

**WNJS(TV) – Request for Extension of STA**  
**LMS File No. 75321**

New Jersey Public Broadcasting Authority (“NJPBA”), licensee of noncommercial educational TV station WNJS(TV), Camden, New Jersey (“WNJS”), respectfully requests six months of additional time to operate from its post-transition interim antenna pursuant to Special Temporary Authority granted in LMS File No. 75321. As set forth herein, WNJS has been unable to construct its permanent facilities due to delays in the state procurement process.

**Background**

WNJS is assigned to transition from Channel 22 to Channel 23 in Phase 4 of the repack. The station’s transition plan calls for, among other things, replacement of the station’s existing transmitter. The NJPBA is a state agency that operates a noncommercial educational public TV network consisting of several transmission sites serving the State of New Jersey with high-quality public TV programming and emergency communications. As a state agency, the NJPBA is required by law to proceed through the State of New Jersey’s “bid and award” procurement process for larger projects such as the purchase of WNJS’s permanent post-repack facilities. This procurement process involves other elements of New Jersey state government and includes substantial delays outside of the WNJS licensee’s control.

In October 2018, WNJS determined that it would not be possible to complete the state procurement process in time to secure delivery of the station’s new facilities and install them prior to the end of Phase 4. At that point, the station modified Form 399 and its transition plan to include interim Channel 23 facilities to ensure that the station would be able continue serving its viewers while timely ceasing broadcasts on its pre-auction channel. NJPBA requested and was granted a one-time purchasing waiver from the State with a procurement threshold of \$150,000. This exemption enabled the NJPBA to rapidly award a contract for the equipment necessary to build an interim, low-power facility for WNJS to ensure continuity of service until the station’s full power facility can be procured consistent with state requirements. Prior to the completion of Phase 4, WNJS ceased operations on its pre-auction facilities and began broadcasting on its post-auction channel over temporary facilities pursuant to a grant of special temporary authority in LMS File no. 75321.

Meanwhile, WNJS continues to navigate the New Jersey state procurement process. The New Jersey Division of Purchase and Property (“NJDP”) is the state agency responsible for procurement of the equipment and services related to the repacked WNJS transmitter. Regarding this project, NJDP provided the following statement for inclusion in this tolling request:

“Our current established project plan has the NJ Public Broadcasting Authority’s task, T3085 FCC Repack, targeted to have the Evaluation Report & Recommendation Committee report completed & submitted by December 27th, 2019. The Award Recommendation Approval is targeted for January 27, 2020 of which a ten-day Protest Period will begin on January 28, 2020. The contract award would then occur on February 14, 2020.”

NJPBA estimates that it will take an additional 200 days past contract award for equipment to be delivered, installed, and integrated, and is hoping to put the permanent WNJS facility into operation by the end of September 2020.

WNJS has been unable to construct its permanent facilities due to delays in the state procurement process. WNJS is required by law to make major purchases through the New Jersey state procurement process. This process is simply incompatible with the aggressive buildout timelines associated with the television repack. Thus, WNJS respectfully requests a six-month extension of time to operate from its post-transition interim antenna pursuant to Special Temporary Authority granted in LMS File No. 75321. WNJS expects that it will need one further extension of this STA before it can build and license the station's permanent facilities.