

**WHDS-LD, Savannah, Georgia (Fac. Id. 167565)**  
**Renewal Application**  
**Minimum Operating Schedule Explanation**

WHDS-LD's inability to adhere to the FCC's minimum operating schedule requirements is a direct result of it being displaced by T-Mobile from operating on channel 41 when that spectrum was repurposed for mobile broadband use.

WHDS-LD first ceased operations on September 13, 2018 pursuant to a silent STA (LMS 0000059607) because it received a T-Mobile letter to cease operations on channel 41. A request for extension of that STA was filed (LMS 0000068475) but ultimately dismissed when the station sought an engineering STA for temporary reduced power operations on its displaced channel 20 (LMS 0000072278). WHDS-LD resumed operations at reduced power on channel 20 on August 28, 2019 using a leased transmitter. When the owner of the leased transmitter needed to use it temporarily, WHDS-LD had to once again cease operations, doing so on October 15, 2019, seeking temporary authority to remain silent once again (LMS 0000087649). While that request for silent authority was pending, WHDS-LD filed a modification of its prior channel 20 STA and resumed channel 20 operations at higher power on December 9, 2019 (LMS 0000093012). On January 28, 2020, WHDS-LD commenced full power channel 20 operations (LMS 0000101192).

WHDS-LD respectfully submits that the events causing it to be unable to comply with the FCC's minimum operating schedule requirements were out of its control, and that with limited resources, it managed to eventually resume operations on channel 20. For that reason, WHDS-LD's noncompliance in this instance should be excused.