its post-transition channel 14 antenna can be installed in the top-mount position. In order to remain on air and provide service to the public during that period of time, KTIV needs to operate on pre-transition channel 41 from the interim facility specified in this STA application and the Technical Statement. (KTIV does not have an existing auxiliary antenna.)

Grant of this STA to operate from the side-mount interim antenna specified in the Technical Statement attached to this request is in the public interest because it is in furtherance of KTIV's repack transition plan. Indeed, the Commission has specifically contemplated precisely this type of temporary, "interim" operation in furtherance of the overall post-Auction transition in order to facilitate continuity of service for viewers and to avoid stations being off-the-air for periods of time during construction activities of repacked stations. *See, e.g., Incentive Auction Task Force and Media Bureau Adopt a Post-Incentive Auction Transition Scheduling Plan*, Public Notice, 32 FCC Rcd 890 (2018), ¶ 62 ("[I]nterim and auxiliary facilities will be an important part of the transition for broadcasters and we will take action as appropriate to facilitate the use of such facilities and equipment.").

* * * * *