

Request for Special Temporary Authorization for Early DTV Transition and Reduced Power Operations

Georgia Public Telecommunications Commission (“GPTC”) hereby seeks authority for Station WABW-TV to make an early transition to its post-transition Channel 6 on February 18, 2009 and to operate at reduced power for a limited period of time until tower work is completed. This request is directly related to construction and operation of Station WABW-DT’s post-transition facilities. GPTC requests that the Media Bureau expedite this application.

As GPTC explained in its October 2008 update to Station WABW-DT’s DTV transition status report, Station WABW-DT has a construction permit for maximized post-transition digital facilities to change from a side-mounted directional antenna to a top-mounted omnidirectional antenna. (File No. BMPEDT-2008619AKP). GPTC has scheduled the tower work to remove the top-mounted analog antenna and install the top-mounted DTV omnidirectional antenna to commence on February 23, 2009.

In light of the DTV transition date being extended until June 12th, and because its analog facilities are in poor shape, GPTC plans to terminate the analog operations of Station WABW-TV on February 17th in order to maintain the current schedule for tower work. GPTC believes that it will be difficult to reschedule the work in a timely manner given the demands for tower work associated with the transition.

GPTC currently estimates that it will take approximately six weeks from the start of the tower work, scheduled to begin on February 23rd, to install the new top-mounted omnidirectional antenna. During this short period while the tower work is underway, GPTC seeks authority to operate Station WABW-DT on its post-transition Channel 6 from a side-mounted directional antenna at reduced power. The parameters of the temporary facilities are set forth in the attached engineering statement of Kessler & Gehman. As demonstrated in the engineering statement, these proposed operations will not result in impermissible interference to any analog or pre-transition DTV operations. Once the tower work is completed in early April, GPTC plans to commence full, authorized post-transition operations on Channel 6.¹

As demonstrated in the engineering statement, the proposed reduced power facilities will maintain at least Station WABW-DT’s current digital service and, thus, will not result in a loss of the station’s pre-transition digital service. There will be a temporary loss of service compared to the analog service when Station WABW-DT transitions to Channel 6 at reduced power for the limited period of construction. However, surrounding stations operated by GPTC will continue to provide digital service to most, if not all, of the viewers in Georgia. Since Station WFSU-TV, Tallahassee, is a PBS member, the residents of Florida will also continue to receive local public television service. Moreover, after construction of the final Channel 6 facilities is completed,

¹ Upon completion of the tower work, GPTC will file a request to modify the STA in order to operate Station WABW-DT’s fully authorized post-transition facilities before June 12th.

GPTC will operate Station WABW-DT from its fully authorized Channel 6 facilities, which will cover a larger service area than either the analog or pre-transition DTV channel.²

Grant of this request will serve the public interest by enabling GPTC to complete construction of Station WABW-DT's final post-transition facilities.

² To the extent necessary, GPTC hereby seeks a waiver of the requirement that Station WABW-DT's early transition will not result in a loss of analog service.