

## WUNU Transition Plan Progress Report

The Transition Phase for WUNU, Lumberton, NC, was changed in mid-September 2019 from Phase 5 to Phase 7, resulting in WUNU's transition deadline now being January 17, 2020. Although WUNU was originally assigned to Phase 5 and was ready, willing, and able to transition to its post-transition channel 30 on the extended deadline for Phase 5 (necessitated by Hurricane Dorian) of September 11, 2019, the licensee sought (and was granted) an emergency phase change (LMS File No. [0000081483](#)) in order to allow a linked station to remain on the air on its pre-transition channel. More specifically, WUNU's change to Phase 7 was predicated on the request of WSFX-TV, Wilmington, NC (FCC Facility ID 72871) and two other repacked stations (WWAY and WECT) co-located with WSFX-TV who will share post-transition transmission equipment. WSFX-TV is an upstream station to WUNU; in other words, WUNU's post-transition channel is the same channel as WSFX-TV's pre-transition channel. Because of the co-channel issue and the proximity of WSFX-TV's multiuser site to WUNU's site, there was no viable engineered solution that would provide acceptable interference levels that would have allowed WSFX-TV to continue operating on its pre-transition channel 30 and also allow WUNU to have transitioned on September 11, 2019, to its post-transition channel 30 as planned.

WSFX-TV's technology staff has informed us that progress is being made on the technical problems that resulted in WSFX-TV's inability to timely transition by the Phase 5 deadline. As of the filing of this amended 10-Week report for WUNU, WSFX-TV has indicated that they believe they will be able to transition by late November 2019. Consequently, WUNU currently plans to begin operation on its post-transition channel as previously contemplated using its interim auxiliary facility on the morning of December 10, 2019. WUNU is also continuing to engage in coordination communications with WKTC, Sumter, SC, which is the downstream transition station for WUNU.

Because WUNU's transition plan has always contemplated the use of a post-transition interim facility, UNC-TV had previously (i.e., prior to the unexpected phase change) received a grant of the Construction Permit extension request (LMS File No. [0000074599](#)) for WUNU's Construction Permit (LMS File No. [0000025918](#), as modified by LMS File No. [0000034418](#)) extending the construction deadline to March 4, 2020.

The WUNU transition plan has consistently called for work to be performed in 2 parts. Part 1 included the work necessary for WUNU to begin operating on its post-transition channel utilizing its interim auxiliary facility. That work was completed well before the initial Phase 5 deadline of September 6, 2019. UNC-TV also plans to submit a Digital Auxiliary License Application (to cover the aux CP granted in LMS File No. [0000080190](#)) for WUNU once it begins operations on its post-transition channel and, if necessary, an STA request for the WUNU post-transition interim facility.

Part 2 of the transition plan will occur after WUNU commences operating on its post-transition channel 30. Part 2 includes the removal of the pre-transition main and auxiliary transmitters as well as the completion of the building infrastructure modifications. No definitive schedule has been provided by UNC-TV's contractors, but they have indicated that they hope to complete their work by the end of 2019.

Part 2 tower work includes (a) the removal of the existing main antenna system (which cannot be retuned to WUNU's post-transition channel) and (b) the installation of the permanent post-transition main antenna system in the same location. This work is tentatively scheduled to begin in February 2020 and is expected to take about 6 weeks to complete. That installation timeline is subject to change based on the availability of the qualified installation crew, the equipment necessary for the antenna system change out, and the vagaries of winter weather. Based on this current timeline, UNC-TV cannot say with certainty whether construction of WUNU's full repack facility will be completed by the March 4, 2020, construction permit extension deadline. While UNC-TV's objective is to have the project completed by that date, certain elements of the project – including winter weather and the availability of qualified installation crews – are beyond UNC-TV's control.

UNC-TV will be submitting additional budget updates for FCC Form 399. Among other things, these updates will reflect the general contractor costs, revisions for transmitter installation costs, and revised professional services pricing. Further budget adjustments may be necessary as this project continues.

As of this November 2019 filing, WUNU is ready to begin operating on its post-transition channel, albeit using interim facilities. A copy of the project schedule / timeline for the WUNU site is included with this transition report demonstrating that, as of the date of the filing of this Transition Progress Report, the Phase 7 transition deadline is achievable. Of course, UNC-TV reserves the right to update the project schedule / timeline as warranted to account for changes that may occur during this fluid process.

To reiterate, WUNU plans to begin its post-transition operations using an interim transmission system. Consistent with UNC-TV's North Carolina state statutory mission to provide noncommercial education service to the residents of North Carolina, the interim system will attempt to replicate as much as practically possible the population served by the proposed post-transition facility. When appropriate, UNC-TV will file, if necessary, a request for special temporary authority for WUNU to operate the interim transmission system for its initial post transition operations.

It bears repeating that The University of North Carolina (UNC-TV), Licensee of WUNU, Lumberton, North Carolina, is a governmental agency entity of the State of North Carolina. As a state entity, it is legally required to comply with certain state requirements, restrictions, and policies regarding construction projects and the purchasing of goods and services. UNC-TV's repack transition project for 11 full-power television stations is no exception, and UNC-TV is required to abide by the applicable construction, contracting, and purchasing requirements, restrictions, and policies for all 11 stations, including WUNE-TV. Significantly, as UNC-TV has previously reported while UNC-TV's project is considered 11 different projects by the FCC, to the State of North Carolina and its representative agencies it is considered one project. The two state government agencies that are extensively involved in UNC-TV's repack (the State Office of Purchasing and Contracts ["P&C"] and the State Construction Office ["SCO"]) are requiring UNC-TV to bundle together all 11 station repack transitions as one unitary project request to them. While the 11 repack projects (including WUNU) have so far progressed in a manner that is consistent with the Commission's nationwide transition expectations, UNC-TV's position within the State Government of North Carolina should remain an important consideration for the Commission as these projects continue to progress toward completion.

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10 Weeks Prior to Phase 7 Deadline  
WUNU, Lumberton, North Carolina (Fac ID No. 69416)  
The University of North Carolina

In short, UNC-TV's compound, complicated lodestar for this entire repack enterprise is timely completion of the repack with full compliance of all applicable state and federal regulation while—most importantly—keeping the station operating with as much coverage areas as possible with the least possible negative impact to viewers.