

## Reasons for Extension of Special Temporary Authority

This application requests an extension of the special temporary authority (STA) previously authorized in LMS File No. 0000058788 (currently set to expire on February 11, 2019) to allow Vermont ETV, Inc. (VETV), to continue to operate essentially from four of the five sites that have been authorized in the construction permit for WVER's eventual post-repack distributed transmission system on DTS Channel 10 (LMS File No. 0000034603).

As previously demonstrated, operation on Channel 10 as specified in this STA extension request will allow VETV to fill in service area that will be lost on an interim basis when VETV discontinues operation of co-owned WVTA pursuant to successful spectrum auction participation (see LMS File No. 0000063255). Extension of the STA will avoid the loss of VETV's public television service for many current WVTA viewers. When the repack of WVER from Channel 9 to 10 with the full DTS system is complete, WVER will substantially fill in that loss area.

Because the DTS engineering STA form has space for technical specifications for only one site, VETV has provided the information for Ascutney in the form and has included the specifications for the other three sites as exhibits.

As previously indicated, the four-location DTS STA on Channel 10 causes a technically impermissible 0.52% predicted interference to the licensed WVER facility on Channel 9. VETV accepts that negligible interference.