

Nature of Special Temporary Authority (STA) Request

WLS-TV is presently licensed to operate on RF Channel 44 pursuant to FCC License LMS File No. 0000058239. As a result of the FCC's Incentive Auction, WLS-TV was repacked to RF Channel 22. In accordance with its mandated reassignment, WLS-TV presently holds an outstanding Construction Permit, FCC LMS File No. 0000034300, to operate on RF Channel 22. As a station assigned to Transition Phase 6, WLS-TV is required to complete its transition to Channel 22 before October 18, 2019.

Due to the complex nature of the multiple station repack effort on the Willis Tower in downtown Chicago, the Applicant had anticipated that the WLS-TV main Channel 22 CP facility referenced above would not be completed prior to the transition date. For this reason, the applicant obtained an Auxiliary Construction Permit (LMS File No. 0000072134) to transition to Channel 22 using the planned Willis Tower auxiliary antenna ("Willis Tower Aux Facility") hoping to avoid the necessity of a last minute request for STA to operate from a temporary facility in order to satisfy the transition deadline.¹

Unfortunately, despite over two years of assurances by Willis Tower that they would be able to complete construction of the Willis Tower Aux Facility in order to enable WLS's timely transition, this prospect now seems unlikely. Accordingly, WLS is submitting the instant STA request to enable it to transition to Channel 22 by October 18 using a reduced power facility.

The technical facility proposed herein specifies use of the broadband antenna currently licensed to WLS-TV Channel 44 on the northeast tower atop the Willis Tower (FCC File No. BXLCDT-20130321ABI). The Applicant intends to use this antenna for a short time until the installation of the Willis Tower Aux Facility authorized under LMS File No. 0000072134 is complete. Granting the instant request for STA is in the public interest because it will allow WLS-TV to timely transition to Channel 22 while the new transmission system installation effort is being completed.

¹ WLS also obtained an Auxiliary Construction Permit (LMS File No. 0000080868) to operate an auxiliary facility on Channel 22 from the John Hancock Building ("Hancock Aux Facility"). WLS had not planned to use the Hancock Aux Facility to implement the transition and thus has not focused on constructing the Hancock Aux Facility. Rather, WLS has been working to transition to Channel 22 using the Willis Tower Aux Facility. As a result, WLS anticipates that construction of the Hancock Aux Facility will not be complete until sometime after it transitions to Channel 22 on October 18 pursuant to the special temporary authority sought by the instant application.