

**NOTIFICATION OF EARLY REDUCTION
OF PRE-TRANSITION DIGITAL SERVICE WITHIN
90 DAYS BEFORE DTV TRANSITION DATE**

On behalf of Young Broadcasting of Davenport, Inc. ("Young"), the licensee of KWQC-TV and KWQC-DT, Davenport, Iowa, (Facility ID No. 6885), the instant filing shall serve as notification that KWQC-DT will permanently reduce its pre-transition digital broadcast service commencing in mid-late December, during the week of December 15, possibly as late as December 19, 2008. This notification is filed pursuant to the Commission's service reduction policy in the *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Report and Order, FCC 07-228 (2007) (the "*Third Order*"), ¶ 133.

In accordance with Paragraph 133 of the *Third Order*, the planned termination date is within 90 days of the February 17, 2009, DTV transition date.

Pursuant to Young's post-transition DTV construction permits in FCC File No. BPCDT-20080313AAV ("DTV CP"), and in accordance with the Commission's final digital table of allotments ("DTV TOA") in *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order, FCC 08-72 (2008), KWQC-DT will operate its post-transition DTV facility on Channel 36. Young's pre-transition DTV channel is Channel 56. Thus, Young's post-transition DTV operation will be on a different channel than its pre-transition operation, and, as discussed below, Young's early reduction of its pre-transition DTV Channel 56 operation is directly related to the construction and operation of its post-transition Channel 36 facility. As such, Young meets the threshold requirement for early reduction of pre-transition digital service established by the *Third Order*.

As Young described in its FCC Form 387 DTV Transition Status Report, the buildout of KWQC-DT's post-transition Channel 36 DTV facility will involve the conversion of the station's digital transmitter from Channel 56 to Channel 36. In other words, Young, following modification, will use the pre-transition Channel 56 DTV transmitter for post-transition Channel 36 DTV operation. As a result, the station must reduce its pre-transition Channel 56 digital operation in mid-late December 2008, so that the manufacturer can begin to perform the channel change, by modifying one of its current DTV transmitter cabinets from Channel 56 to Channel 36 operation. This modification will require the removal of one transmitter amplifier cabinet from the station's current Channel 56 DTV service, leaving the remaining cabinet for continued Channel 56 operation. Clearly, the early reduction of KWQC-DT's pre-transition DTV Channel 56 operation is directly related to the construction and operation of its post-transition Channel 36 facility.

In accordance with the *Third Order*, Young, as of December 11, has commenced viewer notifications on both its NTSC channel and its pre-transition DTV channel to notify its viewers about the early pre-transition digital service reduction and to inform them about how they can continue to receive the station. The viewer notifications provide, in audio and video, substantially the following information:

As part of KWQC-TV's transition from analog to digital the station will temporarily reduce the power and coverage of its digital signal in mid-December. Because of this, viewers watching KWQC's digital signal over the air may no longer be able to receive it.

Young Broadcasting of Davenport, Inc.
KWQC-DT, Davenport, Iowa
Pre-Transition Digital Reduction Notification

These viewers can still watch KWQC by tuning to our analog signal on Channel 6. Viewers may also continue to access KWQC's programming through cable or satellite. More information about the transition to digital is available at KWQC.com or by contacting KWQC directly. [Video only: KWQC.com KWQC TV6, 805 Brady Street, Davenport, IA 52803. (563) 383-7000]

The Station will air a minimum of ten such notifications every day, including at least one in prime time, through December 21, 2008. Beginning on December 22, 2008, the Station will air at least 4 notifications per day, including one in prime time, and will continue to air them through February 17, 2009. In addition to these spots, the Station will also advise viewers of the power reduction in news segments aired between now and the end of the transition.

Significantly, however, these on-air notifications are not the only method by which the Station has communicated or will communicate with the public about the upcoming power reduction. The Station has been notifying and educating the public about the power reduction since September 2008. The Station's Chief Engineer has conducted two seminars since September 2008 at which he discussed the Station's upcoming reduced power operation. In addition, the Station updated its website in October 2008 to include information specifically relating to the upcoming power reduction, including contour maps that show visually the geographic areas that will be affected. While the reduced power operation will result in approximately 50 percent reduction in power, the coverage area affected is far smaller, and only a narrow band of viewers at the outer edge of the signal (and, perhaps, households with marginal antenna systems) will be affected.

The instant notification is being filed with fewer than 30 days left before the anticipated date of service reduction in part because the date on which the station will reduce power is not known with precision, but is anticipated to occur sometime during the week of December 15, possibly as late as December 18. Because of the high demand for vendor services, it is not possible to reschedule this work for a later date. In addition, prior Form 387 reports filed with the Commission and the Station's request for post-transition STA to operate temporarily at reduced power (File No. BDSTA-20080606ABF) made reference to the Station's plan to alter its pre-transition digital transmitter, necessitating a reduction in pre-transition power—thus, the Commission already had notice of the Station's plan. Due to the filing of the STA, the Station conflated its pre-transition and post-transition notification requirements and believed that it had fulfilled all of the regulatory requirements relating to notifying the Commission of its transition plans.¹

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¹ To the extent that a waiver of the 30-day notification requirement is necessary, the Station respectfully requests one, for the reasons cited above.