

STA Request Justification

Station K12PO was involuntarily displaced by the broadcast incentive auction and was forced to vacate channel 12. Channel 51 of San Diego, Inc. (“Channel 51”) subsequently was granted a construction permit for displacement facilities on channel 3. Although Channel 51 has actively been working to get K03JB-D on the air, it has faced monumental obstacles as a result of the COVID-19 pandemic – these obstacles have included financial hurdles, as well as supply chain shortages that have severely delayed Channel 51’s progress.

Owing to these continued delays, Channel 51 is trying to get creative with a solution that will restore the station to the air while it works through the continued delays in constructing the new authorized facilities. Because there is still a working transmitter and signal at the site, Channel 51’s Chief Engineer has determined that it is possible to temporarily run the new K03JB-D signal on a custom antenna mounted to the existing transmitter. Thus, grant of this STA request would nullify the need for the pending request for STA for K03JB-D to remain silent.

Channel 51 has been actively working to get K03JB on the air with its authorized displacement facilities, but has continued to face roadblocks. Among other issues, Channel 51 is still waiting for delivery of its channel 3 antenna system. Additionally, the county is now unexpectedly insisting that a building permit is necessary for the tower work, even though Channel 51 is replacing an existing antenna with a different (and smaller) antenna. Also, the necessary structural analysis has been delayed for reasons beyond the control of Channel 51. American Tower owns the tower and there has been a backlog getting work scheduled, including the tower reinforcements. Channel 51 is still waiting for them to remove the old antenna and its mount so that a new mount can be fabricated for K03JB-D.

Channel 51 hereby requests special temporary authority to operate K03JB-D consistent with the parameters set forth in the STA request. The signal will be broadcast over a temporary half wave dipole, end fed, horizontal cut, tuned to 63 MHz (center of channel 3), that will be mounted on the roof of the transmitter site. Channel 51 does not expect any interference issues to arise to any other authorized facility. The dipole has less gain and Channel 51 can control the output power.

Channel 51 will continue to expeditiously work to construct its authorized facilities and will update the Commission when this STA is no longer needed and the license to cover is filed.