

Request for Special Temporary Authority

As discussed in the technical exhibit, the instant STA request seeks authorization to operate in a manner that contemplates a minor extension of the contour of the translator in a limited way. Because the proposed operation would create no new, unique interference in any direction—and, in fact, would mitigate unique interference in certain directions—the minor contour extension along the azimuths indicated would be de minimis.

In addition, because the licensee has been advised by the manufacturer that the antenna cannot be repaired, the licensee's options are (1) use an existing antenna, as contemplated by the instant request, (2) invest in a new antenna, (3) continue the current low power operation that provides precious little actual over-the-air service to viewers and is not actually receivable in the town of Boone which is the closest major population center,¹ or (4) shut down the facility. The licensee respectfully submits that Option 1 would serve the public interest in a more meaningful manner than Options 2, 3, or 4.

The undesirability of Options 3 and 4 is self-explanatory: neither unreceivable service nor a silent station would actually result in the reception of the facility's programming by viewers. Likewise, Option 2—investing in a new antenna—is an undesirable option. A new antenna would be an extraordinary expense for the licensee because the facility is a translator that, as a result of the Commission's Incentive Auction, will not be allowed to continue to operate on its current channel (41) for much longer. Moreover, at the current time it is impossible to predict whether any other channel will become available for the facility's long-term use once the post-Incentive Auction repacking transition is completed. As a public entity operating a noncommercial service, the licensee is compelled to carefully consider the ramifications of investing scarce resources into an operation that is likely to be available only for the short-term. In this instance, purchase of a new antenna would represent a "sunk cost" that would almost certainly be abandoned in 24 months' time. Thus, the licensee has made the judgment that the most desirable option is to re-use the antenna proposed in this application.

For these reasons and for the reasons explained in the technical exhibit, the licensee respectfully requests authority to operate as proposed herein.

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¹ One of the licensee's engineers visited Boone during the current reduced power operation and attempted to access the facility's over-the-air (OTA) signal. He has informally reported to the licensee that OTA reception in Boone is not currently feasible.