

CP Extension Request - Amendment

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 (the Station) transmission facilities by relocating from channel 13 to 11 as part of the incentive auction repacking process. This Statement provides an explanation for amending the requested extension of the Station's Construction Permit.¹

The original Construction Permit Extension Request was filed 90 days in advance as required by §73.3700(b)(5)(iv).² The instant amendment was filed following the recently granted *Request for Modification and Waiver of Phase Assignment* of the WJZ-TV post-incentive auction transition from Phase 9 to Phase 10.³ *ViacomCBS* now seeks to amend the Station's request for a Construction Permit expiration date of December 30, 2020, 180-days beyond the newly assigned Phase 10 completion date.

Justification for the original Construction Permit extension request was due to the limited availability of the nearby Loyola University sports complex, which was to be used as a helicopter landing zone. COVID-19 related tower construction delays have now ruled out a helicopter lift on the available dates. Although the lift will now utilize alternative parking lots instead, the helicopter itself is not available until the weekend of July 4th, 24 hours after the Phase 10 completion date.

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 feasible. However, since the Rules limit stations to a single, 180-day extension and considering the extensive and widespread delays related to COVID-19, it is believed sensible to seek 180-days out of the abundance of conservatism.⁴

¹ See file number 0000095029. This change will make the completion deadline 180-days beyond the recently granted WJZ-TV Request for Modification and Waiver of Phase Assignment from Phase 9 to Phase 10 (LMS file number 0000108425).

² See FCC LMS file number 0000099867.

³ See FCC LMS file number 0000108425. This change in Phase assignment was due to COVID-19 related delays.

⁴ See FCC Rule 73.3700(b)(5).