

## KRCB(TV) – Request for Waiver

Rural California Broadcasting Corp., licensee of noncommercial educational TV station KRCB(TV), Cotati, California (“KRCB”), hereby requests a partial waiver of the FCC’s consumer education requirements for transitioning stations. *See* 47 C.F.R. § 73.3700(c)(3).

KRCB is currently assigned to transition from Channel 23 to Channel 5 in Phase 9 of the repack. KRCB’s repack plan calls for, among other things, replacement of the station’s main antenna, transmitter and transmission line on Sutro tower in San Francisco. On March 19, 2020, California governor Gavin Newsome issued Executive Order N-33-20 which, among other things, ordered “all individuals living in the State of California to stay at home . . . except as needed to maintain continuity of operations of the federal critical infrastructure sectors . . .” In addition to the lockdown order, COVID-19 has impacted the manufacturer’s ability to deliver KRCB’s auxiliary antenna, which is needed to allow tower workers to safely work in proximity to the new main antenna.

On March 25, 2020, due to these factors, KRCB filed a request for the station to move to Phase 10 of the repack pursuant to the FCC’s COVID-19 Repack Public Notice.<sup>1</sup> Subsequent to that filing, T-Mobile contacted KRCB regarding its transition and offered assistance to ensure that the station could timely transition to its new channel in Phase 9. With T-Mobile’s assistance, KRCB now plans to transition on April 29, 2020.

As a result of the events described above, KRCB did not commence the broadcast of public service announcements regarding its channel change until April 10, 2018. Since it decided to transition on April 29, 2020, KRCB has worked quickly to alert its viewers of the impending change, the need to rescan and the rescan actions they can take to continue to receive the station’s over-the-air signal.

Specifically, KRCB has implemented the following consumer education plan:

- Compliance with PSA requirement in FCC rules:
  - KRCB intends to broadcast 240 seconds of public service announcements per day. This is four times the baseline requirement in the rules and this approach will result in an aggregate amount of public service announcements available to viewers more than two and a half times greater than the aggregate required under the FCC’s rules.
- Efforts beyond those required by FCC rules:
  - KRCB intends to broadcast radio PSAs regarding the television repack on its sister station, KRCB-FM, Windsor, California.
  - KRCB will send e-mail notifications regarding its channel change to its viewers.

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<sup>1</sup> *Guidance for Stations in Phase 9 of the Post-Incentive Auction Transition as a Result of the Novel Coronavirus (COVID-19) Pandemic*, Public Notice (MB rel. Mar. 17, 2020) (COVID-19 Repack Public Notice).

Thus, KRCB respectfully requests that the FCC determine that the consumer education approach described herein satisfies the station's obligations under 47 C.F.R. § 73.3700(c)(3). KRCB plans to provide additional details regarding each of the outreach efforts outlined above in the certification of compliance it places in its online public file pursuant to 47 C.F.R. § 73.3700(c)(6).