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June 30, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 03-15
WJAC-DT, Johnstown, Pennsylvania (Facility ID No. 73120)
FCC File No. BPCDT-20040305ABL
Request for Waiver of July 1, 2005 Replication/Maximization Deadline

Dear Ms. Dortch:

As a precautionary measure, WPXI-TV Holdings, Inc. ("WPXI"), permittee of television station WJAC-DT (Johnstown, Pennsylvania) (the "Station"), by its attorneys, hereby requests waiver of the Commission's July 1, 2005 replication/maximization interference protection deadline. WPXI's current construction permit for WJAC-DT does not expire until November 18, 2005 (FCC File No. BPCDT-20040305ABL).

In its *Second DTV Periodic Review Report and Order*,[1] the Commission adopted replication/maximization interference protection deadline for DTV licensees. Stations affiliated with the top-four networks in the top 100-ranked designated market areas that held construction permits with deadlines extending beyond July 1, 2005 were required to implement replication or maximization facilities by the expiration date specified in their construction permit.[2] On May 18, 2005, the Commission granted WPXI a construction permit for WJAC-DT with an expiration date of November 18, 2005. On June 15, 2005, the Commission released a Public Notice explaining, among other things, that any station with a construction permit expiring after July 1 automatically would have its replication maximization deadline extended to the expiration date of its construction permit.[3] In an abundance of caution, however, and to the extent

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1 Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, *Report and Order*, 19 FCC Rcd 18279 (rel. Sept. 7, 2004).

2 *Id.*, ¶¶ 78, 84.

3 *Public Notice*, DTV Channel Election Issues – Compliance with the July 1, 2005 Replication Maximization Interference Protection deadline; Stations Seeking Extension of the Deadline, DA 05-1636 (rel. June 15, 2005).

necessary, WPXI respectfully requests that the Commission waive the July 1, 2005 interference protection deadline for WJAC-DT until and through the expiration of the Station's construction permit.

Please contact me if you have any questions about this matter.

Respectfully submitted,

Scott S. Patrick

cc: Shaun Maher (FCC)