

WRSP-TV, Springfield, IL (Fac. Id. No. 62009)
Gocomm Media of Illinois, LLC
Request for Waiver/Change of Phase Assignment

Request for Waiver of Phase Assignment

Gocomm Media of Illinois, LLC, the licensee of WRSP-TV, Springfield, Illinois (Fac. Id. No. 62009) (“WRSP”), hereby respectfully files this request for a waiver of the post-Incentive Auction Transition Phase assignment and corresponding testing dates and construction completion deadlines for WRSP. WRSP was assigned to Transition Phase 7 pursuant to the *Closing and Reassignment Public Notice*.¹ WICS now requests re-assignment to Transition Phase 9. Based on discussions with the Media Bureau Staff, WRSP plans to delay construction of its post-transition facility in order to coordinate with two other stations – Station WSEC(TV), Jacksonville, Illinois (Fac. Id. No. 70536), licensed to the Board of Trustees of Southern Illinois University (“SIU”), and WICS(TV), Springfield, Illinois, licensed to WICS Licensee, LLC, which have already filed similar requests for phase changes from Phase 7 to Phase 9 (*See* LMS File Nos. 0000080342 and 0000080937).

WRSP is currently licensed to operate on channel 44. The station was reassigned to channel 16 in the *Closing and Channel Reassignment Public Notice* and assigned to transition Phase 7, which has a phase testing period start date of October 19, 2019, and a phase completion date of January 17, 2020. WRSP seeks to transition in Phase 9, which has a phase testing period start date of March 14, 2020, and a phase completion date of May 1, 2020. WRSP has no downstream dependencies. As Media Bureau staff is aware, the SIU transition plan for WSEC required the construction of a new replacement tower because the existing tower could not support the new antenna. In consultation with the FCC’s Incentive Auction Task Force, it was determined that the most cost-efficient and effective solution would be to have WSEC delay its transition until Phase 9. Upon request from the Incentive Auction Task Force in order to facilitate WSEC’s move to Phase 9 due to potential interference concerns, WICS agreed to request a later transition deadline to move from Phase 7 to Phase 9.²

Because WRSP shares a common antenna, common transmission line, and common combiner with WICS, WRSP is currently coordinating the construction plans of its post-transition facility with WICS to make concurrent and efficient use of limited tower and transmitter crews. WRSP therefore submits that for the reasons stated herein and those provided in the WSEC and WICS phase change requests, the public interest supports WRSP’s request for a phase change from Phase 7 to Phase 9.

In the *Transition Scheduling Adoption Public Notice*,³ the Commission anticipated that there would be circumstances where a station would need to seek a waiver of the phase

¹ *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 Red 2786 (WTB & MB 2017) (*Closing and Channel Reassignment Public Notice*).

² *See* application narratives associated with LMS File Nos. 0000080342 and 0000080937.

³ *Incentive Auction Task Force and Media Bureau Adopt A Post-Incentive Auction Transition*

construction deadline, including authority to continue operating on its current channel. The Commission indicated that it would consider these requests on a “case-by-case basis,” by evaluating the impact to viewers and the transition schedule.⁴ Re-assigning WRSP to a later transition phase (Phase 9) will allow the station to stay on the air until it can move to its post-transition channel and ensure viewers are not left without important programming aired by the station.

The licensee respectfully submits that the instant request to modify the phase assignment of WRSP to allow the station to transition to its post-auction channel in Phase 9 instead of Phase 7 satisfies the requirements for a waiver and is in the public interest. Accordingly, the grant of this request will serve the public interest by permitting WRSP to continue serving viewers while the station completes the transition to its post-repack channel.

Scheduling Plan, MB Docket No. 16-306 and GN Docket No. 12-268, 32 FCC Rcd 890 (MB 2017) (*Transition Scheduling Adoption Public Notice*).

⁴ *Transition Scheduling Adoption Public Notice*, ¶ 49.