

**Request for Waiver of Transition Phase Assignment, Testing Period,  
and Phase Completion Date for Involuntary Move of WUNM-TV to Phase 7**

By this Legal STA Request, The University of North Carolina (“UNC-TV”) seeks waiver of the post-Incentive Auction Transition Phase assignment, and corresponding testing dates and construction completion deadlines, for WUNM-TV, Jacksonville, North Carolina (Fac. ID No. 69444) (“Station” or “WUNM”). Pursuant to the CCR Public Notice, WUNM was originally assigned to Transition Phase 5, for which the Phase Completion Date is currently scheduled as September 6, 2019 (with a testing phase that commenced August 3, 2019).<sup>1</sup>

On August 21, 2019, UNC-TV filed a phase change request in LMS File No. [0000080508](#) to move from Phase 5 to Phase 10. That phase change request was not made for the convenience or benefit of WUNM; instead, as detailed in the exhibit to File No. [0000080508](#) (a copy of which is attached to the instant request for convenience, the “Phase 10 Exhibit”), that phase change request was driven by the decision of co-located WYDO—whose owner owns the WUNM tower site—to move to Phase 10 and the corresponding decision of a key repack vendor to make only one trip to the site, which would be at Phase 10. Subsequent to the filing of WUNM’s phase change request for Phase 10, WUNM learned that WYDO would, instead, be moving to Phase 7 to accommodate T-Mobile’s 600 MHz buildout plans in the geographic area. Using T-Mobile’s leverage, a new repack vendor was identified to do the tower work necessary for WYDO and WUNM (which are linked and, therefore, must move together) to complete the transition during the Phase 7 testing period. Hence the instant request—which, like the request to move to Phase 10, is not WUNM’s brainchild and is not being done for the convenience of WUNM—for WUNM to also now move to Phase 7. (WYDO filed a Legal STA request on August 29, in LMS File No. [0000080747](#), to move to Phase 7.)

The waiver standard is set forth in the attached Phase 10 Exhibit, and is not being reiterated here. Virtually all of the same factors that were relevant to UNC-TV’s proposed move to Phase 10 are also present here, except that a new vendor who has committed to doing the WYDO/WUNM repack tower work has been identified for the earlier Phase 7 timeline. In addition, no interference issues will be created by WUNM’s move to Phase 7, and because WYDO and WUNM are linked to each other (WYDO will be transitioning to Channel 19, which is WUNM’s pre-Auction channel), it is necessary for the two stations to transition at the same time. *See* Engineering Statement from Joe Davis of Chesapeake RF Consultants, LLC, which is attached to the Phase 10 Exhibit. In other words, now that WYDO is going to transition during Phase 7, WUNM *must also transition during Phase 7* because of the linkage; WYDO’s move to Phase 7 has created an involuntary need for WUNM to also transition during Phase 7.

To be sure all of the same resource-deployment and tower safety factors referenced in the Phase 10 Exhibit will apply with equal force to the new Phase 7 plan, because the new tower

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<sup>1</sup> *See Incentive Auction Closing and Channel Reassignment Public Notice: The Broadcast Television Incentive Auction Closes; Reverse Auction and Forward Auction Results Announced; Final Television Band Channel Assignments Announced; Post-Auction Deadlines Announced*, Public Notice, 32 FCC Rcd 2786 (WTB & MB 2017) (“CCR Public Notice”).

vendor will only need to make one visit to the site in order to perform the work that is necessary for WYDO and WUNM to both make the transition during Phase 7. Moreover, viewers will be sufficiently notified of the new rescan date, and should experience no loss of service as a result of the proposed phase change.

In short, UNC-TV believes that the phase change for WUNM to Phase 7 is consistent with the public interest and will not have any negative impact on the nationwide transition. UNC-TV respectfully requests grant of this request.

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**Request for Waiver of Transition Phase Assignment, Testing Period,  
and Phase Completion Date for Involuntary Move of WUNM-TV to Phase 10**

**A. Introduction and Background**

By this Legal STA Request, The University of North Carolina (“UNC-TV”) seeks waiver of the post-Incentive Auction Transition Phase assignment, and corresponding testing dates and construction completion deadlines, for WUNM-TV, Jacksonville, North Carolina (Fac. ID No. 69444) (“Station” or “WUNM”). Pursuant to the CCR Public Notice, WUNM has been assigned to Transition Phase 5, for which the Phase Completion Date is currently scheduled as September 6, 2019 (with a testing phase that commenced August 3, 2019).<sup>1</sup> Until recently, UNC-TV’s WUNM repack project was on-schedule to terminate the Station’s pre-transition channel 19 and commence operations on its post-transition channel 28 by the Phase 5 deadline. In August 2019, however, UNC-TV learned (a) from WUNM’s site owner (who owns two stations co-located at the same site—WCTI-TV, which has always been assigned to Phase 10, and WYDO, which has been assigned to Phase 5 but for which a phase change request was filed August 16, 2019,<sup>2</sup> to change to Phase 5), that both of the site owner’s repacked stations at the site would be transitioning as part of Phase 10, and (b) from the tower services vendor (Stainless) that it would not mobilize twice to the site and that its only mobilization to the WUNM/WYDO/WCTI-TV site would occur on a schedule intended for completion of the projects in Phase 10.

The result of (a) and (b) above has caused UNC-TV to have to reconfigure its transition plans for WUNM and, as a result, UNC-TV is making this filing to move WUNM’s reassignment to Transition Phase 10, which would mean WUNM’s transition would be completed by July 3, 2020, with the Phase 10 testing period to commence May 2, 2020. To be clear, while the phase change *would not result in a net detriment to viewers* (by UNC-TV’s estimation, the effect on viewers is the same whether WUNM-TV transitions in Phase 5—which, as discussed herein, is no longer possible—or in Phase 10), the move to Phase 10 is not UNC-TV’s brainchild and does not result in a net benefit or convenience to WUNM-TV or its viewers (though it would result in a net benefit to the overall nationwide transition). To the extent that any additional costs are incurred by UNC-TV for the delay in WUNM’s transition as a result of changing phases, the proposed move to Phase 10 would have detrimental and inequitable consequences on the public, noncommercial licensee of WUNM because UNC-TV is not the architect of the plan to change phases and should be “made whole” for its willingness to change phases to stay in lockstep with the transition schedule established by the site owner who also owns and operates WYDO and WCTI-TV (the latter of which was originally assigned to Phase 10 and the former of which has applied in LMS File No. [0000080400](#) to move from Phase 5 to Phase 10). Indeed, absent the circumstances compelling WUNM’s request to change phases, UNC-TV would not otherwise have

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<sup>1</sup> See *Incentive Auction Closing and Channel Reassignment Public Notice: The Broadcast Television Incentive Auction Closes; Reverse Auction and Forward Auction Results Announced; Final Television Band Channel Assignments Announced; Post-Auction Deadlines Announced*, Public Notice, 32 FCC Rcd 2786 (WTB & MB 2017) (“CCR Public Notice”).

<sup>2</sup> See LMS File No. [0000080400](#).

authority to incur costs to change its transition phase for its own convenience or desire, and UNC-TV has not been authorized by the State to incur additional costs for the purpose of satisfying Stainless's "second touch initiative" and/or the site owner's desire to change WYDO's phase from 5 to 10.

## **B. Waiver Standard and Public Interest Considerations**

The Transition Scheduling Adoption Public Notice<sup>3</sup> expressly authorized stations to propose "alternative transition solutions that could create efficiencies," and specifically indicated that a request to modify a station's transition deadline would be viewed favorably if the request is "otherwise compliant with [FCC] rules and [has] little or no impact on the phase assignments or transition schedule."<sup>4</sup> As discussed herein, the instant request, which was prompted by circumstances beyond UNC-TV's control, qualifies for such favorable treatment.

The FCC may grant a waiver for "good cause shown."<sup>5</sup> A waiver is appropriate where the particular facts make strict compliance inconsistent with the public interest.<sup>6</sup> In considering a waiver, the FCC may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>7</sup> Such a waiver is appropriate if circumstances warrant a deviation from the general rule, and such deviation will serve the public interest.<sup>8</sup>

As demonstrated herein, good cause exists for waiver of WUNM's assigned Transition Phase 5 and its attendant testing and completion dates because moving to Transition Phase 10 will serve the public interest by maximizing the deployment and use of scarce transition resources (specifically, tower crew services provided by Stainless) while causing no negative impact on broadcast television viewers. More specifically, WUNM must complete its transition during Phase 10 because the tower services vendor is only mobilizing one time to the combined WUNM/WCTI-TV/WYDO site, which will increase worker safety and benefit the overall nationwide transition. Moreover, the Phase 10 transition of WUNM will create no interference issues and will result in no additional rescans.

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<sup>3</sup> *Incentive Auction Task Force and Media Bureau Adopt A Post-Incentive Auction Transition Scheduling Plan*, 32 FCC Rcd 890 (MB 2017) ("Transition Scheduling Adoption Public Notice").

<sup>4</sup> Transition Scheduling Adoption Public Notice, at ¶ 51 (*citing Incentive Auction Task Force and Media Bureau Seek Comment on Post-Incentive Auction Transition Scheduling Plan*, Public Notice, 31 FCC Rcd 10802 (MB 2016) ("Transition Scheduling Proposal Public Notice")).

<sup>5</sup> 47 C.F.R. § 1.3.

<sup>6</sup> *See Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>7</sup> *See WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular*, 897 F.2d at 1166.

<sup>8</sup> *See Northeast Cellular*, 897 F.2d at 1166.

UNC-TV believes that this request for WUNM-TV to change from Phase 5 to Phase 10 is grantable—and should be granted—for the following reasons:

- No impermissible interference will be caused to any other station (see Engineering Statement from Joe Davis of Chesapeake RF Consultants, LLC, which is attached to this exhibit).
- Scarce repack resources will be more efficiently deployed and used—specifically, tower service vendor Stainless (with whom UNC-TV contracted because the site owner had already selected Stainless as the vendor for its WYDO and WCTI-TV repack projects at the shared site) has made clear that it will mobilize only one time to the tower site and that single mobilization will occur on a schedule for Phase 10 (see Letter Dated August 19, 2019, from Jon Marcusse at Stainless). As set forth in Stainless’s letter:

As discussed, Sinclair Broadcast Group is moving their WCTI and WYDO repack antenna installs from phase 5 to phase 10. Since all of you are on the same tower, we would like to try and get your WUNM station into the same phase 10 because the demands of the nationwide repack means that our resources are stretched too thin to reasonably incur two mobilizations and multiple tower riggings at the WUNM/WYDO/WCTI site.

By reducing the mobilizations of the tower crew from two to one for the shared WUNM/WYDO/WCTI-TV site, Stainless presumably can repurpose its tower crew to other repack projects, which would result in a net benefit to the entire nationwide transition during a period of the transition when tower crews are in especially high demand.<sup>9</sup>

- Tower worker safety will be increased by the single mobilization to the shared WUNM/WYDO/WCTI-TV site. First, as the Stainless letter describes, the change of WUNM’s Transition Phase from 5 to 10 will further the vendor’s “second touch initiative” which prioritizes single mobilizations to repack sites. To be sure, the fewer tower crew mobilizations there are to any single repack site, the more efficiently that scarce tower crew resources can be deployed and the less time and money that will be spent moving tower crews from one project to the next and the less travel fatigue the crew will experience. More mobilizations per site necessarily results in a fewer number of sites that can be serviced by the tower crew and the more time and money that must be expended moving tower crews around and, more significantly, *the more fatigue the crew will experience*. Fatigue is a significant contributing factor in many workplace

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<sup>9</sup> *Accord, e.g., WXII-TV Legal STA (Phase Change Request granted Jan. 29, 2019), LMS File No. [0000063414](#) (phase change request premised in part on preferential scheduling of scarce tower crew resources and tower safety).*

accidents, and the FCC—together with OSHA—has specifically recognized as much with respect to work performed by tower crews on communications towers. Indeed, in the publication titled “Communication Tower Best Practices” issued by the FCC and OSHA in 2017, the following recommendations were made:

- Carriers should take proactive steps to guard against employee fatigue.
  - The hazards presented by employee fatigue can be greatly reduced by, among other measures, minimizing long drives to and from work sites.
  - Due to the remote location of many communication tower work sites, carriers should give special consideration to travel time when setting project schedules.
  - Setting limits on drive times and “high time” (or, time spent on the tower) can promote climber safety and also demonstrate to contractors that minimizing employee fatigue is a high priority.<sup>10</sup>

While UNC-TV is not intimately familiar with the details of Stainless’s “second touch initiative,” it seems pretty evident that a change in the Station’s Transition Phase from 5 to 10 would better fulfill the best practices recommendations endorsed by the FCC and OSHA as set forth above,<sup>11</sup> because one tower crew mobilization is inherently “better” than two mobilizations to a single site.

- UNC-TV learned of the single-mobilization developments relating to Stainless’s services in August 2019 when it was already too late to hire another vendor to complete the work on WUNM’s Phase 5 schedule. This is especially true in light of the mandatory state-imposed procurement process that governs UNC-TV as a public entity.<sup>12</sup>
- Execution and fulfillment of other repack projects by WUNM’s transmitter and antenna vendors will not be impeded because WUNM’s transmitter and antenna needs have

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<sup>10</sup> OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION AND FEDERAL COMMUNICATIONS COMMISSION, COMMUNICATION TOWER BEST PRACTICES, OSHA 3877-06 2017 (2017), p.12, available at <https://docs.fcc.gov/public/attachments/DOC-345150A1.pdf>.

<sup>11</sup> *Accord*, WXII-TV Legal STA (Phase Change Request granted Jan. 29, 2019), LMS File No. [0000063414](#) (phase change request premised in part on preferential scheduling of scarce tower crew resources and tower safety).

<sup>12</sup> For more details about the state-imposed procurement process applicable to UNC-TV’s repack projects, including WUNM-TV, see, e.g., WUNM-TV’s Quarterly Transition Plan Progress Reports filed in LMS File Nos. [0000031474](#) & [0000038558](#).

already been satisfied in order to meet WUNM's original Phase 5 schedule.

- No additional rescans will be needed in the market, because WCTI-TV was (and other repacked stations in the market were) already assigned to Phase 10.

### **C. Conclusion**

In sum, grant of this waiver (i) will not undermine or delay any post-Auction transition goals, (ii) does not require waiver of any interference regulations or policies, and (iii) will facilitate a more effective and efficient implementation of the overall policy goals of the Incentive Auction and post-auction transition. And, if this request were to not be granted, the consequences for WUNM's viewers would be deleterious: because UNC-TV learned of Stainless's "second touch initiative" at a time that made it too late for UNC-TV to find a different vendor to provide necessary services on WUNM's Phase 5 schedule, WUNM's only choice would be to go silent for the duration of time between Phase 5 and Phase 10. Accordingly, grant of this request is in the public interest.

\* \* \* \* \*



August 19, 2019

University of North Carolina PBS  
10 T.W. Alexander Drive  
Research Park Triangle, NC 27709

Attn: Don Smith

Re: 2<sup>nd</sup> Touch Initiative

Dear Don,

Thank you for visiting with me about the FCC's second touch initiative.

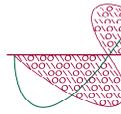
As discussed, Sinclair Broadcast Group is moving their WCTI and WYDO repack antenna installs from phase 5 to phase 10. Since all of you are on the same tower, we would like to try and get your WUNM station into the same phase 10 because the demands of the nationwide repack means that our resources are stretched too thin to reasonably incur two mobilizations and multiple tower riggings at the WUNM/WYDO/WCTI site.

If you would reach out to the FCC and determine if this is a possibility, we would be appreciative of the request.

Please let me know if there is anything you may need from us and your attention to this matter is greatly appreciated.

Regards,

Jon Marcusse  
National Sales Manager – Broadcast  
FDH Infrastructure Services



## **ENGINEERING STATEMENT**

### **Request for Waiver of Transition Phase Assignment**

prepared for

**University Of North Carolina**  
WUNM-TV Jacksonville, NC  
Facility ID 69444

This statement is prepared on behalf of *University Of North Carolina (“UNC”)*, licensee of digital television station WUNM-TV, Facility ID 69444, Jacksonville NC, in support of *UNC’s* request for waiver of WUNM-TV’s transition phase assignment. Reassignment of WUNM-TV from Channel 19 to Channel 28 was specified in the *Incentive Auction Closing and Channel Reassignment Public Notice* (DA 17-317, released April 13, 2017). WUNM-TV has been assigned to make the transition to Channel 28 at phase 5 (testing period start date August 3, 2019 and phase completion date September 6, 2019). *UNC* seeks to delay the transition of WUNM-TV to its reassignment facility until phase 10 (testing period start date May 2, 2020 and phase completion date July 3, 2020). This statement provides engineering details to support the waiver request.

The change in phase is requested in order to coincide with the construction and implementation of the reassignment facilities of two other television stations that utilize the same antenna supporting tower as WUNM-TV. *UNC* leases space on the tower for WUNM-TV’s side-mounted antenna. The subject tower structure and the other two co-located television stations, WCTI-TV (Fac ID 18334, New Bern NC) and WYDO(DT) (Fac ID 35582, Greenville NC), are under common ownership. WCTI-TV, presently Channel 12, is reassigned to Channel 10 at phase 10. WYDO, presently Channel 47, is reassigned to Channel 19 at phase 5. Citing tower crew installation efficiencies that can be achieved, a request to change WYDO’s transition to phase 10 has been submitted by WYDO’s licensee (LMS file# 0000080400).

Since the tower work associated with WUNM-TV’s side-mount antenna replacement is to be performed by the same contractor as that engaged for WCTI-TV and WYDO, *UNC* seeks herein to also change WUNM-TV’s transition to phase 10, thus allowing all tower work to be

performed in a single mobilization. *UNC* proposes to continue to operate WUNM-TV with its licensed pre-auction Channel 19 facility beyond its assigned phase 5 and transition WYDO to Channel 28 at phase 10.

The proposed operation on pre-auction Channel 19 beyond phase 5 was evaluated for potential impact to stations downstream of WUNM-TV. According to the FCC's transition data files,<sup>1</sup> only one station, WYDO, is dependent on WUNM-TV's transition. As discussed above, a separate phase change request is pending to change WYDO to phase 10, and WUNM-TV's proposed phase 10 transition will be coordinated with WYDO.

Since many reassigned stations have achieved an expanded facility and/or alternate channels, additional analysis is provided herein to determine if any additional dependencies now exist for WUNM-TV. An interference study using FCC TVStudy software (OET Bulletin 69) was conducted to determine compliance with the 2.0 percent limit of additional interference permitted during the transition with respect to pertinent nearby full service and Class A television stations. The TVStudy report is supplied in Table 1 for relevant station operations on their pre-auction and reassignment channels that may be affected by WUNM-TV's operation on Channel 19 through phase 10.

The interference analysis shows that the proposed operation of WUNM-TV into phase 10 would not cause interference in excess of 2.0 percent to any other station, except for WYDO. Therefore, the proposed phase change complies with the interference protection requirements for operation during the transition. No new dependency or linked station set is created with respect to interference created to other stations through phase 10.

Regarding incoming interference to WUNM-TV's operation on Channel 19 for operation during phase 6 to 10, Table 2 shows that WUNM-TV will not receive interference from any post-transition station in excess of the 2 percent threshold permitted for interference contribution

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<sup>1</sup> [http://data.fcc.gov/download/incentive-auctions/Current\\_Transition\\_Files/](http://data.fcc.gov/download/incentive-auctions/Current_Transition_Files/)

by any individual station for operation during the transition. Therefore, no dependency or linked station set is created with respect to interference received from any other station.

In summary, the proposed change for WUNM-TV's transition to phase 10 extension will comply with the interference allowance established for the transition period (regarding both caused and received interference) and will not create any new linked station set or dependency. As with the current situation at phase 5, WUNM-TV will coordinate with WYDO for the proposal where both stations are changed from phase 5 to phase 10.

List of Attachments

Table 1	TVStudy Analysis of Proposal Phase 6 – 10 Operation of WUNM-TV on Pre-Auction Ch. 19
Table 2	TVStudy Analysis – Incoming Interference WUNM-TV Proposed Phase Change

**Chesapeake RF Consultants, LLC**

Joseph M. Davis, P.E.                      August 21, 2019  
207 Old Dominion Road                      Yorktown, VA 23692                      703-650-9600

**Table 1 WUNM-TV TVStudy Analysis of Proposal  
Phase 6-10 Operation of WUNM-TV on Pre-Auction Ch. 19  
(page 1 of 3)**



tvstudy v2.2.5 (4uoc83)  
Database: localhost, Study: WUNM-TV Lic-19\_BLEDT20090827AAT, Model: Longley-Rice  
Start: 2019.08.21 09:45:35

Study created: 2019.08.21 09:45:35

Study build station data: LMS TV 2019-08-20

Proposal: WUNM-TV D19 DT LIC JACKSONVILLE, NC  
File number: BLEDT20090827AAT  
Facility ID: 69444  
Station data: LMS TV 2019-08-20  
Record ID: 96974c6e8d0f45dba66ccf6212b6c0ea  
Country: U.S.  
Zone: II

Build options:  
Protect pre-transition records not on baseline channel

Search options:  
Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	WLFL	D18	DT	CP	RALEIGH, NC	BLANK0000068685	125.2 km
No	WFXB	D18	DT	LIC	MYRTLE BEACH, SC	BLCDT20070205ACJ	197.1
Yes	WSOC-TV	D19	DT	CP	CHARLOTTE, NC	BLANK0000034695	308.5
Yes	WYDO	D19	DT	CP	GREENVILLE, NC	BLANK0000034494	0.0
No	WCSC-TV	D19	DT	LIC	CHARLESTON, SC	BLANK0000054856	325.7
No	WCAV	D19	DT	LIC	CHARLOTTESVILLE, VA	BLCDT20090522ADB	336.0
No	WZBJ-CD	D19	DC	CP	LYNCHBURG, VA	BLANK0000034402	299.1
Yes	WAVY-TV	D19	DT	CP	PORTSMOUTH, VA	BLANK0000034800	204.7
No	WYSJ-CA	D19	DC	LIC	YORKTOWN, VA	BLANK0000001579	233.5
No	WUNC-TV	D20	DT	CP	CHAPEL HILL, NC	BLANK00000075398	186.1
Yes	WUND-TV	D20	DT	LIC	EDENTON, NC	BMLEDT20101027ABX	125.9
No	WGNT	D20	DT	CP	PORTSMOUTH, VA	BLANK0000034473	203.7

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D19  
Latitude: 35 6 16.00 N (NAD83)  
Longitude: 77 20 11.00 W  
Height AMSL: 575.0 m  
HAAT: 561.0 m  
Peak ERP: 100 kW  
Antenna: DIE-TFU-14DSC/VP-R P320 (ID 87112) 0.0 deg  
Elev Pattnr: Generic  
Elec Tilt: 1.00

39.3 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	32.1 kW	560.1 m	91.7 km
45.0	96.4	561.0	101.0
90.0	20.9	563.2	88.3
135.0	26.7	568.0	90.6
180.0	32.1	562.9	91.9
225.0	96.4	560.7	101.0
270.0	20.9	563.7	88.4
315.0	26.7	557.5	90.0

Database HAAT does not agree with computed HAAT  
Database HAAT: 561 m Computed HAAT: 562 m

Distance to Canadian border: 844.2 km

Distance to Mexican border: 2126.4 km

**Table 1 WUNM-TV TVStudy Analysis of Proposal  
Phase 6-10 Operation of WUNM-TV on Pre-Auction Ch. 19**  
(page 2 of 3)



Conditions at FCC monitoring station: Laurel MD  
Bearing: 5.6 degrees Distance: 453.6 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 291.2 degrees Distance: 2507.0 km

No land mobile station failures found

Study cell size: 2.00 km  
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%  
Maximum new IX to LPTV: 2.00%

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Interference to BLANK0000068685 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	WLFL	D18	DT	CP	RALEIGH, NC	BLANK0000068685				
Undesireds:	WUNM-TV	D19	DT	LIC	JACKSONVILLE, NC	BLEDT20090827AAT	125.2 km			
	WRAL-TV	D17	DT	CP	RALEIGH, NC	BLANK0000075896	0.0			
	WCCB	D18	DT	CP	CHARLOTTE, NC	BLANK0000067979	204.8			
	WSOC-TV	D19	DT	CP	CHARLOTTE, NC	BLANK0000034695	204.3			
	WYDO	D19	DT	CP	GREENVILLE, NC	BLANK0000034494	125.2			
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX			
	47212.7	3,747,583	47033.1	3,743,960	43771.7	3,599,893	43771.7	3,599,893	0.00	0.00
Undesired			Total IX		Unique IX, before	Unique IX, after				
WUNM-TV	D19	DT	LIC	119.2	2,091	0.0	0			
WRAL-TV	D17	DT	CP	8.0	525	8.0	525	8.0	525	
WCCB	D18	DT	CP	2388.6	131,435	2376.5	130,611	2376.5	130,611	
WSOC-TV	D19	DT	CP	12.1	824	0.0	0	0.0	0	
WYDO	D19	DT	CP	864.8	12,107	864.8	12,107	745.6	10,016	

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Interference to BLANK0000034695 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	WSOC-TV	D19	DT	CP	CHARLOTTE, NC	BLANK0000034695				
Undesireds:	WUNM-TV	D19	DT	LIC	JACKSONVILLE, NC	BLEDT20090827AAT	308.5 km			
	WCCB	D18	DT	CP	CHARLOTTE, NC	BLANK0000067979	0.9			
	WGCL-TV	D19	DT	LIC	ATLANTA, GA	BLCDT20060113ACO	368.1			
	WBPI-CD	D19	DC	LIC	AUGUSTA, GA	BLANK0000059661	223.7			
	WYDO	D19	DT	CP	GREENVILLE, NC	BLANK0000034494	308.5			
	WCSC-TV	D19	DT	LIC	CHARLESTON, SC	BLANK0000054856	276.4			
	WKPZ-CD	D19	DC	LIC	KINGSPORT, TN	BLANK0000001584	218.7			
	WZBJ-CD	D19	DC	CP	LYNCHBURG, VA	BLANK0000034402	272.2			
	WUNF-TV	D20	DD	CP	ASHEVILLE, NC	BLANK0000029742	165.5			
	WUNC-TV	D20	DT	CP	CHAPEL HILL, NC	BLANK0000075398	156.3			
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX			
	35334.0	3,706,808	34341.1	3,638,832	32689.8	3,560,047	32689.8	3,560,047	0.00	0.00
Undesired			Total IX		Unique IX, before	Unique IX, after				
WUNM-TV	D19	DT	LIC	44.2	680	0.0	0			
WCCB	D18	DT	CP	112.4	4,332	92.4	2,738	92.4	2,738	
WGCL-TV	D19	DT	LIC	59.7	2,739	4.0	208	4.0	208	
WBPI-CD	D19	DC	LIC	51.7	1,103	4.0	0	4.0	0	
WYDO	D19	DT	CP	325.5	13,635	76.1	4,174	72.1	4,163	
WCSC-TV	D19	DT	LIC	490.1	9,834	378.4	6,634	378.4	6,634	
WZBJ-CD	D19	DC	CP	20.1	582	4.0	162	4.0	162	
WUNF-TV	D20	DD	CP	407.9	21,314	372.1	19,172	372.1	19,172	
WUNC-TV	D20	DT	CP	592.8	39,641	375.1	32,838	375.1	32,838	

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**Table 1 WUNM-TV TVStudy Analysis of Proposal  
Phase 6-10 Operation of WUNM-TV on Pre-Auction Ch. 19**  
(page 3 of 3)



Interference to BLANK0000034494 CP scenario 1  
**\*\*IX: 99.33%** interference caused

**WYDO also requesting transition at phase 10**

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	WYDO	D19	DT	CP	GREENVILLE, NC	BLANK0000034494			
Undesireds:	WUNM-TV	D19	DT	LIC	JACKSONVILLE, NC	BLEDT20090827AAT	0.0 km		
	WLFL	D18	DT	CP	RALEIGH, NC	BLANK0000068685	125.2		
	WSOC-TV	D19	DT	CP	CHARLOTTE, NC	BLANK0000034695	308.5		
	WCSC-TV	D19	DT	LIC	CHARLESTON, SC	BLANK0000054856	325.7		
	WAVY-TV	D19	DT	CP	PORTSMOUTH, VA	BLANK0000034800	204.7		
	WUNC-TV	D20	DT	CP	CHAPEL HILL, NC	BLANK0000075398	186.1		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
32751.2	1,283,531	32751.2	1,283,531	30965.6	1,237,484	335.3	8,284	98.92	<b>99.33</b>
Undesired		Total IX		Unique IX, before		Unique IX, after			
WUNM-TV	D19 DT LIC	32415.8	1,275,247			30630.3	1,229,200		
WLFL	D18 DT CP	630.5	30,494	570.5	28,190	0.0	0		
WSOC-TV	D19 DT CP	91.5	1,758	31.8	100	0.0	0		
WCSC-TV	D19 DT LIC	31.8	122	0.0	0	0.0	0		
WAVY-TV	D19 DT CP	1155.4	17,590	1095.4	15,357	0.0	0		
WUNC-TV	D20 DT CP	4.0	619	0.0	0	0.0	0		

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 Interference to BLANK0000034800 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	WAVY-TV	D19	DT	CP	PORTSMOUTH, VA	BLANK0000034800			
Undesireds:	WUNM-TV	D19	DT	LIC	JACKSONVILLE, NC	BLEDT20090827AAT	204.7 km		
	WYDO	D19	DT	CP	GREENVILLE, NC	BLANK0000034494	204.7		
	WGNT	D20	DT	CP	PORTSMOUTH, VA	BLANK0000034473	1.5		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
30225.3	2,080,708	30221.3	2,080,691	28780.0	2,058,110	28776.0	2,058,110	0.01	0.00
Undesired		Total IX		Unique IX, before		Unique IX, after			
WUNM-TV	D19 DT LIC	753.6	10,563			4.0	0		
WYDO	D19 DT CP	1349.6	19,451	1337.6	19,369	588.0	8,806		
WGNT	D20 DT CP	103.7	3,212	91.8	3,130	91.8	3,130		

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 Interference to BML EDT20101027ABX LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	WUND-TV	D20	DT	LIC	EDENTON, NC	BML EDT20101027ABX			
Undesireds:	WUNM-TV	D19	DT	LIC	JACKSONVILLE, NC	BLEDT20090827AAT	125.9 km		
	WYSJ-CA	D19	DC	LIC	YORKTOWN, VA	BLANK0000001579	131.2		
	WWCW	D20	DT	LIC	LYNCHBURG, VA	BLCDT20090619ABM	333.0		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
39049.1	1,506,640	39049.1	1,506,640	38985.1	1,503,853	38981.1	1,503,519	0.01	0.02
Undesired		Total IX		Unique IX, before		Unique IX, after			
WUNM-TV	D19 DT LIC	4.0	334			4.0	334		
WYSJ-CA	D19 DC LIC	24.1	2,725	24.1	2,725	24.1	2,725		
WWCW	D20 DT LIC	39.9	62	39.9	62	39.9	62		

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**Table 2 TVStudy Analysis – Incoming Interference  
WUNM-TV Proposed Phase Change**

(page 1 of 1)



**WUNM-TV on Pre-Auction Channel 19  
Operation at Phase 6 to Phase 10  
Relevant Interfering Facilities**

Proposal: WUNM-TV D19 DT LIC JACKSONVILLE, NC  
 File number: BLEDT20090827AAT  
 Facility ID: 69444  
 Station data: LMS TV 2019-08-20  
 Record ID: 96974c6e8d0f45dba66ccf6212b6c0ea  
 Country: U.S.  
 Zone: II

Channel: D19  
 Latitude: 35 6 16.00 N (NAD83)  
 Longitude: 77 20 11.00 W  
 Height AMSL: 575.0 m  
 HAAT: 561.0 m  
 Peak ERP: 100 kW  
 Antenna: DIE-TFU-14DSC/VP-R P320 (ID 87112) 0.0 deg  
 Elev Pattn: Generic  
 Elec Tilt: 1.00

Study cell size: 2.00 km  
 Profile point spacing: 1.00 km

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 Interference to proposal scenario 1

0.75% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WUNM-TV	D19	DT	LIC	JACKSONVILLE, NC	BLEDT20090827AAT	
Undesireds:	WLFL	D18	DT	CP	RALEIGH, NC	BLANK0000068685	125.2 km
	WSOC-TV	D19	DT	CP	CHARLOTTE, NC	BLANK0000034695	308.5
	WCSC-TV	D19	DT	LIC	CHARLESTON, SC	BLANK0000054856	325.7
	WZBJ-CD	D19	DC	CP	LYNCHBURG, VA	BLANK0000034402	299.1
	WAVY-TV	D19	DT	CP	PORTSMOUTH, VA	BLANK0000034800	204.7
	WUNC-TV	D20	DT	CP	CHAPEL HILL, NC	BLANK0000075398	186.1
	WUND-TV	D20	DT	LIC	EDENTON, NC	BMLEDT20101027ABX	125.9

Service area	Terrain-limited	IX-free	Percent IX
27298.2 1,029,109	27298.2 1,029,109	26876.3 1,021,427	1.55 0.75

Undesired	Total IX	Unique IX	Prcnt Unique IX
WLFL D18 DT CP	28.3 275	16.2 95	0.06 0.01
WSOC-TV D19 DT CP	11.9 10	0.0 0	0.00 0.00
WCSC-TV D19 DT LIC	7.9 5	0.0 0	0.00 0.00
WAVY-TV D19 DT CP	345.4 7,533	180.7 3,948	0.66 0.38
WUND-TV D20 DT LIC	200.9 3,449	56.3 53	0.21 0.01

Total Incoming Interference (population) 7,682  
 0.75%

Downstream Station Omitted, also proposed to change at Phase 10:  
 WYDO D19 DT CP GREENVILLE, NC BLANK0000034494 0.0