

Request for Extension of Construction Permit Deadline

Multimedia Holdings Corporation (“Licensee”), licensee of KTVD(DT), Denver, Colorado (Facility ID 68581) (“KTVD”), hereby requests a 180-day extension of KTVD’s construction permit for its main post-Incentive Auction facility (File No. 0000027979) (the “Main CP”) – through October 9, 2019 – due to delays in receiving the equipment necessary to complete construction of the facility.¹

KTVD’s main post-Auction facility requires, among other equipment, three manifolds, a power divider, and the retuning of the phase combining unit. Dielectric has delivered two of the required manifolds. However, the phasing unit, power divider and third manifold are delayed. Dielectric’s most recent estimate is that the necessary components for the power divider will arrive at Dielectric facilities on or about March 28. Licensee understands from Dielectric that work on the third manifold is expected to be completed shortly, after which Dielectric will begin retuning the phasing unit. However, Licensee has not received an anticipated completion date for the phasing unit. Given these delays, Licensee cannot be assured that the construction required by the Main CP can be completed by the original April 12, 2019, deadline. Assuming the current delivery estimates hold, Licensee expects it would be able to complete construction by the end of June 2019, and potentially earlier. In an abundance of caution, Licensee requests a 180-day extension of the Main CP to account for the possibility of further unforeseen delays.

KTVD already has ceased operations on its pre-Auction channel and is operating on its post-Auction channel under Special Temporary Authority; KTVD will continue to do so during any extension of the Main CP.² Granting the requested extension of the Main CP therefore would have no effect on any party’s ability to complete its post-Auction transition. The extension thus would serve the public interest by facilitating the orderly completion of KTVD’s main post-Auction facility without impacting the broader repacking schedule.

¹ See 47 C.F.R. § 73.3700(b)(5)(ii)(B). To the extent necessary, Licensee also requests that the Commission waive the requirement that requests for additional time to complete construction be filed at least 90 days in advance of the construction permit deadline, as Licensee did not learn of the anticipated equipment delay from Dielectric until March 11, 2019. See § 73.3700(b)(5)(iv). For the reasons set forth herein, grant of this waiver would serve the public interest by allowing KTVD to complete construction of its permanent post-Auction facility in an orderly fashion, without affecting any other party’s repacking.

² See File No. 0000066681 (the “Channel 31 STA”). The Channel 31 STA is scheduled to expire on September 4, 2019. In the event construction of KTVD’s main facility is not yet complete at that time, Licensee will seek an extension of the Channel 31 STA.