

MIDLEN LAW CENTER
7618 LYNN
CHEVY CHASE, MD 20815-6043

301-656-3000
FAX: 301-656-8262

john@midlen.com
www.midlen.com

July 3, 2006

Via Courier

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
c/o Natec, Inc.
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Attention: Shaun Maher

Re: MB Docket No. 03-15
Request for Waiver of Interference Protection Deadline
KNLC-DT – St. Louis, MO

Dear Ms. Dortch:

Station KNLC-DT is owned and operated by New Life Evangelistic Center, Inc. (NLEC), a church organized under Missouri law and tax-exempt under the Internal Revenue Code. The station has been operating a digital facility under the STA provisions of the *First DTV Periodic Review MO&O*. NLEC also holds a maximization construction permit for KNLC-DT, as to which construction is nearly complete.

As detailed more fully in a separate Application for Extension of Time to Construct a Digital Television Station (FCC Form 337), filed June 30, 2006, File No. 20060630AGF, NLEC has met with unforeseen circumstances. Its companion analog channel suffered a complete antenna failure. In an effort to make maximum use of limited resources, the decision was made to combine both analog and digital signals in the new digital antenna. Although this required significant redesign of the antenna, it was considered a more prudent option than purchasing a separate analog antenna for the limited time before the end of transition. Even with these complications, NLEC has been able to nearly complete the maximization process. The KNLC-DT engineering staff, along with equipment vendors and contract

service personnel, is preparing to make equipment tests on the *newly built* maximized facility.

During the time KNLC-DT has been providing digital service to its community with its STA facility, the entire area authorized for service under the maximized facility has been protected from interference in accordance with the *First DTV Periodic Review MO&O*. However, as of July 1, 2006, the *Second DTV Periodic Report and Order* has directed that protection to any areas not yet receiving digital service will end unless a station requests and receives a waiver of this deadline.

NLEC has sought to make wise use of its limited resources and has made large investments to complete this opportunity for expanded service. However, it does not have complete control of vendor and contract schedules and many of these suppliers are dealing with multiple stations in similar circumstances to KNLC. In addition, there was no way for NLEC to anticipate the failure of its analog antenna. Therefore, NLEC requests an extension of the interference protection deadline for six months while work is completed on the maximized facility.

NLEC certifies that neither it nor any other party to this request is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of 'party to the request' as used in this certification.

Very truly yours,

John H. Midlen, Jr.
Counsel to New Life Evangelistic Center,

Inc.

cc: Shaun Maher