

STA Exhibit

WJCL(TV), Savannah, Georgia (Facility ID No. 37174) (“WJCL”), currently provides analog service on channel 22 and pre-transition digital service on channel 23. In the channel election process, WJCL opted to return to channel 22 following the DTV transition. WJCL currently faces a February 17, 2009 deadline to complete the construction of its post-transition channel 22 facilities.

As described in its Form 387 DTV Transition Status Reports, WJCL will be repurposing much of its analog transmission equipment for post-transition digital operations, and only minor equipment modifications are required to complete the station’s transition. *See, e.g.,* BDTUCT-20081020AQG. In modifying its analog transmission equipment, WJCL must add a mask filter that is designed for DTV operations on channel 22. While WJCL expected that it could acquire the filter in time to complete its DTV transition by February 17, 2009, the filter’s manufacturer is facing a significant backlog. WJCL anticipates that it will complete construction of its post-transition facilities within six months of terminating analog service on February 17, 2009.

Because it will not be able to commence post-transition digital operations on channel 22 on February 17, 2009, WJCL seeks special temporary authorization (“STA”) for temporary use of its in-core pre-transition DTV channel for a period of time after February 17, 2009. As demonstrated in WJCL’s comprehensive Engineering Statement, this request for STA satisfies the dual criteria set forth in paragraph 92 of the Commission’s *Report & Order*, MB Docket No. 07-91, FCC 07-228 (rel. Dec. 31, 2007) (the “Order”). First, the proposed post-transition operation of WJCL’s channel 23 facilities will provide service to 100% of the population receiving its pre-transition digital service and to 105.7% of the population currently receiving analog service. Second, post-transition operation on channel 23 is not predicted to cause more than 0.5% interference to other stations.

The instant proposal will neither impede other stations’ DTV transitions through harmful interference nor result in a loss of service to WJCL’s existing viewers. Accordingly, WJCL respectfully requests that the Commission grant STA for temporary, post-transition use of its channel 23 digital facilities.