

WAIVER REQUEST OF FREEZE
Renard Communications Corp.
July, 2019

Renard Communications Corp. (“Renard”), licensee of WONO-CD, Syracuse, NY (Fac. ID 14315) hereby respectfully requests a waiver of the Commission’s Freeze (DA 13-618 – April 5, 2013) in order to implement a non-directional antenna in place of the directional antenna in the station’s construction permit authorization 0000071755 for its post-repack channel.

In support of its request, it is stated if not for the limitation imposed by station WPXJ-TV, Batavia, NY – Fac. ID 2325), Renard would have been able to file for the facilities requested herein during the period that the Commission lifted the freeze from November 28 through December 7, 2017 in DA 17-1086. More recently WPXJ-TV has been granted a construction permit (0000064525) to relocate its post-repack facilities in Phase 4 to a site that would no longer require WONO-CD to utilize a directional antenna to protect the noise-limited contour of WPXJ-TV.

Renard could not have foreseen the change in site that was recently applied for and granted to WPXJ-TV and no longer unnecessarily requiring WONO-CD to utilize a directional antenna. Further, the use of the proposed non-directional antenna would permit WONO-CD to serve its local community more effectively.

Regarding the potential effect on any other stations or authorizations, all other local area displaced LPTV and translator stations have been accommodated with post-repack channels. Thus, the request herein would have little or no impact on future spectrum usage.

Finally, it is a preference of Renard to utilize a common antenna with WHSU-CD, and WTVU-CD, both Syracuse, NY which have been assigned channels 23 and 25 respectively. Use of a single multi-channel antenna for the three adjacent channels would permit the best utilization of space and minimize wind load on the common tower they share.

For the aforementioned reasons stated, it is respectfully requested that the Commission grant the requested waiver to permit approval of the pending application for WONO-CD as it would benefit all television viewers in the Syracuse, NY DMA.