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April 5, 2011

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

Re: Request for Waiver for TV Translator Receive Sites Beyond 80 km
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

In its *Second Memorandum Opinion and Order* in ET Docket Nos. 04-186 and 02-380, 25 FCC Rcd 18661 (2010), the Commission adopted rules to protect TV translator receive sites and cable TV headends that are located beyond 80 kilometers of the protected contours of the TV stations being received. The Commission found that such protection is important to avoid disruption of TV service to viewers who are located beyond TV station service areas and able to receive those signals through retransmission on TV translators and cable systems.

On behalf of MMM License II LLC, licensee of Station KULR-TV, Billings, Montana, the Media Bureau is respectfully requested to waive Sections 15.712(6) and 15.713(c)(1) of the Commission's rules to allow inclusion in the TV bands database of the receive sites listed in the attached spread sheet. The spread sheet lists the geographical coordinates of the receive sites of TV translator stations which rebroadcast the signal of Station KULR-TV, Channel 11 (virtual channel 8), and the call signs, channel numbers, input stations, and input channel numbers of the aforementioned TV translator stations. Also attached is a map showing the location of the receive sites.

MMM License II LLC submits that a grant of this waiver request will serve the public interest by providing for the continuation of interference-free, over-the-air television service in remote rural areas. In addition to the entertainment value of the programs being rebroadcast, these translators provide local news, weather, weather watches, fire hazard warnings and other Emergency Alert System information. Often these translators are community supported, either through County-level tax assessments or donation-based local organizations. Residents in these areas tend to have lower incomes and may not be able to afford satellite service or have access to cable service.



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Should you have any questions concerning this matter, kindly advise the undersigned.

Sincerely,

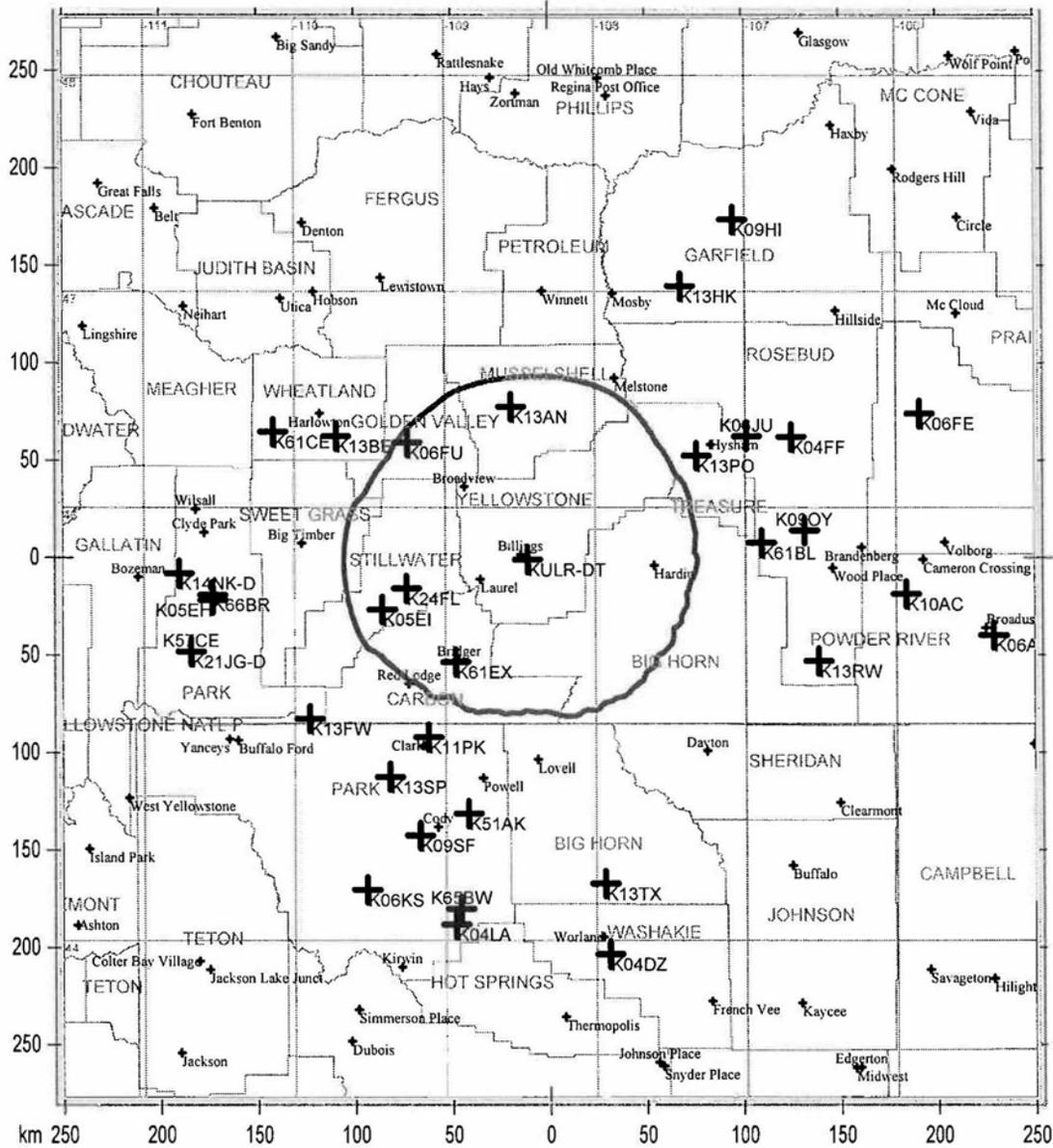
Erwin G. Krasnow

cc: Hugh Van Tuly, FCC (via email)
Alan Stillwell, FCC (via email)
ET Docket Nos. 04-186 and 02-380 (via ECFS)

KULR translators

Call Sign	Channel	Community/Area	Comments	Input Station	Input Channel
K21JG-D	21	Emigrant, MT	Waiver required	K66BR/K20KQ-D	66/20
K06FE	6	Miles City, MT	Waiver required	K61BL/K38MC-D	61/38
K65BW	65	Meeteetse, WY	Waiver required	Microwave fed	ASI
K06KS	6	South Fork, WY	Waiver required	K51AK	51
K04DZ	4	Worland, WY	Waiver required	K51AK	51
K57CE	57	Paradise Valley, MT	Waiver required	K66BR/K20KQ-D	66/20
K04LA	4	Wood River, WY	Waiver required	K51AK	51
K06AA	6	Broadus, MT	Waiver required	K61BL/K38MC-D	61/38
K09HI	9	Jordan, MT	Waiver required	KYUS	3
K10AC	10	Sonnette, MT	Waiver required	K06AA	6
K13TX	13	Manderson, WY	Waiver required	K51AK	51
K14NK-D	14	Livingston, MT	Waiver required	Microwave fed	ASI

TV TRANSLOCATORS IN FCC CDBS DEPICTED



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

Map Scale: 1:3500000 1 cm = 35.00 km V/H Size: 553.65 x 500.17 km

Figure 1