

January 5, 2018

Marlene H. Dortch, Esq.
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: WRAZ-TV, Raleigh, NC (FIN 64611)
File No. 0000034036
Non-Objection to Predicted Interference from Channel 16 Operations by
WXII-TV, Winston-Salem, NC (FIN 53921)

Dear Ms. Dortch:

WRAZ-TV, Inc. is the licensee of WRAZ(TV), channel 49, Raleigh, North Carolina (FIN 64611) (“WRAZ”).¹ WRAZ has been issued a construction permit to operate its post-auction facilities on channel 15 (File No. 0000025194) (the “WRAZ Construction Permit”). On October 23, 2017, during the second post-auction filing window,² WRAZ filed an application proposing to make minor modifications to its post-auction construction permit (*see* File No. 0000034036) (the “WRAZ Modification Application”). The WRAZ Modification Application remains pending.

Commission staff recently advised WRAZ-TV, Inc. that the WRAZ Modification Application is mutually exclusive with an application filed on November 1, 2017 for WXII-TV, channel 16, Winston-Salem, North Carolina (FIN 53921) (“WXII”) (*see* File No. 0000034697) (the “WXII Modification Application”).³

WRAZ-TV, Inc. has conducted an interference analysis which confirms that there is predicted interference from the facilities proposed in the WXII Modification Application to the facilities proposed in the WRAZ Modification Application which exceed the 0.5% protection requirement. In addition, the interference analysis confirms that WRAZ’s operations proposed in the WRAZ Modification Application are compliant with the 0.5% protection criteria with respect to outgoing interference to all protected facilities, including the facilities proposed in the WXII Modification Application.

¹ WRAZ-TV, Inc. is a wholly-owned subsidiary of Capitol Broadcasting Company, Inc.

² *Incentive Auction Task Force and Media Bureau Announce the Opening of the Second Filing Window for Eligible Full Power and Class A Television Station—October 3 Through November 2, 2017*, Public Notice, DA 17-911 (rel. Sept. 20, 2017).

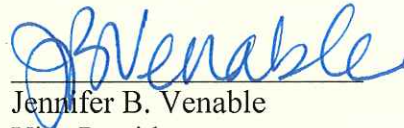
³ All applications filed during the second post-auction filing window were treated as filed on the last day of the window for purposes of determining mutual exclusivity. *Id.* at 2.

A detailed analysis of the predicted interference from WXII to WRAZ indicates that the area of predicted interference is entirely outside of WRAZ's DMA (the Raleigh-Durham DMA), and is largely outside of the replication service area of the facilities authorized in the WRAZ Construction Permit.

In view of these facts, WRAZ-TV, Inc. hereby notifies the Commission of its non-objection to WXII's proposed operations in Winston-Salem on channel 16, as set forth in the WXII Modification Application, and of WRAZ's acceptance of the predicted interference from the facilities proposed in the WXII Modification Application, with the understanding that the WRAZ Modification Application is otherwise eligible for grant. WRAZ-TV, Inc. reserves its right to object to any interference received from WXII to viewers within the Raleigh-Durham DMA, but does not anticipate that any such interference will occur.

Should you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,



Jennifer B. Venable
Vice President
WRAZ-TV, Inc.