

Need for Special Temporary Authority

Station WLRN-TV is one of two PBS-affiliated television stations serving Miami, Florida.¹ Its licensee is the School Board of Miami-Dade County, Florida.² Its transmitting antenna is located at the 300 meter level of a 308 meter (1,010 foot) tower in Pembroke Park, Florida. Located directly beneath the WLRN-TV antenna, at the 284 meter level of the tower, is the WLRN-FM antenna. WLRN-FM is a C1 FM station operating with 47 kW ERP. This FM station is the only National Public Radio affiliate serving Miami-Dade and Broward Counties, Florida, and portions of Palm Beach County and Monroe County's Upper Florida Keys.

MDCPS seeks to construct WLRN-TV's final post-auction facilities without significant disruption of public radio service in the four Florida counties served by WLRN-FM. To this end it must procure a temporary or auxiliary FM antenna to install on the lower levels of WLRN-TV's tower. This FM project needs to be coordinated with the following elements of WLRN-TV's post-auction reconstruction: (a) removal and replacement of the Channel 20 auxiliary antenna with a Channel 26 auxiliary antenna; (b) final re-tuning of the WLRN-TV antenna and (c) testing of the re-tuned WLRN-TV antenna and transmission line under full-power conditions. MDCPS estimates that, under normal conditions, this combined project requires approximately five days of tower work, inclusive of time spent rigging and de-rigging the tower.³

MDCPS's efforts to implement the project described above have been hampered by procurement difficulties, the unavailability of equipment and problems scheduling a tower crew. Specifically the procurement process has delayed the purchase of tuning sections and elbows needed to finalize re-tuning of WLRN-TV's antenna. Similarly, the procurement process for the interim FM antenna has bogged down in antenna design and bidding problems. The procurement of WLRN-TV's auxiliary TV antenna is also delayed .

As a practical matter, MDCPS must overcome all equipment and procurement issues before it can complete construction of WLRN-TV's final post-auction facilities. This is because of difficulties hiring tower crews piecemeal to install needed equipment. Tower crews are in high demand to complete construction of television stations in other phases of the post-auction repacking of the television band. All aspects of the WLRN-TV construction project must be completed in a single tower crew mobilization. There will be no second chance to obtain a tower crew capable of completing this project.

Station WLRN-TV transitioned to its post-auction digital channel, Channel 26, in April of 2019. At the time of the transition, the station's main transmitter had not been delivered. Therefore, the station commenced Channel 26 operations under an STA authorizing operations at reduced power, using an interim transmitter. The station's main transmitter is now in place in the

¹ The other station is WPBT, Miami, Florida.

² The licensee is hereafter referred to as the Miami-Dade County Public Schools or "MDCPS."

³ Specifically the tower crew would be required to travel to Pembroke Park, Florida, rig a gin pole, remove the WLRN-TV Channel 20 auxiliary antenna, hoist the elements of the interim FM antenna and the Channel 26 auxiliary TV antenna and their transmission lines, secure those antennas to the tower and connect associated transmission lines. and re-tune the tuning elbows of the main WLRN-TV antenna.

WLRN-TV transmitter building. It is connected to power and its heat exchange system.⁴ At the present time, the main transmitter is not connected to a dummy load or to the switch that will connect it to the station's transmission line. MDCPS expects to complete transmitter installation prior to the current expiration of the WLRN-TV construction permit. The remaining construction problems relate to compliance with government procurement procedures and to acquiring the equipment needed for tower work to commence on the WLRN-TV and FM antenna installation/re-tuning project.

Accordingly Station WLRN-TV requests extension of its special temporary authority to operate at reduced power with the facilities specified in FCC File No. 0000068099, until October 3, 2020. The station will use its resources to initiate service under the construction permit at the earliest practicable date. Due to procurement issues and considerations of tower crew availability, completion of the reconstruction of Station WLRN-TV is dependent on the coordinated acquisition and installation of an FM interim antenna and a television auxiliary antenna. In the interim, reduced power operation under the extended STA is necessary to continue WLRN-TV's existing service pending completion of tower work on the antennas.

⁴ The electronic connections that will enable the transmitter to communicate with the heat exchange system are not yet completed.