

## **Request for STA for Interim Pre-Transition Channel Operations for DTS Site 2**

The instant request for STA seeks ongoing authority for WUNF-TV to operate from its DTS Site 2 on pre-transition channel 25 from a broadband antenna during construction of WUNF-TV's repack project to transition from its existing channel 25 to its post-transition channel 20.

WUNF-TV has been assigned to Transition Phase 5, which means that testing of its post-transition facility is scheduled to begin August 3, 2019, and the Phase Completion Date is scheduled for September 6, 2019. As such, WUNF-TV's DTS Site 2 transition-related construction activities—including but not limited to installation of WUNF-TV's post-transition primary antenna (which is the same broadband antenna for which WUNF-TV now seeks STA for pre-transition operations)—have been scheduled to commence in or soon after late March 2019. Thus, once the new broadband antenna for DTS Site 2 is installed, WUNF-TV will be in the position to terminate operations on its current DTS site 2 antenna and move its operation over to the DTS Site 2 broadband antenna (on the pre-transition channel 25) as an interim [operation](#), which is described in the technical portion of this STA request. The precise date that pre-transition channel 25 operations will be moved to the DTS Site 2 broadband antenna is unknowable, and WUNF-TV respectfully requests a full six-month period of STA (which should take us to the Phase 5 transition deadline) for the purpose of these interim operations. As noted in the attached technical exhibit, WUNF-TV's DTS Site 1 is unaffected by this STA request.

Grant of this STA for interim operations from WUNF-TV's DTS Site 2 broadband antenna specified herein is in the public interest because it is in furtherance of WUNF-TV'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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