

WAIVER REQUEST
Renard Communications Corp.
April, 2019

Renard Communications Corp. (“RCC”), licensee of WONO-CD, Syracuse, NY (Fac. ID 14315) holds a Construction Permit to change its output channel to channel 24 as part of the Commission’s repack initiative for television stations.

As a result of station WPXJ-TV, Batavia, NY (Fac. ID 2325) having recently requested relocation of its facilities (LMS0000064525) to a site much farther away from WONO-CD, RCC hereby requests a waiver of Section 73.3517 of the Rules such that the application herein may be accepted for filing prior to the grant of the requested facilities by WPXJ-TV.

Good cause is stated for the waiver request in that it would allow WONO-CD to minimize any delay in construction on its new channel, which is scheduled for Phase 8. Once the WPXJ-TV application is granted and presumably constructed, the facilities requested herein would allow WONO-CD to maximize its coverage through the use of a non-directional antenna. While contingent applications are not normally accepted by the Commission, the television channel repacking process is unique and the waiver request herein would allow for the smoothest transition for WONO-CD. Further, it would benefit the general public in providing the most efficient use of WONO-CD’s post-repack channel.

If the Commission is able to grant the modification application for WONO-CD prior to the proposed modification for WPXJ-TV, RCC agrees that it will not cause WONO-CD to commence operating with the facilities requested herein until the

modification application is granted for WPXJ-TV which is expected to take place prior to Phase 4, barring any unforeseen delay.