

## Mohammad Habib

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**From:** Hossein Hashemzadeh  
**Sent:** Friday, April 20, 2018 7:19 AM  
**To:** Mohammad Habib  
**Subject:** RE: STA Application in File No. 0000049026

You can go ahead and process the STA without displacement application on file.

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**From:** Mohammad Habib  
**Sent:** Thursday, April 19, 2018 3:06 PM  
**To:** Hossein Hashemzadeh <Hossein.Hashemzadeh@fcc.gov>  
**Subject:** FW: STA Application in File No. 0000049026  
**Importance:** High

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**From:** Stephen Hartzell [<mailto:SHARTZELL@brookspierce.com>]  
**Sent:** Thursday, April 19, 2018 10:51 AM  
**To:** Mohammad Habib <[Mohammad.Habib@fcc.gov](mailto:Mohammad.Habib@fcc.gov)>  
**Cc:** Carol Heynen <[CHEYNEN@brookspierce.com](mailto:CHEYNEN@brookspierce.com)>  
**Subject:** STA Application in File No. 0000049026  
**Importance:** High

Hi Mohammad.

Thanks for letting my paralegal, Carol, know about the confusion over the pending STA application in LMS File No. [0000049026](#).

You are correct that there is no displacement application pending. The STA application is based on the pending DTS application for full-power station WUNW (see File No. [0000036076](#)). We are seeking STA to change the translator's operation to channel 27, which is what the WUNW DTS application is intended to do. The translator is being displaced, but it is not going to continue to be a translator; it will—after the WUNW DTS application is granted—become one of the DTS sites specified in the WUNW DTS application. We tried to explain that in the STA application, but I guess we didn't do it very well!

I had talked with Kevin Harding a few weeks ago about whether to file for STA as a DTS site under the pending WUNW DTS application or whether it would make more sense to file for a translator STA, and he thought it would make more sense to file as a translator STA as long as the STA application makes reference to the WUNW DTS application.

Here is the language about WUNW's DTS application from the technical exhibit in the STA application:

"Owing to the eventual displacement of W47DM-D and numerous others of UNC's translators, an application for Construction Permit is pending (file# 0000036076) to convert WUNW to a Distributed Transmission System ("DTS") by adding seven transmitter sites to its current site. These seven sites correspond to existing television translator locations (one of which is W47DM-D) utilized by UNC that are displaced as a result of the Incentive Auction proceeding, and buildout would eventually replace the existing, displaced translator operations with operation as DTS on WUNW's Channel 27 (WUNW was not reassigned to another channel). Now, considering the 120 day notice from the wireless licensee, W47DM-D must cease operation on its licensed Channel 47 by August 31, 2018. Since the Channel 27 WUNW DTS facility will eventually provide replacement service for W47DM-D, UNC does not intend to file for a displacement

channel for W47DM-D in the Special Displacement Window. Thus, the procedures described in DA 17-5841 cannot precisely be followed. As discussed informally with FCC staff, UNC herein requests Special Temporary Authority ("STA") to operate W47DM-D on Channel 27, with the proposed parameters on file for "Site 7" in the WUNW DTS application."

Does that help?

Thanks!

Best,  
- Stephen

Stephen Hartzell



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