

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

The instant STA extension request seeks ongoing authority for WMOR-TV to operate at the parameters most recently granted in LMS File Number [0000063935](#). As WMOR-TV's repack construction project continues to progress, the station will continue to operate periodically on its pre-transition channel 19 from the station's interim antenna in order to facilitate WMOR-TV's transition from its existing channel 19 to its post-transition channel 18.

WMOR-TV has been assigned to Transition Phase 7, which means that testing of its post-transition facility cannot begin before October 19, 2019, and the Phase Completion Date is scheduled for January 17, 2020. WMOR-TV anticipates that its transition-related construction activities—which have already begun in earnest—will continue into the Phase 7 testing period. As previously described, the STA we seek to extend authorizes WMOR-TV to periodically shut down its current primary antenna and move its operation over to the side-mount interim antenna, which is described in the technical portion of this STA extension request and in LMS File No. [0000063935](#). WMOR-TV respectfully requests a full six-month extension of STA for this purpose, and it is probable that WMOR-TV will need to file for one additional extension of STA in late 2019.

Grant of this STA extension for interim operations from WMOR-TV's side-mount antenna specified herein is in the public interest because it is in furtherance of WMOR-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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