

July 14, 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
WCBD-DT (Charleston, South Carolina)
Facility ID No. 10587
Request for Waiver of July 1, 2006 Replication/Maximization Deadline

Dear Ms. Dortch:

Out of an abundance of caution, Media General Communications, Inc. (“Media General”), licensee of WCBD-DT, Charleston, South Carolina (the “Station”), by its attorneys and pursuant to the Commission’s *Public Notice*,¹ hereby respectfully requests waiver of the Commission’s replication/maximization interference protection deadline, as extended to July 7, 2006.²

On July 6, 2006, Media General timely completed construction of its certified DTV facilities prior to the replication/maximization deadline. The Station at that time commenced operations pursuant to Program Test Authority.³ Media General is filing its covering license application today⁴ pursuant to Section 73.1620(a)(1) of the Commission’s rules.⁵ Accordingly,

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 Letter from Daniel Kirkpatrick, counsel to Media General, to Marlene Dortch, Secretary, FCC. As explained therein, the notice was late filed.

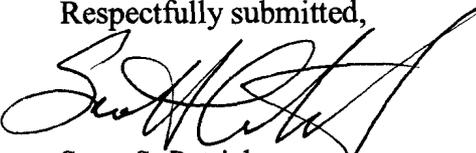
⁴ See FCC File No. BLCDT-20060714AAN.

Media General submits that, by commencing program tests prior to July 7, 2006 and by filing its license application within the prescribed ten days, it has complied with the replication/maximization deadline.

Nevertheless, to the extent the Commission requires that licensees submit a covering license application on or before July 7, 2006 – rather than just commence operations by that date – Media General seeks waiver for this six-day period. If a waiver is necessary, Media General submits the instant request satisfies the standards set forth in the *Public Notice*. In its *Second DTV Periodic Review Report and Order*,⁶ 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.”⁷ 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.”⁸ Media General believes this instant waiver request satisfies these requirements.

Based upon the foregoing, Media General believes that it has shown good cause for the Commission to grant waiver and a six-day extension of the replication/maximization deadline. Should any questions arise, please contact the undersigned.

Respectfully submitted,



Scott S. Patrick

cc: Shaun Maher (FCC)

⁵ Section 73.1620(a)(1) of the Commission’s rules provides that covering license applications are to be filed within ten days of commenced operations.

⁶ 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*”).

⁷ *Id.*, ¶ 87. See also *Public Notice*.

⁸ *Report and Order*, ¶ 87.