

**Before the Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| Response Efforts Undertaken |) | PS Docket No. 17-344 |
| During 2017 Hurricane Season |) | |

Comments of the Virgin Islands Public Broadcasting System

The Virgin Islands Public Broadcasting System (VIPBS), through counsel, hereby responds to Public Notice DA-17-1180, released December 7, 2017, seeking comment on matters relating to issues that arose during the 2017 hurricane season.

1. VIPBS, an agency of the U.S. Virgin Islands, is the licensee of public broadcasting Stations WTJX-TV and WTJX-FM, Charlotte Amalie, St. Thomas, U.S.V.I., as well as a television translator station extending the reach of WTJX-TV to St. Croix, U.S.V.I. VIPBS is a member of the Public Broadcasting Service, airing national PBS programming and a substantial amount of locally-produced programming. Its mission is to partner with individuals, foundations, corporations, and government agencies to develop community engagement projects designed to enhance the quality of life for everyone in the Virgin Islands, with the goal of “educating everyone in the Virgin Islands from the cradle to the rocking chair.” Its operations are supported by the Corporation for Public Broadcasting, Territorial appropriations, and viewer and business community support. These comments respond principally to Question D. 12 of the Public Notice, which asks:

What was the impact of the hurricanes on broadcast radio and television services? Did broadcasters face any unique challenges in the face of any of the four hurricanes? To what extent did broadcast-specific best practices exist prior to the hurricanes? Were they implemented? If so, did they prove effective?

2. Hurricane Irma, one of the most powerful Atlantic storms in a century, struck the U.S. Virgin Islands as a Category 5 storm on September 6, 2017 with winds up to 185 miles an hour, devastating the islands of St. Thomas and St. John. Hurricane Maria, another Category 5 storm, with maximum sustained winds of 175 miles an hour, battered St. Croix starting the evening of September 19, 2017. Power and Internet service failed widely across the Virgin Islands during the hurricanes. Power was not restored at the VIPBS St. Thomas transmitter site until January 4, 2018. Internet service at that site is still unavailable. The VIPBS St. Thomas studio was destroyed. Its satellite dishes were damaged. The St. Croix television translator sustained damage from Maria. WTJX-FM resumed regular service on September 26, 2017. WTJX-TV only last week resumed service, but at reduced power because of a compromised air-conditioning system that cannot cool the transmitter adequately to allow licensed operation.¹

3. VIPBS faced several unique challenges in the face of the hurricanes. The unprecedented strikes by two of the most powerful hurricanes in history within two weeks severely compromised recovery efforts. The Virgin Islands are isolated, about 1,200 miles from Florida. The VIPBS transmission site is isolated and not a priority for power or Internet restoration. VIPBS plans to ask the Territorial power authority to make restoration of power to the public broadcast stations a priority. In particular, the lack of radio service in the wake of the storms was a significant impediment to early emergency and recovery efforts. The continuing lack of Internet service has greatly thwarted recovery. The fact that Puerto Rico also suffered extensive damage, as did the Florida Keys and mainland, divided the federal government's resources. From the VIPBS

¹ VIPBS has applied for special temporary authority to continue reduced power operations until adequate air conditioning is available.

perspective it did so generally to the disadvantage of the U.S. Virgin Islands. VIPBS also faces a substantial challenge because its St. Thomas radio station, which was restored to power fairly quickly, generally does not reach St. Croix. That means that it could not deliver news to St. Croix, such as pre-storm warnings and then information after Irma hit to warn of Maria. VIPBS has been waiting for many years for the FCC to open a window so that it can apply to establish a translator for WTJX-FM on St. Croix.

4. We discovered after the storm that the VIBPS generator was not in good shape. The mechanic who was working on that generator needed a specialized tool that was not readily available in the USVI. We asked FEMA to provide that tool. When we got no response we took advantage of our FCC regional repack representative's offer for the FCC to intervene with FEMA, but there were no results. We eventually were able to borrow that tool from a third party. Our generator was not designed to run for months at a time and power fluctuations affected the air-conditioning units, resulting in the reduced power operations mentioned above. Because of the instability we requested loan of a FEMA generator. FEMA first told us that it did not have any available with adequate capacity. Finally, in mid-December, FEMA provided a generator of suitable capacity and in good operating condition. We got the impression that priority had been placed on Puerto Rican recovery efforts. We have returned the FEMA generator. It appears that our own backup generator will need replacement.

5. DIRS is a voluntary system and our observation is that relatively few broadcasters participated other than VIPBS and that DIRS did not aid efforts to assess the state of broadcasting. On the other hand, broadcast personnel on the islands, like everyone else, were at first primarily devoted to protecting families and homes. It is

therefore understandable that trying to find Internet access to report station outages in the face of widespread devastation was not practicable.

6. The Commission asked for reports and issued public notices on the status of post-Irma broadcast service on St. Thomas for a relatively brief time. When Maria hit, the federal government, facing concerted criticism over response to emergency conditions in Puerto Rico, appeared to provide much greater attention to Maria damage than to Irma damage. In fact, months after the Commission shut down Irma reporting, the Commission is still issuing daily Maria status reports.

7. VIPBS requests the Commission to seek through appropriate channels to encourage power and telecommunications companies and local governments to accord higher priority to restoration of power and Internet services broadcast stations, and particularly radio stations, even when their facilities are in isolated areas. VIPBS also asks the Commission to implement policies and procedures that will provide more even-handed and consistent treatment of disaster areas based on need.

Respectfully submitted,

VIRGIN ISLANDS PUBLIC
BROADCASTING SYSTEM

/s/

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