EXPLANATION

Station WGGN-TV, Ch. 42, Sandusky, Ohio, was designated to change channel as part of the FCC spectrum repack in Phase 4. The Phase 4 deadline is August 2, 2019. Christian Faith Broadcast ("CFB"), licensee of WGGN-TV has worked diligently to implement its post-repack Ch. 3 construction permit but due to matters beyond its control, it will be unable to meet the August 2 deadline.

The new transmitter for the CH. 3 facility has been delivered but the required mask filter has not yet been delivered. CFB has been told that it will take 3 days to install the transmitter and filter, when received. Even more a problem, however, is the fact that the Jampro antenna to be used has not been delivered – manufacture of the antenna required a modification to accommodate the top plate on the tower. Jampro is quoting delivery in late August *at best*. In addition, the tower crew has indicated that it will be delayed in coming to do the tower work. It has not yet been able to provide a date that it will be at the site.

CFB is hopeful that it will have all equipment in hand and installation completed by September 1st but timing is not within its control.

The station does not have another station with which it could temporarily share so moving channel temporarily is not an option. Going off the air would be a significant financial hardship for this Church owned station. That said, WGGN-TV is not a linked set, so remaining on its current channel would not appear to delay the repack generally. A phase waiver from Phase 4 to Phase 5 would give CFB just over 30-days additional time to implement its repack CP. A waiver to Phase 6 would give CFB until October 18, 2019. CFB hopes to be able to transition as early as possible and well in advance of the Phase 6 deadline.

CFB respectfully requests a phase waiver to allow it to complete construction of its post-auction Ch. 3 facility.