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*flour mill building*

*1000 potomac street nw*

*washington, d.c. 20007-3501*

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Please reply to MELODIE A. VIRTUE  
mvirtue@gsblaw.com TEL EXT 2527

October 12, 2012

Our File Number 21704-00200-66

**Via ECFS**

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

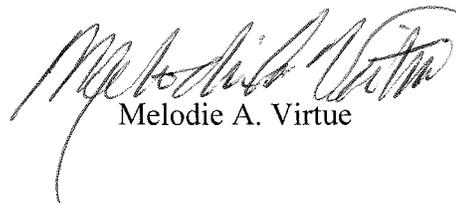
Re: **WPFO(TV), Waterville, ME**  
Facility ID No. 84088  
Request for General Waiver of CALM Act Implementation Deadline  
MB Docket No. 11-93

Dear Ms. Dortch:

Transmitted herewith on behalf of CMCg Portland License LLC, licensee of WPFO, Waterville, Maine, pursuant to *Implementation of the Commercial Advertisement Loudness Mitigation (CALM) Act*, 26 FCC Rcd 17222 (2011), paragraphs 56 – 58, is the licensee's request for a **GENERAL WAIVER** of the December 13, 2012, implementation deadline for a period of six months.

Should there be any questions regarding this matter, kindly communicate directly with this office.

Respectfully submitted,



Melodie A. Virtue

MAV:c11  
Enclosure

DC\_DOCS:709914.1

Before The  
Federal Communications Commission  
Washington, D.C. 20554

In re Matter of )  
)  
IMPLEMENTATION OF THE COMMERCIAL ADVERTISEMENT ) MB Docket No. 11-93  
LOUDNESS MITIGATION (CALM) ACT )

To: The Secretary  
For: Media Bureau

REQUEST FOR GENERAL WAIVER

CMCG Portland License LLC, licensee of WPFO, Waterville, Maine (Facility ID Number 84088), pursuant to Section 1.3 of the Commission's rules, hereby requests a "general" waiver as set forth in paragraph 56 of *Implementation of the Commercial Advertisement Loudness Mitigation (CALM) Act*, 26 FCC Rcd 17222 (2011) (the "CALM Rules"). WPFO needs a waiver of the December 13, 2012, implementation deadline because the station will be in the middle of moving or rehabilitating its studios at that time. A request for waiver for six months is respectfully requested in order to allow sufficient time to complete the move to new studio facilities or upgrade its studio facilities in place. The upgrade and/or move of its studio facilities overlap with the effective date of the CALM Rules.

The licensee already has accepted delivery of the equipment that will allow it to comply with the CALM Rules. The equipment is currently rack mounted, and shrink wrapped in a warehouse with the rest of its new HD Master Control room equipment for the station. The delay for installation is caused by the need to finalize its lease. The licensee's current lease expires in February 2013.

The station has been in negotiations with the landlord of the building it currently occupies. It is also possible that the station studios will be moved to a different building. Regardless of which space it will occupy, WPFO hopes to begin its upgrade and move, if that turns out to be the case, in December or early January. If the licensee completes negotiations for the studio space sooner, it may not need a waiver of the CALM Rules compliance deadline. This request for a temporary delay in complying with the CALM Rules is sought out of an abundance of caution in order to authorize temporary non-compliance with the rule if the move or upgrade in place is not completed before the effective date of the CALM Rules.

Good cause exists for granting a temporary waiver. A temporary waiver will reduce unnecessary wear and tear on the new equipment that will occur from installing the equipment, and soon thereafter removing and reinstalling the equipment. A temporary waiver of the rule will also reduce needless duplication of expense for installing and removing the equipment before it is installed in the upgraded studio facilities. The savings would be better spent on improved programming on the station.

The undersigned certifies under penalty of perjury that the foregoing is true and correct based on information supplied by the station's Chief Engineer.

October 12, 2012

By   
David J. Wilhelm  
Assistant Secretary of  
Corporate Media Consultants Group LLC  
Sole member of CMCG Portland License LLC