

Request for Extension of Construction Permit

The School Board of Miami-Dade County, Florida (“Miami Dade County Public Schools” or “MDCPS”) requests a 180 day extension of its construction permit to construct post-auction facilities for Station WLRN-TV, Miami, Florida.¹ Station WLRN-TV presently operates on Channel 20 and must move to Channel 26 to accommodate post auction repacking of the television band. In support of this request, MDCPS submits that reconstruction of WLRN-TV has been impeded by government-mandated procurement requirements, school operating schedules, equipment unavailability and difficulties scheduling tower crews. Nevertheless, MDCPS will cease operation on its pre-auction channel on April 12, 2019, as scheduled.

With respect to government procurement requirements, WLRN-TV sought to avoid construction delays by trying to complete this project without the use of government funds. It used station donations to fund preconstruction design work, such as tower analysis, antenna analysis and transmission line sweeping. Ultimately it proved impossible to rebuild the television station without reliance on government funds. At that point the station was required to go through MDCPS’ formal procurement process, a process intended primarily to support construction and operation of the 392 schools MDCPS uses to educate its 345,000 enrolled students.

Station WLRN-TV’s formal procurement efforts were delayed by the operating schedule of MDCPS, which is designed to provide full administrative staffing during times school is in session. Progress on the WLRN-TV procurement project slowed significantly when School Board administrative staff was on leave during summer and winter break.

MDCPS has reached the point where all equipment required for WLRN-TV to operate on its new channel has been ordered. Vendors inform us that there may be delays in obtaining the station’s main and auxiliary transmitters. Further there are tower crew availability issues that may delay the retuning of WLRN-TV’s existing main antenna to permit operation on Channel 26. MDCPS will continue its efforts to construct its post-auction facilities in a timely fashion. However, there is no certainty that this can be accomplished within the time remaining on the WLRN-TV construction permit. Therefore, an extension of construction permit is required to insure that this project can proceed to its conclusion.

In view of the foregoing, MDCPS requests that the time to construct WLRN-TV’s post-auction television facilities be extended an additional 180 days.

¹ See Television Broadcast Station Construction Permit, FCC File No. 0000026166.