

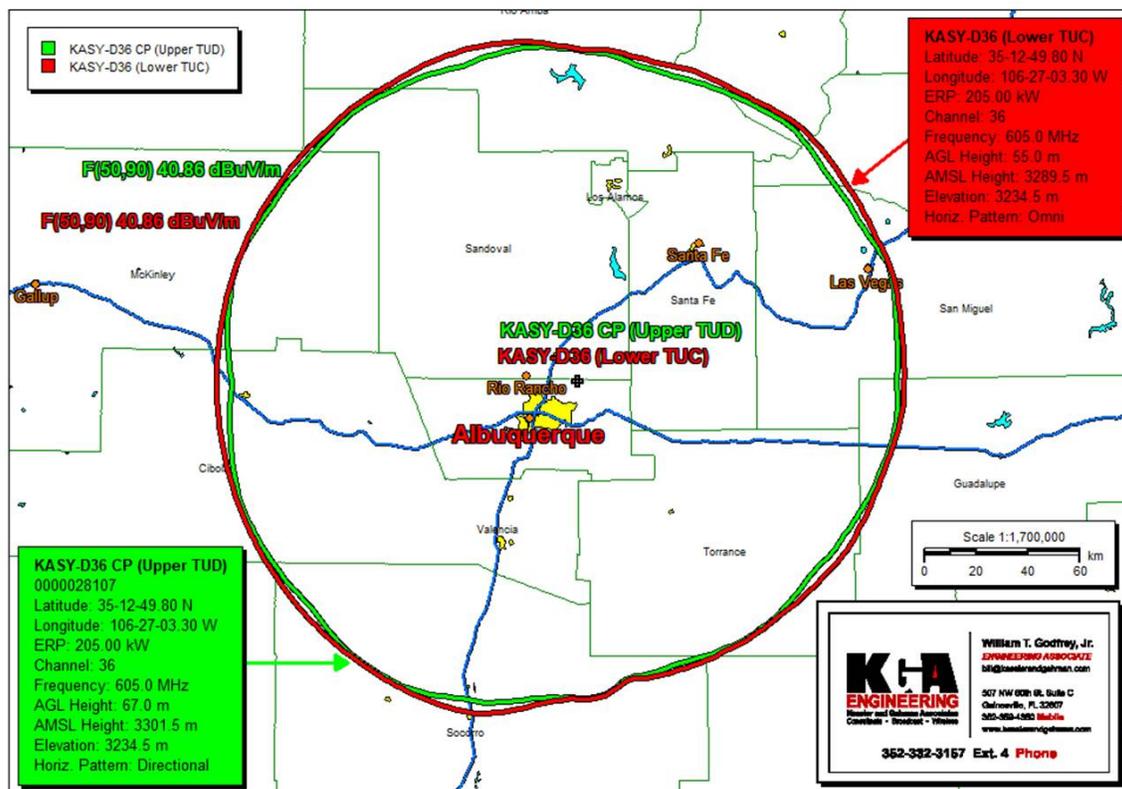
REQUEST FOR WAIVER

On April 5, 2013, the Media Bureau issued a Public Notice (April 2013 Freeze Public Notice) imposing limitations on the filing and processing of certain applications by full power and Class A television stations in light of the then forthcoming broadcast incentive auction¹. To date, the Media Bureau will not accept modification applications for changes to existing digital television service areas that would increase a station's protected contour in one or more directions beyond the area resulting from the station's present parameters as represented in its authorizations (license and/or construction permit). The April 2013 Freeze Public Notice indicates that the Bureau will consider, on a case-by-case basis, requests for waiver of the filing limitation imposed by the Public Notice when a modification application is necessary or otherwise in the public interest for technical or other reasons to maintain quality service to the public, such as when zoning restrictions preclude tower construction at a particular site or when unforeseen events, such as extreme weather events or other extraordinary circumstances, require relocation to a new tower site.

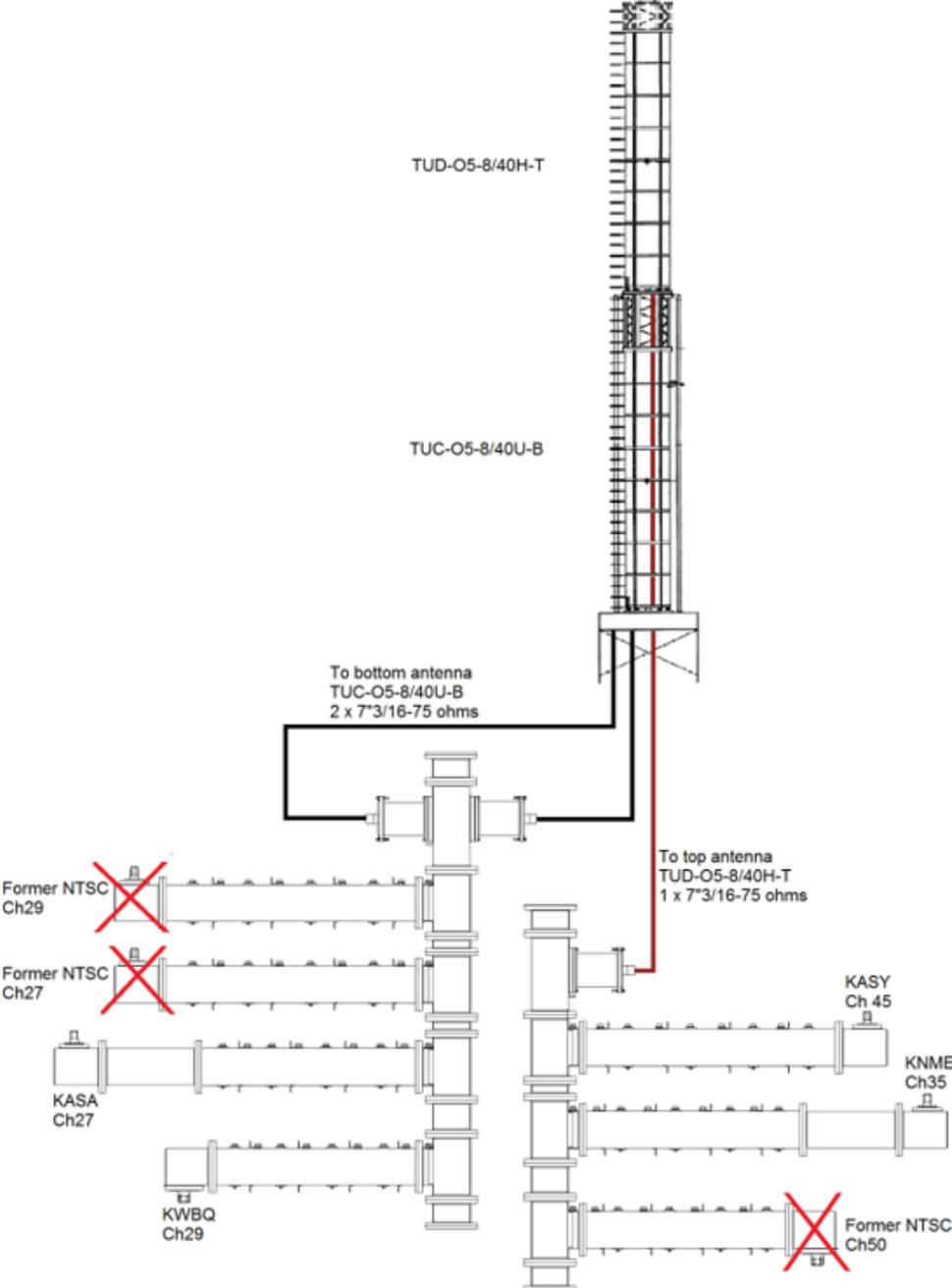
The KASY-D45 pre-auction facility operated on the top-mount upper-stack TUD non-directional antenna. American Tower Corporation (ATC) is requiring KASY to move to the top-mount lower-stack TUC non-directional antenna which has a radiation center that is approximately 40 ft lower than what the current post-auction CP is authorized for (0000028107). This is required in order to keep post-auction adjacent channels separated at the combiner input. Also, the KASY-D36 pre-auction azimuth pattern was filed in the initial 90-day CP filing window based on pre-auction Channel 45 TUD antenna because a pattern was not available for the TUC antenna based on pre-auction channel 36 at that time. Therefore, the KASY post-auction facility must reduce its radiation center by 40 ft to operate using the lower-stack TUC antenna. Nexstar now has a post-auction Channel 36 azimuth

¹ *Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate*, Public Notice, 28 FCC Rcd 4364 (MB 2013)

pattern for the TUC antenna; however, the peaks go beyond the nulls in the authorized Channel 45 pattern in various azimuthal directions. Therefore, Nexstar is filing as an omni since that is exactly what the TUC antenna model is. The showing below demonstrates that the proposed omni would very slightly exceed the authorized contour by keeping the ERP the same and reducing the antenna radiation center approximately 40 ft. Since the license application for Phase 3 stations must be filed no later than June 21, 2019, Nexstar respectfully requests a waiver of the aforementioned rule section as well as expedited processing in order to meet the June 21st Phase 3 license to cover deadline. It is believed that the waiver for slightly expand coverage is justified in order to retain the CP coverage area and maintain quality service to the public while also allowing the applicable co-located stations on the tower to move up from the TUC antenna to the TUD antenna as required to operate the antenna systems with appropriate adjacent channel spacing as shown below.

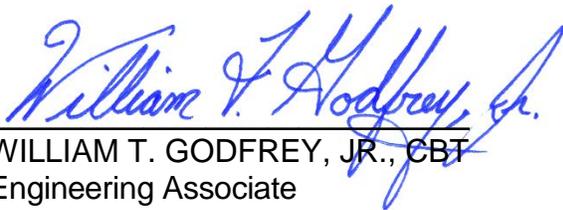


KASY-D36 CP (TUD Upper Stack) vs. KASY-D36 OMNI - WAIVER (TUC Lower Stack)



CERTIFICATION

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

A handwritten signature in blue ink that reads "William T. Godfrey, Jr." with a stylized flourish at the end.

WILLIAM T. GODFREY, JR., CBT
Engineering Associate

20 June, 2019