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K20KF-D / K33QA-D
FI 74376
Davenport, IA
Silent 7/3/2020

Applicant is seeking a 312(g) waiver[1] for additional time to remain silent in preparation for the construction of the displacement CP related to the 2018 TV Spectrum Repack and Reimbursement Program[2].

Equipment has been ordered, deliveries are being staged, tower crews are being scheduled to complete construction of all the stations involved in this particular program. There are delays from equipment manufacturers due to the volume of low power television / translator stations involved in the 2018 Displacement Window, which are beyond the control of the applicant. Also, shear demand on tower installation crews has pushed out implementation of final construction across the country, due to the limited number of qualified companies. Many tower owners require rigorous standards be met and adequate liability insurance from qualified crews prior to allowing access to tower sites.

Edge Spectrum, Inc. (Edge) holds a large number of construction permits and licenses across the United States. Many have been involved in the 2018 Displacement Window "Repack" process. Edge plans to utilize DTS and ATSC 3.0 in all of its outstanding construction permits. Edge has sought guidance from the Media Bureau on how to proceed with the build out of this plan without requiring the temporary build of an ATSC 1.0 station. The Commission has previously stated, it seeks to avoid forcing LPTV stations from making significant expenditures in new ATSC 1.0 facilities by July 13, 2021 only to later be faced with a further expenditure of resources if the station chooses to convert those facilities to ATSC 3.0.[3]

Edge is fully committed to this plan and respectfully requests extension pursuant to 312(g) to promote equity and fairness.

Respectfully submitted,
Susan Hansen
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June 29, 2021

[1] 47 U.S.C. § 312(g)

[2] See Incentive Auction Task Force and Media Bureau Announce Post Incentive Auction Special Displacement Window April 10, 2018, Through May 15, 2018 , and Make Location and Channel Data Available , Public Notice, 33 FCC Rcd 1234, 1237, para. 7 (IATF/MB 2018) (Special Displacement Window PN)

[3] *See,* Next Gen TV Report and Order, 32 FCC Rcd at 9951, para 44.