

**Attachment to DTV Legal STA Application**

WCAV(DT) is currently assigned to Phase 6 of the television repack, with a current deadline of October 18, 2019, for WCAV(DT) to transition operations from its pre-auction facility on Channel 19 to its post-auction facility on Channel 32.<sup>1</sup>

WCAV(DT) has completed construction of its post-auction facility and, subject to equipment tests, is ready to commence operations on Channel 32 by the Phase 6 deadline. WCAV(DT) is currently operating at reduced power on Channel 19 with an interim antenna pursuant to special temporary authority in FCC File No. 0000081021 pending commencement of operations on Channel 32. As shown in WCAV(DT)'s application for special temporary authority, WCAV(DT)'s interim facility has a net loss of 125,531 persons compared to WCAV(DT)'s licensed facility.

WCAV(DT) desires to cease broadcasting on Channel 19 and commence operating its post-auction Channel 32 facility as soon as possible. However, television station WVIR-TV, Charlottesville, VA (Fac. ID No. 70309) has requested that WCAV(DT) delay its transition to Channel 32 until December 1, 2019. WCAV(DT) is part of a linked set with WVIR-TV. WVIR-TV's pre-auction Channel is 32. Accordingly, WCAV(DT)'s equipment tests and transition to its post-auction Channel 32 must be coordinated with WVIR-TV.

While not WCAV(DT)'s preference, but as an accommodation to WVIR-TV, WCAV(DT) hereby requests the reassignment of WCAV(DT) to Phase 7, with the understanding that the expiration date for WCAV(DT)'s and WVIR-TV's post-auction construction permits and deadline for each station to cease operations on their respective pre-auction channel will be set to 11:59 PM on December 1, 2019.<sup>2</sup>

As necessary in connection with the instant request, Charlottesville TV LLC agrees that WCAV(DT) will continue to accept between 2% and 5% temporary pairwise interference from WZBJ-CD, Lynchburg, VA (Fac. ID No. 168095) during this further transition delay<sup>3</sup> and that it will increase viewer education and outreach above and beyond what is required by the Commission's rules as committed to by the former licensee of WCAV(DT) in order to mitigate any viewer disruption caused by the reassignment of WCAV(DT) to Phase 7. WCAV(DT) will coordinate its testing and transition with WVIR-TV.

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<sup>1</sup> Charlottesville TV LLC recently acquired WCAV(DT) on October 1, 2019. WCAV(DT)'s prior licensee, Gray Television Licensee, LLC ("Gray"), previously obtained a waiver to change WCAV(DT)'s transition phase from Phase 5 (as originally assigned) to Phase 6 (FCC File No. 0000080705).

<sup>2</sup> WVIR-TV has separately filed a request to change WVIR-TV from Phase 6 to Phase 7 in FCC File No. 0000086613.

<sup>3</sup> WCAV(DT) is also directly linked with WZBJ-CD. WZBJ-CD is licensed to Gray, the former licensee of WCAV(DT). WZBJ-CD has completed its transition to its post-auction Channel 19, and prior to Charlottesville TV LLC's acquisition of WCAV(DT) from Gray when WCAV(DT) and WZBJ-CD were commonly owned, Gray agreed that WCAV(DT) would accept additional interference from WZBJ-CD's post-auction Channel 19 facility.