

Request For Special Temporary Authorization

Connecticut Public Broadcasting, Inc. (“Licensee”), licensee of television station WEDW(TV), Bridgeport, Connecticut (Fac. ID 13594) (“Station”), hereby submits this request to allow the Station to transition from its current, pre-auction DTV channel (49) to its post-auction DTV channel (21) from its existing site, which will serve as DTS site one when Licensee completes construction of its permitted distributed transmission system (“DTS”). Concurrently herewith, Licensee is filing a request to extend the Station’s pending construction permit for an additional 180 days due to delays in granting its application to convert to a DTS.

On April 13, 2017, the FCC released the Incentive Auction Closing and Channel Reassignment Public Notice, in which it reassigned WEDW from pre-auction DTV channel 49 to post-auction DTV channel 21. On June 26, 2017, Licensee filed its initial filing window application for a construction permit for WEDW to operate on the baseline channel 21 facility specified in the Closing and Channel Reassignment PN, which the FCC granted on June 29, 2017. File No. 000025204. On November 2, 2017, Licensee filed its application for an expanded facility, which proposed to utilize a single transmitter site located near Stamford, Connecticut (the “Stamford Facility”). File No. 0000034869. The Commission issued a construction permit for the Stamford Facility on December 1, 2017. On December 6, 2017, Licensee filed an application to implement a distributed transmission system (the “DTS Application”). File No. 0000036047. The DTS Application proposed to utilize WEDW’s existing tower in Bridgeport (the “Bridgeport Facility”) as DTS Site 1 and a new antenna on Empire State Building as DTS Site 2 (the “ESB Facility”). The DTS Application was the subject of a meritless informal objection by PMCM TV, LLC. The FCC granted the DTS Application and issued the CP for the DTS facility (the “CP”) on June 12, 2019 – less than two months before the Phase Four transition deadline.

The FCC has indicated that “in order to facilitate timely construction of new facilities and to minimize any time broadcasters may be off the air,” reassigned stations and band changing stations may request an STA to operate with temporary facilities while they complete construction of their post-auction channel facilities.¹ Among the options for a temporary facility is “a station operating on its assigned post-auction channel with parameters at variance from its post-auction construction permit.”²

Licensee promptly filed the DTS Application in December 2017. However, the DTS Application was subject to an informal objection and a supplemental pleading filed by PMCM. The pleading cycle for the DTS Application was closed on March 9, 2018. The Commission did not grant the application until a year later. It simply was not possible for Licensee to complete all of the steps necessary to construct the full DTS in the 51 days between the FCC’s grant of the

¹ *Incentive Auction Task Force and Media Bureau Announce Procedures for the Post-Incentive Auction Broadcast Transition*, Public Notice, DA 17-106 ¶ 46 (rel. Jan. 27, 2017) (citing *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd. 6567 ¶ 584 (2014).

² *Id.* ¶ 47.

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WEDW(TV), Bridgeport, CT (Fac. ID 13594)
Engineering STA

CP and the Phase 4 transition deadline. Therefore, if the Commission denies the instant STA, the Station will have no choice but to temporarily suspend operations.

For the foregoing reasons, Licensee respectfully requests a grant of the instant Engineering STA.