

WTTW Repack: Request for Third Tolling Waiver, Repack CP Extension and Repack STA Extension

Window to the World Communications, Inc., licensee of noncommercial educational TV station WTTW, Chicago, Illinois, ("WTTW") respectfully request a third waiver of the tolling standard set forth at Section 73.3598(b) of the rules of the Federal Communications Commission ("FCC" or "Commission") as well as extension of the repack construction permit for WTTW and extension of the WTTW repack STA. WTTW broadcasts from the Willis Tower in Chicago.

Previously, WTTW obtained waivers of the FCC's tolling standard to extend the post-auction CPs for WTTW based upon a demonstration that special, rare and exception circumstances precluded construction of WTTW's post-auction facilities. WTTW's current CP expires on **April 12, 2021**.

WTTW permanent post auction CP facilities are subject to the special, rare and exceptional circumstances described by LS Television, Inc., Fox Television Stations, LLC, NBC Telemundo License LLC, and Unimas Chicago LLC (the "Chicago Broadcasters") in their repack filing because the Chicago Broadcasters are also on the Willis Tower. See the third tolling waivers recently filed by Chicago Broadcasters in these FCC files:

WLS (LMS File No. 0000139978)
WFLD (LMS File No. 0000139959)
WMAQ (LMS File No. 0000139992)

However, the WTTW repack main antenna is on a different (and faster) City zoning approval and installation schedule than the Chicago Broadcasters. Per information provided by Jeremy Ruck and Associates, on or about March 9, 2021, the City of Chicago permit for the WTTW repack main antenna was in the final approval process. After City approval is obtained, the WTTW repack antenna installation and related work is expected to take approximately two weeks. Thus, assuming the process proceeds on time, WTTW believes that this request may be the final tolling waiver, CP extension and STA extension for WTTW's repack facilities. See attached milestones chart provided by Jeremy Ruck and Associates.

WTTW therefore seeks additional tolling of its repack construction permit, for the reasons set forth above and for the applicable factual circumstances set forth in the Chicago Broadcasters tolling requests in the LMS files listed above. In addition, WTTW seeks extension of its repack STA to continue operations pending completion and licensing of its permanent repack facilities. WTTW respectfully submits that its circumstances justify a third tolling waiver and associated CP and STA extensions.