

**WTCI(TV) – Request for Extension of Special Temporary Authority
LMS File No. 86450**

Greater Chattanooga Public Television Corp. (“GCPTC”), licensee of noncommercial educational TV station WTCI(TV), Chattanooga, TN (“WTCI”), hereby respectfully requests six months of additional special temporary authority to operate from facilities substantially identical to those authorized by its repack construction permit (LMS File No. 34751) until such time as the station is able to file a covering license for those facilities. The station’s existing STA was granted in LMS file number 86450.

WTCI was assigned to transition from Channel 29 to Channel 35 in Phase 5 of the repack. The station’s transition plan called for, among other things, construction of a new tower to hold the station’s post-repack facilities. WTCI worked for months to finalize tower construction plans and contracted with a tower company in early 2019 to decommission an existing WTCI tower and construct a new structure in its place. The tower company faced extensive delays securing the necessary licenses and permits from the state of Tennessee. Quickly after work began on July 18, 2019, the tower company determined that hard limestone would prevent them from completing the drilling of foundation holes for the new tower on schedule and that the structure could not be completed by the Phase 5 deadline.

GCPTC has secured FAA clearance for the new tower, as well as all local permits. Because of the height of the new tower, GCPTC must conduct an environment assessment before it can update the existing tower registration to reflect the height of the new structure. And until the structure is registered, GCPTC can not modify its repack construction permit to reflect the new tower. Thus, GCPTC will not be able to file a license to cover its repack construction permit until the environmental assessment process has been completed.

GCPTC has been working through the components of the assessment and has satisfied the US Fish and Wildlife Service’s concern of possible endangerment of certain mammals - Gray Bats, Indiana Bats, and Northern Long-eared Bats – and certain flowering plants – Large-flowered Skullcap, Small Whorled Pogonia, and Virginia Spirea. GCPTC is now working on the documentation that twenty-nine separate entities (Indian tribes, historical commissions, and departments of natural resources) have requested in connection with the National Historic Preservation Act.

WTCI has determined that it will not be able to file a covering license application for its full-power facilities until it has received an ASR number from the FCC for its newly constructed tower and modified its construction permit to reflect this new tower information, as the station’s original repack construction permit reflects the station’s old tower (ASR No. 1042763). This process is ongoing. WTCI therefore respectfully requests a six-month extension of special temporary authority to operate from the facilities described herein – which are substantially identical to those authorized by its repack construction permit – until this process is complete.