

Request for Extension of Construction Permit Deadline

WKYC-TV, LLC (“Licensee”), licensee of WKYC(DT), Cleveland, Ohio (Facility ID 73195) (“WKYC”), hereby requests a 180-day extension of WKYC’s construction permit for its main post-Incentive Auction facility (File No. 0000034823) (the “Main CP”) – through January 29, 2020 – due to the unexpected departure of the tower crew Licensee had engaged to complete the facilities authorized by the Main CP.¹

WKYC is a Phase 4 station, and the Main CP accordingly is scheduled to expire on August 2, 2019. WKYC has completed installation of its post-Auction transmitter and has obtained its new primary and interim antennas and associated transmission line. The tower crew originally hired by the station has completed installation of the station’s interim antenna and transmission line. However, on June 7, 2019, the tower crew informed WKYC that the crew was leaving the WKYC site and would not be available to install the station’s primary antenna and transmission line until mid-July.²

WKYC has engaged a replacement crew to complete a helicopter-lift installation of the station’s primary antenna (and the antenna for another station, WVIZ, that will be stacked on top of WKYC’s primary antenna). However, given the short time remaining before the Main CP’s deadline, the potential for weather-related delays, and the possibility of other unforeseen delays relating to the change in construction plans, it may not be possible for the station to complete construction of the station’s permanent post-Auction facility before the scheduled expiration of

¹ See 47 C.F.R. § 73.3700(b)(5)(ii)(B).

² To the extent necessary, Licensee thus 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 change in the tower crew’s schedule until June 7, 2019. See § 73.3700(b)(5)(iv). For the reasons set forth herein, grant of this waiver would serve the public interest by allowing WKYC to complete construction of its permanent post-Auction facility in an orderly fashion, without affecting any other party’s repacking.

the Main CP. In an abundance of caution, Licensee therefore requests a 180-day extension of the Main CP to ensure that the station's permanent facility can be timely constructed and licensed notwithstanding the possibility of further unforeseen delays.

In the meantime, WKYC will use its completed interim antenna to cease operations on its pre-Auction channel and commence operations on its post-Auction channel by the Phase 4 deadline. WKYC shortly will file appropriate applications for special temporary authority to operate on its interim antenna at a power level of 1000 kW. The station expects that it may use its interim antenna to broadcast on its pre-Auction channel for a short period (when work commences on the station's primary antenna) before switching to its post-Auction channel on or before the Phase 4 deadline. Contour maps showing the coverage the station expects the interim antenna to provide on the station's pre-Auction and post-Auction channels are attached hereto as Attachment 1.

Because WKYC will timely cease operation on its pre-Auction channel, granting the requested extension of the Main CP 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 WKYC's main post-Auction facility without impacting the broader repacking schedule.

Attachment 1
Primary and Interim Antenna Contour Maps

Pre-Auction (Channel 17) Predicted Population (U.S. Census 2010 Data)

WKYC-DT CHANNEL 17 LICENSED MAIN

Total Population Within Contour: 4,157,839

Total Housing Units Within Contour: 1,886,248

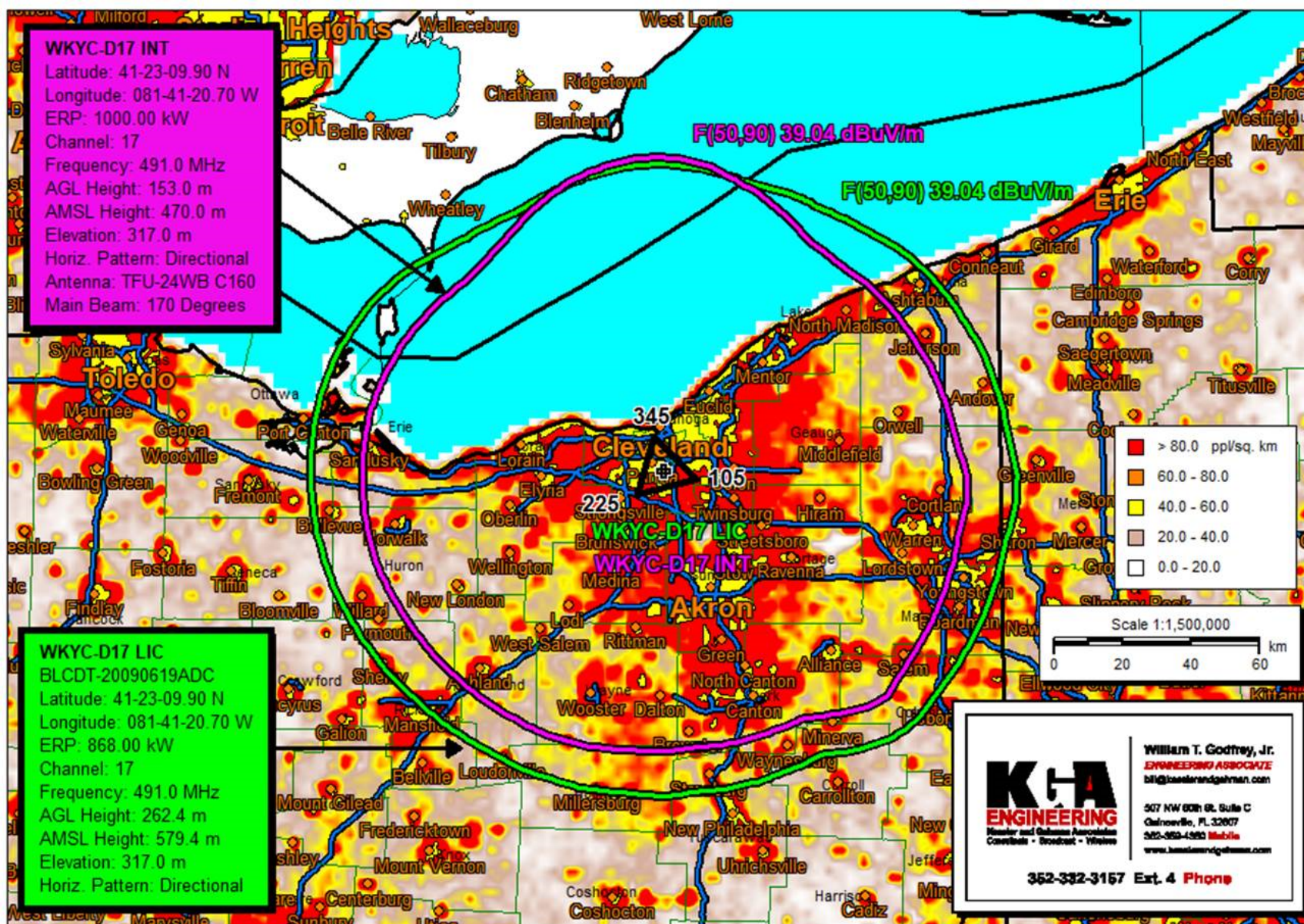
Total Area Within Contour: 28,956.22 sq. km

WKYC-DT CHANNEL 17 INT (TFU-24WB C160)

Total Population Within Contour: 3,707,767

Total Housing Units Within Contour: 1,676,021

Total Area Within Contour: 22646.38 sq. km



WKYC-D17 LIC vs. WKYC-D17 Interim (TFU-24WB C160 at 170 Degrees)

Post-Auction (Channel 19) Predicted Population (U.S. Census 2010 Data)

WKYC-DT CHANNEL 19 CP

Total Population Within Contour: 4,186,172

Total Housing Units Within Contour: 1,899,364

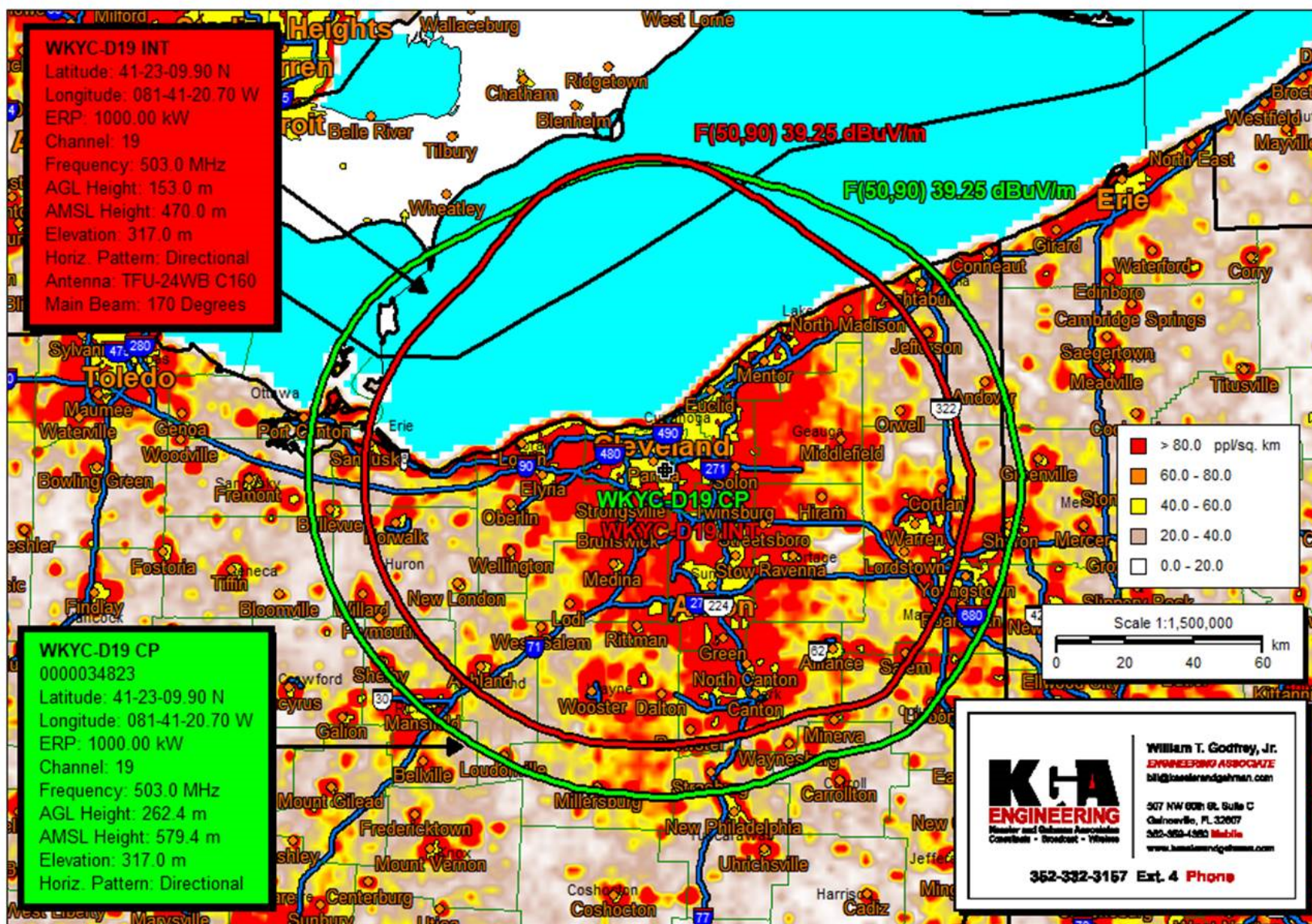
Total Area Within Contour: 29,446.88 sq. km

WKYC-DT CHANNEL 19 INTERIM

Total Population Within Contour: 3,705,157

Total Housing Units Within Contour: 1,675,419

Total Area Within Contour: 22,524.07 sq. km



WKYC-D19 CP vs. WKYC-D19 Interim (TFU-24WB C160 at 170 Degrees)