

K40GC
Facility ID No. 48557
Dora, New Mexico
LIN of New Mexico, LLC
Request for Extension of Existing Engineering STA
January 2008

Exhibit 37
Reasons for Extension of STA to Use Channel 69

Television translator station K40GC, Dora, New Mexico, is licensed to provide television service to the Dora area on channel 40 and, in addition, provides a signal to another translator licensed to LIN of New Mexico – K49BY, Clovis, New Mexico.

As described in the initial request for an Engineering STA, another translator station in Clovis, K41JI, began operations early in 2006 on channel 41. Its signal prevents reception by K49BY of the signal from K40GC on channel 40. This STA permitted K40GC to move back to channel 69, on which it previously operated, a channel from which its signal can be received by K49BY.

LIN of New Mexico applied for a construction permit to move K49BY to a different location from which it will be able to receive a signal on channel 40 from Dora. FCC File No. BPTT-20060331ATP. That application was granted on June 14, 2006.

Construction of that facility has been delayed. Other translator stations which were planning to share the facility have changed their plans, resulting in substantially increased costs for LIN of New Mexico. Further, given the upcoming end of the transition to digital television, construction of a new analog facility for the Clovis station would be inefficient for the limited time that it would operate.¹ Since the Commission has granted a flash-cut authorization for

¹ For similar reasons, the Commission will allow full-power stations that have not completed construction of transitional DTV facilities now to construct only their post-transition

K49BY (FCC File No. BDFCDTT-2006033AUT (granted June 23, 2006)), LIN of New Mexico now expects to construct the digital facility for K49BY at the new location during 2008, allowing K40GC to move off of channel 69 before February 17, 2009, when that channel will be allocated on a primary basis to another service. Until construction of the new facility is completed, it will be necessary to continue operating K40GC on channel 69 to ensure television service to the Clovis area.

Grant of this extension, therefore, would serve the public interest by preserving television service to Clovis.

facilities. Report and Order, *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 07-91 (rel. Dec. 31, 2007) ¶ 43.