

### **Waiver of Phase Assignment**

Word of God Fellowship, Inc. (WOGF), licensee of WBIF, Marianna, Florida (FID 81594) (WBIF) files this request for waiver of the post-Incentive Auction Transition Phase assignment and corresponding testing dates and construction completion deadlines for WBIF.<sup>1</sup> WBIF was assigned to Transition Phase 1, pursuant to the Closing and Reassignment Public Notice. The Phase Completion Date for Phase 1 is November 30, 2018. WBIF requests re-assignment to Transition Phase 2 because construction of its post-repack facility has been delayed by circumstances outside of its control.

In the Transition Scheduling Adoption Public Notice, the Commission anticipated that there would be circumstances where a station would need to seek a waiver of the phase construction deadline, including authority to continue operating on its current channel. The Commission indicated that it would consider these requests on a “case-by-case basis,” by evaluating the impact to viewers and the transition schedule. As explained below, re-assigning WBIF to a later transition phase will ensure that WBIF can continue providing free, over-the-air broadcast service without disruption. WBIF is not part of a paired transition group, therefore, its move to a later transition phase will not delay the transition of another station.

Before ordering its antenna, WBIF had to complete a structural analysis to confirm that its tower could withstand the addition of the new antenna. That analysis was in progress when Hurricane Michael hit Panama City, causing a delay to an already tight repack schedule. Once the hurricane passed, WBIF had to expand the scope of the study to assess whether the storm’s impact caused any structural damage. It appears that WBIF will not need to conduct any reinforcement, but the delay in the study resulted in a corresponding delay in the delivery of WBIF’s antenna, which is now scheduled to arrive on November 30, 2018.

Even without this delay, it is unlikely that WBIF would have been able to complete its construction by the November 30, 2018 Phase Completion Date. WBIF has contracted with GTI America (GTI) for the tower work. WBIF understands that GTI has suspended work in the Panama City area due to an inability to secure needed equipment, such as forklifts and cranes and appropriate lodging and board for their crew as a result of the hurricane.

Based on these delays, WBIF does not expect to meet the Phase 1 deadline. Therefore, WOGF requests that WBIF be re-assigned to Phase 2, allowing it to continue operating on its current (pre-transition) Channel 51 until April 12, 2019.

WBIF is not part of a linked set and does not require coordination with any other station to complete its transition. WBIF has confirmed that moving its transition date to Phase 2 will not create a new linked station set.

Although all stations in this DMA that must transition to post-repack facilities were assigned to Phase 1, WBIF understands that at least one other station has requested to move to Phase 2. As a

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<sup>1</sup> To the extent necessary, WOGF also seeks a waiver of the deadline for requesting an extension of time to complete construction. See 47 C.F.R. § 3700(b)(5). As described herein, the circumstances necessitating a phase waiver only recently became apparent.



result, allowing WBIF to move to Phase 2 will not increase the total number of times a viewer may need to rescan equipment. In any event, moving from one rescan to two is within the presumptive cap established by the Transition Scheduling PN.

Accordingly, WOGF respectfully requests that the Commission grant this request.



## **Letter from GTI**





November 9, 2018

To Whom It May Concern,

Please be advised that the antenna and transmission line installation project for Daystar will not place a hardship on any other broadcaster and is scheduled to not conflict with any other projects in Window 2 of the repack.

Additionally this work is tentatively scheduled to be completed by the end of January, 2019.

Please feel free to give me a call if you have any questions or require further information.

Sincerely,

Sheryl Richmond  
General Manager

SR/sf  
CC: John McKay