

CP Extension Request
CBS Television Licenses LLC
WJZ-TV, Baltimore, MD
Facility ID 25455

CBS Television Licenses LLC (ViacomCBS) is required by the FCC to modify its WJZ-TV Baltimore, MD transmission facilities by relocating from channel 13 to 11 as part of the incentive auction repacking process. This Statement provides an explanation for necessary changes to the WJZ-TV transition plan and a justification for requesting extension of the WJZ-TV primary antenna Construction Permit by 180 days.¹ As required by §73.3700(b)(5)(iv), this timely request is being filed 90 days in advance.

Background

The WJZ-TV broadcast facility is located at the highest point in Baltimore known as “Television Hill” and utilizes the world’s first three-antenna candelabra antenna structure. This distinctive tower is owned by Television Tower Inc. (TTI), a joint venture comprised of WJZ-TV, WBAL-TV, and WMAR-TV (the “TTI Stations”), three Baltimore television stations that are repacking in Phase 9.

Auxiliary Antenna – Phase 9 Repack Plan

The TTI Stations plan to install and operate post-transition auxiliary antennas in advance of the Phase 9 deadline. Since these antennas will be located below the candelabra arms, their installation is far less complex than the primary antennas and pedestals that will extend upward, above the candelabra. As such, *ViacomCBS* anticipates transitioning WJZ-TV to post-transition channel 11 during Phase 9 as scheduled using a future auxiliary antenna.

Main Antenna - Primary Plan

The TTI Stations plan to utilize an Erickson Air Crane® helicopter as the primary method to replace the main television antennas and support pedestals since it brings many cost, efficiency, safety, and logistics benefits over slower, traditional methods. Since the WJZ-TV and WBAL-TV studios and offices are located very near to the tower and must be evacuated during the removal and installation of the heavy

¹ See file number 0000095029.

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antennas, a helicopter lift will limit necessary facility evacuation to a single weekend. Unfortunately, the helicopter lift requires use of a landing/staging area separated from the tower and studios on adjacent property owned by Loyola University. Due to the school's busy academic and sports calendars, this property is only available during two weekends in 2020, beginning one month after the Phase 9 completion deadline.² In order to complete construction of the main WJZ-TV antenna after Phase 9, extension of the Construction Permit expiration date is necessary.

Main Antenna - Contingency Plan

If unfavorable weather or other complications make the helicopter lift impossible, the TTI Station engineers are making parallel preparations for a traditional "gin pole" lift. As possible complications won't be known until the scheduled date of the helicopter lift, this contingency plan cannot be put into motion until a month after the present Construction Permit expiration date. Furthermore, despite careful advance planning by the *ViacomCBS* and TTI Station engineers, a finite amount of time will be required to mobilize equipment necessary to begin the time-consuming and expensive traditional "gin pole" lifts.

Construction Permit Extension Request

The TTI Stations have made arrangements for a helicopter lift, which is clearly the best available rigging option for this unique facility. Because such a lift cannot take place until after the main antenna Construction Permit expires, *ViacomCBS* respectfully requests an extension. Such an extension will have no impact to "downstream" repack stations or 600 MHz licensees since WJZ-TV and the TTI Stations will have transitioned during Phase 9 to their post-transition channels using auxiliary facilities.

ViacomCBS is motivated to expeditiously complete construction of the technically superior main antenna system and will endeavor to do so in less than 180-days if possible. However, since the Rules limit stations to a single, 180-day extension and it is possible for unforeseen complications to arise, it is believed sensible to seek the maximum.

² Phase 9's completion date is May 1st. The Loyola University agreement specifies May 30th - 31st with a June 6th - 7th rain date.