

## **EXPLANATION FOR CP EXTENSION REQUEST**

Pursuant to FCC Public Notice, DA 20-724, released July 13, 2020,<sup>1</sup> Chicago 22, LLC (“Chicago 22”), permittee of low power television station WRJK-LD, Chicago, Illinois (“WRJK”), hereby requests a 180-day extension of time to complete construction of the facility (FCC Permit No. 0000054928).

In support of its request, Chicago 22 notes that over a period of years WRJK has worked diligently to provide unique broadcast programming service to viewers in Chicago and its environs. During that time, WRJK has been the subject of a series of channel displacements in the market, from analog Channel 22, to digital Channel 24, to digital Channel 11. Despite multiple setbacks, WRJK currently operates on Channel 11 on Willis Tower pursuant to Special Temporary Authority (LMS File No. 0000086734), and continues to pursue ways to improve its service. See, for example, WRJK’s currently pending displacement application for Channel 36 (LMS File No. 0000105856).

A variety of factors support the instant CP extension request. Chicago 22 has encountered multiple engineering and construction complexities and expended considerable resources in trying to find more permanent engineering solutions (beyond its current STA operations) within the extremely congested and challenging RF environment of Willis Tower and the Chicago market. Though Chicago 22 continues these efforts, over the preceding year, it has encountered substantial delays due to COVID-19 restrictions on businesses and individuals and residual effects of the pandemic shutdowns, including severe attendant restrictions on travel and site access, and the need to prioritize overarching health and safety concerns. As a result, Chicago 22 will not be able to complete the facilities prior to the permit’s current July 13, 2021 expiration, recently modified by Commission Staff from its original expiration date of September 24, 2021.

Chicago 22 will continue to make good faith efforts to complete construction of WRJK’s facilities as soon as possible, but due to the above described events and circumstances beyond its control, it respectfully requests a 180-day extension of its construction permit until Monday, January 10, 2022.

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<sup>1</sup> This Public Notice reminded Low Power Television and Television Translator Stations of July 13, 2021 Digital Transition Date. In that Public Notice (the “Reminder PN”), the FCC also provided, in part, “In addition to ceasing analog operations by the digital transition date, transitioning LPTV/translator stations that experience delays in completing their digital facilities may seek one last extension of time of their digital construction permits, of not more than 180 days, to be filed no later than March 13, 2021, which is four months prior to the July 13, 2021, transition date. Because March 13, 2021, was a Saturday, that deadline extended to today, March 15, 2021, the first business day thereafter.