

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

The instant request for STA seeks authority for WUNE-TV to operate at reduced power on its pre-transition channel 17 from the station's existing primary antenna and using the Station's back-up transmitter, which is not capable of operating at full, authorized power. (The back-up transmitter is only capable of approximately 58% of WUNE-TV's full authorized power.) This reduced power operation is necessary during certain stages of construction of WUNE-TV's post-transition facility.

WUNE-TV has been assigned to Transition Phase 5, and the Station will be using an interim facility (post-transition side-mount antenna and post-transition transmitter) to effectuate its cutover to post-transition channel 36 by the September 6, 2019, Phase 5 deadline.<sup>1</sup> As such, not surprisingly, certain of WUNE-TV's transition-related construction activities—including removal of WUNE-TV's existing pre-transition primary transmitter and installation of WUNE-TV's post-transition primary transmitter—have been scheduled to occur during July and August 2019 and be performed over a several-week period. Hence the need for this STA request.

Grant of this STA for pre-transition reduced power interim operations using WUNE-TV's back-up transmitter and existing primary antenna as described herein is in the public interest because it is in furtherance of WUNE-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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<sup>1</sup> To be clear, the WUNE-TV will soon file a separate STA request for its post-transition interim facility. The instant request only applies to pre-transition interim operations.