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July 7, 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  
KUID-DT, Facility ID No. 62382  
FRN: 0001-6317-38  
Moscow, Idaho

Dear Ms. Dortch:

State Board of Education, State of Idaho, licensee, licensee of noncommercial educational television station KUID-TV and permittee of KUID-DT, Moscow, Idaho, which operates the station as Idaho Public Television ("Idaho PTV"), hereby respectfully requests a waiver and extension 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").

Idaho PTV initially was allotted DTV channel 35 to accompany its then-authorized analog channel 12 for KUID-TV. Through a rule making proceeding, however, those channel allotments were exchanged, so that the analog allotment became for channel 35, and the digital allotment is now for channel 12. Concurrently with the rule making proceeding, Idaho PTV sought and obtained Special Temporary Authority ("STA") to operate in this manner, and it subsequently filed applications for construction permit to implement the channel exchange. Since that time, Idaho PTV has been operating KUID-TV on Channel 35 and KUID-DT on Channel 12.

As a result of its experience constructing and commencing DTV operations on Channel 12, Idaho PTV learned that the power level specified in its implementing construction permit is in excess of that which is necessary to provide sufficient coverage to its community of license

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and the surrounding area. It should be recalled that Moscow is a small and remote community in Idaho, with little surrounding population. In addition, as a practical matter, the existing transmission facilities of the station simply cannot accommodate the addition of higher-power equipment. Construction of additional facilities would be cost-prohibitive for KUID-TV as a public television station located in a remote community. Idaho PTV has determined that an effective radiated power of 78 kW in lieu of the previously authorized maximum power of 128.5 kW will provide the most efficient and best service to the public, in that it will provide a robust DTV signal to the residents of the station's community of license without imposing undue burdens to provide coverage outside of any substantially populated area.

Idaho PTV has recognized that it must now file an application to modify its authorized facilities, and such an application is being filed simultaneously herewith under separate cover. In addition, Idaho PTV is seeking an STA to operate with the facilities specified in its application. Upon grant of the modification application, Idaho PTV will promptly submit an application for license to cover the facilities specified.

For the foregoing reasons, Idaho PTV hereby respectfully requests an extension of the Replication Deadline until such time as the Commission can process and grant its modification application, and Idaho PTV can then file an application for license to cover construction permit.

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

Very truly yours,

A handwritten signature in black ink that reads "Anne Goodwin Crump". The signature is written in a cursive, flowing style.

Anne Goodwin Crump  
Counsel for State Board of Education,  
State of Idaho

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