

Justification

CNZ Communications SE, LLC (“CNZ”), licensee of television station WLGA(TV), Opelika, GA (Fac. ID 11113) hereby requests an extension of its Special Temporary Authorization to operate from only one of the two transmission sites approved in its post-repack construction permit, File No. 30376 (the “DTS CP”) for an additional 180 days.

On May 14, 2018, the FCC granted the DTS CP, which will allow WLGA to recapture population lost as a result of the post-auction repack through the use of a two-site distributed transmission system (“DTS”). CNZ has undertaken extensive efforts to refine the engineering for the DTS, select the equipment for the DTS, and work with the tower owner on engineering issues regarding the second transmitter site. Unfortunately, these efforts have taken longer than expected.

On November 19, 2018, CNZ filed a request for Special Temporary Authority to allow it to transition from its pre-auction channel (RF channel 30) to its post-auction channel (RF channel 17) from DTS site #1 before CNZ completed construction of DTS site #2. File No. 63640. The Commission timely granted that application, and WLGA transitioned from RF channel 30 to RF channel 17 before the end of the Phase 1 deadline. See File No. 70417. The Commission has twice extended the STA, which is currently set to expire on May 20, 2020.

CNZ now requests an additional 180 days to continue operating from one of the two transmission sites authorized in the DTS CP while CNZ completes construction of DTS site #2. There is substantial public benefit associated with this request, as it will allow WLGA to continue serving viewers in approximately 63% of the DTS protected area population while construction of the remainder of the DTS continues.

Accordingly, CNZ respectfully requests a 180 day extension of its authorization to operate from only DTS site #1.