

Legal STA Phase Change Request

WSYX Licensee, LLC, licensee of digital television broadcast station WSYX, Columbus, Ohio (Facility Id. No. 56549) (“WSYX”), hereby requests a phase change to transition its facilities in an earlier phase. Currently, WSYX is scheduled to transition during Phase 8; however, WSYX requests a phase change so that it may transition in Phase 7. For the reasons stated below, the licensee respectfully submits that the instant request is in the public interest.

As background, WSYX, WTTE, Columbus, Ohio (Facility Id. No. 74137) (“WTTE”), and WWHO, Chillicothe, Ohio (Facility Id. No. 74137) (“WWHO”) are all repacking on the same candelabra tower, and their transmitters and associated equipment are all located in the same building in Columbus, Ohio. WTTE is a Phase 2 station,¹ and WSYX and WWHO are both Phase 8 stations. Under the stations’ current transition plan and subject to Media Bureau approval of the instant request, the parties plan to relocate and stack the WSYX antenna above the WTTE antenna on the shared candelabra tower, and the antennas for both WSYX and WTTE will be installed at the same time in Phase 7. Subsequently, in Phase 8, the WWHO antenna will be installed where the WSYX pre-repack channel 48 antenna is currently located on the tower.

The transition plan provides for an efficient use of limited tower crews because it will allow the stations to use a single tower crew to install the antennas for both WSYX and WTTE simultaneously, as opposed to using separate crews at separate times. The planned sequencing is also beneficial because the transmission line feeding WSYX must pass through the WTTE antenna, and simultaneous installation will not interfere with or delay the operation of WTTE. By transitioning earlier, WSYX would therefore provide the least amount of interruption to viewers and disruption to WTTE’s facilities. This will also create time and cost savings, including valuable tower crew time and resources that can be used to complete work on other station repack efforts in furtherance of the Commission’s repack goals.²

Regarding the current repack transition plans for the stations’ shared transmitter building, WTTE has installed a new transmitter for its post-repack operations on channel 27. Because of limited space in transmitter building, WTTE’s pre-repack channel 36 transmitter will be removed to make room for WSYX’s post-repack channel 28 transmitter. After WSYX transitions to the new transmitter, the parties plan to remove the WSYX pre-repack channel 48 transmitter in order to create the space necessary to install the new WWHO post-repack channel 23 transmitter in its place. The only other alternative to this plan is to construct large building additions that can accommodate both the old and new transmitters for the stations simultaneously. However, it is estimated that the cost of constructing the building expansion necessary to accommodate all of the stations’ pre and post-repack transmitters in the transmitter building would be approximately \$300,000. Consequently, Media Bureau approval of the WSYX request to move to Phase 7 will

¹ WTTE is currently operating on its post-transition channel 27 by using interim facilities (LMS File No. 0000071530).

² The *Transition Scheduling Adoption Public Notice* permitted stations to propose “alternative transition solutions that could create efficiencies,” (as is the case here) and held that a request to modify a station’s transition deadline — including by moving to an earlier phase — would be viewed favorably if the request is “otherwise compliant with [FCC] rules and [has] little or no impact on the phase assignments or transition schedule.” *Incentive Auction Task Force and Media Bureau Adopt A Post-Incentive Auction Transition Scheduling Plan*, MB Docket No. 16-306 and GN Docket No. 12-268, 32 FCC Rcd 890, 913 ¶ 51 (MB 2017).

save the FCC's repack fund approximately \$300,000 if the parties are allowed to remove and replace the transmitters as described.

As indicated by the attached letters from Stainless (tower), Rohde & Schwarz (transmitter), and Dielectric (antenna), an earlier transition of WSYX would not disrupt the repack schedule or the installation schedule for any of the companies. As shown in the TV Study Report from Carl T. Jones Corporation attached to the instant application, the requested phase change will not result in any new linked station sets, and the only station that receives interference beyond 2% from WSYX's post-repack facilities on channel 28 is WPTO, Oxford, Ohio, currently operating on channel 28. However, WPTO is scheduled to move from channel 28 to channel 29 in phase 6, prior to WSYX beginning its post-repack operations on channel 28 in phase 7, so there will be no interference from the WSYX facilities to the WPTO facilities once the stations have transitioned to their post-repack facilities.³

While an earlier transition would result in three rescans, a waiver of the rescan requirement is warranted in this case for the reasons described above. And in order to notify the station's audience of the proposed transition and to provide detailed instructions on the rescanning process, the licensee plans to implement a comprehensive consumer awareness campaign and is committed to mitigate any viewer disruption by increasing outreach education beyond the required public service announcements and crawls. This would also include outreach by WTTO and WWHO to their viewers, and by utilizing WSYX's website and social media outreach in the community.

In sum, a grant of this phase change and any necessary waivers will facilitate a more effective, efficient, and less costly implementation of the overall policy goals of the Commission's Incentive Auction and post-auction transition, and thus is in the public interest.

³ See WSYX Minor Modification Application (LMS File No. 0000027371; granted July 27, 2017), Engineering Statement at 3 (“[T]he study results, shown in Appendix B, indicate that the instant application for construction permit is predicted to cause no new interference exceeding 0.5% to the populations served by any post reassignment DTV station, construction permit, allotment or Class A DTV station.”).



May 2, 2019

Mr. Dale Scherbring, CPBE
Regional Director of Engineering
Sinclair Broadcast Group
10706 Beaver Dam Road
Cockeysville, MD 21030

RE: WSYX-TV Columbus, OH

Dear Mr. Scherbring,

Stainless has a contract with WSYX and WTTE to remove and replace the existing stacked antenna system and to modify the tower to accept the new re-packed antenna(s).

These stacked antennas are configured for maximum efficiency. WTTE is located on the bottom, is 52.1 feet tall, weighs 22,500 pounds and is used to support the WSYX which is 64.4 feet tall and itself weighs 15,450 pounds for a total stacked weight of 38,900 pounds with an overall height of 121.5 feet.

The new stacked antenna requires a heavier and taller support structure to accommodate the new WTTE and WSYX antenna(s) which weigh about the same, though somewhat shorter at 96.3 Ft. overall antenna height.

The sequencing of the antenna installation is to prevent future interruption of WTTE operation, since the transmission line feeding the WSYX antenna must pass through the WTTE antenna.

The least expensive manner to replace both stations' antenna is to perform the operation at one time and one mobilization. The additional work to complete WSYX in addition to WTTE will have no impact or cause delay to remaining phases.

Respectfully Submitted,



Donald Doty
Director of Broadcast Services



ROHDE & SCHWARZ

Rohde & Schwarz USA, Inc.
6821 Benjamin Franklin Drive
Columbia, MD 21046-2265

May 1, 2019

Dale Scherbring, CPBE
Regional Director of Engineering
Sinclair Broadcast Group
2000 West 41st Street
Baltimore, MD 21211

Subject: Earlier Transition Impact on Rohde & Schwarz

Project: WSYX

Dear Mr. Dale Scherbring,

Rohde & Schwarz USA is aware that WSYX is in the process of requesting a waiver and/or Special Temporary Authorization to perform the transition of WSYX to an earlier Phase.

This letter is to confirm that the earlier transition of WSYX will not impair the ability of Rohde & Schwarz to provide the required transmitter and resources to other phase stations to complete their own transitions.

You and your staff at WSYX are permitted to share this letter with the FCC as required.

Sincerely,

Erik Balladares
Vice President – Broadcast & Media



Dielectric. LLC
22 Tower Road
Raymond, ME 04071
1-800-341-9678

Harvey Arnold, VP Engineering
Sinclair Broadcast Group

May 2, 2019

Re. WSYX Columbus Repack Antenna

Mr. Arnold,

Dielectric has manufactured the WSYX, Repack Phase 8 Antenna to be coordinated with the WTTE (earlier Phase) antenna, on the same tower in Columbus.

The antennas were constructed with a coordinated manufacturing schedule because the antennas are a "stacked design" (one on top of the other). The manufacture of stacked antenna systems have always been coordinated, to reduce off air time, reduce installation costs, and reduce the significant installation risk involved with these complicated systems.

This letter is to confirm that efforts by Dielectric to complete equipment for WSYX's earlier installation does not impair Dielectric's ability to construct and supply equipment for other customers to complete their transition during their assigned phases.

Kindest regards,

A handwritten signature in cursive script that reads "Christine Zuba".

Christine Zuba
National Sales

Cc: Jay Martin, VP Sales