



April 30, 2018

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20054

RE: Tower Crew Shortage

Dear Ms. Dortch,

We have just passed the 1-year mark from the kick-off of Broadcast Spectrum Repack ("Repack") and from what we can tell, less than 40 high power antennas are on their Repack frequency or ready to broadcast. This represents less than 5% of the subject stations properly converted after completion of one third of the established construction period.

The last two tragedies within the broadcast industry bring into focus a key variable that is currently impacting the Repack timeline: the ability to increase and train the tower contractor workforce. I would also point out that the accidents themselves were not unique to the Repack timeline and involved typical construction activities.

Broadcasters should be specifying in their contracts that tower erectors must know, understand, and operate in accordance with, applicable established standards (ASSE/ANSI A10.48 and TIA 322) that describe exactly what is required from tower erectors working on rigging of Class IV complexity—the type of rigging which comprises a majority of the Repack work.

Workforce development is a process that can take years to complete, so that the safety centric standards used as the core of on the job learning can reasonably impact the learning process.

Does it make sense for a professional tower contractor to "ramp-up" for a short-term deployment strategy with limited resources and carry the burden of added financial risk? Many contractors ramped-up during the transition to DTV and were met with disastrous results, both practical and financial. "Not this time" is an often spoken sentiment in our industry, if made quietly or under the breath of the speaker. In addition, timing for crew development across most filed service entities was held until work was realized with valid work contracts. Most entities could not afford the burden of increased staff and equipment ahead of actual bookings. We are more than a third of the way into the construction period and qualified firms are still in the process of ramping or have just determined that their current make-up is sufficient for the quantity of work they wish to win.

For this reason, as well as for many others previously identified prior to and during the incentive auction, it is reasonable to predict that the Repack will not be fully deployed for an additional 3-5 years after 2020. This does not suggest that any broadcaster should not have changed to the new channel assignment by the original deadline, they might just be broadcasting on an interim solution. This would not be dissimilar to the DTV transition, where hundreds of stations are on a full-power, but interim solution with their top-mount antenna positions occupied by the unused analog antennas.



We would propose to the FCC that it consider extending the Repack payments beyond 2020, to allow for the deployment of broadcast stations' final full power Repack solution. One concern would be that broadcasters use this extension to manage their delay instead of managing their Repack transition. But strict adherence to the existing timeline runs a substantial and, we think, untenable risk of giving short shrift to appropriate workforce development and the necessary and concomitant focus on safety. History does not have to repeat itself, but lessons can be learned to safely manage the resources that are available today.

Should you have comments, questions or concerns, please feel free to contact me.

Respectfully submitted,

Donald Doty  
Business Development Manager