



NBC Telemundo License Co.  
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July 1, 2005

*VIA HAND DELIVERY*

The Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: NBC Telemundo License Co.  
Request for Waiver of Interference Protection Deadline  
MB Docket No. 03-15  
WJAR-DT, Providence, RI; Facility ID No. 50780**

Dear Madam Secretary:

NBC Telemundo License Co. (“NBC”), licensee of the above-referenced permitted digital television facility WJAR-DT, Providence, Rhode Island (“WJAR-DT”), hereby respectfully submits this request for a waiver of the July 1, 2005 replication/maximization interference protection deadline for WJAR-DT.<sup>1</sup>

NBC is operating WJAR-DT on DTV Channel 51 under a grant of Special Temporary Authority (“STA”). *See* FCC File No. BEDSTA-20041108ACD. Although NBC intends to remain on Channel 51 post-transition, NBC is unable to complete construction of WJAR-DT’s outstanding construction permit, *see* FCC File No. BEPCDT- 20030604AAV (the “WJAR-DT Permit”) for unavoidable technical reasons. *See Notice* at 2. In order to comply with the WJAR-DT Permit or WJAR-DT’s allotted replication facilities, NBC must relocate WJAR-DT’s antenna very near or at the top of its digital antenna tower. At present, however, the relevant antenna location is occupied by WJAR-TV’s analog antenna, and NBC is not able to exchange the location of the two antennas without adversely affecting WJAR-TV’s analog coverage.

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<sup>1</sup> *See* 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 (June 15, 2005). NBC is the licensee of 14 stations affiliated with a top-four network. Of these, NBC is submitting additional information or requesting further Commission action with respect to five: WNBC-DT, New York, New York; KNBC-DT, Los Angeles, California; WCMH-DT, Columbus, Ohio; WVTM-DT, Birmingham, Alabama; and WJAR-DT, Providence, Rhode Island. NBC’s other stations are not subject to the July 1, 2005, deadline.

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In light of these circumstances, NBC recently has filed to modify WJAR-DT's outstanding STA to enable WJAR-DT to increase the facility's effective radiated power from 526 kW to 1000 kW. A copy of that STA is attached. Upon grant of the modified STA, WJAR-DT will serve at least 100 percent of the number of viewers served by the 1997 facility upon which WJAR-DT's replication coverage was based, but will not quite serve 100% of WJAR-DT's projected digital population. Specifically, pursuant to the modified STA, WJAR-DT will serve 108% of its authorized analog population and nearly 100% -- 92.2% -- of its projected digital population. (Accordingly, NBC will serve more than 100% of the averaged analog and digital populations.)

NBC has explored other means to maximize the facility's digital coverage area that would not require disruption to the Station's analog service, but none has proven feasible at this time. WJAR-DT's current digital antenna is being shared by WLNE-DT, New Bedford, Massachusetts, so any change (including using a nondirectional pattern or a change in height in that shared antenna) would adversely affect the digital service of WLNE-DT, which is not authorized to use an omnidirectional antenna. Other re-design efforts have not been workable because of the aged state of the tower, as the resulting load on the tower appears to be more than the tower can safely withstand. By increasing WJAR-DT's effective radiated power to 1000 kW pursuant to the proposed modified STA, WJAR-DT is projected to serve nearly the entire service area of the permitted facility, except for areas over the Atlantic Ocean, limited (albeit heavily populated) areas north of Boston and limited areas far outside the Station's DMA in central Massachusetts, Connecticut and on Cape Cod. The modified STA would enable digital coverage to encompass all counties of the Providence-New Bedford DMA, including Providence, Kent, Washington, Newport, Bristol (RI) and Bristol (MA) counties, as well as areas immediately outside the market in Massachusetts and Connecticut. *See* attached map.

Upon termination of analog service, NBC will be able to remove the analog antenna and complete permitted construction. Accordingly, NBC hereby requests an extension of time of the July 1, 2005, replication/maximization deadline, both to allow for grant of the modified STA and to preserve WJAR-DT's replication contour until such time as it is possible to re-locate the station's digital antenna.

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Please communicate with the undersigned with respect to this request.

Respectfully submitted,

**NBC TELEMUNDO LICENSE CO.**

By:   
F. William LeBeau

Its Assistant Secretary and Senior  
Regulatory Counsel

cc: Shaun Maher, Video Division  
Station's Public Inspection File