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April 5, 2011

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VIA HAND DELIVERY

FILED/ACCEPTED

APR - 5 2011

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Attn: Office of Engineering and Technology

Re: KSAX(TV), Alexandria, Minnesota (Facility ID No. 35584)
Unlicensed Operation in the TV Broadcast Bands (ET Docket No. 04-186)
Waiver of 47 C.F.R. §15.712(b)

Dear Ms. Dortch:

KSAX-TV, Inc., the licensee of KSAX(TV), Alexandria, Minnesota (Facility ID No. 35584), by its counsel and pursuant to Section 1.3 of the Commission's rules, 47 C.F.R. §1.3, hereby requests a waiver of Section 15.712(b) of the Commission's rules, 47 C.F.R. §15.712(b), to permit the registration of KSAX's receive site in the TV bands database. *See Unlicensed Operations in the TV Broadcast Bands*, Second Memorandum Opinion and Order, 25 FCC Rcd 18661 (2010). KSAX-TV, Inc. and KSTP-TV, LLC, the licensee of KSTP-TV, St. Paul, Minnesota (Facility ID No. 28010), are commonly-controlled by Hubbard Broadcasting, Inc. KSAX is a satellite television station of KSTP-TV, and plans to begin receiving KSTP-TV's signal over-the-air rather through the use of microwaves in the near future. KSAX's receive site is located slightly farther than 80 km beyond the nearest edge of KSTP-TV's protected contour. KSTP-TV transmits on Channel 35, and the coordinates of its transmitter are:

Latitude:	N	45°	3'	44"
Longitude:	W	93°	8'	21"

The coordinates of KSAX's receive site are:

Latitude:	N	45°	41'	59"
Longitude:	W	95°	10'	35"

A grant of the requested waiver would help protect KSAX's continued reception of the signal of KSTP-TV and its retransmission of KSTP-TV's valuable broadcast programming to viewers in and around Alexandria, Minnesota. The waiver, therefore, would serve the public interest. As noted by the Commission, "it is important to avoid disruption to TV service to viewers who are located beyond TV station service areas and able to receive those signals through retransmission . . . The purpose of permitting the registration of receive sites is to protect the reception of over-the-air TV signals that are redistributed through other means." *Id.* at 18677-79.

In addition to an original and four (4) copies of this waiver request, an extra copy is enclosed. Please date-stamp the extra copy and return it to the courier.

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

Respectfully submitted,
HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read 'LTB', is written over a horizontal line.

Leighton T. Brown
Counsel for KSAX-TV, Inc.