

Request for Waiver of Section 73.622(f)

KWWL Television, Inc. (“Licensee”), the licensee of television station KWWL, Waterloo, Iowa (Fac. ID No. 593) (“KWWL” or “Station”), hereby amends the instant FCC 301 modification application (FCC File No. BMPCDT-20090409AEB) (“Modification Application”) to request that the Commission waive Section 73.622(f) of the Commission’s rules and grant the Modification Application.

Pursuant to the Commission’s grant on October 7, 2009 of experimental authority to operate KWWL at variance from the Station’s currently authorized facilities¹ with the experimental facilities authorized in STA File No. BDSTA-20090922AAJ, the Station commenced operations with an effective radiated power (“ERP”) of 49 kW at the currently authorized antenna height above average terrain (“HAAT”) of 601 meters in an effort to resolve VHF reception issues (widespread indoor antenna and some outdoor antenna reception issues). *See* Request for STA for details about the Station’s VHF reception issues. Operation of KWWL with the experimental facilities resolved the Station’s reception issues. Considering that the experiment was premised on the Station’s inability to provide reliable reception in core market areas based on its currently authorized ERP of 30 kW, the Station did not receive any reception complaints once operation at increased power commenced. Accordingly, the required report on Field Strength Measurements taken before and after the requested power increase is attached.

As the facilities proposed in the Modification Application exceed the power and antenna height limits set forth in the FCC’s rules, the Licensee hereby respectfully requests that the Commission waive Section 73.622(f) of the Commission’s rules and grant the Modification Application. An interference analysis was conducted using the FCC - TV interference and spacing analysis program and the results demonstrate that the proposed facilities will meet the post-transition interference protection provisions of Section 73.616 of the FCC’s rules (a copy of the analysis will be furnished to the FCC upon request). As demonstrated in the Field Strength Measurements Report, the grant of the Modification Application will serve the public interest because it will permit the Licensee to alleviate the VHF reception problems that had been experienced by many of KWWL’s viewers.

¹ Construction Permit File No. BMPCDT-20080619ADP, currently subject to a pending application for a license to cover (FCC File No. BLCDDT-20090513AFN).