

**WJHL-TV, Johnson City, Tennessee (Facility ID No. 57826)**  
**DTV “Phase-In” Special Temporary Authority Request**  
**January 2009**

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WJHL-TV, Johnson City, Tennessee (the “Station”), licensed to Media General Communications Holdings, LLC (“Licensee”) hereby requests Special Temporary Authority (“STA”) to use the Station’s existing analog antenna to provide DTV service between February 17, 2009 and May 29, 2009.<sup>1</sup> The Station qualifies for “phased” service due to a “unique technical challenge” associated with replacement of its top-mounted analog antenna with a new DTV antenna.

The Station’s request for a “phased” transition is unexpected. As reflected recently in the Station’s October 2008 Transition Status Report,<sup>2</sup> the Station anticipated timely completion of full post-transition facilities, with tower crews scheduled in November to complete installation of the new antenna. Unfortunately, inclement weather arrived earlier than expected in November, preventing the tower crew from completing installation at that time. Scheduling and weather issues continue to prevent timely construction, so the Station has been forced to reschedule the tower crew, who has availability in May.

Given that construction now will not be complete until May, the Station wishes to operate until that time using the existing analog Channel 11 antenna. The Commission indicated that it would permit television stations facing the “unique technical challenge” associated with the installation and arrangement of new antennas to operate at less than their full, authorized post-transition facilities temporarily until construction is completed.<sup>3</sup> Under such provisions, a television station must demonstrate that it (1) in fact is encountering a “unique technical challenge”; (2) can reach 85 percent of the service population; and (3) would not cause impermissible interference.<sup>4</sup>

The Station’s request satisfies this standard. The Commission explicitly has determined that, as with the Station, the replacement of top-mounted antennas qualifies as a “unique technical challenge.”<sup>5</sup> Operations pursuant to this STA request will permit the Station to continue to serve all of the population currently receiving the Station’s analog television service and approximately 98% of the population currently receiving the Station’s digital television

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<sup>1</sup> Because Licensee will not be implementing full facilities until May 29, 2009, Licensee also hereby requests to the extent necessary an extension of the Station’s DTV construction permit (FCC File No. BPCDT-20080410AAV) to May 29, 2009.

<sup>2</sup> See FCC File No. BDTUCT-20081020AMT.

<sup>3</sup> Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion To Digital Television, *Report and Order*, 23 FCC Rcd 2994, ¶ 94 (rel. Dec. 31, 2007) (“*Third Periodic Review*”).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*, ¶ 53.

service. Licensee will provide all required viewer notifications.<sup>6</sup> Licensee further certifies that the operations are not predicted to cause impermissible interference to other stations and has no reason to believe that they will prevent other stations from making their transition.<sup>7</sup> Accordingly, Licensee believes that the Station satisfies the Commission’s standards for “phase-in” STA requests.

Licensee accordingly seeks STA through May 29, 2009, pursuant to the remaining schedule for implementing the Station’s full post-transition facilities.

- **February 17, 2009** Terminate analog operations on Channel 11. Terminate pre-transition DTV operations on Channel 58. Commence DTV operations on Channel 11 pursuant to STA.
- **May 2009** Tower crews remove existing Channel 11 antenna and install new DTV antenna. Reconnect transmission line to new DTV antenna. Construction will occur at nighttime while operating from a low power, side-mounted standby antenna.
- **May 29, 2009** **IMPLEMENT FULL POST-TRANSITION OPERATIONS.**

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<sup>6</sup> *Id.*, ¶ 91 (requiring viewer notifications on a station’s pre-transition channels at least four times per day, including once in primetime each day, for the 30 days prior to the termination of analog service).

<sup>7</sup> *Id.*, ¶ 94.