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July 6, 2006

**BY ELECTRONIC FILING (ECFS)**

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, D.C. 20554

Attention: Video Division, Media Bureau

Re: MB Docket 03-15  
Request for Extension of Digital Replication Deadline  
WDBD-DT, Facility ID No. 71326  
FRN: 0008-8156-80  
Jackson, Mississippi

Dear Ms. Dortch:

Jackson Television, LLC ("Jackson Television"), licensee of WDBD(TV) and permittee of WDBD-DT, Jackson, Mississippi, hereby respectfully requests a waiver of the July 1, 2006, deadline by which stations that received a tentative digital channel designation on their current digital channel in the channel election process must construct full, authorized facilities or lose interference protection ("Replication Deadline").

Jackson Television's full-power digital facilities have been constructed in part, but it has been prevented from completing maximized facilities due to severe financial constraints. Jackson Television did not acquire the license for WDBD(TV) until September 30, 2003. In the two-and-three-quarters years that Jackson Television has been the licensee, it has suffered continuing losses which have precluded it from completing construction of full power DTV facilities to date.

Jackson Television is anxious to move forward with final completion of its full-power DTV facilities, but it has simply been unable to do so. When Jackson Television acquired the station, WDBD-DT was operating pursuant to Special Temporary Authority, and Jackson Television has maintained that operation. The antenna, transmission line, and combiner to be

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used for the full-power operation have been installed and are currently in operation. The only remaining steps needed are the installation and modification of transmitter equipment necessary to allow for full-power operation. Jackson Television has obtained estimates as to the total costs of completing such construction. Copies of those estimates are attached hereto. The total amount that this construction would cost is estimated to be \$367,000. This substantial amount is clearly beyond the ability of Jackson Television to finance.

Since the time that Jackson Television took over the station less than three years ago, it has been unable to turn around the operations of the station sufficiently to generate the funds necessary to finance the capital expenditure that would be required. Rather, it has generated only continuing losses. Indeed, for last year, those losses were almost \$3 million, and the loss for this year, through the end of May 2006, is already approximately \$1.9 million.<sup>1</sup> As these losses clearly preclude self-financing of the construction from the revenues of the station, Jackson Television has sought funds from other sources. Its institutional investor and lenders, however, have refused to allow Jackson Television to borrow any additional funds. Furthermore, provisions of existing loan agreements preclude Jackson Television from taking on additional indebtedness from other sources or further encumbering its assets without the consent of its lenders, which consent has been refused, as stated above. Thus, it is virtually impossible for Jackson Television to obtain financing from any other source.

Jackson Television's financial difficulties with a newly acquired operation have been further exacerbated by WDBD(TV)'s lack of a major network affiliation. Until the beginning of this month, WDBD(TV) was an affiliate of The WB Television Network. As has been well publicized, the operations of that network are coming to an end, with former affiliates left to seek new affiliations with one of two new, start-up networks and no assurance that all stations would necessarily find a new affiliation with either. The period of upheaval and confusion that ensued from the network announcement of the end of its operations additionally complicated Jackson Television's financial situation.

As of the beginning of this month, however, WDBD(TV) has become a Fox network affiliate. It is anticipated that the new affiliation, which restores an affiliation arrangement that had previously existed in the market, will improve the station's financial position substantially. As soon as the station's finances have improved sufficiently to allow for additional borrowing or expenditure by the station, Jackson Television will proceed forward as quickly as possible to complete its full-power digital facilities.

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<sup>1</sup> Detailed Income Statements are omitted from this request as filed in MB Docket 03-15 due to their confidential nature but are attached to the copy provided to the Commission's staff. Confidential treatment of those materials is hereby requested.

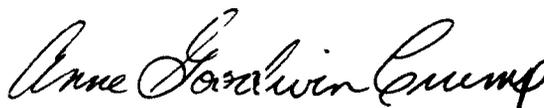
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As indicated by the cost estimates attached hereto, Jackson Television is poised to take that final step. It has selected the equipment that will be necessary, and it has obtained cost estimates for the transmitter and additional equipment. The antenna, line and combiner are already in place and in operation. Thus, substantial progress has already been made toward constructing the facilities authorized by WDBD-DT's outstanding construction permit. Additional time is necessary, however, in order to allow Jackson Television to develop the finances necessary to take the final steps of completing that construction.

For the foregoing reasons, Jackson Television hereby respectfully requests a waiver of the Replication Deadline.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Anne Goodwin Crump  
Counsel for Jackson Television, LLC

Enclosures

cc: Mr. Shaun Maher **By Hand Delivery and E-Mail (Shaun.Maher@fcc.gov)**



**MARSAND, INC.**

Matthew A. Sanderford, Jr., P.E.  
 P.O. Box 485  
 6100 IH-35W (817)783-5566 Phone  
 Alvarado, TX 76009 (817)783-5577 Fax

# Quotation

Date	Number
2/3/2006	1227

Prepared For
WDBD CH 40 Jackson Television, LLC 700 St John Street, Suite 300 Lafayette, LA 70501

P.O. No.	Terms	Project	Reference
	See Terms Below	Digital Upgrade	WDBD

Description	Qty	Rate	Total
WDBD-DT Full Power Digital Build - - separate one amplifier from the analog system and upgrade it to be a digital cabinet with the latest revisions - install a digital control cabinet moving the existing digital exciter out of the low power transmitter and using it in a hot standby setup - install associated RF, water cooling and electrical including a pad for cooling system - commission and proof the transmitter Note: This will bring the digital transmitter up to the most recent revision in production at Thales including the latest firmware and software for control and monitoring. Terms: 50% Down / 40% 45 days ARO / 10% Upon completion	1	367,000.00	367,000.00
<b>Total</b>			5367,000.00

Signature \_\_\_\_\_

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**DECLARATION**

I, D. Wayne Elmore, hereby declare and state as follows:

I am President of Galloway/Elmore Holdings, LLC, sole member of Jackson Television, LLC. I have read the foregoing request for extension of the July 1, 2006, deadline by which stations must construct full, authorized facilities or lose interference protection.

I hereby declare under penalty of perjury that the facts contained therein are true and correct to the best of my knowledge and belief.

Executed this 6<sup>th</sup> day of July, 2006.

  
\_\_\_\_\_  
D. Wayne Elmore  
President, Galloway/Elmore Holdings, LLC,  
sole member of Jackson Television, LLC