

Request for Waiver

In accordance with directions from the International Bureau staff, Inyo Broadcast Holdings, LLC (“INYO”), parent of INYO Broadcast Licenses, 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 merely will allow for continued registration and interference protection for earth station antennas that already are reflected on the list of incumbent earth stations. The sole change will be to change the manner in which those antennas are reflected in the Commission’s databases, such that they will appear under multiple call signs rather than a single call sign. Grant of the waiver thus serves the twin goals of uninterrupted access to video delivery services *and* an orderly and timely C-band transition.

The recently completed merger of Scripps Media, Inc. (“Scripps”) and ION Media Networks (“ION”) resulted in the transfer of control of 48 ION television stations to Scripps and 23 ION television stations to INYO. All of these television stations utilize C-band earth stations and antennas to receive their network programming, but all of the earth stations and their antennas are registered to ION subsidiary, ION Television Licensee, LLC, as a single network under the call sign, E190712. That call sign appears on the list of incumbent earth stations. Given the stations’ newly separated ownership, it has become necessary to re-assign the earth stations that serve the INYO stations to separate registrations. To be clear, there will be no change in technical parameters of the earth stations and their antennas, and no new station or antenna will receive interference protection or reimbursement eligibility by virtue of grant of this request.

As directed by the staff, Scripps is filing an application to modify the E190712 registration to remove the INYO earth stations from that authorization, and in the instant application and 25 concurrently-filed applications, INYO is simultaneously filing to register its earth stations under new call signs. INYO also respectfully requests that the International Bureau staff amend its list of reimbursement-eligible antenna sites to include INYO’s stations’ new call signs and station 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.