

**Before the
Federal Communications Commission**

In the Matter of

Florida State University
Licensee of WFSG-TV, Facility ID No. 6093
Panama City, Florida

Directed to: Office of the Secretary
Attention: Chief, Television Branch, Video Division, Media Bureau

**REQUEST FOR WAIVER OF THE REPACK PHASE ASSIGNMENT
CONSTRUCTION DEADLINE**

Florida State University "FSU", licensee of television station WFSG-TV, Facility ID No. 6093, hereby respectfully requests that WFSG-TV be allowed to fully transition to its post transition parameters as specified in FCC construction permit file number 0000024504 prior to its Phase 1 November 30, 2018 completion deadline.

On or about July 29, 2017 the licensed Channel 38 transmitter experienced an anomaly forcing it to operate at 95% of its licensed transmitter power output. In an attempt to repair the transmitter, it was discovered that it is no longer serviceable by the manufacturer or any of its subcontractors. The anomaly causing the transmitter to power down has not been diagnosed and it is feared that the transmitter will likely fail before the Phase 1 deadline of November 30, 2018. In lieu of continuing to operate an unstable transmitter until the transition date; FSU upon the grant of the instant legal STA would fast track the construction of its post transition facility and begin operating pursuant to its post transition construction permitted facility as soon as construction is complete.

The Transition Scheduling Adoption Public Notice¹ established that stations may seek alteration of their transition phases and waivers of transition deadlines. That Public Notice acknowledged the importance of facilitating a smooth transition and providing broadcasters with necessary flexibility. WFSG-TV is not linked to any other station, as is shown in both the April 13, 2017, channel reassignment letter and a subsequent Commission Public Notice². In sum, a WFSG-TV early transition would have no impact on the ability of any other station to complete their transition. An early transition would avert WFSG-TV from potentially having to purchase a new pre-transition channel 38 transmitter for interim operation only to decommission or have it retuned to channel 28 shortly thereafter for post-transition operation. For the reasons stated above the requested waiver should be granted.

Respectfully submitted,
Florida State University

By: 

Its Telecommunications Consulting Engineer

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¹ *Incentive Auction Task Force and Media Bureau Adopt a Post-Incentive Auction Transition Scheduling Plan* DA 17-107 Released January 27, 2017 paragraphs 49 and 50.

² *Incentive Auction Task Force and Media Bureau Announce Regional Coordinators to Facilitate Post-Auction Transition for Broadcast Stations* DA 17-376 Released April 20, 2017.