

Mission

Broadcasting, Inc.

March 19, 2008

Via ECFS and Electronic Mail

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, D.C. 20554

Re: Request for Extension of Time to Construct Full-Power DTV Facilities
and Request for Confidential Treatment

Dear Ms. Dortch:

Mission Broadcasting, Inc. ("Mission"), the permittee of the digital television broadcast stations listed on Attachment 1 hereto, hereby requests an extension of the May 18, 2008 construction deadline for these five stations. Mission also requests extension of the replication/maximization interference protection deadline to construct full-power facilities for these stations.

Mission is the licensee of 14 full-power television stations, operating in DMAs 53-195. The build-out of DTV facilities for its stations is one of the highest priorities of the company, and all 14 of its stations are currently operating either full-power or low-power DTV facilities. Mission has devoted, and continues to devote, significant company resources to the successful transition of all 14 of its stations from analog to digital by the February 17, 2009 deadline mandated by Congress.¹ Toward this goal, Mission has constructed the post-transition DTV facilities for six of its 16 stations, and these stations are either licensed or FCC Forms 302-DTV have been filed and are pending.² Within the past 18 months, Mission has constructed the DTV facilities for three of these six stations. The company's construction efforts over the past 18 months underscore the seriousness of its commitment to the DTV transition process.

Section 73.624(d)(3) of the Commission's rules allows for extension of DTV construction deadlines upon a demonstration by the permittee that the request for extension is

¹ Mission's total expenditures to date on the DTV transition are approximately

² These six stations are KAMC, Lubbock, Texas; KOLR, Springfield, Missouri; KRBC-TV, Abilene, Texas; WTOV, Rockford, Illinois; WUTR, Utica, New York; and WYOU, Scranton, Pennsylvania.

The three remaining Mission stations that are not the subject of the instant extension request either will be built out by May, 18, 2008 or have August 18, 2008 or February 17, 2009 DTV construction deadlines. These stations are not addressed herein.

Mission Broadcasting....it's our mission to care

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due to circumstances that are either unforeseeable or beyond the licensee's control where the licensee has taken all reasonable steps to resolve the problem expeditiously.³ Such circumstances shall include, but shall not be limited to, the unavailability of facilities, such as a tower, because of delays in obtaining zoning or FAA approval or similar constraints or where the cost of construction exceeds the permittee's financial resources.⁴

Mission is committed to constructing full-power digital operations for its stations as expeditiously as possible. However, Mission's financial situation requires it to pace out the large cash expenditures of DTV construction consistent with the timeline set forth in Attachment 1. As of March 11, 2007, Mission had approximately _____ in outstanding debt. Mission is not in a position to incur additional debt under its loan agreement or through the issuance of bonds for capital expenditures in the amount required to complete full-power DTV facilities for its remaining stations. Therefore, Mission is funding its full-power DTV conversion from its available working cash-flow.

In order to meet its other payment obligations (including payroll, programming and debt service costs) from its available cash flow and to remain in compliance with certain loan covenants, Mission, with input from its DTV contractors, vendors and consultants, has developed the timetable for DTV conversion set out Attachment 1 based on its overall projected cash-flow and expenses. While there are variables beyond Mission's control, such as weather delays and manufacturers' scheduling conflicts, Mission projects that it will be able to initiate full-power digital operations consistent with this timeline.⁵

As Mission has stated in previous extension requests,⁶ the company is party to shared services agreements with Nexstar Broadcasting, Inc. ("Nexstar") for its stations. In order to minimize the expense and burden associated with DTV conversion, Mission requested that Nexstar work with Mission to develop a feasible conversion plan.

With Mission's consent, Nexstar retained AZCAR and Morrison Hershfield (collectively "AZCAR") to work with Mission to complete the DTV transition. With AZCAR, Mission has created a master plan to convert its stations that are not yet operating full-power digital facilities

³ 47 C.F.R. § 73.624(d)(3)(i) (2007).

⁴ Id. at § 73.624(d)(3)(ii).

⁵ Mission acknowledges that the Commission can extend DTV construction permits for six months, and that three of the five stations listed in Attachment 1 have projected construction dates beyond November 18, 2008, which is six months from the date of expiration of the current permits for the stations. Mission anticipates having to file an additional extension request for these stations in September 2008.

⁶ In November 2007, Mission submitted an extension request, similar to the instant request, for these five stations.

by February 17, 2009. A significant challenge in meeting construction deadlines is the strengthening or replacement of the towers for all of these stations. It is estimated that the cost of these tower repairs/replacements will be approximately [redacted]. Attached hereto as Attachment 2 is a letter from Morrison Hershfield Corporation providing detailed information with respect to the required upgrades and/or repairs to each of the station's towers, including a tentative schedule for completing such actions.

Based on AZCAR's proposed construction plan, Mission has executed contracts with Acrodyne and Thompson-Grass Valley for transmitters; Dielectric for antennas and transmission line; Stainless Doty-Moore, Precision Communications and Radian for tower construction; and with Micro Communications, Inc. for RF systems. When Mission is ready to construct the full-power facilities for its stations it will execute contracts, on a station-by-station basis, for the needed repairs and upgrades for its towers.

AZCAR also estimated that the equipment necessary to initiate full-power DTV operating for its remaining stations (including antennas, transmitters, encoders, transmission line and non-tower site upgrades) will cost approximately [redacted]. AZCAR further estimated that Mission will have to spend approximately [redacted] in engineering and consulting fees to bring all stations to full-power digital operation. Based on AZCAR's analysis, Mission believes it will cost approximately [redacted] (including tower upgrade costs) to convert its remaining stations to full-power digital operations.

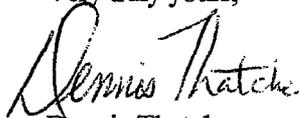
Based on the foregoing, Mission submits there is good cause for granting the applications for extension of time to construct the DTV stations listed in Attachment 1, and that such a grant meets the requirements of Section 73.624(d)(3) of the Commission's rules. Such action is in the public interest because it will allow Mission to deliver full-power digital service on the stations listed in Attachment 1 on or before the February 17, 2009 DTV transition deadline. Mission also requests a further extension of special temporary authority to continue operating the stations listed in Attachment 1 with the facilities specified in the requests for special temporary authority previously filed with the Commission until such time as these stations' full-power DTV facilities are constructed.

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Mission is submitting an application for extension of construction permit on FCC Form 337 for each of the stations listed in Attachment 1.

Please address any questions concerning this request for extension of time to Mission's counsel, Howard Liberman or Naomi Travers of Drinker Biddle & Reath LLP, at (202) 842-8800.

Very truly yours,

A handwritten signature in cursive script that reads "Dennis Thatcher".

Dennis Thatcher
EVP & COO

cc: Shaun Maher (Video Services Division)

ATTACHMENT 1

<u>Station</u>	<u>DTV Construction Permit</u>	<u>Anticipated Construction Date</u>
WFXW-DT	BMPCDT-20070125ACT	10/31/2008
KODE-DT	BMPCDT-20070125ACU	10/31/2008
KSAN-DT	BMPCDT-20070125ABX	12/31/2008
KJTL-DT	BMPCDT-20070404ACI	12/31/2008
WFXP-DT	BMPCDT-20070404ACJ	12/31/2008

MORRISON HERSHFIELD CORPORATION
66 Perimeter Center East, Suite 600, Atlanta, Georgia 30346 USA
Tel. 770 379 8500 Fax. 770 379 8501



March 19, 2008

Mr. Dennis Thatcher
Mission Broadcasting, Inc.
7650 Chippewa Road
Suite 305
Brecksville, Ohio 44141-2319

Re: Tower Upgrades

Dear Dennis:

As part of our comprehensive analysis for Mission's full-power DTV television build-out we have determined that a number of your stations' antenna structures require strengthening or replacement prior to the installation of the equipment necessary for full-power DTV operations. Below is a summary of the current status of Mission's antenna structures, which are in need of repair before installing additional DTV equipment, a description of the work, required and an estimate of the time required to make the required repairs once work is begun.

Erie (WFXP) – The equipment for the DTV operations for WFXP is being mounted on a tower owned by Nexstar Broadcasting. This tower is moderately overstressed for the DTV antenna installation. The tower will require replacement of top guy levels 5 and 6, addition of mid-panel bracing for twenty panels, replacement of fifteen bays of diagonals and replacement of eight levels of horizontals.

Joplin (KODE) – This tower is significantly overstressed for the DTV antenna installation. The tower will require replacement of the top guy level, addition of mid-panel bracing for thirty panels, replacement of twenty bays of diagonals and replacement of ten levels of horizontals.

Wichita Falls (KJTL) – This tower is severely overstressed for the DTV antenna installation. The tower will require sixty-six bays of leg bracing, ten bays of diagonal replacement and four levels of guy replacement.

San Angelo (KSAN) – This tower is significantly overstressed for the DTV antenna installation. The tower will require three new guy anchors, new guy wires at 80 ft, 230 ft and 339 ft above grade, guy wire replacements at 158 ft, 278 ft and 398 ft above grade, leg reinforcement from base to 30 ft above grade, mid-panel bracing from base to 174 ft above grade, new diagonal bracing at select locations along the tower height and re-tensioning of all guy wires.

Terre Haute (WFXW) – This tower is moderately overstressed for the DTV antenna installations. The tower will require thirty bays of leg bracing, four bays of diagonal replacement and three levels of guy wire replacement.

Engineering work for WFXP, KODE, KJTL, KSAN and WFXW has been completed. The material fabrication is currently in progress and the construction has been scheduled for these five stations. The tower construction and antenna installation for KODE is expected to be complete by July 2008. The tower construction and antenna installations for KSAN and WFXW are expected to be complete by October 2008. The tower construction and antenna installations for WFXP and KJTL are expected to be complete by December 2008.

The anticipated time periods are based on our experience with similar scope of work carried out on overstressed towers. This is subject to change depending on material and crew availability as well as unforeseen weather related delays.

Sincerely,



Shylesh Moras
Manager, Tower Upgrades
Morrison Hershfield Corporation
770-379-8509 (tel)
770-379-8501 (fax)

