

Request for Waiver

In accord with directions from the International Bureau staff, Scripps Media, Inc. (“Scripps”), parent of ION Television Licensee, LLC, hereby requests waiver of the temporary freeze on the filing of new or modification applications for receive-only earth station registrations in the 3.7-4.2 GHz frequency band (the C-band). *See Public Notice*, DA 18-398 (released April 19, 2018).

Good cause exists for waiver, which will merely allow for continued registration and interference protection for earth station antennas that already are reflected on the list of incumbent earth stations. Grant of the waiver will serve the twin goals of uninterrupted access to video delivery services and an orderly and timely C-band transition.

Scripps recently completed a merger with ION Media Networks (“ION”) which resulted in the transfer of control of 48 ION television stations to Scripps and 23 of ION’s television stations to INYO Broadcast Holdings (“INYO”).

All these television stations utilize C-band earth stations to receive their network programming, but all the earth stations are registered to an ION subsidiary, ION Television Licensee, LLC, as a single network under the call sign, E190712. Given the stations’ newly separated ownership, it has become necessary to relocate the earth stations that serve the INYO stations to a separate registration.

As directed by the staff, Scripps is filing the present application to modify the E190712 registration to remove the INYO earth stations from that authorization, and INYO is simultaneously filing applications to register its earth stations under new call signs.

Scripps requests that the International Bureau staff amend its list of reimbursement-eligible antenna sites to include Scripps’ stations new call sign for these established antenna sites.

Waiver of the freeze to permit the proposed reorganization of these established earth stations will serve the public interest by permitting the continued protected use of these earth stations to deliver the programming aired by the Scripps and INYO television stations without any actual change in the scope of interference protection and reimbursement eligibility for registered antennas.