

Extraordinary Circumstances & Public Interest Factors Supporting STA Extension

PMCM TV, LLC, licensee of WJLP Middletown Township, New Jersey, proposes a continuation of its temporary operation (STA) at its licensed antenna site, using its licensed antenna system with an effective radiated power (ERP) of 26.5 kilowatts. No changes or deviation in technical parameters are proposed from that of the current STA operation.

As previously reported, PMCM TV, LLC, holds a construction permit that authorizes modification of its current facility license to operate at WTC-Freedom Tower (LMS file number 0000035766). That authorization is part of a mutual power increase agreement and the associated minor change applications of WJLP, Channel 3, Middletown Township, NJ, and the immediate adjacent channel facilities of WDPN-TV (formerly KJWP), Channel 2, Wilmington, DE, WACP Channel 4, Atlantic City, NJ.

WDPN-TV and WACP have implemented the agreed-upon power increases. A continuation of the existing STA allows WJLP (as nearly as possible) to maintain the “desired to undesired” signal ratio between all facilities and thus has protected its established service area and viewers from undue interference.

WJLP continues to experience delays beyond its control in its construction that may last several more weeks or months as a result of periods of inclement weather during previous STA periods, now including the onset of winter weather, and also the substantial restrictions and impediments surrounding the COVID-19 pandemic. These complications have included the need to compete for limited manpower and material due, first, to the now virtually completed repack, and then to COVID-19 and the resultant shutdown of the city throughout much of this year, which has impeded any practical ability to hire manpower from outside the city.

Nevertheless, WJLP has made significant progress. As previously stated, the antenna system was partially installed and is now largely installed, and now transmission line and the transmitter are also in place. Meanwhile other, but not all, of the associated equipment is on site awaiting installation, while the electrical work is nearing completion.

Nonetheless, at this point, the site is not fully operational because of delays as outlined above. COVID-19 issues have further impeded completion of the project, as they have delayed necessary antenna testing from the site and posed problems in getting the antenna manufacturer’s personnel on site to do inspections and testing (as prudently contracted for before commencing full time operation). Required quarantines of two weeks, or potentially more, for personnel that fly to New York City from California or England to conduct such inspections and tests, and then further restrictions as they return to home base, are currently not practical for busy manufacturer engineers and other personnel. The exact timetable for completion thus cannot yet be determined with any precision or certainty, as the date remains subject to continuing and varying restrictions imposed in response to changing pandemic conditions in one of the cities hit hardest by the virus.

As noted previously and approved, the ERP requested in this STA matches to the extent possible the authorized service contour of the WTC/Freedom tower facilities over the southern service area of

concern (i.e., towards WDPN and WACP). No other facilities are impacted by this request that are not a part of the underlying mutual interference agreement. While the ERP requested is slightly below that in which an ideal match of the southern contour would occur, it represents that maximum ERP that can be obtained from the antenna system (transmitters and antennas) at 4-Times Square (the licensed and STA site).

For all of the foregoing reasons, PMCM TV, LLC requests a further extension of its current STA.