

KQDS-TV Request for Authority for Interim Channel 18 Operation

KQDS Acquisition Corp., the licensee of KQDS-TV, Duluth, Minnesota (FCC Facility ID 35525) (“KQDS”) has made diligent efforts to complete its final transition from its historic Channel 17 to its permanent Channel 18 operation under its current construction permit. (LMS File No. 0000106367)

Unfortunately, by letter dated February 27, 2020, a copy of which is attached, Tower King II, Inc. informed KQDS that it would not be able to complete the antenna construction this Spring, as previously anticipated by KQDS. Because of winter conditions in and around Duluth, Minnesota, Spring was the first opportunity to complete the KQDS construction. As shown in the attached letter, Tower King II now anticipates completion of construction in July 2020 via use of a helicopter. KQDS already has filed an application to extend its construction permit because of this unanticipated delay. (LMS File No. 00001069830) That extension application includes a waiver request because the delay imposed by Tower King II occurred less than 90 days before the May 1, 2020 transition date.

KQDS now requests that the Commission grant the instant request for Special Temporary Authority (“STA”) so that it may begin operations on Channel 18 by May 1, 2020, as an essential step to cease operations on Channel 17 while preserving its broadcast services to the public. KQDS asks that this STA be granted for the maximum permissible period of time. The decision by Tower King II, Inc. to delay construction of the permanent Channel 18 facility was outside of the control of KQDS and was contrary to KQDS’s understanding of when construction would have been completed. Grant of this STA for KQDS to establish an interim operation on Channel 18 would be harmless to any other television station because KQDS would be operating on its authorized permanent, post-transition, channel by the May 1, 2020 Phase 9 transition deadline.

Accordingly, KQDS urgently requests that the Commission grant its pending construction permit application for extension of time, and this STA, so that KQDS may complete construction of its permanent Channel 18 facilities in an orderly way and without extensive interruption of television broadcast services to the public.



Tower King II, Inc.

Foundations • Tower Erections • Turnkey

Offering solutions to the most difficult broadcast challenges.

469-272-3388 Main

469-272-3728 Fax

February 27, 2020

KQDS-Fox 21 Television
2001 London Rd.
Duluth, MN 55812

Attn: Chris Drovda-Chief Engineer

Re: FCC Repack project for KQDS

Dear Chris, this message is to inform KQDS TV that Tower King has the repack project scheduled for July of 2020. Due to the size and weights of the equipment to be removed and installed on the 693' guyed tower located at 1421 N 3rd Ave W, Duluth, Minnesota, we sought the helicopter services of Erickson Air Crane.

Since Erickson is the only specialized helicopter service that can lift up to 19,500#, they are in great demand by tall tower companies for the repack projects. Their soonest date in their tight schedule is for July 18th to July 19th for the Duluth tower.

Tower King will mobilize crew and equipment about a week prior to that date, rig the tower and prepare the existing antennas for removal. At the same time, we will prepare the new equipment to be lifted onto tower top.

This is the soonest our crew and the helicopter company can accommodate your station. If anything should change in the schedule, we will definitely let all parties know.

Thanks for your patience and understanding.

Best Regards,

Charlie Lee-Operations Manager