

July 7, 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
KRXI-DT (Reno, Nevada)
Facility ID No. 48360
Request for Waiver of July 1, 2006 Replication/Maximization Deadline

Dear Ms. Dortch:

Out of an abundance of caution, KTVU Partnership, permittee of KRXI-DT, Reno, Nevada (the "Station"), by its attorneys and pursuant to the Commission's June 14, 2006 *Public Notice*,¹ hereby respectfully requests a brief extension of the Commission's July 1, 2006 replication/maximization interference protection deadline. On June 29, 2006, the Commission extended until July 7, 2006, the deadline for KTVU Partnership to submit its waiver request.² It is unclear, however, if the Commission also extended the deadline by which KTVU Partnership must file the Station's covering license application, which KTVU Partnership filed today.³ Therefore, to the extent necessary, KTVU Partnership requests a six-day extension of the replication/maximization deadline to reflect that KTVU Partnership submitted the covering license application on July 7, 2006.

If a waiver request is necessary, KTVU Partnership submits the instant request satisfies the standards set forth in the *Public Notice*. In its *Second DTV Periodic Review Report and*

¹ 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*").

² See *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*, Public Notice, DA 06-1372 (rel. June 29, 2006).

³ See FCC File No. BLCDDT-20060707ACZ.

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Order,⁴ the Commission adopted a July 1, 2006 replication/maximization 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.”⁵ 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.”⁶ KTVU Partnership believes this instant waiver request satisfies these requirements.

Based upon the foregoing, KTVU Partnership believes that it has shown good cause for the Commission to grant a six-day 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)

⁴ 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*”).

⁵ *Id.*, ¶ 87. See also *Public Notice*.

⁶ *Report and Order*, ¶ 87.