

**WRAL-TV POST-AUCTION CONSTRUCTION PERMIT**  
**EXTENSION AND WAIVER REQUEST**

Capitol Broadcasting Company, Inc. (“CBC”), the licensee of WRAL-TV, Raleigh, NC (FIN 8688) (“WRAL”), has been issued an extension until December 31, 2019 to complete construction of its main post-auction facilities (File No. 0000075896) (the “WRAL Construction Permit”). The extension was granted on September 4, 2019. See File No. 0000080709.

Due to reasons beyond its control, and as further explained below, CBC will be unable to complete construction of the WRAL main post-auction facilities by December 31, 2019. Accordingly, CBC hereby requests, pursuant to Section 73.3700(b)(5) of the Commission’s rules, an extension of the WRAL Construction Permit deadline for the remainder of the 180-day period, i.e., to and including **March 9, 2020**, in order to allow CBC to complete construction of WRAL’s post-auction channel facilities.

WRAL is currently operating on its post-auction channel with a side-mounted auxiliary antenna, and ceased operations on its pre-auction channel at the end of Phase 5 of the transition. WRAL is unable to complete construction of the WRAL main antenna facilities until WRAL and other stations in the market are able to complete their construction of a top-mounted candelabra antenna configuration at the top of the tower. A helicopter is needed for this work, and was originally scheduled to complete the work in October 2019. However, that scheduled timeline has now been delayed due to reasons beyond CBC’s control.

Specifically, as shown in the attached letter from Electronics Research, Inc. (“ERI”), “[t]he scheduling of the helicopter for part of the installation work and the development of the rigging plan and gin pole supports required for the installation of the lower antenna, in addition to weather related delays, have taken longer than anticipated.” Although ERI indicates in the letter that it anticipates all work to be completed by March 31, 2020, CBC anticipates that the work can be expedited so that all work is completed on or before March 9, 2020.

CBC submits that a grant of this additional time is consistent with the Commission’s rules governing the television repacking process. Section 73.3700(b)(5) delegates authority to the Media Bureau to grant an extension of time of up to six months to licensees of reassigned stations to complete construction of their post-auction channel upon demonstration by the licensee that failure to meet the construction deadline is due to circumstances that are either unforeseeable or beyond the licensee’s control.<sup>1</sup> Circumstances that may justify an extension of the construction deadline of a licensee of a reassigned station include, but are not limited to, unusual technical challenges, such as the need to construct a top-mounted antenna or the need to coordinate channel changes with another station.<sup>2</sup> CBC submits that those facts are present here, and that CBC is not requesting any additional time beyond the permitted six months.

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<sup>1</sup> 47 C.F.R. § 73.3700(b)(5).

<sup>2</sup> *Id.* § 73.3700(b)(5)(ii)(D).

**A Waiver of Section 73.3700(b)(5)(iv) Would Serve the Public Interest**

In the interest of ensuring a smooth transition of repacked stations, CBC respectfully requests a waiver of the 90-day deadline set forth in Section 73.3700(b)(5)(iv). CBC submits that a waiver in this instance will help ensure that WRAL can successfully complete the build-out of its main facilities at the top of the tower.

**Bill Harland**  
**Vice President of Marketing**

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October 7, 2019

Mr. Peter A. Sockett  
Director of Engineering and Operations  
Capitol Broadcasting Company  
WRAL / WRAZ / WILM  
2619 Western Blvd  
Raleigh, NC 27606  
[PSockett@wral.com](mailto:PSockett@wral.com)

REF: WRAL-TV, FCC Facility ID 8688  
WRAZ (DT), FCC Facility ID 64611  
ERI Sales Order 36139

Dear Mr. Sockett:

Electronics Research, Inc. ("ERI") has been working to fulfill the transmission equipment and services included on ERI Sales Order Number 36139, placed with ERI in April 2018, and related follow on orders for this project. The products ERI is supplying for WRAL-TV and WRAZ include a top mounted, stacked array, of two UHF television antennas and associated transmission line systems. The scheduling of the helicopter for part of the installation work and the development of the rigging plan and gin pole supports required for the installation of the lower antenna, in addition to weather related delays, have taken longer than anticipated.

Without major additional issues ERI estimates the antenna and transmission systems we plan to mobilize to site in December 2019 and anticipate the installation will be completed by March 31, 2020 or before.

All of the material required to meet this schedule is on hand or scheduled to be received in time to meet the estimated date listed above. If you have questions or require additional information or other documentation please contact me or your ERI Project Manager, Peggy Hunt.

Sincerely,

ELECTRONICS RESEARCH, INC.



Bill Harland  
Vice President of Marketing

cc: Peggy Hunt, Executive Project Manager & Director of Customer Service, ERI

