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BY ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, DC 20554

**Re: MB Docket No. 03-15
Journal Broadcast Corporation
WSYM-DT, Lansing, Michigan (Facility ID No. 74094)
Request for Waiver of Interference Protection Deadline and
Extension of Time to Construct "Para. 78 Facilities"**

Dear Ms. Dortch:

Journal Broadcast Corporation ("JBC"), permittee of WSYM-DT, channel 38, Lansing, Michigan, (the "Station"), by undersigned counsel and pursuant to *Public Notice*, "DTV Channel Election Issues – Compliance with the July 1, 2006 Replication/ Maximization Interference Protection Deadline; Stations Seeking Extension of the Deadline," DA-06-1255 (June 14, 2006) (the "June 14 Public Notice"), hereby requests a limited waiver of the July 1, 2006, interference protection deadline and an extension of time to construct "para. 78 facilities" pursuant to *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, 19 FCC Rcd 18279 (2004) ("*Second DTV Periodic Review Report and Order*"). ^{1/} A limited waiver and extension are warranted because the Station's application for modification of digital construction permit has not been granted.

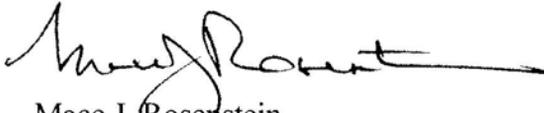
WSYM-DT elected to conduct permanent, post-transition digital operations on its assigned DTV channel 38 at its authorized maximized facilities. See FCC File Nos. BCERCT-20041103AII and BFRECT-20050126ADW. Pursuant to the *Second DTV Periodic Review Report and Order* and the June 14 Public Notice, the Station was required to file an application for minor modification of its pending digital construction permit to specify para. 78 facilities by the July 1 deadline. That application was filed on June 2, 2006 (as amended on June 19, 2006), and is

^{1/} This request is timely filed pursuant to *Public Notice*, "DTV Channel Election Issues – Media Bureau Extends Filing Deadline for Compliance with the July 1, 2006 Replication/Maximization Interference Protection Deadline to July 7, 2006," DA 06-1372 (June 29, 2006).

pending. *See* FCC File No. BMPCDT-20060602ABQ. 2/ Upon grant of the application JBC will activate the Station's increased facilities and file a license to cover its modified construction permit. Grant of the limited relief requested herein will serve the public interest in the completion of the digital transition with minimal disruption of existing service to the public.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,



Mace J. Rosenstein

cc: Shaun Maher
Nazifa Sawez

2/ The Station currently is operating with facilities at variance from its digital construction permit pursuant to Special Temporary Authority. *See* FCC File No. BEDSTA-20051005ADU. A timely request for extension of STA is pending. To the extent required, JBC requests grant of the STA extension request pending grant of its application for modification of construction permit and the filing of an application for license to cover.