

WBBH-TV, Ft. Myers, FL
Facility ID 71085
Waterman Broadcasting of Florida, LLC
FRN 0001807965

JUSTIFICATION FOR SPECIAL TEMPORARY AUTHORITY

This application requests authority for WBBH-TV to operate with temporary facilities during the construction work period during which its licensed antenna ("Main Antenna") is replaced.

WBBH-TV shares its Main Antenna with WZVN-TV, Facility ID 19183, Naples, FL. WZVN-TV will change from Channel 41 to Channel 28 as part of the post-Incentive auction repack of the television broadcast spectrum. WBBH-TV operates on Channel 15 and will remain on Channel 15.

The change of channel for WZVN-TV will require complete replacement of the Main Antenna. The replacement Main Antenna will again be shared by WBBH-TV and WZVN-TV.

A new separate antenna ("STA Antenna") will be installed below the Main Antenna to allow WBBH-TV and WZVN-TV to remain on the air during the removal and replacement of the Main Antenna. This application requests an STA to allow WBBH-TV to operate temporarily using the STA Antenna. (WZVN-TV has a granted STA, LMS File No. 0000082500, to channel-share temporarily with WBBH-TV, so WZVN-TV will operate on WBBH-TV's channel and will not require a separate authorization for temporary use of the STA antenna.)

The testing period for WZVN-TV's channel change starts January 18, 2020, with a final cutover deadline on March 13, 2020. However, the tower work is planned to start in November of 2019. Completion of that work is likely to take several weeks. WBBH-TV will not have to wait until the repack cutover date to use the replacement Main Antenna, because it is not changing channels; but it is difficult to predict at this time exactly when the replacement Main Antenna will be ready for service and how long it will be necessary to operate under special temporary authority.

The replacement Main Antenna will not alter WBBH-TV's licensed parameters beyond what is permitted by Section 73.1690(c)(3) of the Commission's Rules, so WBBH-TV will be able to use the replacement Main Antenna without a construction permit. The licensee will file an application for modification of license after completion of the installation.

Additional details with respect to the proposed temporary facilities are set forth in a separate rule waiver exhibit.