

WUNG-TV Transition Plan Progress Report

Consistent with the extended deadline for Phase 5 (necessitated by Hurricane Dorian), WUNG-TV in the early morning hours of September 11, 2019 ceased operation on its pre-transition channel and began operating on its post-transition channel, channel 21, utilizing an interim facility. That interim facility is the licensed auxiliary facility for WUNG-TV (LMS File No. [0000081300](#)).

Consistent with the use of a post-transition interim facility, UNC-TV received a grant of the Construction Permit extension request (LMS File No. [0000074593](#)) for WUNG-TV's Construction Permit (LMS File No. [0000025213](#) as modified by LMS File No. [0000034415](#)) extending the construction deadline to March 4, 2020.

WUNG-TV plans to begin operating its full post-transition facility in late March 2020 barring any unforeseen delays. This expected completion date is beyond the extended construction permit deadline.

The WUNG-TV transition plan has consistently called for work to be performed in 2 parts. Part 1 included the work necessary for WUNG-TV to begin operating on its post-transition channel utilizing an interim facility. As noted above, that work was successfully completed prior to the September 11, 2019 transition day. Part 2 of the transition plan began immediately following the ceasing of pre-transition operations on September 11, 2019. The Part 2 work completed includes the removal of the pre-transition main transmitter, and the completion of the building infrastructure modifications.

Part 2 tower work includes (a) the removal of the existing main antenna system (which cannot be retuned to WUNG-TV'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 be completed in late March 2020. That installation timeline is subject to changes based on weather, and the availability of the qualified installation crew.

Based on the timeline that we currently expect, UNC-TV believes that it is unlikely and impracticable to meet the extended construction deadline of March 4, 2020, for WUNG-TV's full repack facility. The inability to meet the extended deadline of March 4, 2020, is due to the contractor's ability to supply a qualified installation crew with the necessary equipment to safely perform the antenna system changeout. While UNC-TV's objective is to have the project completed by the deadline, certain elements of the project – including weather and the availability of qualified installation crews – are beyond UNC-TV's control. These elements can also have an adverse impact on the schedule. As the various elements of WUNG-TV's final construction of the full repack facility continue to progress and the time line evolves with greater certainty in light of the real-world challenges identified above, UNC-TV will—if necessary—make an appropriate filing to request a further extension of the station's repack CP including a request for waiver of the tolling standard.

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

We believe, as of this early January 2020 filing, that the completion of the installation work and commencement of final post-transition operations utilizing the station's main transmit antenna will probably not occur prior to the March 4, 2020, construction permit extension deadline. It is believed the biggest remaining issues are (i) the availability of the necessary skilled manpower required to properly and safely perform the remaining tasks, (ii) the availability of the specialized equipment required to safely perform the installation, and (iii) the timely delivery of additional materials needed to complete the installation. A copy of the project schedule / timeline for the WUNG-TV site is included with this transition report. 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, WUNG-TV is operating on its post-transition channel using its licensed auxiliary facility on an interim basis until the main antenna system installation can be completed. Consistent with UNC-TV's North Carolina state statutory mission to provide noncommercial educational service to the residents of North Carolina, the interim system currently being used attempts to replicate as much as practically possible the population served by the proposed post-transition facility. When appropriate, UNC-TV will file, the required license to cover application for its proposed post-transition facility.

It bears repeating that The University of North Carolina (UNC-TV), Licensee of WUNG-TV, Concord, 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 WUNG-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 WUNG-TV) 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.

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 regulations while—most importantly—keeping the station operating with as much coverage areas as possible with the least possible negative impact to viewers.