



LEVENTHAL SENTER & LERMAN PLLC

July 7, 2006

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Via ECFS

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

Re: MB Docket No. 03-15
Request for Waiver of the July 7, 2006
Replication/Maximization Interference Protection Deadline
Television Station KJTV-TV, Lubbock, Texas
Facility ID No. 55031

Dear Ms. Dortch:

Ramar Communications II, Ltd. ("Ramar"), the licensee of Station KJTV-TV and the permittee of Station KJTV-DT, Lubbock, Texas (Facility ID No. 55031), by its attorneys, hereby requests a waiver of the July 7, 2006 replication/maximization interference protection deadline for KJTV-DT.

Ramar has diligently pursued construction of the full power digital facilities for KJTV-DT authorized in FCC File No. BMPCDT-20041115ACT, and reasonably anticipated that construction of those facilities would be completed by the July 7, 2006 replication/maximization deadline. However, due to circumstances beyond its control, Ramar will be unable to complete construction of those facilities by that date.

Ramar determined that the station's existing tower could not support the weight and wind load characteristics of both the KJTV-TV analog and KJTV-DT full power digital antenna due to the tower's design characteristics and the presence of internal rust. Although it was clear that construction of a new tower to accommodate the two antennas was required, the design of that new tower was complicated by the fact that the structure had to be constructed within approximately fifty feet of the existing tower. Additionally, the initial tower design prepared by Doty-Moore Tower Service LLC/Stainless, LLC ("Doty/Stainless"), the tower erection and manufacturing firm retained by Ramar, included only one set of interleaved guy wires, as opposed to the two sets required. Despite these complications and related delays, Doty/Stainless assured Ramar that construction of that new tower would be completed prior to July 1, 2006. See Letter dated June 22, 2006 from Bill Allen, Project Manager, Doty-Moore Tower Service LLC, to Ramar Communications, attached hereto as Exhibit 1. However, Ramar was subsequently informed that construction of the new tower would not be completed on time, a circumstance beyond the control of Ramar. Specifically, Doty/Stainless informed Ramar that the shipment of certain component parts, including guy wires, lighting systems and appurtenances,



by third party vendors had been delayed. *Id.* As a consequence, construction of the new tower is now scheduled to be completed by October 25, 2006.

In addition, Ramar has been informed that the delivery of other equipment necessary for the build-out of KJTV-DT, which was originally scheduled to arrive before July 1, 2006, had also been delayed, again due to circumstances beyond the control of Ramar. Axcera, LLC, the manufacturer of the new 25kW DTV transmitter for KJTV-DT, originally informed Ramar that the delivery and installation of the new transmitter and other ancillary equipment would be completed prior to July 1, 2006. *See* Letter dated June 20, 2006 from Russ Erickson, Regional Sales Manager, Axcera, LLC, to Tee Thomas, Ramar Communications, attached hereto at Exhibit 2. However, shipment of the new transmitter and RF system, originally postponed to June 30, 2006, has now been postponed until July 17, 2006, while shipment of the beam supply has also been postponed until July 17, 2006. Similarly, Radio Frequency Systems' shipment of KJTV-DT's new UHF slot antenna from Australia has been delayed due to material availability issues. That equipment is now scheduled to be delivered by August 8, 2006. *See* Letter dated June 20, 2006 from Martin O'Donohue, Broadcast Business Manager, Radio Frequency Systems, to Tee Thomas, Ramar Communications, attached hereto at Exhibit 3. As a result of these unanticipated delays in the construction of the new tower and the delivery of the requisite equipment for KJTV-DT, Ramar will be unable to complete construction of the full power facilities of KJTV-DT by July 7, 2006.

As the attached letters indicate, Ramar has been informed that all the equipment necessary to construct the full power KJTV-DT will be on site and available for installation as of the date the new tower is scheduled to be completed. Although Ramar reasonably anticipates that construction of the full power facilities for KJTV-DT can be completed by November 1, 2006, out of an abundance of caution, Ramar respectfully requests a six month extension of the July 7, 2006 deadline, to and including January 8, 2007.

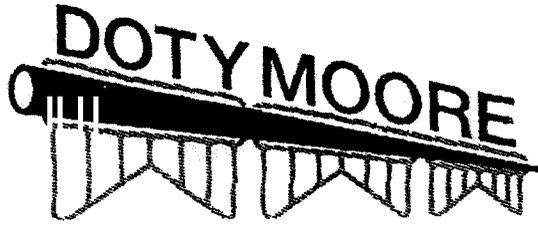
Ramar has demonstrated its commitment to the digital transition. As the Commission has been advised, Ramar commenced reduced power digital operations on Station KJTV-DT on August 22, 2003 pursuant to Special Temporary Authority, and the station has continued to broadcast digitally in this manner since that time. *See* FCC File No. BDSTA-20030805ARJ. Ramar has also made a good faith effort to complete construction of its full power digital facilities for KJTV-DT by the July 7, 2006 deadline, but will be unable to do so due to circumstances beyond its control. Accordingly, Ramar submits that an extension of the July 7, 2006 replication/maximization interference protection deadline for KJTV-DT is clearly warranted, amply justified and respectfully requested.

Respectfully yours,

Dennis P. Corbett
John D. Poutasse

cc: Shaun Maher, Esq. (via electronic mail)
Ms. Nazifa Sawez (via electronic mail)

EXHIBIT 1



DOTY-MOORE TOWER SERVICE LLC
1570 W. BELTLINE ROAD
CEDAR HILL, TX 75104
(972) 637-5000

Thursday, June 22, 2006

KJTV, Ramar Communications
P.O. Box 3757
9800 University Avenue
Lubbock, Texas 79452-3757

Attention: Tee Thomas
Ref: 950 Foot G-65 Tower Installation

Mr. Thomas,

This communication is to inform you of our estimated project time line from Contract Award to on Air Completion. We have attached a copy of our project schedule, based on predictions as of this date, for reference.

The original contract discussions began in February 2005 and final agreement was reached on March 10, 2006. At the time of the agreement, we advised you that we could meet the July 1, 2006 deadline in the agreement. Due to delivery dates of some components that are supplied by an outside supplier, the schedule was adjusted to reflect the delivery dates of long lead items, such as, guy wires, lighting systems and appurtenances. We tried to meet your delivery requirements, but will now be unable to complete the project by July 1.

The major milestone dates for this project as of now are:

- | | |
|--|---------------------|
| ➤ Contract Award to Stainless, LLC | 03/10/06 |
| ➤ Engineering Design Information | 03/13/06 - 06/02/06 |
| ➤ Engineering & Fabrication Milestones | 05/16/06 - 08/14/06 |
| ➤ Foundation Installation | 06/26/06 - 08/09/06 |
| ➤ Tower Erection | 08/14/06 - 09/29/06 |
| ➤ Antenna & Line Inspection | 09/18/06 - 10/20/06 |
| ➤ Inspection & Demobilization | 10/23/06 - 10/25/06 |

Please feel free to contact me if you have any questions. We will keep you informed of the progress going forward.

Sincerely,

Bill Allen
Project Manager
Doty-Moore Tower Services

cc: Les Kutasi

EXHIBIT 2

June 20, 2006

Tee Thomas
Ramar Communications
9800 University Ave
Lubbock, TX 79423



Russ Erickson
8360 Steeplechase Dr.
Windsor, CO 80550
970-674-1430 phone
1-877-440-7877 toll-free
970-674-1430 fax
rerickson@axcera.com
www.axcera.com

Dear Mr. Thomas,

This letter is to confirm that the shipment of the Axcera model HP25SDP, 25kW DTV Transmitter has been delayed, as has the rechanneling and conversion of your current low power DTV transmitter.

At the time Ramar placed the order with Axcera, we had every confidence that we would be able to ship your transmitter and it's ancillary equipment with ample time to install it and to perform the FCC required proof-of-performance prior to the DTV maximization deadline of July 1st, 2006. Delays beyond the control of Axcera and Ramar have now made that impossible to accomplish.

As of this writing, the scheduled ship dates for your various pieces of equipment are as follows:

Transmitter	6-30-06
RF System	6-30-06
DTV RF Mask Filter	On hold per Applications Engineering
Beam Supply	7-17-06
Surge Protector	Shipped (in storage)
Voltage Regulator	Shipped (in storage)

Again, these are tentative ship dates, not delivery dates or installed dates. And Axcera remains committed to completing this project for Ramar at the earliest possible date.

We appreciate your patience and understanding in this matter.
Thank you.

Best regards,

Russ Erickson
Regional Sales Mgr.

EXHIBIT 3

RADIO FREQUENCY SYSTEMS



20th June, 2006

Tee Thomas
Chief Engineer Ramar Communications

Dear Mr Thomas,

I regret to inform you that due to a material availability issues your RD32OM-596650H7S07 UHF Slot Antenna is currently delayed in manufacturing.

Our revised delivery date ex works Australia is now 8th August, 2006.

Please accept our apologies for this delay and thank you for your understanding.

Yours faithfully
RADIO FREQUENCY SYSTEMS

A handwritten signature in black ink, appearing to read 'Martin O'Donohue', with a long horizontal line extending to the right.

Martin O'Donohue
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