

Phase Adjustment Waiver for W40CN-D
Chicago, IL, Facility ID 71111

EXHIBIT SUPPORTING WAIVER
OF PHASE ASSIGNMENT, TESTING PERIOD, AND PHASE COMPLETION DATE

Local Media TV Chicago, LLC (owns W40CN-D) seeks waiver of the post-Incentive Auction Transition Phase assignment, and corresponding testing dates and construction completion deadlines, for W40CN-D, Chicago, IL (Facility ID No. 71111) (“Station”). Pursuant to the *Closing and Reassignment Public Notice*, Station has been assigned to Transition Phase 8, for which the Phase Completion Date is 3/13/2020. Local Media TV Chicago seeks to transition the Station early in phase 6, with expected transition completion on or before 10/18/2019.

The *Transition Scheduling Adoption Public Notice* permitted stations to propose “alternative transition solutions that could create efficiencies,” and held that a request to modify a station’s transition deadline — including by moving to an earlier phase — would be viewed favorably if the request is “otherwise compliant with [FCC] rules and [has] little or no impact on the phase assignments or transition schedule.”¹ As demonstrated below, Local Media TV Chicago, LLC’s instant request qualifies for such favorable treatment.

The FCC may grant a waiver for good cause shown.² A waiver is appropriate where the particular facts make strict compliance inconsistent with the public interest.³ In considering a

¹ *Incentive Auction Task Force and Media Bureau Adopt A Post-Incentive Auction Transition Scheduling Plan*, MB Docket No. 16-306 and GN Docket No. 12-268, 32 FCC Rcd 890, 913 ¶ 51 (MB 2017) (*Transition Scheduling Adoption Public Notice*), citing *Incentive Auction Task Force and Media Bureau Seek Comment on Post-Incentive Auction Transition Scheduling Plan*, Public Notice, 31 FCC Rcd 10802 (MB 2016) (*Transition Scheduling Proposal Public Notice*).

² 47 C.F.R. § 1.3.

³ *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

waiver, the FCC may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁴ Such a waiver is appropriate if circumstances warrant a deviation from the general rule, and such deviation will serve the public interest.⁵

As demonstrated herein, good cause exists for waiver of the assigned Transition Phase and its attendant testing and completion dates because it will serve the public interest by facilitating an orderly and efficient transition to more swiftly deliver new wireless broadband services to the public while minimizing impacts on broadcast television viewers and post-auction transition resources. Specifically, if Station is permitted to complete its transition early in phase 6 in conjunction with WGBO and WCPX-TV – which Local Media understands is also seeking to move early – then all but one station in the Chicago DMA will transition in phase 6. This will reduce the amount of rescanning consumers will need in the Chicago DMA. Additionally, moving early will allow T-Mobile a winning 600 MHz wireless licensee, to deploy new competitive wireless broadband service to people of the Chicago, IL market up to 5 months earlier than scheduled.

Interference. The Station has undertaken an engineering analysis (see attached interference analysis from du Treil, Lundin, & Rackley, Inc.) to determine that no new interference will be created or received by the proposed early transition of the Station beyond the permissible 0.5% rounding level of interference allowed by the FCC. W40CN-D (40-27) has a dependency and has

⁴ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular*, 897 F.2d at 1166.

⁵ *Northeast Cellular*, 897 F.2d at 1166.

to move after station WCIU-TV (27-20) within the phase 6 test period, to avoid any interference issues. The early transition will not create any pairwise interference cases or new linked station sets.

Impacts to Transition Plan. The proposed transition will permit better utilization of resources by engaging vendors and service providers early in the process rather than have them potentially overloaded further in the overall transition. Local Media TV Chicago, LLC has consulted with equipment manufacturers, vendors, site lessor, engineers, and tower crews to ensure an orderly early transition. (see attached letters from vendors).

Impact to Viewers. Local Media TV Chicago, LLC believes any disruption to viewers will be minimized. The Station recognizes that its request for an early transition will not increase the total number of times a viewer may need to rescan equipment in order to receive all reassigned stations in the Chicago, IL market. Under the original FCC transition plan there is scheduled 2 rescan for W40CN-D's DMA and the granting of the proposed early transition will not change the number of rescans. The two rescans are within the cap (2 rescans) established by the Transition Public Notice, therefore, grant of the instant waiver is appropriate. Local Media TV Chicago, LLC pledges to act to further mitigate any viewer disruption by increasing outreach education above and beyond the required public service announcements and crawls including utilizing the Station's digital and social media outreach to notify the Station audience of the proposed transition and provide detailed instructions on the rescanning process. This will ensure that viewers will be well informed of the transition.

W40CN-D will complete the transition using its final, permanent, transmission facilities as provided in the construction permit granted on 6/26/18. W40CN-D does not anticipate needing to utilize auxiliary facilities past the phase 6 transition deadline if a waiver is granted.

MVPD Notification. Finally, Local Media TV Chicago, LLC will start to take the necessary actions to ensure all impacted MVPDs are notified of the impending channel change at least 90 days prior to actual change.

In summary, the grant of this waiver will facilitate a more effective and efficient implementation of the overall policy goals of the Incentive Auction and post-auction transition, and thus is in the public interest.



601 Pennsylvania Ave., NW Suite 800 Washington, DC 20004 | 202-654-5900

CONFIDENTIAL TREATMENT REQUESTED

Pursuant to Sections 0.457 and 0.459 of the FCC's rules and FOIA exemption 4,¹ T-Mobile USA, Inc. ("T-Mobile") respectfully request that the Commission withhold from public inspection and give confidential treatment to the site maps, TV Study files, and deployment scheduled submitted pursuant to Section 27.14 of the Commission's rules.

The FCC and the Freedom of Information Act ("FOIA") recognize the need to protect trade secrets and commercial information. Specifically, FOIA Exemption 4 permits parties to withhold from public inspection "trade secrets and commercial or financial information obtained from a person and privileged or confidential."² Commercial or financial information is confidential under FOIA if its disclosure will cause substantial harm to the competitive position of the entity from which the information was obtained.³ In conformance with this statutory mandate, the Commission allows parties seeking to withhold materials from public inspection under FOIA Exemption 4 to file a request for non-disclosure pursuant to the requirements of Section 0.459.⁴ If a party who submits materials which it wishes withheld from public inspection shows that the materials contain trade secrets or privileged or confidential commercial, financial or technical data, the materials will not be made routinely available for inspection.⁵ Accordingly, pursuant to the Commission's Rules, T-Mobile submits the following explaining the nature of this request for confidential treatment.

The maps, TV Study data, and deployment schedule for which T-Mobile seeks confidential treatment contain commercial and proprietary information regarding specific details of T-Mobile's site planning and wireless network deployment efforts. In particular, the information for which T-Mobile seeks confidential treatment is the location of all transmitter sites in a licensed areas and is a trade secret. This commercially sensitive information customarily would be guarded from competitors and would not be made routinely available for public inspection.⁶

The confidential information contained in the data could result in substantial competitive harm if disclosed. Competitors could use detailed information about T-Mobile's

¹ 47 C.F.R. §§ 0.457, 0.459, 5 U.S.C. § 552(b)(4).

² See 5 U.S.C. § 552(b)(4).

³ See *Nat'l Parks and Conservation Assoc. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974); *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879-90 (D.C. Cir. 1992).

⁴ See 47 C.F.R. §§ 0.457(d)(2), 0.459.

⁵ See 47 C.F.R. § 0.457(d)(2).

⁶ See 47 C.F.R. § 0.457(d).



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wireless network and deployment plans to curtail competition.

All information for which protection is sought is treated by T-Mobile as proprietary and confidential. The information is not made available to the public, nor can it be readily obtained or deduced from public sources. To the best of the T-Mobile's knowledge, the information identified as confidential in this request is not available to the public and has not been disclosed to third parties.

Given the current state of the consumer wireless marketplace, T-Mobile believes that three years is a reasonable time period that is sufficient to ensure that release of this information does not cause competitive harm to T-Mobile.

Sincerely,

/s/

Chris Wieczorek, Esq.

Senior Director of Spectrum Policy

Government Affairs, T-Mobile USA, Inc.

Enclosure: ISIX Compliance and Deployment Statement; map, TV Study data



601 Pennsylvania Ave., NW Suite 800 Washington, DC 20004 | 202-654-5900

April 22, 2019

Ms. Barbara Kreisman
Chief, Video Division Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Application for Early Transition from the 600 MHz Spectrum,
WGBO, WGBO License Partnership, G.P., Joliet, IL, Facility 12498;
WCPX-TV, ION Media Chicago, Chicago, Facility 10981;
W40CN-D, Local Media TV, Chicago, Facility 71111;**

Dear Ms. Kreisman,

T-Mobile is pleased to support the effort of WGBO, WCPX, and W40CN in transitioning early out of the 600 MHz band. In my capacity as Senior Vice President, Radio Network Engineering and Development, I oversee the buildout and licensing of the 600 MHz wireless spectrum acquired by T-Mobile in Auction 1002 to ensure compliance with our interference protection obligations. T-Mobile has entered into an agreement with these stations to clear certain portions of the 600 MHz spectrum T-Mobile holds licenses for the Chicago area.

An early transition of the stations from their current channel to their post-Incentive Auction channels will permit T-Mobile to deploy more than [Highly Confidential Information] cell sites on across its 600 MHz B, C, D, and E Block licenses prior to their currently scheduled phase 8 date. A map of this planned deployment accompanies this submission.

T-Mobile has performed the required Inter-Service Interference (“ISIX”) studies to confirm that these sites will be cleared by the early move of these stations.

Once the stations have transitioned from their pre-Auction channel, T-Mobile will commence deployment of equipment using the 600 MHz band. This deployment is expected to start [Highly Confidential Information].

Should you have any further questions, please feel free to contact me.

Sincerely,

/s/

Mark McDiarmid

Senior Vice President, Radio Network Engineering
T-Mobile USA, Inc.

Enclosure: Inter-service Interference analysis documentation



Chicago Accelerated Repack

Spectrum Engineering

3.27.2019

Chicago Summary

- Under Title 47 -> Chapter 1 -> Subchapter B -> Part 27-> Subpart N -> §27.1319 section (b):
 - (b) *A licensee authorized to operate wireless services in the 600MHz downlink band:*
 - (1) *Is not permitted to deploy wireless base stations within the noise-limited contour or protected contour of a broadcast television station licensed on a co-channel or adjacent channel in the 600MHz downlink band*
- Analysis takes into consideration the ISIX-3 impact for:
 - WWME-CD [39] phase 8
 - WQRF [42] phase 8
- Owned / Leased blocks to be clear in the Chicago area once stations repack early
 - PEAs 3, 116, 153, 224, and 270 – B, C, D and E Blocks
- [Highly Confidential Information]



[Highly Confidential Information]

ENGINEERING STATEMENT
SUPPORTING REQUEST FOR WAIVER
CLASS A TELEVISION STATION W40CN-D
(FACILITY ID NO. 71111)
SUGAR GROVE, ILLINOIS
CHANNEL 27

Background

This statement was prepared on behalf of Local Media TV Chicago, LLC, licensee of W40CN-D, Sugar Grove, Illinois, in support of a request for waiver of the FCC's Phase Assignment, Testing Period, and Phase Completion Date for television station W40CN-D in the Chicago DMA*. W40CN-D is licensed for operation on RF Channel 40 with a maximum effective radiated power (ERP) of 15 kW and an antenna height above mean sea level (AMSL) of 270.8 m.†

As a result of the FCC's Incentive Auction repack process, the W40CN-D facility was reassigned to RF Channel 27. W40CN-D now holds a construction permit for operation on Channel 27 with a maximum directional ERP of 5 kW and an antenna height AMSL of 330 m.‡ An FCC engineering database summary sheet for the W40CN-D construction permit facility is attached hereto for reference. The W40CN-D construction permit facility is the subject early transition facility.

In coordination with the wireless carrier T-Mobile, Local Media TV Chicago, LLC seeks a waiver of the FCC's Phase Assignment, Testing Period, and Phase Completion Date to allow W40CN-D to make the transition to Channel 27 earlier than its given phase transition date. Specifically, the target date for W40CN-D to begin operations on Channel 27 is on or before October 18, 2019. This will facilitate the early deployment of new 600 MHz band wireless broadband services.

This statement demonstrates that the W40CN-D facility can transition to Channel 27 before its assigned phase date without any disruption to the FCC's transition plans. Specifically, it is demonstrated that the operation of W40CN-D on Channel 27 will

* Nielsen Designated Market Area abbreviated as DMA.

† See FCC File No. BLDTA-20110103ACG.

‡ See FCC File No. 0000034531. The W40CN-D facility is to be relocated as part of its repack build-out.

have no adverse interference consequences, either caused or received, under the current allocation environment.

Assigned Phase

W40CN-D is assigned to transition Phase 8, with a testing begin date of January 18, 2020. This is based on the latest FCC Phase Assignment spreadsheet dated October 23, 2018.

Linked Station Sets and Linked Station Neighbor Stations

An inspection of the latest FCC Linked Station Set (LSS) and Linked Station Neighbor (LSN) spreadsheet databases indicates that the W40CN-D facility is not part of any LSSs or LSNs. These are based on the latest LSS and LSN spreadsheets available from the FCC, both dated October 23, 2018.

It is noted that there is a dependency with respect to station WCIU-TV (Facility ID 71428), which is in Phase 6. As described below, the W40CN-D facility will not make its early transition until after the WCIU-TV facility has completed its scheduled Phase 6 transition.

Interference Caused Analysis Under Current Allocation Environment

An interference analysis was conducted for the W40CN-D Channel 27 facility utilizing the latest version[§] of the FCC's *TVStudy* coverage and interference analysis prediction software. The report of the results is attached hereto entitled 'Interference Caused Analysis for W40CN-D Channel 27 Construction Permit Facility Under Current Allocation Environment.'

The results of the analysis indicate that the proposal meets the 0.5% permissible interference level with respect to interference caused to all full-service and Class A television stations.

[§] *TVStudy* version 2.2.5

It is noted that W40CN-D will complete its early transition to Channel 27 on or before October 18, 2019, following the phase transition of the following station:

- WCIU-TV (Facility ID 71428), Chicago, IL (Ch. 27 → Ch. 23)

Station WCIU-TV is in transition Phase 6, which has a testing start date of September 7, 2019 and a phase end date of October 18, 2019. Therefore, the W40CN-D early transition will avoid any predicted interference case with respect to WCIU-TV by implementing its early transition only after WCIU-TV has completed its phase transition.

Interference Received Analysis Under Current Allocation Environment

An interference analysis specifically for the ‘received case’ of interference was conducted for the W40CN-D Channel 27 early transition facility utilizing the FCC’s *TVStudy* prediction software. The report of the results is attached hereto entitled ‘Interference Received Analysis for W40CN-D Channel 27 Construction Permit Facility Under Current Allocation Environment.’ The purpose of this study is to evaluate all current environment records in the received interference analysis.

The results of the analysis indicate that there are no cases of incoming (received) interference exceeding the permissible 0.5% interference level to the W40CN-D Channel 27 early transition facility.

As with the interference caused analysis, it is noted that the W40CN-D early transition will occur only following the transition of WCIU-TV; and, therefore, it will avoid any predicted interference case with respect to WCIU-TV.

Effects on Linked Station Sets

It has been determined that the early transition of the W40CN-D facility to Channel 27 in advance of its phase transition date will not create any pairwise interference cases or new linked station sets.

Conclusion

Based on the early transition of W40CN-D following the phase transition of WCIU-TV, on or before October 18, 2019, it is concluded that the early transition of the W40CN-D facility on Channel 27, as described herein, will not result in any interference caused or received cases that would result in the creation of any new linked station sets or dependencies established in the Incentive Auction repack process.



Louis R. du Treil, Jr., P.E.

du Treil, Lundin & Rackley, Inc.
3135 Southgate Circle
Sarasota, Florida 34239

October 25, 2018

INTERFERENCE CAUSED ANALYSIS FOR W40CN-D CHANNEL 27 CONSTRUCTION PERMIT FACILITY UNDER CURRENT ALLOCATION ENVIRONMENT

tvstudy v2.2.5 (4uoc83)

Database: localhost, Study: w40cn27e2, Model: Longley-Rice

Study build station data: LMS TV 2018-10-24

Proposal: W40CN-D D27 DC CP SUGAR GROVE, IL
 File number: BLANK0000034531
 Facility ID: 71111
 Station data: LMS TV 2018-10-24
 Record ID: 25076ff363e52f22016409c450571a79
 Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Protect LPTV records from Class A

Search options:

All post-transition APP, CP, and baseline records excluded

Individual records excluded:

20110822ADN WCIU-TV D27 DT LIC CHICAGO, IL BLCDT20110822ADN (WCIU-TV will have completed its Phase 6 transition by October 18, 2019.)

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WMKB-LP	N25z	TX	LIC	Rochelle, IL	BLTTL20070813AFM	104.4 km
Yes	WBBM-TV	D26	LD	LIC	CHICAGO, IL	BLCDT20140305ABH	19.0
No	WRDH-LP	D26	LD	CP	HOLCOMB, IL	BDCCDTL20061030ANL	104.4
No	WCCU	D26	DT	LIC	URBANA, IL	BLCDT20050317ADS	171.8
No	WJGP-LD	D26	LD	LIC	KALAMAZOO, MI	BLDTL20091210ADC	218.1
No	WKOW	D26	DT	LIC	MADISON, WI	BLCDT20111006AAO	185.8
No	KFXA	D27	DT	LIC	CEDAR RAPIDS, IA	BLCDT20050713ABD	342.4
No	W39BH	D27+	LD	CP	CHAMPAIGN, IL	BLANK0000053230	195.8
No	WEEJ-LD	D27	LD	CP	JACKSONVILLE, IL	BLANK0000052931	269.2
No	WDLF-LD	D27	LD	CP	PEORIA, IL	BLANK0000051596	191.2
No	W27DF-D	D27	LD	LIC	QUINCY, IL	BLANK0000023020	352.4
No	W48CK-D	D27	LD	CP	STERLING, IL	BLANK0000052787	136.7
No	WIPX-TV	D27	DT	LIC	BLOOMINGTON, IN	BLANK0000050610	312.6
No	WSOT-LD	D27	LD	LIC	MARION, IN	BLDTL20111212AGP	236.3
No	WFHD-LP	N27z	TX	LIC	ANN ARBOR, MI	BLTT20000925AAY	350.6
No	W48CL	D27+	LD	CP	GRAND RAPIDS, MI	BLANK0000052038	222.6
No	WLNW-LD	D27	LD	LIC	LANSING, MI	BLDTL20090630ABI	296.1
No	W27DU-D	D27	LD	CP	TRAVERSE CITY, MI	BNPDTL20100510AGO	370.6
No	KBGU-LP	D27	LD	CP	ST. LOUIS, MO	BLANK0000051595	416.8
No	WBGU-TV	D27	DT	LIC	BOWLING GREEN, OH	BLEDT20090612AFQ	346.4
No	WLQP-LP	D27z	LD	CP	LIMA, OH	BLANK0000054500	346.4
No	WACY-TV	D27	DT	LIC	APPLETON, WI	BLCDT20061222AAT	277.9
No	WHWC-TV	D27	DT	APP	MENOMONIE, WI	BLANK0000035676	474.3
No	WHWC-TV	D27	DT	LIC	MENOMONIE, WI	BLEDT20040824AAF	474.3
No	W27AU-D	D27	LD	LIC	WAUSAU, WI	BLDTL20110315ABH	363.6
No	WYZZ-TV	D28	DT	LIC	BLOOMINGTON, IL	BLCDT20060609ABE	169.2
No	WIFR-LD	D28	LD	CP	ROCKFORD, IL	BLANK0000052512	111.5
No	WODF-LD	D28	LD	CP	ROCKFORD, IL	BLANK0000053005	196.0
No	WSJV	D28	DT	LIC	ELKHART, IN	BLCDT20100115AAE	148.5
No	WMYS-LD	D28	LD	CP	SOUTH BEND, IN	BLANK0000054333	149.2
No	WTMJ-TV	D28	DT	LIC	MILWAUKEE, WI	BLCDT20001218ACR	137.1

No non-directional AM stations found within 0.8 km

Directional AM stations within 3.2 km:

WCKG 1530 L DAD D ELMHURST, IL BL19960524AA
 WCKG 1530 C DAD D ELMHURST, IL BP20151110AMR

Record parameters as studied:

Channel: D27

Mask: Full Service

Latitude: 41 51 30.11 N (NAD83)

Longitude: 87 57 16.23 W

Height AMSL: 330.0 m

HAAT: 0.0 m

INTERFERENCE CAUSED ANALYSIS FOR W40CN-D CHANNEL 27 CONSTRUCTION PERMIT FACILITY UNDER CURRENT ALLOCATION ENVIRONMENT

Peak ERP: 5.00 kW

Antenna: DIE-TUM-TU-02/02M-T (ID 1003870) 63.0 deg
Elev Pattnr: Generic

50.0 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.107 kW	123.3 m	20.6 km
45.0	4.06	133.1	40.1
90.0	3.19	138.7	39.2
135.0	0.057	137.3	18.4
180.0	0.107	109.4	19.4
225.0	4.06	111.5	38.5
270.0	3.19	105.1	36.7
315.0	0.057	108.9	15.9

Database HAAT does not agree with computed HAAT

Database HAAT: 0 m Computed HAAT: 121 m

Distance to Canadian border: 397.7 km

Distance to Mexican border: 1804.9 km

Conditions at FCC monitoring station: Allegan MI

Bearing: 62.5 degrees Distance: 184.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 268.3 degrees Distance: 1458.5 km

Study cell size: 1.00 km

Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%

Maximum new IX to LPTV: 2.00%

Interference to BLCDT20140305ABH LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WBBM-TV	D26	LD	LIC	CHICAGO, IL	BLCDT20140305ABH	
Undesireds:	W40CN-D	D27	DC	CP	SUGAR GROVE, IL	BLANK0000034531	19.0 km
	W25DW-D	D25	LD	LIC	ARBURY HILLS, IL	BLDTL20110224ACQ	12.3
	WCWW-LD	D25	LD	APP	SOUTH BEND, IN	BLANK0000054334	134.7
	W26DZ-D	D26	LD	LIC	CHAMPAIGN, IL	BLANK0000014105	322.8
	WKOW	D26	DT	LIC	MADISON, WI	BLCDT20111006AAO	191.8
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	4049.0	5,255,837	4046.0	5,255,786	3690.0	4,974,571	3687.0 4,972,575 0.08 0.04
Undesired				Total IX	Unique IX, before	Unique IX, after	
W40CN-D	D27	DC	CP	20.0	20,492	3.0	1,996
W25DW-D	D25	LD	LIC	355.9	281,215	335.9	261,092
WKOW	D26	DT	LIC	3.0	1,627	0.0	0

INTERFERENCE RECEIVED ANALYSIS FOR W40CN-D CHANNEL 27 CONSTRUCTION PERMIT FACILITY UNDER CURRENT ALLOCATION ENVIRONMENT

tvstudy v2.2.5 (4uoc83)

Database: localhost
 Station Data: LMS TV 2018-10-11
 Study: LMS181011
 Model: Longley-Rice
 Scenario: w40cn27e2r

Desired station	Service area		Terrain-limited		Interference-free	
Undesired station	Total interference		Unique interference			
W40CN-D D27 DC CP SUGAR GROVE, IL	3075.7	4,995,594	3075.7	4,995,594	3075.7	4,995,594
WIPX-TV D27 DT LIC BLOOMINGTON, IN	0.0		0	0.0	0	
WACY-TV D27 DT LIC APPLETON, WI	0.0		0	0.0	0	

Note:

- Individual record excluded: WCIU-TV D27 DT LIC CHICAGO, IL BLCDT20110822ADN (WCIU-TV will have completed its Phase 6 transition by October 18, 2019.)



Dielectric. LLC
22 Tower Road
Raymond, ME 04071
1-800-341-9678

April 22, 2019

Mr. Lawrence Rogow
Local Media TV Chicago, LLC
5670 Wilshire Boulevard
Suite 1620
Los Angeles, CA 90036

Dear Mr. Rogow,

I am writing in response to your inquiry concerning the timing of the delivery of the antenna and transmission line for W40CN-D of Sugar Grove, IL, as required by the FCC in the currently assigned repack timetable.

By way of this letter, we confirm the advancing the delivery of the antenna and transmission line to the timetable for Phase 6 may be accomplished without causing any of our other current order to incur a delay that would impact detrimentally on their compliance with the repacking schedule.

Please let me know if you have any questions regarding this matter.

Regards,

A handwritten signature in black ink, appearing to read "Jay S Martin", written over a large, stylized loop.

Jay S Martin
VP Sales-Dielectric



PHONE 215 499 9104

117 Broad St

Hatboro. PA 19040-3103

PROSERVICE@TRANSMITTERSERVICE.COM

WWW.TRANSMITTERSERVICE.COM

April 19, 2019

Lawrence Rogow

Local Media TV Chicago, LLC

5670 Wilshire Boulevard. Suite 1620

Los Angeles, CA 90036

RE: Station Repack Antenna and Transmission Line Installation

Dear Larry,

This letter is to confirm that Pro Service, Inc. is able to meet the schedule for W40CN-D antenna and line installation with the earlier transition date and in doing so will not impair our ability to meet our other customer's phase transition dates as applicable.

We appreciate your business the opportunity to work with you. Please let us know if you have any questions or if you need any additional information.

Respectfully,

Bill Barrow

A handwritten signature in black ink, appearing to read 'Bill Barrow', with a long horizontal flourish extending to the right.



Rohde & Schwarz USA, Inc.
6821 Benjamin Franklin Drive
Columbia, MD 21046-2265

April 19, 2019

Larwrence Rogow
Local Media TV Chicago, LLC
5670 Wilshire Blvd., Suite 1620
Los Angeles, CA 90036
W40CN-D, FID: 71111

Subject: Earlier Transition Impact on Rohde & Schwarz

Project: W40CN-D

Dear Mr. Larwrence Rogow,

Rohde & Schwarz USA is aware that W40CN-D is in the process of requesting a waiver and/or Special Temporary Authorization to perform the transition of W40CN-D to an earlier Phase.

This letter is to confirm that the earlier transition of W40CN-D will not impair the ability of Rohde & Schwarz to provide the required transmitter and resources to other phase stations to complete their own transitions.

You and your staff at W40CN-D are permitted to share this letter with the FCC as required.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik Balladares', with a long horizontal flourish extending to the right.

Erik Balladares
Vice President – Broadcast & Media