



WILLIAMS MULLEN

Direct Dial: 202.293.8111
jshepard@williamsmullen.com

July 7, 2006

ELECTRONICALLY FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: **MB Docket No. 03-15**
Television Station KFBB-DT, Great Falls, Montana, (Facility Id. No. 34412),
Request for Temporary Waiver of July 1, 2006 Interference Protection Deadline

Dear Ms. Dortch:

On behalf of MMM License II LLC (FRN: 0011094281) ("MMM"), the licensee of television broadcasting station KFBB-DT, Great Falls, Montana, we hereby request a temporary waiver of the July 1, 2006 "use-it-or-lose-it" interference protection deadline in accordance with the procedures set forth in FCC Public Notice DA 06-1255, released June 14, 2006.

KFBB-DT is authorized to operate on Channel 8. KFBB-DT elected replication coverage on Channel 8 for post-transition operation. Effective July 1, 2006, KFBB-DT was obligated to construct and operate at 28.6 kW with an antenna at 180 meters HAAT. Currently, KFBB-DT is fully licensed at less-than-replication facilities of 3.39 kW with an antenna at 146 meters HAAT (see File No. BLCDDT-20020507AAI). As set forth in the attached Declaration of Charles C. Stanton, the current KFBB-DT facility provides complete coverage of the community of license and serves 97% of its replication population.

MMM made its certification for replication coverage in good faith. MMM's DTV construction plans were adversely affected by unforeseeable circumstances as described in MMM's request for temporary waiver of the interference protection deadline for its other Montana television station, KULR-DT, Billings, Montana (Facility Id. No. 35724). Essentially, until the costs associated with unforeseen tower problems for KULR-DT were quantified following the decision of TIA/ANSI on the applicable construction standard, the cost of total DTV improvements for KULR-DT was unknown and impossible to predict, and the extent of funds available for DTV improvements at both stations was made uncertain. MMM has acted diligently to resolve this uncertainty. KFBB-DT has filed an application for modification of

A Professional Corporation

VIRGINIA • WASHINGTON, D.C. • LONDON

1666 K Street, N.W., Suite 1200 Washington, D.C. 20006 Tel: 202.833.9200 Fax: 804.783.6507 or 202.293.5939
www.williamsmullen.com



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license specifying full replication facilities, and expects to re-commence construction as soon as possible.

Accordingly, a temporary waiver of the construction deadline for 3% population coverage is warranted and in the public interest. Unforeseeable circumstances affected the licensee's construction plans. MMM respectfully requests a temporary waiver to continue full interference protection of its replication coverage until construction is completed.

Respectfully submitted,

A handwritten signature in cursive script, reading "Julian L. Shepard".

Julian L. Shepard

cc: Shaun Maher (via e-mail)
Attachment: Exhibit A (Declaration of Charles C. Stanton)

DECLARATION OF CHARLES C. STANTON

Under penalty of perjury I, Charles C. Stanton, of Stancom, 4401 Leatherwood Drive Virginia Beach, Virginia, 23462, hereby declare that:

1. I am a Consulting Engineer who has over 40 years of experience in the design, procurement, installation and testing of Broadcast and other Telecommunications systems around the world. Further, over the past fourteen years I have consulted with and have designed, procured, installed and tested multiple new and upgraded TV and FM broadcast facilities for the principals of Max Media LLC ("Max Media"). Further, I have personal knowledge (except where noted) of the following facts concerning the construction of digital television facilities for MMM License II LLC, a subsidiary of Max Media, the licensee of full power television station KFBB-TV, located in Great Falls, Montana:

2. KFBB-TV is currently licensed to operate on NTSC Channel 5, and KFBB-DT has been licensed to operate at 3.39 kW on DTV Channel 8.

3. KFBB-DT elected replication coverage on Channel 8 for its post-transition DTV operation.

4. KFBB-DT's replication coverage on Channel 8 requires the construction of a 28.6 kW facility by the July 1, 2006 "use-it-or-lose-it" construction deadline ("Construction Deadline").

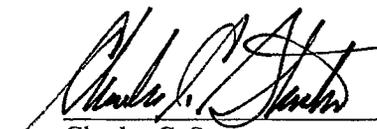
5. Based on an analysis provided by Communications Technologies, Inc., P.O. Box 1130, Marlton, NJ 08053, the current KFBB-DT facility completely covers its community of license and serves 97% of its replication population.

6. The equipment for the transmitter antenna upgrade is on order, and the transmitter upgrade order is on hold pending the results of the tower analysis that is required for this

installation. The antenna should be delivered in late September, and if any tower rework is required, we will try to do it and install the antenna at the same time, weather permitting. The transmitter modifications should be available during the same time period.

KFBB-DT has been actively working to complete the required construction, and, subject to equipment availability, I estimate that full, authorized DTV facilities will be completed by December 2006.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 7, 2006.



Charles C. Stanton