

**Request for Special Temporary Authority and
Extension of Deadline to Submit Invoices for Reimbursement
from the TV Broadcaster Relocation Fund**

Pursuant to Sections 1.3 and 73.1635 of the rules of the Federal Communications Commission (“FCC” or “Commission”) and the procedures set forth in the *January 2022 Invoice Reminder PN*,¹ KGO Television, Inc.,² Fox Television Stations, LLC,³ and San Francisco Television Station KBCW Inc.⁴ (collectively, the “Sutro Broadcasters”), respectfully submit the instant request Special Temporary Authority (“STA”) and limited extension of the March 22, 2022 deadline to submit all remaining invoices for reimbursement from the TV Broadcaster Relocation Fund (“Reimbursement Fund”). As explained herein, due to circumstances beyond their control, including the need to comply with local zoning, land use and permitting laws and regulations, the Sutro Broadcasters will not have incurred all repack-related expenses by March 22, 2022. Accordingly, the Sutro Broadcasters request that they be given until September 6, 2022 to submit their invoices for reimbursement from the Reimbursement Fund.⁵

I. BACKGROUND

The Sutro Stations broadcast from Sutro Tower, a 977 foot tall tower constructed in the early 1970s. Sutro Tower is used by 18 television and FM broadcast stations, satellite and cable providers, and nearly two dozen public and commercial wireless communication services. Sutro Tower is located in a residential area of San Francisco, and is subject to local building ordinances, zoning and other restrictions, such as the requirement to obtain a building permit from the San Francisco Planning Commission (“City Planning Commission”) and the Department of Building Inspection (“City Building Department” and, together with the City Planning Commission, the “City”) before any changes are made to the broadcast facilities located on Sutro Tower.

¹ See 47 C.F.R. § 1.3; 47 C.F.R. § 73.1635; TV Broadcaster Relocation Fund Invoice Filing Deadline Approaches in Sixty Days, Public Notice, DA 22-72 at note 6 (rel. Jan. 21, 2022) (“*Jan. 2022 Invoice Submission Reminder PN*”).

² KGO Television, Inc. is the licensee of commercial television station KGO-TV, Facility ID No. 34470, San Francisco, California (“KGO”).

³ Fox Television Stations, LLC is the licensee of commercial television station KTVU, Facility ID No. 35703, Oakland, California (“KTVU”).

⁴ San Francisco Television Station KBCW Inc. is the licensee of commercial television station KBCW, Facility ID No. 69619, San Francisco, California (“KBCW” and, together with KGO and KTVU, the “Sutro Stations”).

⁵ The Incentive Auction Task Force and Media Bureau established March 22, 2022 as the deadline by which repacked television stations assigned completion dates in Phases 6-10 must submit all remaining invoices and initiate close-out procedures. See Invoice Filing Deadlines for TV Broadcaster Relocation Fund, Public Notice, 35 FCC Rcd 11273 (rel. Oct. 7, 2020) (“*Invoice Filing PN*”). The third and final invoice submission deadline was initially set for September 5, 2022, which is Labor Day. Accordingly, the deadline was extended to September 6. See *January 2022 Invoice Submission Reminder PN* at para. 4.

The Sutro Stations, along with 4 other full-power broadcast stations located on Sutro Tower, were assigned new channels as part of the broadcast incentive auction repacking process. All of the repacked television stations at Sutro Tower were assigned to Phases 8 and 9 of the Transition Scheduling Plan. The work required to construct the post-auction facilities for the Sutro Stations, including all structural improvements required in connection therewith, cannot be completed without the involvement of Sutro Tower, Inc. (“STI”), the owner of Sutro Tower. STI is coordinating, managing, and implementing the major components of the repack project, including obtaining the required approvals for the project from the City.

As explained above, the Sutro Stations cannot complete the repack process without the required permits and consents from the City. Working with the Sutro Stations, STI submitted its initial application to the City for the repack-induced modifications shortly after the Sutro Stations’ received their channel assignments in 2017. This application sought authority from the City to (1) remove and replace the broadcast antennas used by the repacked stations (including the Sutro Stations) associated structural strengthening of the tower and (2) remove the architectural cladding existing on the vertical legs of Sutro Tower to reduce weight and lessen wind loading in compliance with local wind and seismic standards. Both of these tasks are essential components of the repack of the Sutro Stations.

After many discussions with the City, local politicians, and neighborhood stakeholders, it became clear that, so long as cladding elimination was included in the repack application, it would not be possible to obtain the requisite approvals from the City in time for the Sutro Broadcasters to complete the repack within the FCC-established timeframe for the Sutro Stations.⁶ In light of these deadlines, the City permitted STI to modify the repack application to bifurcate the required work into two parts: (1) the removal of pre-transition antennas and replacement with post-transition antennas and (2) eliminating the cladding as initially proposed in order to ensure the structural soundness of Sutro Tower. Thereafter, on July 18, 2019 (nearly two years after STI and the Sutro Stations began the process of obtaining the required local permits and consents for the repack project at Sutro Tower), the City approved the repack application. The City’s approval of the repack application is subject to several conditions, including completion of (a) a structural analysis of the adequacy of Sutro Tower (including associated peer and environmental reviews) in accordance with the San Francisco Code for Existing Buildings (“SFEBC” and, such condition, the “Structural Analysis Condition”), (b) structural improvements to Sutro Tower to ensure that Sutro Tower complies with specified wind and seismic standards pursuant to Section 403.9 of the SFEBC (“Structural Upgrade Condition” and, with the Structural Analysis Condition, the “Structural Improvements”), and (c) certain tasks related to Sutro Tower’s radio frequency emissions (“RF Conditions”).

Having obtained the City’s approval for the repack application in July 2019, the Sutro Stations were able to remove their pre-auction antennas and install their post-auction antennas and thus successfully transition to their respective post-auction facilities by their assigned transition deadlines in Phases 8 and 9. However, as explained above, the City’s approval of the repack application was subject to conditions requiring additional work that has not yet been completed for reasons outside of the Sutro Broadcasters’ control. As a result, the Sutro

⁶ The controversy over the cladding elimination structural improvement was the result of efforts by the City to designate Sutro Tower a historical resource.

Broadcasters, to date, have incurred only a portion of the costs for the repack of the Sutro Stations. Accordingly, the instant request for an extension of the invoice submission deadline is being filed to enable the Sutro Broadcasters to submit invoices for repack-related expenses incurred after March 22, 2022.⁷

II. THERE IS GOOD CAUSE TO EXTEND THE MARCH 22 INVOICE SUBMISSION DEADLINE

Pursuant to Section 1.3 of its rules, the FCC may waive its rules “for good cause shown.”⁸ Specifically, a waiver is warranted where “particular facts would make strict compliance with the rule inconsistent with the public interest” and “special circumstances warrant a deviation from the general rule.”⁹ In evaluating a request for waiver, the Commission takes “into account considerations of hardship, equity, or more effective implementation of overall policy”,¹⁰ as well as whether waiver would result in a “more effective implementation of overall policy” than enforcing the rule as written.¹¹

When establishing the deadlines to submit invoices for reimbursement from the Reimbursement Fund, the Incentive Auction Task Force and Media Bureau (together, the “Bureau”) contemplated that, in some circumstances, strict enforcement of these deadlines would be contrary to the public interest. For example, the Bureau noted that it would consider extensions where the “circumstances requiring the extension were outside of [a station’s] control, such as local zoning”.¹² In such situations, the Bureau will consider a shift from the assigned submission deadline to the next invoice filing deadline.¹³ Due to the need to comply with local zoning, land use and permitting laws and regulations, the Sutro Broadcasters have not yet incurred all costs associated with the repack of their respective facilities. Thus, a limited extension of the invoice submission deadline, from March 22, 2022 to September 6, 2022, is warranted.

⁷ The Sutro Broadcasters have submitted substantially all invoices for costs incurred to date in connection with the repacking of the Sutro Stations, and will endeavor to submit any remaining invoices for costs to date by March 22.

⁸ 47 C.F.R. § 1.3.

⁹ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990), citing *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

¹⁰ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹¹ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

¹² *Invoice Filing Deadline PN* at para. 13. *See also, Jan. 2022 Invoice Submission Reminder PN* at para. 2.

¹³ *Id.*

A. Since Receiving their Post-Auction Channel Assignments, the Sutro Broadcasters Have Worked Diligently with STI to Complete the Repack

As discussed above and demonstrated in the attached letter discussing the Sutro Tower permitting process,¹⁴ the Sutro Broadcasters, through STI, have taken the steps within their control to complete the repack, including, *inter alia*:

- Working with the City to complete environmental review and permitting to enable the timely transition to the Sutro Stations' respective post-auction facilities by the applicable Phase 8 and Phase 9 transition deadlines established by the Commission;
- Ceasing broadcasts on the Sutro Stations' pre-auction channels (thereby freeing up 600 MHz spectrum for wireless use) and commencing broadcasts on their post-auction channels (thereby ensuring continuity of over-the-air service to viewers) in accordance with the FCC's schedule, without the need for any extensions or other relief;
- Completing the peer review process to make the structural improvements required by the City in connection with the repack, despite the complicated nature of the project and the inevitable pandemic-driven delays;
- Obtaining the City's approval for all required structural improvements other than the cladding elimination, and commencing work to implement these upgrades;
- Completing the RF Conditions established by the City in connection with its approval of the repack application; and
- Submitting and prosecuting the required application to the Planning Department for the cladding elimination, and working with the Planning Department to commence the environmental review process for this application.

B. Due to Circumstances Outside of the Sutro Broadcasters' Control, the Structural Improvements Necessitated by the Repack Are Not Yet Complete and Will Result in Additional Invoices After the March 22 Deadline

While the Sutro Broadcasters have been working diligently with STI since 2017 to implement the repack, due to delays and obstacles outside of their control, the Structural Improvements necessitated by the repack and required by the City have not yet been completed.

- Structural Analysis Condition. As a result of the complicated nature of the structural integrity of Sutro Tower and pandemic-related delays, both of which were outside of the Sutro Broadcasters' control, the independent review of the structural re-analysis of Sutro Tower required by the City took over two years to complete. STI began construction of the improvements covered by the structural re-analysis that fall within the scope of the

¹⁴ See Attachment A, Letter to Raul Velez, Vice President & Chief Operating Officer, Sutro Tower, Inc. from Kristen Thall Peters, Cooper White & Cooper LLP (Feb. 11, 2022) ("Sutro Permitting Letter").

repack application (“Repack Improvements”)¹⁵ in earnest just after the Sutro Stations were transitioned to their post-auction channels, and this work is nearly complete. Delays in completing the Repack Improvements have been principally due to the location of Sutro Tower with the resultant effect that 40% of spring and summer days in 2021 were so severely impacted by fog and wind that welders were unable to access the tower to perform the necessary tasks.¹⁶

- Structural Upgrade Conditions. STI and the Sutro Broadcasters have encountered significant obstacles in obtaining approvals for the cladding elimination structural improvements, including the City’s continued efforts since 2019 to designate Sutro Tower a historical resource. Despite these obstacles, which are outside of the Sutro Broadcasters’ control, work to secure the required permits and consents has continued. For example, when STI provided the final report to satisfy the Structural Analysis Condition to the City on April 26, 2021, STI requested that the City commence the environmental review process for the cladding elimination project, which is required under the California Environmental Quality Act and is thus a pre-requisite to the City’s approval of the cladding elimination application. It is the Sutro Broadcasters’ understanding that restrictions imposed by the City’s COVID-19 shelter-in-place orders (e.g., City staff still have not returned to their offices in 22 months) have impeded progress on the environmental impact report. Indeed, to date, despite numerous requests and the passing of over nine months since having requested the initiation of the environmental review process, the City has not yet designated its environmental consultant to conduct such impact assessment.

In short, the primary reason the Sutro Broadcasters have been unable to make all of the required structural improvements, and thus complete the repack process, is due to the fact that, despite the efforts of STI (working on behalf of its tenants, including the Sutro Broadcasters), the City has not yet approved the long-pending application to implement the majority of the improvements through the cladding elimination.¹⁷ The inability to secure approvals required under local zoning, land use and permitting laws and regulations falls squarely within the types

¹⁵ The peer review covered improvements within the scope of the repack application, as well as the cladding elimination improvements. The cladding elimination improvements, however, have not yet commenced because, as discussed herein, the City has not yet approved these structural upgrades.

¹⁶ See Attachment B.

¹⁷ In addition to diligently prosecuting the cladding elimination application pending before the City, STI and the Sutro Stations have taken other steps intended to expedite the approval process and reduce expenses. This includes, for example, the submission of a separate application on November 23, 2021 to obtain the City’s consent to replace certain cladding on Sutro Tower while the cladding elimination application remains pending. This proposal was initially included in the cladding elimination application but STI has now filed a separate application because it believes that, if the City authorizes the work promptly, STI can achieve significant cost efficiencies by using personnel and equipment currently on-site. STI also has explored alternatives to the cladding elimination structural improvements as a means to expedite City approval.

of circumstances that the Bureau deems outside of a station's control and thereby warrants an extension of the March 22 invoice submission deadline.¹⁸

C. Grant of the Requested Relief is Consistent with Congress's Intent that Broadcasters Be Reimbursed for Costs Reasonably Incurred to Relocate to Their Post-Auction Facilities

Grant of the requested extension is consistent with the statutory mandate the repacked broadcasters be reimbursed for costs reasonably incurred in connection with their relocation to new television channels as a result of the broadcast incentive auction.¹⁹ Indeed, as set forth above, structural improvements to Sutro Tower are a necessary component of the repack and expressly required by the City as a condition of its consent to the repack-related modifications to Sutro Tower. STI, as the owner of Sutro Tower, has taken all steps necessary to obtain the required permits and approvals to implement these structural improvements but has not yet been able to secure the City's approvals. While the Sutro Broadcasters and STI were able to execute a plan to timely transition the Sutro Stations to their post-auction channels (thereby ensuring that the Sutro Stations could provide their viewers with uninterrupted over-the-air service), the Sutro Broadcasters are still required to implement the structural improvements necessitated by the repack, and to incur the expenses associated therewith. If the Sutro Stations are not permitted to seek reimbursement for these costs after March 22, they will be forced to pay for them out-of-pocket, which is contrary to Congress's goal that broadcasters be fully compensated for repack-related expenses.

III. CONCLUSION

For the reasons stated herein, the Sutro Broadcasters respectfully request that the Bureau grant the instant request for a legal STA and extension as needed to shift the deadline to submit all remaining invoices for reimbursement from the Reimbursement Fund from March 22, 2022 to September 6, 2022.

¹⁸ The Sutro Broadcasters have heard from STI as recently as February 11, 2022 that the required local approvals may not be final until 2023. *See* Sutro Permitting Letter at 3. The parties will make efforts to push this process forward as expeditiously as possible but the timing of the approvals is ultimately outside the control of the Sutro Broadcasters.

¹⁹ *See* Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, §§ 6402 (codified at 47 U.S.C. § 309(j)(8)(G)), 6403 (codified at 47 U.S.C. § 1452), 126 Stat. 156 (2012) (requiring the FCC to reimburse broadcasters for costs reasonably incurred to transition to a new channel assignment); In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268, Report and Order, FCC 14-50, at para. 596 (rel. June 2, 2014) ("The Spectrum Act requires the Commission to reimburse broadcast television licensees for costs "reasonably incurred" in relocating to new channels assigned in the repacking process").

Attachment A:
Sutro Permitting Letter

CONFIDENTIAL - REDACTED FROM PUBLIC REVIEW

Attachment B:
Repack Improvements – Weather Delays

See attached

36789 Sutro (Master List)																				
Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs		
TH	5-Mar	9.5	0	Start Prep	M	20-Apr	7.5	0		FR	5-Jun	0	4	Weather	T	21-Jul	4		Weather	
FR	6-Mar	0	4		Weather	T	21-Apr	9		0	SAT	6-Jun	0	4	Weather	W	22-Jul	9		
SAT	7-Mar	0	4	Weather	W	22-Apr	8	0		SUN	7-Jun	0		No Work	TH	23-Jul	7			
SUN	8-Mar	0		rk	TH	23-Apr	9	0		M	8-Jun	10.5	0		FR	24-Jul	0	4	Weather	
M	9-Mar	9.5	0		FR	24-Apr	9.5	0		T	9-Jun	10.5	0		SAT	25-Jul	7	2	Weather	
T	10-Mar	10	0		SAT	25-Apr	2	4	Weather	W	10-Jun	10.5	0		SUN	26-Jul	0		No Work	
W	11-Mar	10.5	0		SUN	26-Apr	0		No Work	TH	11-Jun	5.5	2	Weather	M	27-Jul	10.5	0	3rd man added	
TH	12-Mar	10.5	0		M	27-Apr	9.5	0		FR	12-Jun	0	4	Weather	T	28-Jul	10	0		
FR	13-Mar	6.5	0		T	28-Apr	9	0		SAT	13-Jun	-	-	Day Off	W	29-Jul	8.5	0		
SAT	14-Mar	0	4		Weather	W	29-Apr	0	4	Weather	SUN	14-Jun	0		No Work	TH	30-Jul	0	4	Weather
SUN	15-Mar	0			No Work	TH	30-Apr	7	2	Weather	M	15-Jun	2.5	4		FR	31-Jul	0	4	Weather
M	16-Mar	6	0		FR	1-May	9	0		T	16-Jun	3.5	4		SAT	1-Aug			OFF SITE	
T	17-Mar	-		OFF SITE	SAT	2-May	-		OFF SITE	W	17-Jun	6	3	Weather	SUN	2-Aug			OFF SITE	
W	18-Mar	-		OFF SITE	SUN	3-May	0		OFF SITE	TH	18-Jun	10.5	0		M	3-Aug			OFF SITE	
TH	19-Mar	-		OFF SITE	M	4-May	3	4	Weather	FR	19-Jun	10.5	0		T	4-Aug			OFF SITE	
FR	20-Mar	-		OFF SITE	T	5-May	0	4	Weather	SAT	20-Jun	0	4	Weather	W	5-Aug			OFF SITE	
SAT	21-Mar	-		OFF SITE	W	6-May	8.5	0		SUN	21-Jun	0		No Work	TH	6-Aug			OFF SITE	
SUN	22-Mar	0		OFF SITE	TH	7-May	8	0		M	22-Jun	10.5	0		FR	7-Aug			OFF SITE	
M	23-Mar	-		OFF SITE	FR	8-May	11	0		T	23-Jun	9	0		SAT	8-Aug			OFF SITE	
T	24-Mar	-		OFF SITE	SAT	9-May	0	4	Weather	W	24-Jun	10	0		SUN	9-Aug			OFF SITE	
W	25-Mar	-		OFF SITE	SUN	10-May	0		No Work	TH	25-Jun	10	0		M	10-Aug	7.5	0		
TH	26-Mar	-		OFF SITE	M	11-May	0	6	Weather	FR	26-Jun	9	0		T	11-Aug	0	4	Weather	
FR	27-Mar	-		OFF SITE	T	12-May	8	2	Weather	SAT	27-Jun	0	4	Weather	W	12-Aug	10.5	0		
SAT	28-Mar	-		OFF SITE	W	13-May	0	4	Weather	SUN	28-Jun	0		No Work	TH	13-Aug	9.5	0		
SUN	29-Mar	0		OFF SITE	TH	14-May	0	4	Weather	M	29-Jun	7.5	0		FR	14-Aug	10	0		
M	30-Mar	-		OFF SITE	FR	15-May	0	4	Weather	T	30-Jun	8	0		SAT	15-Aug	4	3		
T	31-Mar	-		OFF SITE	SAT	16-May	0	4	Weather	W	1-Jul	8.5	0		SUN	16-Aug	0		No Work	
W	1-Apr	-		OFF SITE	SUN	17-May	0		No Work	TH	2-Jul	8	0		M	17-Aug	10	10		
TH	2-Apr	-		OFF SITE	M	18-May	2.5	4	Weather	FR	3-Jul	0	4	Weather	T	18-Aug	9	0		
FR	3-Apr	-		OFF SITE	T	19-May	9	0		SAT	4-Jul	0	4	Weather	W	19-Aug	9.5	0		
SAT	4-Apr	-		OFF SITE	W	20-May	8.5	2	Weather	SUN	5-Jul	0		No Work	TH	20-Aug	4.5	3		
SUN	5-Apr	0		No Work	TH	21-May	9.5	0		M	6-Jul	0	4	Weather	FR	21-Aug	8.5	0		
M	6-Apr	6	0		FR	22-May	10	0		T	7-Jul	10.5	0		SAT	22-Aug	0	4	Weather	
T	7-Apr	9.5	0		SAT	23-May	0	4	Weather	W	8-Jul	8.5	0		SUN	23-Aug	0		No Work	
W	8-Apr	0	4	Weather	SUN	24-May	0		No Work	TH	9-Jul	9.5	0		M	24-Aug	8	0		
TH	9-Apr	9.5	0		M	25-May	8	0		FR	10-Jul	9.5	0		T	25-Aug	9	0		
FR	10-Apr	9.5	0		T	26-May	9.5	0		SAT	11-Jul	0	4	Weather	W	26-Aug	0	4	Weather	
SAT	11-Apr	0	5	Weather	W	27-May	8	2		SUN	12-Jul	0		No Work	TH	27-Aug	0	4	Weather	
SUN	12-Apr	0	0	No Work	TH	28-May	1.5	4.5	Weather	M	13-Jul	0	4	Weather	FR	28-Aug	8.5	0		
M	13-Apr	9	0		FR	29-May	0	4	Weather	T	14-Jul	9	0		SAT	29-Aug	0	4.5	Weather	
T	14-Apr	10	0		SAT	30-May	0	4	Weather	W	15-Jul	9.5	0		SUN	30-Aug	0		No Work	
W	15-Apr	9.5	0		SUN	31-May	0		No Work	TH	16-Jul	0	4	Weather	M	31-Aug	7.5	2.5	Weather	
TH	16-Apr	0	4	Weather	M	1-Jun	12	0	Started Welding	FR	17-Jul	8	0		T	1-Sep	0	4	Weather	
FR	17-Apr	8	0		T	2-Jun	10.5	0		SAT	18-Jul	1	4	Weather	W	2-Sep	0	6	Weather	
SAT	18-Apr	0	4.5	Weather	W	3-Jun	12	0		SUN	19-Jul	0		No Work	TH	3-Sep	0	4	Weather	
SUN	19-Apr	0		No Work	TH	4-Jun	10	2	Weather	M	20-Jul	0	4	Weather	FR	4-Sep	7	3	Weather	

Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs	
SAT	5-Sep	0	4	Weather	W	21-Oct			OFF SITE	SUN	6-Dec			No Work	TH	21-Jan			OFF SITE
SUN	6-Sep	0		No Work	TH	22-Oct			OFF SITE	M	7-Dec	0	4	Weather	FRI	22-Jan	0	4	Weather
M	7-Sep	8	0		FR	23-Oct			OFF SITE	T	8-Dec	0	8	Weather	SAT	23-Jan	4	0	
T	8-Sep	0	4.5	Weather	SAT	24-Oct			OFF SITE	W	9-Dec	0	8	Weather	SUN	24-Jan			No Work
W	9-Sep	10	0		SUN	25-Oct			No Work	TH	10-Dec	9	0		M	25-Jan	0	4	Weather
TH	10-Sep	10	0		M	26-Oct	0	4	Weather	FRI	11-Dec	1.5	3.5	Weather	T	26-Jan	4	3	Weather
FR	11-Sep	9	0		T	27-Oct	0	8	Weather	SAT	12-Dec	1.5	2.5	Weather	W	27-Jan	0	6	Weather
SAT	12-Sep	0	4	Weather	W	28-Oct	1	7	Weather	SUN	13-Dec			No Work	TH	28-Jan	0	6.5	Weather
SUN	13-Sep	0		No Work	TH	29-Oct	0.5	7.5	Weather	M	14-Dec	7.5	3	Weather	FRI	29-Jan	10.5	0	
M	14-Sep	10.5	0		FR	30-Oct	4	6	Weather	T	15-Dec	10.5	0		SAT	30-Jan	0	4	Weather
T	15-Sep	10	0		SAT	31-Oct	0	4	Weather	W	16-Dec	0	8	Weather	SUN	31-Jan			No Work
W	16-Sep	8.5	0		SUN	1-Nov			No Work	TH	17-Dec	0	4	Weather	M	1-Feb	0	6.5	Weather
TH	17-Sep	6	1.5	Weather	M	2-Nov	0	8	Weather	FRI	18-Dec	1	7	Weather	T	2-Feb	5.5	5	Weather
FR	18-Sep	8	2	Weather	T	3-Nov	7	1	Weather	SAT	19-Dec			OFF SITE	W	3-Feb	10.5	0	
SAT	19-Sep	0	4	Weather	W	4-Nov	9	0		SUN	20-Dec			No Work	TH	4-Feb	0	8	Weather
SUN	20-Sep	0		No Work	TH	5-Nov	5	4.5	Weather	M	21-Dec			OFF SITE	FRI	5-Feb	5.5	5	Weather
M	21-Sep	10	0		FR	6-Nov	0	4	Weather	T	22-Dec			OFF SITE	SAT	6-Feb	4	0	
T	22-Sep	9.5	0		SAT	7-Nov	2	1	Weather	W	23-Dec			OFF SITE	SUN	7-Feb			No Work
W	23-Sep	8	0		SUN	8-Nov			No Work	TH	24-Dec			OFF SITE	M	8-Feb			OFF SITE
TH	24-Sep	9.5	0		M	9-Nov	2	7	Weather	FRI	25-Dec			Christmas	T	9-Feb			OFF SITE
FR	25-Sep	10	0		T	10-Nov	9.5	0		SAT	26-Dec			OFF SITE	W	10-Feb			OFF SITE
SAT	26-Sep	0	4	Weather	W	11-Nov	0	8	Weather	SUN	27-Dec			No Work	TH	11-Feb			OFF SITE
SUN	27-Sep	0		No Work	TH	12-Nov	4.5	5	Weather	M	28-Dec			OFF SITE	FRI	12-Feb			OFF SITE
M	28-Sep	0	4.5	Weather	FR	13-Nov	0	4	Weather	T	29-Dec			OFF SITE	SAT	13-Feb			OFF SITE
T	29-Sep	10.5	0		SAT	14-Nov	1	3	Weather	W	30-Dec			OFF SITE	SUN	14-Feb			No Work
W	30-Sep	0	4	Weather	SUN	15-Nov			No Work	TH	31-Dec			OFF SITE	M	15-Feb			OFF SITE
TH	1-Oct	10	0		M	16-Nov	0	4.5	Weather	FRI	1-Jan			OFF SITE	T	16-Feb			OFF SITE
FR	2-Oct	0	5.5	Weather	T	17-Nov	0	4	Weather	SAT	2-Jan			OFF SITE	W	17-Feb			OFF SITE
SAT	3-Oct	0	4	Weather	W	18-Nov	0	4	Weather	SUN	3-Jan			No Work	TH	18-Feb			OFF SITE
SUN	4-Oct	0		No Work	TH	19-Nov	0	8	Weather	M	4-Jan	0	4	Weather	FRI	19-Feb			OFF SITE
M	5-Oct	0	4	Weather	FR	20-Nov	0	4	Weather	T	5-Jan	0	8	Weather	SAT	20-Feb			OFF SITE
T	6-Oct	10	0		SAT	21-Nov			OFF SITE	W	6-Jan	3	2	Weather	SUN	21-Feb			No Work
W	7-Oct	10	0		SUN	22-Nov			No Work	TH	7-Jan	0	8	Weather	M	22-Feb	0	8	Weather
TH	8-Oct	4	5	Weather	M	23-Nov			OFF SITE	FRI	8-Jan	3	7	Weather	T	23-Feb	0	8	Weather
FR	9-Oct	8	2	Weather	T	24-Nov			OFF SITE	SAT	9-Jan	0	4	Weather	W	24-Feb	0	8	Weather
SAT	10-Oct	0	4	Weather	W	25-Nov			OFF SITE	SUN	10-Jan			No Work	TH	25-Feb	7.5	3	Weather
SUN	11-Oct			No Work	TH	26-Nov			Thanksgiving	M	11-Jan	0	8	Weather	FRI	26-Feb	5	3	Weather
M	12-Oct	7.5	0		FR	27-Nov			OFF SITE	T	12-Jan	7.5	3	Weather	SAT	27-Feb	0	4	Weather
T	13-Oct			OFF SITE	SAT	28-Nov			OFF SITE	W	13-Jan	0	8	Weather	SUN	28-Feb			No Work
W	14-Oct			OFF SITE	SUN	29-Nov			No Work	TH	14-Jan	0	8	Weather	M	1-Mar	0	8	Weather
TH	15-Oct			OFF SITE	M	30-Nov	2	6	Weather	FRI	15-Jan	1	7	Weather	T	2-Mar	7.5	3	Weather
FR	16-Oct			OFF SITE	T	1-Dec	0	8	Weather	SAT	16-Jan	0	4	Weather	W	3-Mar	6.5	1.5	Weather
SAT	17-Oct			OFF SITE	W	2-Dec	0	4	Weather	SUN	17-Jan			No Work	TH	4-Mar	10.5	0	
SUN	18-Oct			No Work	TH	3-Dec	1	7	Weather	M	18-Jan	0		MLK day	FRI	5-Mar	9.5	0	
M	19-Oct			OFF SITE	FR	4-Dec	0	5	Weather	T	19-Jan			OFF SITE	SAT	6-Mar	1.5	2.5	Weather
T	20-Oct			OFF SITE	SAT	5-Dec	0	4	Weather	W	20-Jan			OFF SITE	SUN	7-Mar			No Work

Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs		Day	Date	Work Hrs	Delay Hrs	
M	8-Mar	3.5	4.5	Weather	F	23-Apr	3	5	Weather	T	8-Jun	0	8	Weather	SAT	24-Jul	8	0	
T	9-Mar	1	7	Weather	SAT	24-Apr	4	0		W	9-Jun	0	5.5	Weather	SUN	25-Jul			No Work
W	10-Mar	4	4	Weather	SUN	25-Apr			No Work	TH	10-Jun	8	0		M	26-Jul	0	5	Weather
TH	11-Mar	0	8	Weather	M	26-Apr	7.5	0.5	Weather	F	11-Jun	7	1.5	Weather	T	27-Jul	9	1	Weather
F	12-Mar	9	1	Weather	T	27-Apr	2	6	Weather	SAT	12-Jun	4	0		W	28-Jul	8.5	1	Weather
SAT	13-Mar	0	0	DAY OFF	W	28-Apr	6	4	Weather	SUN	13-Jun			No Work	TH	29-Jul	8	1	Weather
SUN	14-Mar			No Work	TH	29-Apr	10.5	0		M	14-Jun	3	5	Weather	F	30-Jul	8.5	1	Weather
M	15-Mar	0	4	Weather	F	30-Apr	4	4	Weather	T	15-Jun	5.5	3.5	Weather	SAT	31-Jul	0	4	Weather
T	16-Mar	3.5	4.5	Weather	SAT	1-May	0	4	Weather	W	16-Jun	7.5	0		SUN	1-Aug			No Work
W	17-Mar	10.5	0		SUN	2-May			No Work	TH	17-Jun	10.5	0		M	2-Aug	7.5	2	Weather
TH	18-Mar	0	4	Weather	M	3-May	1	7	Weather	F	18-Jun	10	0		T	3-Aug	8.5	1	Weather
F	19-Mar	3	5	Weather	T	4-May	10.5	0		SAT	19-Jun	0	4	Weather	W	4-Aug	0	5	Weather
SAT	20-Mar	2.5	2	Weather	W	5-May	9	1	Weather	SUN	20-Jun			No Work	TH	5-Aug	0	5	Weather
SUN	21-Mar			No Work	TH	6-May	0	5	Weather	M	21-Jun	0	5	Weather	F	6-Aug	7	2	Weather
M	22-Mar	0.5	7.5	Weather	F	7-May	8	0.5	Weather	T	22-Jun	6	2	Weather	SAT	7-Aug	3.5	2	Weather
T	23-Mar	0	4	Weather	SAT	8-May	0	4	Weather	W	23-Jun	6	2.5	Weather	SUN	8-Aug			No Work
W	24-Mar	7	3.5	Weather	SUN	9-May			No Work	TH	24-Jun	0	8.5	Weather	M	9-Aug	6.5	2	Weather
TH	25-Mar	3.5	5.5	Weather	M	10-May	0	8	Weather	F	25-Jun	0	5	Weather	T	10-Aug	8	2	Weather
F	26-Mar	7	3.5	Weather	T	11-May	9	0		SAT	26-Jun	4.5	0		W	11-Aug	7	2	Weather
SAT	27-Mar	9	0		W	12-May	0	8	Weather	SUN	27-Jun			2nd welder	TH	12-Aug	10	0	
SUN	28-Mar			No Work	TH	13-May	0	4	Weather	M	28-Jun	0	7	Weather	F	13-Aug	0	5	Weather
M	29-Mar	8.5	2	Weather	F	14-May	0	4	Weather	T	29-Jun	0	4	Weather	SAT	14-Aug	6	2	Weather
T	30-Mar	0	8	Weather	SAT	15-May	0	4	Weather	W	30-Jun	0	5	Weather	SUN	15-Aug			No Work
W	31-Mar	0	8	Weather	SUN	16-May			No Work	TH	1-Jul	0	5	Weather	M	16-Aug	6.5	2.5	Weather
TH	1-Apr	6	4	Weather	M	17-May	0	4	Weather	F	2-Jul	0	5	Weather	T	17-Aug	0	4	Weather (4 men)
F	2-Apr	10	0		T	18-May	5.5	2.5	Weather	SAT	3-Jul	0	0	Holiday	W	18-Aug	6.5	2	Weather (4 men)
SAT	3-Apr				W	19-May	0	4	Weather	SUN	4-Jul			Holiday	TH	19-Aug	5.5	3	Weather (4 men)
SUN	4-Apr			No Work	TH	20-May	4	2.5	Weather	M	5-Jul	0	0	Holiday	F	20-Aug	0	5	Weather
M	5-Apr				F	21-May	4.5	3.5	Weather	T	6-Jul	0	5	Weather	SAT	21-Aug	0	4	Weather
T	6-Apr				SAT	22-May	0	4	Weather	W	7-Jul	0	5	Weather	SUN	22-Aug			No Work
W	7-Apr				SUN	23-May			No Work	TH	8-Jul	10.5	0		M	23-Aug	5	4	Weather (2 men)
TH	8-Apr				M	24-May	5.5	3	Weather	F	9-Jul	8.5	2	Weather	T	24-Aug	8.5	2	Weather
F	9-Apr				T	25-May	0	7	Weather	SAT	10-Jul	7.5	1.5	Weather	W	25-Aug	6	4	Weather
SAT	10-Apr				W	26-May	9.5	0		SUN	11-Jul			No Work	TH	26-Aug	8	2	Weather
SUN	11-Apr			No Work	TH	27-May	0	7	Weather	M	12-Jul	0	5	Weather	F	27-Aug	8.5	2	Weather
M	12-Apr				F	28-May	0	8	Weather	T	13-Jul	0	5	Weather	SAT	28-Aug			
T	13-Apr	0	4	Weather	SAT	29-May	0	0	Off	W	14-Jul	5.5	4	Weather	SUN	29-Aug			No Work
W	14-Apr	6.5	2	Weather	SUN	30-May			No Work	TH	15-Jul	0	5	Weather	M	30-Aug			
TH	15-Apr	10.5	0		M	31-May	0	0	Holiday	F	16-Jul	6.5	4	Weather	T	31-Aug			
F	16-Apr	10	0		T	1-Jun	3	5	Weather	SAT	17-Jul	9	0		W	1-Sep			
SAT	17-Apr	4	0		W	2-Jun	5	3	Weather	SUN	18-Jul			No Work	TH	2-Sep			
SUN	18-Apr			No Work	TH	3-Jun	8	1	Weather	M	19-Jul	0	4.5	Weather	F	3-Sep			
M	19-Apr	8	2	Weather	F	4-Jun	0	6	Weather	T	20-Jul	0	5	Weather	SAT	4-Sep			
T	20-Apr	4	4	Weather	SAT	5-Jun	1.5	2.5	Weather	W	21-Jul	5.5	5	Weather	SUN	5-Sep			No Work
W	21-Apr	0	8	Weather	SUN	6-Jun			No Work	TH	22-Jul	7.5	2	Weather	M	6-Sep			
TH	22-Apr	0	4	Weather	M	7-Jun	0	4.5	Weather	F	23-Jul	6.5	3.5	Weather	T	7-Sep			

Hrs worked 1682.5
Hrs delayed 1115.5

