

Request for Special Temporary Authority

WKMG-TV/DT, Orlando, Florida

WKMG-TV/DT, Orlando, Florida (the “Station”) respectfully requests special temporary authority (“STA”) to operate simultaneously the station’s pre-transition DTV facilities on channel 58 and post-transition DTV facilities on channel 26 for a limited period of time.

In a concurrently filed STA request, the Station is seeking authority to commence early operations of the Station’s post-transition facilities. As stated in that STA request, the Station seeks to commence limited digital operations on channel 26 as soon as possible using the Station’s auxiliary antenna. Channel 58 digital operations would cease on or around March 2 in order to permit reconfiguration of the Channel 58 antenna for use on Channel 26. It is anticipated that full power Channel 26 operations would commence on or around March 5.

The public interest would be served by permitting continued operation of the Channel 58 facility for the limited period of time during which the Station’s channel 26 digital operations are conducted using the low-power auxiliary antenna. Simultaneous operations through early March will facilitate the digital transition by easing equipment reconfiguration and ensuring that both over-the-air viewers and subscribers of multichannel video programming providers (“MVPDs”) can transition to the full power channel 26 service without any interruption in digital service.

The Station is seeking in particular to minimize disruption to subscribers of MVPDs and satellite master antenna (“SMATV”) systems, including the disproportionately high population in the Orlando area of senior citizens living alone or in multiple dwelling units. Based on its coordination with MVPDs and operators of SMATV systems, the Station understands that it may not be possible for all such operators to retune their receiving equipment concurrently with the Station’s switch from digital channel 58 to digital channel 26. For example, SMATV operators may be required to visit multiple sites in the Orlando area to complete the retuning. Making these changes either before or after the Station switches digital channels will result in an interruption in service.

The Station already has begun airing viewer notifications and advising viewers of the need to re-scan their receivers after digital stations change channels. The Station intends to continue such notifications after this application is granted and, several days before the anticipated March 2 termination of pre-transition digital operations on channel 58, it anticipates that channel 58 operations would consist entirely of “nightlight”-like programming and information about the need to re-scan receivers. The Station clarifies that it intends to continue regular analog broadcasts (on channel 6) after it switches to its final DTV channel on or around March 5.

Recognizing the importance of avoiding this sort of disruption, the Commission previously has granted authorization to operate simultaneously pre- and post-transition facilities for a limited period, particularly when such simultaneous operation is necessary to allow MVPDs

to modify their reception equipment and to avoid loss of service to MVPD subscribers.¹ For these reasons, the public interest would be served by a grant of this application.

¹ See *Alabama Broadcasting Partners Request for Early Transition and Phased Transition Relief For Station WAKA-DT Selma, AL*, 23 FCC Rcd 17705 (rel. Nov. 25, 2008).