

July 6, 2006

**VIA ELECTRONIC FILING**

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

Re: MB Docket No. 03-15  
WRDQ-DT (Orlando, Florida)  
Facility ID No. 55454  
Request for Waiver of July 1, 2006 Replication/Maximization Deadline

Dear Ms. Dortch:

Out of an abundance of caution, WFTV, Inc. (“Cox”), licensee of WRDQ-DT, Orlando, Florida (the “Station”), by its attorneys and pursuant to the Commission’s *Public Notice*,<sup>1</sup> hereby respectfully requests a brief extension of the Commission’s July 1, 2006 replication/maximization interference protection deadline. Cox has filed its license application,<sup>2</sup> but, because the Station operates on Channel 14, the Station’s underlying construction permit does not provide for automatic program test authority. Accordingly, in its application Cox requested authority to commence program tests, but that request remains pending.

Cox believes it satisfies the requirements set forth in the *Public Notice* because it has filed a license application.<sup>3</sup> Nevertheless, if a brief extension of the July 1 deadline is necessary, Cox submits that it satisfies the standards for such a waiver. In its *Second DTV Periodic Review Report and Order*,<sup>4</sup> the Commission adopted a July 1, 2006 replication/maximization

<sup>1</sup> See *DTV Channel Election Issues—Compliance with the July 1, 2006 Replication/Maximization Interference Protection Deadline; Stations Seeking Extension of the Deadline*, Public Notice, DA 06-1255 at 5 (rel. June 14, 2006) (“*Public Notice*”).

<sup>2</sup> See FCC File No. BLCDT20060601AWH.

<sup>3</sup> See *Public Notice* at 3.

<sup>4</sup> 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) (“*Report and Order*”).

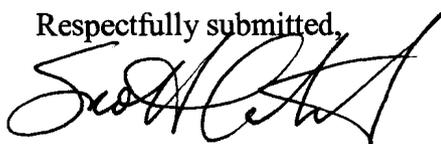
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interference protection deadline for all DTV licensees not subject to the July 1, 2005 deadline. The Commission stated that, in cases where a station was unable to meet the applicable deadline due to "circumstances beyond a station's control," it would "grant extensions of the applicable replication or maximization interference protection deadline on a six-month basis if good cause is shown."<sup>5</sup> To receive such a waiver, broadcasters were required to make a showing "similar to that required to obtain a waiver of the DTV construction deadlines."<sup>6</sup> Cox believes this instant waiver request satisfies these requirements.

Based upon the foregoing, Cox believes that it has shown good cause for the Commission to grant a short extension of the July 1, 2006 deadline for the Station. Should any questions arise, please contact the undersigned.

Respectfully submitted,



Scott S. Patrick

cc: Shaun Maher (FCC)

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<sup>5</sup> *Id.*, ¶ 87. See also *Public Notice*.

<sup>6</sup> *Report and Order*, ¶ 87.