

**GPTC – Requests for Tolling Waivers for Additional Time to Construct and
Requests for Extension of Engineering STAs
WGTV and WACS**

Georgia Public Telecommunications Commission (“GPTC”), licensee of noncommercial educational TV stations WGTV, Athens, Georgia and WACS, Dawson, Georgia, requests tolling waivers for additional time to complete construction of its permanent post-transition facilities for each station. *See* 47 C.F.R. Section 73.3598(b).¹ Due to equipment (antenna) delays, GPTC requests an additional 90 days to construct each facility, *i.e.*, until March 31, 2021. GPTC also requests extension of the engineering STAs for WGTV and WACS to permit operation with the interim facilities until the construction permits are licensed.

GPTC is an entity of the State of Georgia and the statewide public television licensee of nine (9) noncommercial educational television stations providing PBS and educational programming throughout the State of Georgia. GPTC had several of its stations assigned to new channels as part of the repacking process.² WGTV and WACS were assigned to Phase 10 of the repack transitioned to their new channels with interim facilities in July 2020.

WGTV’s repack plan called for, among other things, replacement of the station’s main and standby antennas at its Stone Mountain transmission facility, with the standby antenna being replaced first to avoid disruption of program service, then the main antenna installed by helicopter lift. WACS’s repack plan called for use of an interim antenna to maintain operations while the main antenna was being replaced. Each station’s tower also required some modifications due to repack.

Since July 2020, GPTC has been on interim facilities for WGTV and WACS. GPTC has made good progress towards completion of the WGTV and WACS repack facilities and fully expected to have both repack facilities complete by the end of 2020. The helicopter install for WGTV was booked and the helicopter is parked at a nearby airport, awaiting delivery of the new main antenna. Delays have been due to the equipment (VHF antennas) and the antenna vendor. While GPTC ordered the new main antennas for WGTV and WACS nearly 20 months ago, the antennas have not been delivered and several anticipated delivery dates have been missed.

Despite diligent efforts, GPTC has been unable to speed up the WGTV and WACS equipment (antenna) manufacturing and deliveries. More recently, the antenna vendor company was

¹ This request has been filed fewer than 90 days before the GPTC’s stations’ current construction deadline. GPTC had expected to complete construction prior to expiration of the CPs at year end, but shipment of the repack antennas has been further delayed due to COVID delays with the vendor. For these reasons, GPTC did not file this request until now.

² *Incentive Auction Closing and Channel Reassignment Public Notice: The Broadcast Television Incentive Auction Closes; Reverse Auction and Auction Results Announced; Final Television Band Channel Assignments Announced; Post-Auction Deadlines Announced*, Public Notice, 32 FCC Rcd 2786 (WTB & MB 2017).

affected directly by COVID, which further pushed back the anticipated delivery dates for the antenna and made this tolling waiver request/extension necessary.

Based on information provided by the antenna vendor to GPTC last week, GPTC is expecting the following timing:

WGTV: Main antenna to be shipped for arrival at Stone Mountain on or about January 5, 2021. Tower crew arriving on or about January 5, 2021, to offload and stage the antenna and prepare the tower for the installation. Helicopter for antenna lift is parked at nearby airport with crew scheduled. The transmission site landowners/managers have arranged for the necessary road closures due to helicopter work on or about January 12 or 13, 2021. Thus, absent more unexpected delays, WGTV's main antenna should be operational and the repack CP ready to license by the end of January 2021.

WACS: The main antenna (VHF) is not yet complete. The antenna vendor has pledged that the WACS antenna will be complete and ready to ship by the end of January and the crew will be available to install it in mid-February.

For the reasons set forth above, GPTC will not be able to complete buildout of its permanent post-repack facilities for WGTV and WACS by December 31, 2020. The delays were not within GPTC's control and resulted from equipment (antenna) delays. Thus, GPTC respectfully requests that its construction permits for its post-repack facilities for WGTV and WACS be tolled for 90 days, or until March 31, 2021.

GPTC also respectfully requests extensions of its STAs for interim facilities operations on its post-transition channels for WGTV and WACS in order to continue broadcast service to the public.