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August 13, 2010

BY HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20054

FILED/ACCEPTED

AUG 13 2010

Federal Communications Commission
Office of the Secretary

ATTN: Media Bureau

Re: WTVF-DT, Nashville, Tennessee (Fac. ID No. 36504)
Request for Further Extension of Experimental Authority to Operate a
Replacement Digital Translator on Channel 50 at 100 kW ERP

Dear Ms. Dortch:

NewsChannel 5 Network, LLC ("NewsChannel 5"), licensee of full-power commercial television station WTVF-DT, Nashville, Tennessee (Facility ID No. 36504) ("WTVF"), by its attorneys and pursuant to Sections 74.102 and 74.131(c) of the Commission's rules,¹ hereby requests a further extension of its experimental authority to operate a replacement digital translator on Channel 50 with an effective radiated power ("ERP") of 100 kW.² Extension of the experimental authority will enable WTVF to continue to provide improved service to viewers residing within a 15-mile radius of the station's transmitter site who lost service following WTVF's transition to digital Channel 5 on June 12, 2009.

On July 17, 2009, the Media Bureau granted for a six-month term a request for special temporary authority ("STA") filed by NewsChannel 5 to operate a UHF replacement digital television translator on Channel 50 at 100 kW ERP.³ The STA was subsequently extended for an additional six-month term through August 23, 2010.⁴

¹ 47 C.F.R. § 74.102 & 74.131(c).

² Simultaneous with the filing of this request, NewsChannel 5 is filing a request for further extension of its STA to operate the replacement digital translator at 100 kW.

³ File No. BLSTA-20090714ACU.

⁴ File No. BELSTA-20100217AAU.

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Field tests conducted by WTVF personnel after the replacement digital translator commenced service demonstrate that operation of the replacement digital translator at the increased power level of 100 kW has been very effective in restoring over-the-air reception of WTVF's digital signal to viewers residing within 15 miles of the station's main transmitter site. Extension of the experimental authority will ensure that viewers located in WTVF's prior loss area will continue to receive WTVF's signal as delivered by the replacement digital translator.

WTVF previously has submitted to the Commission an engineering analysis demonstrating that operation of the replacement digital translator on Channel 50 with an ERP of 100 kW will not result in prohibited interference to any station and will not extend WTVF's pre-transition analog service area in any direction.⁵ The engineering analysis is hereby incorporated by reference. In addition, WTVF operates the 100 kW facility in compliance with the engineering and technical requirements (*e.g.*, spurious emissions) applicable to high-power television stations to ensure interference protection to existing services. As noted above, as part of WTVF's course of research and experimentation with the replacement digital translator, the station has conducted field tests and measurements at 15 kW up to 100 kW which have demonstrated the effectiveness of the operation in restoring service to viewers in WTVF's central loss area. The results of such tests are being submitted to the Commission under separate cover.

Under these circumstances, good cause exists to authorize continued operation of WTVF's replacement digital translator so that the station may maintain service to viewers within a 15-mile radius of its main transmitter site. The public interest has been, and will continue to be, served as a direct result of the improved service that WTVF provides with the replacement digital translator facility.

Please contact the undersigned with questions concerning this matter.

Respectfully submitted,



Christopher G. Tygh

Counsel to NewsChannel 5 Network, LLC

cc: Barbara Kreisman (via e-mail)
Clay Pendarvis (via e-mail)
Hossein Hashemzadeh (via e-mail)
Kevin Harding (via e-mail)

⁵ The engineering analysis has been submitted as an exhibit to WTVF's modification application for its construction permit to operate the replacement digital translator with an ERP of 100 kW. See File No. BMPCDT-20090714ACS.