

### **Request for STA for Interim Pre-Transition Channel Operations**

The instant request for STA seeks ongoing authority for WLWT to operate periodically on its pre-transition channel 35 from the station's interim antenna during certain construction phases of WLWT's repack project to transition from its existing channel 35 to its post-transition channel 20.

WLWT has been assigned to Transition Phase 6, which means that testing of its post-transition facility is scheduled to begin in September 2019, and the Phase Completion Date is scheduled for October 18, 2019. As such, some of WLWT's transition-related construction activities—including but not limited to tower work, transmission line refurbishment, and installation of WLWT's post-transition primary antenna—have been scheduled to commence during the summer of 2018. Thus, as some of these activities are set in motion and WLWT's post-transition construction unfolds, WLWT will periodically shut down its current primary antenna and move its operation over to its side-mount interim antenna, which is described in the technical portion of this STA request. Precise dates and periods of side-mount interim antenna operation are, of course, unknowable, and WLWT respectfully requests a full six-month period of STA for this purpose. (WLWT may need to file for one or more extensions of STA for channel 35 operations from the side-mount interim antenna.)

Grant of this STA for interim operations from WLWT's side-mount antenna specified herein is in the public interest because it is in furtherance of WLWT's repack transition plan. Indeed, the Commission has specifically contemplated precisely this type of temporary, "interim" operation in furtherance of the overall post-Auction transition in order to facilitate continuity of service for viewers and to avoid stations being off-the-air for periods of time during construction activities of repacked stations. *See, e.g., Incentive Auction Task Force and Media Bureau Adopt a Post-Incentive Auction Transition Scheduling Plan*, Public Notice, 32 FCC Rcd 890 (2018), ¶ 62 ("[I]nterim and auxiliary facilities will be an important part of the transition for broadcasters and we will take action as appropriate to facilitate the use of such facilities and equipment.").

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