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October 17, 2006

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Reference: Southwest Media, LLC  
KCSG-DT, Channel 14, Cedar City, UT  
Facility Id. 59494  
Request for Waiver of the Replication/  
Maximization Interference Protection  
Deadline  
(MB Doc. 03-15)**

Dear Madam Secretary:

Southwest Media LLC ("Southwest") permittee and operator of KCSG-DT, Channel 14, Cedar City, Utah, respectfully requests a six-month waiver of the July 1, 2006, replication/maximization interference protection deadline pursuant to Public Notice, DA -06-1255 (DTV Channel Election Issues). The deadline procedure was established by the Commission at Paragraph 78 of the *Second DTV Periodic Review Report and Order* ("R&O"), 19 FCC Rcd 18279 (2004). Southwest is also the licensee of analog station KCSG (TV), Channel 4, Cedar City. Cedar City is within the Salt Lake DMA, but has been classified by the Commission as a "remaining market." In support of a waiver the following is shown.

Southwest's Senior Engineering Consultant, who became associated with Southwest in May, 2006, has completed an analysis of the proposed full-power transmitter site, which also is the site from which Channels 14 and 4 operate. He has concluded that substantial upgrading will be required in order to accommodate the equipment necessary to implement a permanent DTV facility at higher power. At this time Southwest is trying to identifying a more suitable site for its upgraded power operation—a site which will not only be suitable from a technical standpoint, but will not require a substantial financial investment. Accordingly, an extension will enable Southwest to complete its site-identification project and to acquire the equipment necessary for increasing power and coverage on Channel 14.



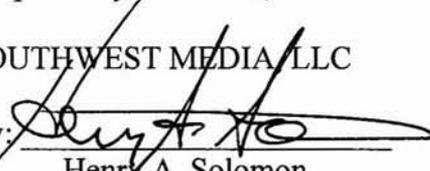
In addition to the foregoing, we wish to invite the Commission's attention to an additional ground for the requested waiver. Late last year Southwest underwent major changes in ownership and management. The former licensee of KCSG (TV), Channel 4, Cedar City and operator of Channel 14, previously had been known as Broadcast West. One of the two partners of Broadcast West resigned, the partnership was dissolved, and a Utah limited liability company was formed. In addition to the assignment of Broadcast West's authorizations, which was approved in the early summer of 2005, a new management team recently came on board and as noted, the Southwest is being counseled by an experienced Senior Engineering Consultant who was retained several weeks prior to the July 1, 2006 deadline. These basic changes made it extremely difficult for the Southwest to address the economic and address the technical issues referred to above. As noted, a new management/technical team is now in place, and Southwest intends to use its best efforts to increase Channel 14's power within the timeframe specified by the Commission in its waiver grant.

Accordingly, Southwest respectfully requests that this waiver request be granted and considered *nunc pro tunc* as of July 1, 2006.

Should you have any questions concerning the foregoing, please contact the undersigned.

Respectfully submitted,

SOUTHWEST MEDIA/LLC

By: 

Henry A. Solomon

Its Attorney

cc: Shaun A Maher, Esq. (FCC-via email)