

Request For Special Temporary Authorization

American Christian Television Services, Inc. (“Licensee”), licensee of television station WTLW(TV), Lima, OH (Fac. ID 1222), hereby submits this request to make temporary joint use of commonly-owned WOIW-LD, Lima, OH (Fac. ID 74373) during the period between the Phase 2 Completion Date (April 12, 2019) and the completion of WTLW’s post-transition low VHF facilities.¹ Licensee separately filed a request to extend WTLW’s construction permit for an additional 180 days due to delays beyond Licensee’s control in the manufacture and delivery of WTLW’s low VHF antenna.²

Licensee submitted a successful bid in the broadcast television incentive auction for WTLW to move from UHF channel 44 to VHF channel 4. The FCC assigned WTLW to transition phase two with a phase completion date of April 12, 2019. On October 18, 2017, Licensee filed its application for a major modification, which the FCC granted on April 16, 2018. The expiration date for the CP is April 12, 2019 – the phase completion date for phase two. However, Dielectric is not scheduled to deliver WTLW’s post-transition antenna until June 7, 2019.

The FCC has indicated that “in order to facilitate timely construction of new facilities and to minimize any time broadcasters may be off the air,” reassigned stations and band changing stations may request an STA to operate with temporary facilities while they complete construction of their post-auction channel facilities.³ Among the options for a temporary facility is “the temporary joint use of a channel.”⁴

To minimize the disruption for WTLW and its viewers, Licensee is proposing to allow WTLW to temporarily serve as a “guest” station of commonly-owned WOIW-LD. This arrangement, combined with the additional steps described below, will provide continuity to viewers in WTLW’s Lima, Ohio designated market area (DMA 190) and minimize the disruption to WTLW’s viewers outside the Lima DMA.

WTLW’s temporary shared operations on WOIW-LD will have no effect on the overwhelming majority of viewers who watch WTLW over MVPD systems. Licensee delivers WTLW’s signal by fiber to Spectrum, the primary cable provider in the DMA, as well as DirecTV, Dish Network, and TSC Communications, which results in the further distribution of WTLW’s signal via fiber to Arthur Mutual Telephone Company, Benton Ridge Telephone Company, Buckland Telephone Company, Consolidated Electric Cooperative, Fort Jennings Telephone

¹ Although WOIW-LD is currently silent as it transitions to its post-auction facility on Channel 17, *see* File No. 0000059302, Licensee expects WOIW-LD to resume broadcasting on February 10, 2019.

² *See* File No. 0000067516.

³ *Incentive Auction Task Force and Media Bureau Announce Procedures for the Post-Incentive Auction Broadcast Transition*, Public Notice, DA 17-106 ¶ 46 (rel. Jan. 27, 2017) (*citing Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd. 6567 ¶ 584 (2014).

⁴ *Id.* ¶ 47.

Company, Glandorf Telephone Company, Kalida Telephone Company, McClure Telephone Company, New Knoxville Telephone Company, Ottoville Mutual Telephone Company, Ridgeville Telephone Company, Sherwood Mutual Telephone Company, Sycamore Telephone Company, Telephone Service Company, Vaughnsville Telephone Company, Hometown Cable and Wabash Mutual Telephone Company. WOIW-LD's signal also reaches all of the analog cable head ends within the Lima DMA, including the head ends for Hometown Cable, NKTelco, Ottoville Mutual Telephone, Fort Jennings Telephone Company, and Kalida Telephone Company (and Licensee is coordinating with these providers to provide a smooth transition). Accordingly, Licensee anticipates that almost all of the MVPD systems that carry WTLW today will continue to carry WTLW during the transition period.

The attached exhibit compares WOIW-LD's over-the-air contour to the predicted contour of WTLW's post-transition station on VHF channel 4. The map demonstrates that WTLW's temporary operations will cover nearly all of the 59,400 households in the Lima DMA – reaching all of Allen County (where Lima is located) and all but a *de minimis* portion of Putnam and Auglaize counties. Accordingly, Licensee does not expect that its temporarily operations will materially affect over-the-air viewers in the Lima DMA. Although Licensee projects that approximately 700,000 viewers outside the Lima DMA may not receive WTLW's over-the-air signal, many of these viewers do not receive WTLW's signal on channel 44 and will only gain access to WTLW's signal when it begins broadcasting on channel 4. To further minimize the effect of the temporary transition on WTLW's over-the-air viewership, Licensee plans to simulcast WTLW's programming on recently acquired WNHO-LP, which is scheduled to move to its new digital channel by April 30. This could add service to approximately 50,000 additional viewers in Paulding, Henry, Defiance, Van Wert and Putnam counties during the transition period.

Licensee will provide the notices to MVPDs and viewers, as required under the Commission's rules. Additionally, although not required by the rules, Licensee intends to: (1) broadcast on-air notifications regarding the need to rescan a minimum of ten times per day from March 12, 2019 through April 12, 2019; (2) send a news release to newspapers within WTLW's over-the-air contour, including The Lima News, Van Wert Times Bulletin, Findlay Courier, Wapakoneta Daily News, Celina Daily Standard, Putnam County Sentinel, Kenton Times, St Marys Evening Leader, Paulding Progress, Defiance Crescent-News, Spencerville Journal News, and Delphos Herald; and (3) send a written notification to all viewers who have provided financial support to Licensee (a 501(c)(3) organization), including an offer of assistance by telephone or in person for supporters who receive WTLW using an antenna.

Although Licensee recognizes that these efforts may not eliminate the disruption to all viewers during the transition period, it estimates that the number of potential viewers who actually lose access to WTLW's signal will be relatively modest. Given the alternative of going silent until WTLW's antenna becomes operative, Licensee proffers that a grant of the instant Engineering STA is in the public interest.

American Christian Television Services, Inc.
WTLW(TV), Lima, OH (Fac. ID 1222)
Engineering STA

For the foregoing reasons, Licensee respectfully requests a grant of the instant Engineering STA.