

### Extraordinary Circumstances & Public Interest Factors Supporting STA Extension

PMCM TV, LLC, licensee of WJLP Middletown Township, New Jersey, proposes a continuation of its temporary operation (STA) at its licensed antenna site, using its licensed antenna system with an effective radiated power (ERP) of 26.5 kilowatts. No changes or deviation in technical parameters are proposed from that of the current STA operation.

As previously reported, PMCM TV, LLC, holds a construction permit that authorizes modification of its current facility license to operate at WTC-Freedom Tower (LMS file number 0000035766). That authorization is part of a mutual power increase agreement and the associated minor change applications of WJLP, Channel 3, Middletown Township, NJ, and the immediate adjacent channel facilities of WDPN-TV (formerly KJWP), Channel 2, Wilmington, DE, WACP Channel 4, Atlantic City, NJ.

WDPN-TV and WACP have implemented the agreed-upon power increases. A continuation of the existing STA allows WJLP (as nearly as possible) to maintain the “desired to undesired” signal ratio between all facilities. Thus protected its established service area and viewers from undue interference.

WJLP continues to experience delays beyond its control in its construction that may last several more weeks or months as a result of not only of winter weather during the first part of the most recent STA period but also the substantial restrictions surrounding the COVID-19 pandemic. The exact timetable for completion has not been yet determined, as it remains subject to continuing restrictions which tower crew availability and work practices in the city hardest hit by the virus.

Nonetheless, during the current STA period, further significant progress has been made on the installation of equipment required at the WTC-Freedom Tower construction permit site. It was previously reported that one-half of the antenna system had been installed, and now the remaining levels and the associated antenna panels have also been installed. This process involved a greater amount of time than the average antenna installation because each antenna panel mounting arrangement required physical adjustment to match the nearly undocumented as-built conditions. Although that installation process is now complete, due to the intervening circumstances, the antenna has not been fully tested.

As noted previously and approved, the ERP requested in this STA matches to the extent possible the authorized service contour of the WTC/Freedom tower facilities over the southern service area of concern (i.e., towards WDPN and WACP). No other facilities are impacted by this request that are not a part of the underlying mutual interference agreement. While the ERP requested is slightly below that in which an ideal match of the southern contour would occur, it represents that maximum ERP that can be obtained from the antenna system (transmitters and antennas) at 4-Times Square (the licensed and STA site).

For all of the foregoing reasons, PMCM TV, LLC requests a further extension of its current STA.