

**KTSM-DT, El Paso, Texas (Facility ID No. 67760)**  
**DTV “Phase-In” Special Temporary Authority Request**  
**April 2009**

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KTSM-DT, El Paso, Texas (the “Station”), licensed to ComCorp of El Paso License Corp. (“Licensee”) hereby requests Special Temporary Authority (“STA”) to operate its DTV facilities at less than fully authorized post-transition power from June 12, 2009 to August 10, 2009.<sup>1</sup> The Station qualifies for a “phased” transition due to a “significant technical impediment” associated with converting its existing analog transmitter to support digital operations.

Licensee must operate the Station briefly at less than the fully authorized post-transition power while completing the conversion of its analog transmitter. The Station already is operating at reduced analog power due to the initial conversion of a portion of its transmitter.<sup>2</sup> Licensee must wait to convert the remaining portions of the Station’s transmitter until after the Station terminates analog service on June 12, 2009. Due to scheduling demands of Licensee’s contract engineers, the final modifications to the transmitter cannot take place until near the end of July. The Commission indicated that it would permit television stations facing such “significant technical impediments” to operate at less than their full, authorized post-transition facilities temporarily until construction is completed.<sup>3</sup> Television stations must demonstrate that the station (1) in fact is encountering a “significant technical impediment”; (2) can reach 100 percent of the population that receives current service; and (3) would not cause impermissible interference.<sup>4</sup>

The Station’s request satisfies this standard. Operations pursuant to this STA request will permit the Station to continue to serve all of the population currently receiving television service while repurposing and converting transmission equipment. The Licensee further certifies that the operations are not predicted to cause impermissible interference to other stations and has no reason to believe that they will prevent other stations from making their transition. Accordingly, Licensee believes that the Station satisfies the Commission’s standards for “phase-in” STA requests.

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<sup>1</sup> Because Licensee will not be implementing full facilities until approximately August 10, 2009, Licensee also hereby requests to the extent necessary an extension of the Station’s DTV construction permit (FCC File No. BPCDT-20080619AEW) to August 10, 2009.

<sup>2</sup> See FCC File No. BLSTA-20081210AEV.

<sup>3</sup> Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion To Digital Television, *Report and Order*, 23 FCC Rcd 2994, ¶ 94 (2007) (“*Third Periodic Review*”).

<sup>4</sup> *Id.*

Licensee seeks STA through August 10, 2009, pursuant to the remaining schedule for implementing the Station's full post-transition facilities:

- **June 12, 2009** Terminate analog and pre-transition DTV operations. Commence broadcasting on DTV Channel 9 at approximately 90% of authorized power pursuant to STA.
- **Late July 2009** Convert remaining analog cabinet to digital. Conduct proof of performance. This work will require approximately one week due to time required to travel to the transmitter site.
- **Early August 2009** **IMPLEMENT FULL POST-TRANSITION OPERATIONS.**

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