WTCI(TV) – Request for Extension of Time to Construct LMS File No. 34751

Greater Chattanooga Public Television Corp. ("GCPT"), licensee of noncommercial educational TV station WTCI(TV), Chattanooga, TN ("WTCI"), hereby requests an extension of time to complete construction of its permanent post-auction facilities. *See* 47 C.F.R. Section 73.3700(b)(5)(iv).¹ WTCI requests an additional 180 days to construct, *i.e.*, until March 4, 2020.

WTCI is assigned to transition from Channel 29 to Channel 35 in Phase 5 of the repack. The station's transition plan calls for, among other things, construction of a new tower to hold the station's post-repack facilities. WTCI worked for months to finalize tower construction plans and contracted with a tower company in early 2019 to decommission an existing WTCI tower and construct a new structure in its place. The tower company faced extensive delays securing the necessary licenses and permits from the state of Tennessee. Only recently did the contractors receive their licenses on an emergency basis, and the company finally began work on July 18, 2019. The company quickly determined that hard limestone would prevent them from completing the drilling of foundation holes for the new tower on schedule and that the structure cannot be completed by the Phase 5 deadline.

Once it was determined that WTCI would not be able to complete construction of its permanent post-repack facilities by the Phase 5 deadline, WTCI shifted focus to ensuring that as many of the station's viewers as possible will be able to continue receiving the station's over-the-air signal on its repacked channel despite the tower construction delays. WTCI intends to operate from an interim (emergency) antenna on its new channel until its new tower can be constructed and its permanent facilities installed. WTCI intends to file shortly a request for special temporary authority (STA) to operate on its post-repack channel from these interim facilities.

Because of the extensive delays it has faced constructing the station's new tower, WTCI will not be able to complete construction of its permanent post-repack facilities by the end of Phase 5 on September 6, 2019. Thus, WTCI respectfully requests that its construction permit for its post-repack facilities (LMS File No. 34751) be extended for 180 days, or until March 4, 2020. The requested extension of time will not impact the repack efforts of other stations because prior to the completion of Phase 5 WTCI will cease operations on its pre-auction facilities and begin broadcasting on its post-auction channel over temporary facilities.

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¹ This request has been filed fewer than 90 days before WTCI's current construction deadline. Because of the timing of construction delays, WTCI only recently determined that this extension request was necessary. WTCI thus respectfully requests a waiver of 47 C.F.R. § 3700(b)(5)(iv).