

**GREG BEST  
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January 17, 18

**ENGINEERING EXHIBIT IN SUPPORT OF WAVY-TV WAIVER REQUEST  
FOR EARLY TRANSITION TO POST-REPACK CHANNEL**

The licensee of WAVY-TV requests a waiver to convert to its post-repack before the assigned Phase 9 transition date of 5/1/2020. The station requests to move to its repacked channel 19 by the conclusion of Phase 7.

The primary reason for moving to Phase 7 is to coordinate its move with co-located WVBT. WVBT is assigned to Phase 7 but also located on the same tower as WAVY-TV which is assigned Phase 9. The most cost-effective move for these stations to their repacked channels is outlined on the Form 399 submission for both stations. This move places the WAVY-TV antenna directly below the WVBT antenna as part of an antenna "stack". This minimizes the overall cost of the two station move and having WAVY-TV on the bottom of the "stack" is the only approach that is structurally safe. If WVBT were to move in Phase 7 and WAVY-TV to move in the assigned Phase 9, it would require putting the WVBT antenna on top, and then removing the WAVY-TV antenna from below it and replacing it later in Phase 9. This is not recommended from a structural engineering and cost point of view.

WAVY-TV is part of a linked station set that includes WHRO and WTKR. The linked station set first requires WAVY-TV (ch 31 to ch 19) to move, which allows WHRO (CH 16 to ch 31) and then WTKR (ch 40 to ch 16) to move to their assigned respective channels. Allowing WAVY-TV to move in Phase 7 just permits the linked station set to move with less dependency on WAVY-TV timing. The early move does not disturb the linked station set nor does it create any new linked station set. The confirmation of no new linked station set is confirmed by executing a TV Study interference analysis under the premise that WAVY-TV would move to its Post Repack channel at the present time. This analysis is provided as a separate attachment to this Exhibit.

Sincerely,



President  
Attachment