

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

The instant request for STA seeks authority for WUNJ-TV to operate at reduced power on its pre-transition channel 29 from the station's existing primary antenna and using the Station's new back-up transmitter,<sup>1</sup> which is not capable of operating at full, authorized pre-transition power. (The back-up transmitter is only capable of operating at a portion of WUNJ-TV's full authorized pre-transition power.) This reduced power operation is necessary during certain stages of construction of WUNJ-TV's post-transition facility.

WUNJ-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 21 by the September 6, 2019, Phase 5 deadline.<sup>2</sup> As such, not surprisingly, certain of WUNJ-TV's transition-related construction activities are currently underway. Hence the need for this STA request for interim pre-transition operations.

Grant of this STA for pre-transition reduced power interim operations using WUNJ-TV's new back-up transmitter and existing primary antenna as described herein is in the public interest because it is in furtherance of WUNJ-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> The new back-up transmitter is capable of being tuned to WUNJ-TV's pre-transition channel and post-transition channel. WUNJ-TV has a pre-transition back-up transmitter, but it is not capable of being retuned to the post-transition channel, which is why the acquisition of a new back-up transmitter is necessary.

<sup>2</sup> To be clear, WUNJ-TV has made a separate filing (in the form of a post-transition aux antenna CP application) to effectuate its post-transition interim facility. The instant request only applies to pre-transition interim operations.