

**ENGINEERING STATEMENT  
FOX TELEVISION STATIONS, LLC  
REQUEST FOR AN EXTENSION OF TIME TO COMPLETE CONSTRUCTION  
CONSTRUCTION PERMIT FILE NUMBER 0000059954  
KTVU, OAKLAND, CA  
CP: CH 31, 1000 kW (EP), DIRECTIONAL, 512 M HAAT**

This statement supports a request by FOX Television Stations, LLC, licensee of KTVU, to extend the time to complete construction of KTVU's post-incentive auction repack facility on channel 31 as stated in Construction Permit, FCC File Number 0000059954.

KTVU has been assigned to Phase 8 in the FCC's post-incentive auction transition "repack" schedule. The phase completion date is set for March 13, 2020 which also coincides with the expiration of its Construction Permit. Through a coordinated effort on the part of the broadcasters in the San Francisco area, the market is targeting a transition date of March 9, 2020..

While meeting the required transition date seems feasible based on the construction progress thus far, there is still significant work that must be completed in order to meet the required deadline. Should any additional circumstances arise between now and the transition date, there exists the possibility that KTVU may not be able to transition to its authorized facility as granted in the Construction Permit. KTVU, therefore, seeks an extension of time to complete construction based on the following.

KTVU transmits from Sutro Tower located in the San Francisco area. Sutro tower is a well known candelabra style tower consisting of three arbors hosting multiple television, FM radio stations and other wireless communication services. KTVU shares an antenna with several broadcasters. The antenna and transmission line for post-repack operation are installed and ready. However, the combining system remains to be completed. Close coordination with other broadcasters is crucial to ensure no station is off-air during the time of the new combiner installation, and also requires significant local zoning coordination. Even with the best pre-planning, it is quite possible that there will be construction delays. Experience with the DTV transition at the tower site gave KTVU and other stations insight as to the breadth of both anticipated and unforeseen delays. It is for these reasons that an extension of time to complete the construction of the facility as granted in Construction Permit 0000059954 is being requested.

KTVU is also in the process of developing a backup plan to operate using an interim channel 31 transmission facility if construction of the main facility extends beyond the Phase 8 deadline. This will ensure no loss of service occurs to its viewers.