

WCMN-LP Channel 14 CP
Explanation for Extension Request & Request for Waiver

WCMN-LP is currently licensed for analog operation on Channel 13. A digital UHF channel search confirmed that the only available UHF channel for WCMN-LP would be Channel 14. An application was filed for a Channel 14 digital companion channel facility, and a construction permit ("CP") was granted on June 24, 2020. However, instead of the customary 36 months construction period, the CP bore an expiration date of July 13, 2021, the digital conversion deadline. Starcom LLC has taken all reasonable steps to attempt construction during this unusually short period of time, however, this left only about a year for construction during a period that was difficult to arrange for construction due to reduced component availability COVID-19 work restrictions and competition from the final phase of the TV Repack.

Moreover, because this CP specifies operation on channel 14, this is not a typical construction timeline. As a channel 14 CP, it imposes a special operating condition requiring equipment tests to identify and mitigate any interference to two-way facilities operating in the 460-470 MHz band. This mitigation requires that a special mask filter be installed to suppress the radiation below 470 MHz, which has yet to be delivered. Should testing fail to demonstrate sufficient mitigation, additional filters on the receiver inputs will be required. This process will take some time as there appear to be about 100 460-470 MHz repeaters located within about five miles of the proposed WCMN-LD site, each of whom must be contacted to determine if they experience any interference problems, followed by additional measures to resolve any such interference which occurs.

The CP specifies that program tests will not be granted without a showing that adequate measures have been taken to identify and eliminate objectionable interference that may be caused to existing land mobile radio facilities in the 460-470 MHz band. This condition requires that this showing be submitted as part of the license application to cover the channel 14 construction permit.

Starcom, LLC, has taken substantial measures to complete construction of the Channel 14 facilities authorized by the CP by the July 13 deadline. However, the need to address potential land mobile interference issues prior to filing a license application, makes it extremely unlikely that it will be possible to file a license application to cover this CP prior to this date. Therefore, it seeks an extension of the construction permit expiration date by six (6) months, which would still only allow about half the length of the typical construction period. As part of this process, WCMN-LP will still plan to cease analog operation on Channel 13 by the July 13 deadline.

Finally, Starcom LLC also seeks a waiver of the Public Notice DA 20-724, in order to file this extension request. Unfortunately, Starcom, LLC did not become aware of the possible need to seek such an extension until the day after the March 15 filing deadline.

Alternatively, a waiver of the CP conditions is requested to allow submission of a license application upon completion of construction and prior to completing the land mobile mitigation procedures, with the further condition that WCMN-LP may not commence program tests until granted the authority to do so following the submission of an amendment documenting the results of the land mobile mitigation process.