

February 24, 2009

FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Attention: Media Bureau, Video Services Division

Re: Request for Special Temporary Authority by Superstation, Inc. to Operate WPCH-DT at Reduced Power

Dear Ms. Dortch:

Pursuant to Sections 73.1560(d) and 73.1635 of the Commission's rules, Superstation, Inc. ("Superstation"), requests Special Temporary Authorization ("STA") to operate digital television station WPCH-DT, Channel 20, Facility ID 64033, Atlanta, Georgia ("WPCH-DT") at reduced power for a period of 120 days, effective March 5, 2009.

On February 3, 2009, WPCH-DT encountered transmitter problems caused by the failure of one of its three transmission tubes. This resulted in a reduction in the station's effective radiated power to 666.7 kW from its authorized 1000 kW. On February 10, 2009, Superstation, in accordance with Section 73.1560(d) of the Commission's rules, notified the Commission of the reduced power operations and indicated that it would apply for an STA if corrective measures could not be completed within the 30 days that Section 73.1560(d) of the rules permit WPCH-DT to operate with reduced power without STA.

It now appears that WPCH-DT will operate at reduced power for more than the 30 days envisioned by Section 73.1560(d) of the rules. Accordingly, STA is requested to operate at reduced power for 120 days beyond the 30 day period (*i.e.* from March 5 to July 2, 2009). When WPCH-DT initially encountered transmission tube problems, it planned to replace the damaged tube with one from its analog facility, WPCH-TV. That replacement would have occurred shortly after the originally planned shutdown of analog transmissions on February 17, 2009 and before the 30 day period prescribed by rule section 73.1560(d).

However, as the Commission is aware, Superstation elected to continue analog transmissions until the new transition deadline of June 12, 2009. Accordingly, the replacement tube will not be available for use until June 13, 2009 and it will require several days to remove the tube from the analog transmitter and install it in the digital transmitter. Accordingly, Superstation will not be able to operate WPCH-DT at full power until approximately July 2, 2009.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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It would be inefficient and cost-prohibitive to purchase a new transmission tube at a price of \$50,000-\$70,000 for this brief period when a replacement tube would be available at no cost in less than 120 days. In addition, as the attached Coverage Contour Maps prepared by Cavell, Mertz & Associates indicates, there will be only a small diminution in the WPCH-DT service area through the use of only two of the three transmission tubes. Moreover, the coverage contour for WPCH-DT continues to exceed the Grade B contour for WPCH-TV, the station's analog signal.

Accordingly, Superstation requests STA to operate WPCH-DT at its currently reduced power for a period of 120 days, from the time the 30-day timeframe under Section 73.1560(d) expires on March 5, 2009 until July 2, 2009. This brief STA will allow Superstation to transition its analog operations to digital in a smooth manner and make the most efficient use of limited and costly resources, while not materially decreasing service to the public.

Once Superstation has restored full power to WPCH-DT, it will notify the Commission. Please address any questions regarding this STA request to the undersigned.

Sincerely,

/s/ Russell H. Fox

Russell H. Fox
Christopher R. Bjornson
Counsel for Superstation, Inc.

Attachment

