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Federal Communications Commission
Office of Secretary

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

Re: MB Docket No. 03-15
Noncommercial Educational Digital Television Station KTCA-DT
St. Paul, Minnesota, Facility Identification No. 68594
FRN: 0002-6440-37

Dear Ms. Dortch:

Twin Cities Public Television, Inc. ("TPT"), permittee of noncommercial educational digital television Station KTCA-DT, St. Paul, Minnesota, hereby requests a temporary waiver of the Commission's replication/maximization interference protection deadline of July 7, 2006, pursuant to the Commission's June 14, 2006 *Public Notice*,¹ pending grant of its application for a minor modification to its construction permit and the filing of a license to cover to specify those modified facilities.

TPT's digital television construction permit BNPEDT-20050322AGE specifies an ERP of 924 kW. On November 5, 2004, TPT filed a pre-election certification stating that it intended to operate post-transition on KTCA-DT's allotted replication facilities. (File No. BCERET-20041105ATV). However, in an email sent to the Commission that same day, TPT explained that it did not plan to build digital facilities that would precisely replicate its authorized power: "KTCA-TV is a noncommercial television station which is licensed to operate at 924 kW, and currently operates at 350 kW under an STA. It is the intention of

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); see also *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)

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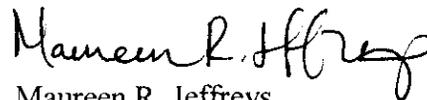
TPT to operate the post-transaction station, KTCA-DT, at 700 kW. This will nearly replicate, but not fully replicate, its allotted power.”

TPT thereafter completed construction of a 662 kW facility on or about June 20, 2006.² On June 27, 2006, counsel for TPT inadvertently filed a license to cover application for KTCA-DT to specify an ERP of 662 kW. Subsequently, TPT’s counsel discovered the discrepancy in its filings and realized that a minor modification of the construction permit BMPEDT-20050322AGE should have been filed first. TPT’s counsel promptly notified the FCC of this error and as soon as possible thereafter prepared and filed a request to extend the STA under which the station had been operating at reduced power (File No. BEDSTA-20060718ABW), a minor modification of construction permit application to specify an ERP of 662 kW (File No. BMPEDT-20060718ACE), and the instant waiver request.

Based on the foregoing, TPT believes that it has shown good cause for the Commission to grant a waiver and a temporary extension of the replication deadline.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely yours,



Maureen R. Jeffreys

Counsel for Twin Cities Public Television, Inc.

cc: Shaun Maher, Esq. (by hand delivery and email)
Randy Lebedoff, Esq. (by email)

² Shortly after completing construction of its 662 kW facilities and increasing the power to that level, TPT experienced a failure of the electrical system for the air conditioner that caused a significant amount of damage to the transmitter. Counsel for TPT notified the FCC on June 21, 2006 that the Station was operating at reduced power because of this failure. The damage is currently estimated to be approximately \$85,000. The air conditioning system has been fully repaired and is now operational. However, before TPT returns the station to full power, the Station engineers believe that it is necessary to relocate some of the transmission feeds in order to avoid permanent damage to the system if a similar problem occurs in the future. The STA extension request filed on July 18, 2006 explains in greater detail the equipment problems and the steps that are being taken to return the Station to full power.