

REQUEST FOR WAIVER

TELEVISION STATION KPXO-TV (DTS)
KANEEOHE, HAWAII
CHANNEL 32

1. ION Media Hawaii License, Inc. ("ION"), licensee/permittee of KPXO-TV, Kaneohe, HI, respectfully requests a waiver of the Section 73.626(f)(1) of the FCC Rules to allow implementation of its proposed Distributed Transmission System (DTS).

2. The licensed and permitted transmitter site for KPXO-TV is located at a remote mountain-top location that is difficult to access. Conversion of KPXO-TV to a DTS system will allow it to co-locate its DTS2 transmitter site with stations KKAI(TV), Kailua, HI and KUPU(TV), Waimanalo, HI, at the Mauna Kapu transmitter site. The KPXO-TV DTS1 site will provide service to the Kaneohe city and surrounding area from an easily accessible location off of Kaneohe Bay Drive adjacent to the John A. Burns Freeway. This will allow for the more rapid transition of KPXO-TV to its new channel assignment, which is critical since KPXO-TV is in Phase 2 with a testing begin date of December 1, 2018, just over one year from the present.

3. Implementation of the DTS system will allow KPXO-TV to join DTS stations KKAI(TV) and KUPU(TV) in providing maximum service penetration over the very rugged terrain of Oahu through the use of DTS systems. The DTS concept was developed in order to provide service to areas otherwise inaccessible by a single transmitter site. Therefore implementation of the KPXO-TV DTS will fulfill the primary aim of the DTS service concept adopted by the FCC.

4. The proposed KPXO-TV DTS facility will maintain its predicted interference-free service population level above the minimum 95% level relative to its reassignment baseline service level. Therefore, the proposed DTS system meets the coverage requirement of the FCC's Closing and Channel Reassignment (CCR) *Public Notice*.