



STAMP AND RETURN

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Bureau / Office

Hossein Hashemzadeh
Deputy Division Chief
Video Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Assignment of Virtual Channel 51
WRIW-CD, Providence, Rhode Island (FIN 70184)**

Dear Mr. Hashemzadeh:

NBC Telemundo License LLC ("NBC") hereby respectfully requests that the Commission assign "virtual" channel 51 for use by digital class A television station WRIW-CD, Providence, Rhode Island (FIN 70184), pursuant to ATSC A/65C, ATSC Program and System Information Protocol for Terrestrial Broadcast and Cable, Revision C With Amendment No. 1 dated May 9, 2006 ("PSIP Standard").¹ NBC is the proposed assignee of WRIW-CD,² and the FCC granted special temporary authority for WRIW-CD to channel share with WPXQ-TV, Block Island, Rhode Island (FIN 50063) licensed to Ocean State Television, L.L.C. ("STA").³ It is requested that the assignment of virtual channel 51 to WRIW-CD be effective upon consummation of the transaction in which NBC will acquire the station and WRIW-CD commences shared channel operations.

The assignment of virtual channel 51 to WRIW-CD is appropriate and such designation is consistent with Annex B, Section B.1.1 (4) of the PSIP Standard, which provides that a station with a virtual channel conflict is to use the RF channel of the station causing the conflict.

¹ Section 73.382(d) of the FCC's rules generally require digital broadcast television signals to comply with the PSIP Standard. The most recent version of the PSIP Standard, dated August 7, 2013, is *available at* <http://atsc.org/standard/a652013-program-and-system-information-protocol-for-terrestrial-broadcast-and-cable/>.

² See FCC File No. BAL-20180509ABV; pending.

³ See FCC File No. 0000053634; granted May 7, 2018. The STA request was filed in lieu of a construction permit application to channel share due to a technical issues with LMS, which prohibited the filing of a construction permit application to channel share.

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In the case of WRIW-CD, the station was on analog RF channel 50 when it converted to digital operations, and thus WRIW-CD should use virtual channel 50 pursuant to the PSIP Standard. However, virtual channel 50 is not available for use by WRIW-CD once shared channel operations begin because the post-auction contours of WRIW-CD and WDMR-LD, Springfield, Massachusetts (FIN 10154) will overlap. WDMR-LD is currently on RF channel 51 and virtual channel 50.

Accordingly, the assignment of virtual channel 51 to WRIW-CD is consistent with Annex B, at Section B.1.1 (4).

Respectfully submitted,

Margaret L. Tobey
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