

Exhibit 1
Request for Waiver/Change of Phase Assignment from Phase 3 to Phase 4

Radio Perry, Inc., Debtor-in-Possession (“Radio Perry”), licensee of WPGA-TV, Perry, Georgia, Facility ID 54728 (“WPGA-TV”), hereby respectfully requests a change to its initial post-Incentive Auction transition phase assignment for WPGA-TV. Currently, WPGA-TV is assigned to change from Channel 32 to Channel 23 during Phase 3 of the post-Incentive Auction transition, which is scheduled to end on June 21, 2019. WPGA-TV planned to make this transition using a reduced-power, temporary facility (“Temporary Facility”) pursuant to special temporary authority.¹ However, construction of the Temporary Facility has been delayed by circumstances beyond Radio Perry’s control. Specifically, the tower crew that Radio Perry engaged to complete installation of the antenna required for the Temporary Facility notified Radio Perry that it could not install the antenna as scheduled because the crew has been delayed on a prior job due to weather conditions. Accordingly, Radio Perry now requests re-assignment to the next transition phase (Phase 4) to enable it time to schedule the tower crew necessary to complete construction of the Temporary Facility.

In the Transition Scheduling Adoption Public Notice, the Commission anticipated that there would be circumstances in which a station may require a waiver of or change in its planned transition phase. The Commission indicated that it would consider these requests on a case-by-case basis, subject to its general waiver standard, by evaluating the impact on other broadcasters, viewers and the transition schedule. Under this standard, the proposed one-phase delay in WPGA-TV’s transition to channel 23 is in the public interest. First, as demonstrated in the attached technical studies, WPGA-TV is not part of a linked set and, so long as WPGA-TV completes its transition by the Phase 4 deadline, the proposed phase change will not create a new linked station set or increased interference beyond the 2% interference standard. Second, grant of this request will not negatively impact resources because Radio Perry already is working with a tower crew to install the antenna for the Temporary Facility and anticipates that the crew (or an alternate crew) can be re-scheduled to complete construction in the next weeks, at the latest.² Third, although the phase change will increase the number of rescan periods in the Macon, Georgia DMA from 2 to 3, WPGA-TV will conduct consumer education and outreach efforts beyond what is required by FCC rules to alleviate the impact of the phase change on viewers. At a minimum, once the Station announces its new transition date and until the Station completes its transition, WPGA-TV will air double the amount of on-air consumer education notifications required by FCC rules.

¹ See LMS File No. 0000074624 (granted June 12, 2019). The deadline by which WPGA-TV must construct the facilities authorized by its post-auction construction permit has been extended from June 21, 2019 to December 18, 2019. See 0000068677 (granted June 20, 2019).

² The station also has reached out to two alternate companies that have stated tower crews can be scheduled to install the Temporary Facility antenna within the next few weeks.