

Virginia Broadcasting, LLC  
WVIR-TV, Charlottesville, VA  
Facility ID 70309  
FRN 0005004528

#### JUSTIFICATION FOR SPECIAL TEMPORARY AUTHORITY

This application requests authority for WVIR-TV to broadcast full time on its post-repack Channel 2, after commencement of the Phase 5 test period, up until it files an application for a license to cover construction permit shortly after the Phase 5 cutover date.

WVIR-TV is currently licensed to operate on Channel 32. It will move to Channel 2 in Phase 5 of the post-incentive auction TV spectrum repack. The test period will begin on August 3, 2019. It is anticipated that a proof of performance on the transmitter will be completed around August 8 or a short time thereafter. The final cutover date will be September 6, 2019.

The transition from UHF to low-band VHF will be particularly difficult for WVIR-TV in terms of educating consumers and making sure that they have antennas capable of low-band VHF over-the-air reception. The station is the NBC network affiliate and serves both the Charlottesville and Harrisonburg DMAs through its main station and translators. It provides the local news service with the largest audience share in Charlottesville, so reaching as many members of the public as possible without interruption is important. Thus once testing of the Channel 2 equipment has been completed, WVIR-TV wishes to keep the transmitter on the air with regular programming. The result is that WVIR-TV would simulcast on both Channels 32 and 2 for approximately 4 weeks.

The new Channel 2 is not linked to any other station. The frequency is wide open. Therefore, no other station would be adversely affected by a grant of this request.

There is no question that operation on Channel 32 must, and will, terminate on the September 6 cutover date, because another repacked station (WCAV, FID 363) will move to Channel 32 on that date. WVIR-TV and WCAV have a good relationship and are working together to coordinate the transition.

To facilitate continuity of its network and local services to the public during the band change, as discussed above, WVIR-TV requests special temporary authority to transmit full time on Channel 2, simulcasting the station's Channel 32 licensed signal, starting on August 8 and terminating on September 6, 2019, a period of less than one month.

The technical parameters specified in this STA request are identical to those approved in WVIR-TV's granted construction permit, LMS File No. 0000034904. All relevant environmental considerations are unchanged and were addressed when that application was processed.