

Amendment to Request for Waiver of Tolling Rule

Pursuant to staff request for additional information, Virgin Islands Public Broadcasting System (“VIPBS”), licensee of noncommercial educational station WTJX-TV, Charlotte Amalie, Virgin Islands, Facility ID No. 70287 (the “Station”), hereby amends its request for a waiver of the tolling rules and further extension of its post-auction construction permit (“CP”) for the Station’s post-auction facility. *See* LMS File No. 0000084077; *see also* LMS File No. 0000025655 (CP) and LMS File No. 0000072190 (Extension of CP). VIPBS submits this amendment to request a 180-day extension of its post-auction CP and to provide additional information on its construction plans and timeline.

The 100’ auxiliary tower rebuild has been completed. The contractor is obtaining additional materials needed to relocate antennas from the 250’ licensed tower to the 100’ tower. VIPBS is preparing to install its licensed auxiliary antenna on the rebuilt 100’ tower, and it then will no longer need the STA for side-mounted operation on the 250’ licensed tower. Additionally, VIPBS wishes to change from paint and red lights for the 100’ tower to a medium intensity dual lighting system without paint, which will require FAA approval and ASR filing. VIPBS expects to have these requirements completed in the near future and to have the antennas installed by the end of 2019. Meanwhile, a required Notice to Airmen for the auxiliary tower has been filed to note that the tower has just been erected and is temporarily without marking and lighting.

After further study, the contractor recommended last week that the licensee rebuild rather than rehabilitate the 250’ licensed main tower because of safety considerations. In accordance with that recommendation, VIPBS will rebuild the tower. The contractor has provided a timeline for the rebuild. The entire process is expected to take six months. The plan includes removing the upper antennas from the tower, which will likely require a crane. The contractor has just begun the new tower construction permitting process, which is expected to take three to four months. Tower fabrication and transit to the site will take approximately 16 weeks and can occur concurrently with the permitting process. Construction work onsite is expected to take another two months.

For the foregoing reasons, VIPBS hereby respectfully requests a 180-day extension of its post-auction CP.