

WGHP(TV), High Point, North Carolina (Facility ID No. 72106)
DTV “Phase-In” Special Temporary Authority Request
December 2008

WGHP(TV), High Point, North Carolina (the “Station”), licensed to Community Television of North Carolina License, LLC (“Licensee”), by its attorneys, hereby requests Special Temporary Authority (“STA”) to utilize a temporary DTV antenna to provide DTV service between February 18, 2009 and March 1, 2009.¹ The Station qualifies for “phased-in” service due to the “unique technical challenge” associated with converting the Station’s current analog transmitter and allow use of its current channel 8 analog antenna for post-transition DTV operations.

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.² Television stations 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.³ The Commission has recognized a “unique technical challenge” for stations that face “circumstances in which the operation of a station’s analog service prevents the completion of construction of the station’s full, authorized post-transition facility.”⁴

The Station’s request satisfies this standard. The Station faces a “unique technical challenge” because it must wait for the termination of analog service to reconfigure its antenna and transmitter for post-transition DTV operations. Operations pursuant to this STA request will permit the Station to serve 89% of the 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.⁵ As demonstrated in the attached Technical Exhibit, the proposed operations are not predicted to cause impermissible interference to other stations and Licensee 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.

¹ From February 18, 2009 until March 1, 2009, the Station plans to operate DTV facilities using its current analog auxiliary antenna. *See* Technical Exhibit. Because Licensee is not scheduled to implement full facilities until March 1, 2009, Licensee also hereby requests an extension of the Station’s DTV construction permit (FCC File No. BPCDT-20080311ACD) to March 1, 2009.

² 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*”).

³ *Id.*

⁴ *Third Periodic Review*, at ¶ 53.

⁵ *See* Technical Exhibit, at 2. The Station will provide all necessary viewer notifications. *Third Periodic Review*, at ¶ 94.

Construction Schedule

Licensee's remaining schedule for implementing the Station's full post-transition facilities is as follows:

- **February 17, 2009** Terminate analog operations on Channel 8. Terminate Channel 35 digital operations. Commence digital operations on Channel 8 using temporary DTV antenna.
- **February 2009** Convert main analog transmitter to digital operations.
- **March 1, 2009** Terminate operations on Channel 8 temporary DTV antenna. Commence digital operations on Channel 8 using main DTV antenna and transmitter. **IMPLEMENT FULL POST-TRANSITION OPERATIONS.**

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