

Notice of Application for Repacking Permit for Sutro Tower

In accordance with our agreements with the neighborhood associations, this notice reports that Sutro Tower filed an application for a Building Permit with the Department of Building Inspection ("DBI") on September 28, 2017 (the "DBI Application"), for modifications to the tower to accommodate the spectrum repacking requirement of the Federal Communications Commission ("FCC").

Background

Earlier this year, the FCC completed its Broadcast Television Spectrum Incentive Auction (the "Incentive Auction"). The Incentive Auction consisted of an integrated, two-part auction designed to address the need to increase spectrum available for mobile broadband services.

Certain categories of television broadcasters participated in a reverse auction through which they bid to give up some or all of their existing spectrum usage rights in exchange for incentive payments, and to thereafter (1) go off the air, (2) share another channel with an existing broadcaster, or (3) move from a UHF channel to a VHF channel (or from a high VHF channel to a low VHF channel). A forward auction then followed the reverse auction, through which the FCC accepted bids from other users, the providers of mobile broadband services, for the spectrum relinquished by TV broadcast stations.

This Incentive Auction causes a nationwide spectrum-repacking process to reorganize and reassign broadcast frequencies to those fewer television stations that will remain on the air, whether or not they participated in the Incentive Auction. The repacking is necessary to reduce that portion of the UHF spectrum band occupied by broadcast television stations, thereby allowing the FCC to configure contiguous blocks of spectrum in the manner most appropriate for flexible-use mobile broadband services. This repacking will require certain antennas to be replaced and/or moved to different locations on communications towers in order to place television broadcasters on the FCC's newly assigned frequencies within a reduced TV spectrum.

On April 13, 2017, following completion of the auction process, the FCC issued a Channel Reassignment Public Notice announcing the final post-auction television channel assignments. Not more than 39 months after this date (i.e. no later than July 13, 2020), all television broadcasters must complete any required transition to new channels, including, but not limited to, permitting, construction, testing and on-air broadcasting in their newly assigned spectrum.

Preliminary Summary of Repacking Requirements

To ensure that all work associated with any required spectrum repacking/channel reassignments involving Sutro Tower television broadcasters can be completed in accordance with the FCC deadline, STI has begun the City permitting/CEQA environmental review process in advance of knowing the full ramifications of the Incentive Auction on the repacking of Sutro Tower. Thus, the DBI application, as well as the Environmental Evaluation Application to be filed hereafter, to complete all necessary work (collectively, the "Repacking Application"), will

be based on a scenario reflecting the Incentive Auction's reasonable maximum level of repacking for Sutro Tower television broadcasters as it is known today.

Three broadcasters at Sutro Tower have completely relinquished their spectrum. As such, two broadcast antennas will be completely removed from Sutro Tower. The third broadcaster occupies a shared antenna so, while the existing antenna itself will remain, broadcast emissions from such shared antenna will decrease.

Some existing television stations at Sutro Tower will require new antennas for their reassigned (“repacked”) frequencies from the FCC. This FCC repacking requirement will also necessitate some stations with antennas currently located elsewhere (e.g. San Bruno Mountain) to broadcast from Sutro Tower to operate most efficiently.

While subject to refinement as additional information becomes available and technical analysis is completed, this scenario is currently anticipated to involve little, if any, modifications to antenna Stacks A and C of Sutro Tower, but a rebuild of Stack B, also known as the south spire (referring to an antenna support mounted on the tower structure, not an actual tower leg). All existing Stack B steel and antennas will be replaced, in addition to adding the new antennas, all in compliance with both current and upgraded building code requirements.

If you would like to view the plans as currently submitted to DBI, please follow this link: http://sutrotower.com/wp-content/uploads/2012/07/PLANNING_SUBMITTAL_9-27-17.pdf. Please note that such plans will be refined and updated with further input and as more information becomes available.

As with all applications for new antennas at Sutro Tower, there will be an informational meeting for the community to discuss the project in detail at a later date. Due to the expected length of time for the Planning Department’s review process, that meeting has not yet been scheduled and will not likely occur until 2018.