



WILLIAMS MULLEN

Direct Dial: 202.293.8111
jshepard@williamsmullen.com

February 15, 2007

ELECTRONICALLY FILED VIA ECFS

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

Re: **MB Docket No. 05-317**
WNKY-DT, Bowling Green, Kentucky, (Facility Id. No. 61217)
TELEVISION STATION SECTION 339(a)(2)(D)(vii) WAIVER REQUEST

Dear Ms. Dortch:

MMK License LLC (FRN: 0008572927) (“MMK”), the permittee of television broadcasting station WNKY-DT (“WNKY”), Bowling Green, Kentucky, by its attorney, hereby requests a waiver of the digital signal testing requirement,¹ in accordance with the statutory criteria set forth in 47 U.S.C. § 339(a)(2)(D)(viii), and pursuant to the procedures set forth in FCC Public Notice DA 05-2979, released November 17, 2005. WNKY is entitled to a waiver based on the fact that “no satellite carrier is providing the retransmission of the analog signals of local network stations” in WNKY’s local market.²

WNKY’s local market is the Bowling Green, Kentucky DMA (“Bowling Green DMA”). At present, DirecTV, EchoStar and All American Direct (in conjunction with EchoStar)³ are the only satellite carriers providing DBS service in the Bowling Green DMA. None of these satellite carriers provides satellite retransmission of the analog signals of local network stations in the Bowling Green DMA. As a result, WNKY is entitled to a digital signal testing waiver.

To support this waiver request, MMK has provided: (1) the Declaration of Ed Groves, General Manager of WNKY (attached hereto under Tab A); (2) a printout of DirecTV’s

¹ 47 U.S.C. § 339(a)(2)(D)(vii).

² 47 U.S.C. § 339(a)(2)(D)(viii)(VI).

³ All American Direct is currently providing distant network programming to Dish Network (EchoStar) subscribers.

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



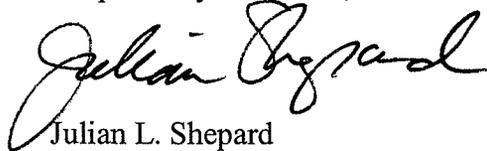
WILLIAMS MULLEN

Marlene H. Dortch, Secretary
TELEVISION STATION SECTION 339(a)(2)(D)(vii) WAIVER REQUEST
February 15, 2007
Page 2

local channel markets (attached hereto under Tab B);⁴ and (3) a printout of EchoStar's local channel markets (attached hereto under Tab C).⁵

For the reasons set forth above, and pursuant to 47 U.S.C. § 339(a)(2)(D)(viii)(VI), MMK respectfully requests a six-month waiver of the digital signal testing requirement.

Respectfully submitted,



Julian L. Shepard

cc: Nazifa Sawez

Attachments: Tab A (Declaration of Ed Groves)
Tab B (DirecTV Local Channel List)
Tab C (EchoStar Local Channel List)

⁴ [Http://www.directv.com/DTVAPP/global/contentPage.jsp?assetId=1000013](http://www.directv.com/DTVAPP/global/contentPage.jsp?assetId=1000013) (last visited Feb. 12, 2007).

⁵ [Https://customersupport.dishnetwork.com/customernetqual/prepAddress.do](https://customersupport.dishnetwork.com/customernetqual/prepAddress.do) (last visited Feb. 12, 2007).

TAB A

DECLARATION OF ED GROVES

Under penalty of perjury I, Ed Groves, hereby declare that:

1. I am President and General Manager of WNKY(TV) ("WNKY") (Facility Id No. 61217), Bowling Green, Kentucky.
2. WNKY is located in the Bowling Green DMA, as defined by Nielsen Media Research.
3. DirecTV, EchoStar and All American Direct (in conjunction with EchoStar) are the only satellite carriers providing DBS service in the Bowling Green DMA.
4. None of these satellite carriers are currently providing local-into-local satellite retransmission of the analog signals of local network stations in the Bowling Green DMA.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 15, 2007.


Ed Groves

TAB B

DIRECTV - Local Channel Markets

Local Channel Markets

We offer local broadcasts in 142 markets across the country. That's more than 94% of the nation's TV households.

Look below to find out more about the areas we serve or use our Local Channels look-up tool.

Want to see what you can watch? Check out promos of your favorite shows in our Video Lounge.

LOCAL CHANNELS AVAILABLE IN THESE MARKETS:

Albany-Schenectady-Troy, NY*†	Los Angeles, CA
Albuquerque-Sante Fe, NM*†	Louisville, KY*
Anchorage, AK****	Macon, GA**
Atlanta, GA	Madison, WI*
Augusta, GA**	Mankato, MN
Austin, TX	Medford-Klamath Falls, OR*†
Bakersfield, CA*	Memphis, TN
Baltimore, MD	Miami-Ft. Lauderdale, FL
Baton Rouge, LA*	Milwaukee, WI
Birmingham, AL	Minneapolis-St. Paul, MN
Boise, ID**	Mobile, AL-Pensacola-Fort Walton Beach, FL*
Boston, MA	Monterey-Salinas, CA*
Buffalo, NY*†	Myrtle Beach-Florence, SC**
Burlington, VT-Plattsburgh, NY**	Nashville, TN
Cedar Rapids, IA**	New Orleans, LA*
Champaign, IL**	New York, NY
Charleston, SC**	Norfolk, VA*†
Charleston-Huntington, WV*	Oklahoma City, OK*
Charlotte, NC	Omaha, NE*
Chattanooga, TN**	Orlando-Daytona, FL
Chicago, IL	Paducah, KY-Cape Girardeau, MO*†
Chico, CA*†	Peoria-Bloomington, IL**
Cincinnati, OH	Philadelphia, PA
Cleveland, OH	Phoenix, AZ
Colorado Springs, CO	Pittsburgh, PA
Columbia-Jefferson City, MO**	Portland-Auburn, ME*
Columbia, SC	Portland, OR
Columbus, OH	Providence, RI-New Bedford, MA*
Columbus-Tupelo, MS	Raleigh-Durham, NC
Corpus Christi, TX*	Reno, NV*†
Dallas-Ft. Worth, TX	Richmond-Petersburg, VA*
Davenport, IA-Rock Island-Moline, IL**	Roanoke, VA*†
Dayton, OH*	Rochester, NY*
Denver, CO†	Rochester-Austin, MN, Mason City, IA
Des Moines, IA*	Rockford, IL**
Detroit, MI	Sacramento-Stockton, CA
Duluth, MN-Superior, WI*†	Salt Lake City, UT†
El Paso, TX*	San Antonio, TX
Eugene, OR*	San Diego, CA
Evansville, IN**	San Francisco-Oakland-San Jose, CA

*Receipt of local channels in these markets requires a DIRECTV Multi-Satellite System.

**Receipt of local channels in these markets requires the use of a second 18-inch DIRECTV Dish.

***Receipt of local channels in these markets requires a 1.2 meter DIRECTV dish.

†ZIP code confirmation required.

TAB C

Abilene, TX
Albany, GA
Albany, NY
Albuquerque, NM
Amarillo, TX
Anchorage, AK
Atlanta, GA
Augusta, GA
Austin, TX
Bakersfield, CA
Baltimore, MD
Baton Rouge, LA
Billings, MT
Birmingham, AL
Boise, ID
Boston, MA
Buffalo, NY
Burlington, VT
Casper, WY
Cedar Rapids, IA
Champaign, IL
Charleston, SC
Charleston, WV
Charlotte, NC
Charlottesville, VA
Chattanooga, TN
Cheyenne, WY
Chicago, IL
Chico-Redding, CA
Cincinnati, OH
Clarksburg-Weston, WV
Cleveland, OH
Colorado Springs, CO
Columbia, SC
Columbia-Jefferson City, MO
Columbus, OH
Columbus-Tupelo, MS
Corpus Christi, TX
Dallas/Ft. Worth, TX
Davenport, IA-Moline, IL
Dayton, OH
Denver, CO
Des Moines, IA
Detroit, MI
Duluth, MN
El Paso, TX
Erie, PA
Eugene, OR
Evansville, IN
Fairbanks, AK
Fargo, ND
Flint, MI
Florence, SC
Fresno, CA
Ft. Myers, FL
Ft. Smith, AR

Ft. Wayne, IN
Gainesville, FL
Grand Junction, CO
Grand Rapids, MI
Great Falls, MT
Green Bay-Appleton, WI
Greensboro, NC
Greenville, NC
Greenville/Spartanburg, SC
Harlingen, TX
Harrisburg, PA
Hartford-New Haven, CT
Honolulu, HI
Houston, TX
Huntsville, AL
Idaho Falls, ID
Indianapolis, IN
Jackson, MS
Jacksonville, FL
Johnstown-Altoona, PA
Joplin, MO-Pittsburg, KS
Juneau, AK
Kansas City, MO
Knoxville, TN
La Crosse-Eau Claire, WI
Lafayette, LA
Lansing, MI
Las Vegas, NV
Lexington, KY
Lincoln, NE
Little Rock, AR
Los Angeles, CA
Louisville, KY
Lubbock, TX
Macon, GA
Madison, WI
Medford, OR
Memphis, TN
Meridian, MS
Miami, FL
Milwaukee, WI
Minneapolis/St. Paul, MN
Minot-Bismarck, ND
Missoula, MT
Mobile, AL
Monroe, LA-El Dorado, AL
Monterey, CA
Montgomery, AL
Nashville, TN
New Orleans, LA
New York, NY
Norfolk-Portsmouth, VA
Oklahoma City, OK
Omaha, NE
Orlando, FL
Paducah, KY

Panama City, FL
Peoria-Bloomington, IL
Philadelphia, PA
Phoenix, AZ
Pittsburgh, PA
Portland, ME
Portland, OR
Providence, RI
Puerto Rico
Quincy, IL
Raleigh/Durham, NC
Rapid City, SD
Reno, NV
Richmond, VA
Roanoke, VA
Rochester, NY
Rockford, IL
Sacramento, CA
Salt Lake City, UT
San Angelo, TX
San Antonio, TX
San Diego, CA
San Francisco, CA
Santa Barbara, CA
Savannah, GA
Seattle, WA
Sherman, TX-Ada, OK
Shreveport, LA
Sioux City, IA
Sioux Falls, SD
South Bend, IN
Spokane, WA
Springfield, MO
St. Louis, MO
Syracuse, NY
Tallahassee, FL
Tampa/St. Petersburg, FL
Terre Haute, IN
Toledo, OH
Topeka, KS
Traverse City, MI
Tri-Cities, TN/VA
Tucson, AZ
Tulsa, OK
Twin Falls, ID
Tyler, TX
Waco, TX
Washington, D.C.
Wausau-Rhineland, WI
West Palm Beach, FL
Wichita Falls, TX
Wichita, KS
Wilkes-Barre, PA
Yakima, WA
Youngstown, OH