

**WJAR(TV), Providence, Rhode Island (Facility ID No. 50780)**  
**DTV “Phase-In” Special Temporary Authority Request**  
**December 2008**

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WJAR(TV), Providence, Rhode Island (the “Station”), licensed to Media General Communications Holdings, LLC (“Licensee”) hereby requests Special Temporary Authority (“STA”) to continue existing DTV service between February 18, 2009 and June 1, 2009.<sup>1</sup> The Station qualifies for “phased-in” service due to “unique technical challenges” associated with replacement of its top-mounted analog antenna with a new digital antenna.

The Station currently operates with a side-mounted DTV antenna, and its construction permit for post-transition facilities authorizes the replacement of the top-mounted analog antenna with a new digital antenna. The Commission indicated that it would permit television stations facing such “unique technical challenges” to operate at less than their full, authorized facilities temporarily until construction is completed.<sup>2</sup> A television station must demonstrate that the station (1) in fact is encountering a “unique technical challenge”; (2) can reach 85 percent of the service population; and (3) would not cause impermissible interference.<sup>3</sup>

The Station’s request satisfies this standard. The Commission previously determined that the Station’s antenna issues qualify as a “unique technical challenge” and accordingly extended the Station’s DTV construction deadline to February 17, 2009.<sup>4</sup> Operations pursuant to this STA request will permit the Station to serve all of the same population that receives the Station’s current digital television service and over 100% of the same population that receives the Station’s current analog television service.<sup>5</sup> 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> The current DTV operations are authorized pursuant to BDSTA-20080222ABL. Because Licensee will not be implementing full facilities until June 1, 2009, Licensee also hereby requests to the extent necessary an extension of the Station’s DTV construction permit (FCC File No. BMPCDT-20080317AIB) until June 1, 2009.

<sup>2</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>3</sup> *Id.*

<sup>4</sup> Television Stations Identified as Facing “Unique Technical Challenge” DTV Construction Deadline Modified to February 17, 2009, *Public Notice*, 23 FCC Rcd 10998 (2008).

<sup>5</sup> *Third Periodic Review*, ¶ 94. Because all current viewers will continue to be served, viewer notifications are not required. *Id.*

Licensee seeks STA through June 1, 2009, pursuant to the remaining schedule for implementing the Station's full post-transition facilities:

- **February 17, 2009** Terminate analog operations on Channel 10. Continue digital operations on Channel 51 pursuant to STA.
- **May 1, 2009** As permitted by warmer weather, commence removal of top-mounted analog antenna and replace with post-transition DTV antenna.
- **June 1, 2009** Complete installation of top-mounted DTV antenna and construction of full post-transition facility. **IMPLEMENT FULL POST-TRANSITION OPERATIONS.**

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