

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

On behalf of Young Broadcasting of Lansing, Inc. ("Young"), the licensee of WLNS-TV and WLNS-DT, Lansing, MI, (Facility ID No. 74420), the instant filing shall serve as notification that WLNS-DT will permanently reduce its pre-transition digital broadcast service commencing on or around January 5, 2009. 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 Nos. BPCDT-20080313ABL ("Initial DTV CP") and BMPCDT-20080618AEA ("Maximized 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), WLNS-DT will operate its post-transition DTV facility on Channel 36. Young's pre-transition DTV channel is Channel 59. 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 59 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 WLNS-DT's post-transition Channel 36 DTV facility will involve the conversion of the station's digital transmitter from Channel 59 to Channel 36. In other words, Young, following modification, will use the pre-transition Channel 59 DTV transmitter for post-transition Channel 36 DTV operation. As a result, the station must reduce its pre-transition Channel 59 digital operation on or around January 5, 2009, so that the manufacturer can begin to perform the channel change, by modifying one of its current DTV transmitter cabinets from Channel 59 to Channel 36 operation. This modification will require the removal of one transmitter amplifier cabinet from the station's current Channel 59 DTV service, leaving the remaining cabinet for continued Channel 59 operation. Clearly, the early reduction of WLNS-DT's pre-transition DTV Channel 59 operation is directly related to the construction and operation of its post-transition Channel 36 facility.

In accordance with the *Third Order*, Young has already 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 substantially the following information both visually and via audio:

As part of WLNS-TV's transition from analog to digital broadcasting, on or around January 5, 2009, the station, which is licensed to Lansing, Michigan, will temporarily reduce the power and coverage of its digital signal. This is necessary so the station can

Young Broadcasting of Lansing, Inc.
WLNS-DT, Lansing, MI
Pre-Transition Digital Reduction Notification

continue construction of its digital facility. Because of this reduced power, some viewers who have been watching WLNS's digital signal over the air may no longer be able to see it after January 5th. These viewers can still watch WLNS over the air by tuning to Channel 6 and watching the station's analog signal until February 18 when all stations will transition to digital broadcasting. Viewers may also access WLNS's programming by subscribing to a cable or satellite television service. WLNS's digital signal will not resume full power and coverage until several weeks after February 18. More information about the transition to digital broadcasting is available at www.wlns.com and www.dtv2009.gov or by calling 1-888-DTV-2009. You may also get information by contacting WLNS-TV at 2820 East Saginaw, Lansing, MI, by calling us at 517-372-8282 or emailing us at DTV@wlns.com.

The Station has scheduled a minimum of five such notifications every day, including at least one in prime time. 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 vendor is scheduled to arrive was only recently firmed up. 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-20080606ADN) 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.