

VCY America, Inc. (“VCY”) is the licensee of analog low power television station WDMY-LP, Toledo, OH (the “Station”). On March 15, 2021, VCY filed a displacement application seeking authority to construct the Station on digital channel 6 (the “Displacement Application”). If the Displacement Application is granted, VCY hereby requests a 180-day extension of the Station’s construction deadline pursuant to the FCC’s Public Notice released March 4, 2021 (DA 21-260).

VCY acquired the Station on January 22, 2021. *See* File No. BAL-20200604AAG. Although the assignment application was granted on July 24, 2020, unprecedented circumstances beyond VCY’s control—namely, the severe economic and public health impacts and business disruptions caused by the COVID-19 pandemic—prevented VCY from consummating its purchase until January 22, 2021. Specifically, VCY was waiting for a tower study, commissioned as part of VCY’s due diligence, to be completed before closing on the Station. That study took nearly a year to complete due to personnel and logistical challenges related to the COVID-19 public health emergency.

With the low power transition deadline less than five months away, VCY believes it does not make sense from either a business or public service perspective to construct analog facilities. Thus, in order to serve the Station’s community of license, VCY has filed the Displacement Application. The Displacement Application also seeks authority for a new tower site, after the nearly year-long study of the site identified in the Station’s current construction permit (File No. 0000099469) revealed that the tower is over-stressed and unable to support an additional facility. However, due to the continuing impact of the COVID-19 pandemic, VCY fears that (if the Displacement Application is granted) it will not be able to complete the Station’s digital facilities by July 13, 2021. VCY is committed to constructing the Station and is hopeful that, as restrictions associated with COVID-19 gradually loosen over the coming months and the supply chain stabilizes, its ability to finalize the tower study at the new site, purchase the necessary equipment, and employ the necessary personnel to install equipment will increase and allow the Station to be built out as quickly as possible.

VCY submits that granting the requested extension request would serve the public interest by allowing WDMY-LP to provide over-the-air service to Toledo, Ohio. Accordingly, if the Displacement Application is granted, VCY requests a 180-day extension of the resulting construction permit to January 9, 2022.