

EMERGENCY REQUEST FOR STA – EXPEDITED PROCESSING REQUESTED

WFFF-DT (Burlington, Vermont) (Facility ID No. 10132)

Smith Media License Holdings, LLC (“Smith”), permittee of the above-referenced digital television station (“Station”), pursuant to Section 73.1635 of the Commission’s rules, hereby respectfully requests **Emergency Special Temporary Authority** (“STA”) to commence DTV operations with parameters at variance from the Station’s construction permit (FCC File No. BPCDT-19991029ABX).

Due to past environmental and legal challenges, Burlington is one of the last markets in the country to receive digital service. Television stations in Burlington are constructing digital facilities on Mt. Mansfield, but access to the site will be closed for winter in the next few days. Smith anticipated it would complete construction of the authorized facilities before the winter closure, but inclement weather has not rendered that possible. Instead crews are rigging up temporary operations for the Station so that Smith at least can commence digital service and operate over the winter. Smith would complete and implement the facilities authorized in the construction permit when the site can be accessed in the Spring.

The facilities requested herein comply with the FCC’s rules, including with the FCC’s minimum initial build-out requirements, FAA and FCC tower requirements, the FCC’s community of license coverage requirement, and the FCC’s environmental rules governing radio frequency (“RF”) radiation. The station’s proposed coverage does not exceed that resulting from the allotted parameters in Appendix B (DTV Table of Allotments) of the *Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders* or the parameters in the above-referenced construction permit.

Grant of emergency STA would serve the public interest by allowing the commencement of digital service to the Station’s community of license before access to the site is closed for Winter. In the unlikely event that unacceptable interference is caused, Smith is willing to take all reasonable steps to eliminate such prohibited interference, including modifying operating parameters or ceasing operation, if necessary. Smith understands that grant of STA does not provide any permanent authority to operate the Station in the manner proposed.