

GPTC – Request for Extensions of Time to Construct

WGTV, WMUM-TV and WACS

LMS File Nos. [insert]

Georgia Public Telecommunications Commission (“GPTC”), licensee of noncommercial educational TV stations WGTV, Athens, Georgia; WACS, Dawson, Georgia and WMUM-TV, Macomb, Georgia, requests extensions of time to complete construction of its permanent post-transition facilities for each station. *See* 47 C.F.R. Section 73.3700(b)(5)(iv).¹ GPTC requests an additional 180 days to construct each facility, *i.e.*, until December 30, 2020.

GPTC is an entity of the State of Georgia and the statewide public television licensee of nine (9) noncommercial educational television stations providing PBS and educational programming throughout the State of Georgia. GPTC had several of its stations assigned to new channels as part of the repacking process.² WMUM-TV was originally assigned to Phase 9 of the repack, but moved to Phase 10 of the repack due to COVID-related issues.³ WGTV and WACS were originally assigned to Phase 10 of the repack pursuant to the Closing and Reassignment Public Notice.⁴ Phase 10 the repack ends on July 3, 2020.

Before the start of 2020, it appeared that all three stations were on track for a timely and orderly transition in their assigned phases of Phase 9 (WMUM-TV) and Phase 10 (WGTV and WACS). However, as the Media Bureau’s Public Notice guidance on March 17, 2020 acknowledged, the COVID-19 pandemic disrupted the repack supply chain and delayed the ability of broadcasters to meet their assigned phase deadlines.⁵ Thus, given the impact of the COVID-19 pandemic and given changes in the availability of tower crews (a scarce repack resource even before COVID-19), GPTC found that it needed to adjust its expectations for meeting its Phase 9 and Phase 10 deadlines.

WGTV’s repack plan called for, among other things, replacement of the station’s main and standby antennas, with the standby antenna being replaced first to avoid disruption in WGTV broadcast program service. WACS and WMUM-TV’s repack plans called for use of an interim

¹ This request has been filed fewer than 90 days before the GPTC’s stations’ current construction deadline. The repack situation has been rapidly evolving since March 2020 due to COVID-related disruptions and delays with equipment, vendors, the scarce repack resource of tower crews and other resource constraints; for all those reasons, GPTC was not able to file this request until now. GPTC thus respectfully requests a waiver of 47 C.F.R. § 3700(b)(5)(iv).

² *Incentive Auction Closing and Channel Reassignment Public Notice: The Broadcast Television Incentive Auction Closes; Reverse Auction and Auction Results Announced; Final Television Band Channel Assignments Announced; Post-Auction Deadlines Announced*, Public Notice, 32 FCC Rcd 2786 (WTB & MB 2017).

³ *Guidance for Stations in Phase 9 of the Post-Incentive Auction Transition as a Result of the Novel Coronavirus (COVID-19) Pandemic*, Public Notice, 35 FCC Rcd 2720 (IATF & MB 2020).

⁴ *See* footnote 2 above.

⁵ *See* footnote 3 above.

antenna to maintain operations while the main antenna was being replaced. Each station's tower also required some modifications due to repack.

Despite diligent efforts, GPTC has been unable to make arrangements to have the tower work (including the new repack antenna installations for the permanent repack facilities) completed by July 3rd. In fact, even finding available tower crews to install the WGTB standby and the WACS and WMUM-TV interim antennas during Phase 10 has been a challenge given that tower crews were a scarce repack resource (made even more scarce by COVID-19 and the moves of other repack stations from earlier phases to the last repack phase – Phase 10).

While there is now a very long queue for the necessary work for repack stations to complete their post-transition facilities (because many repacked stations have met their phase deadlines with interim rather than permanent facilities), based on available information at this point, GPTC believes that the necessary vendors will be available such that WGTB, WACS and WMUM-TV can complete their permanent post-transition facilities, as authorized by their repack construction permits, within the next six (6) months.

For the reasons set forth above, GPTC will not be able to complete buildout of its permanent post-repack facilities for WGTB, WACS and WMUM-TV by the end of Phase 10 on July 3, 2020. Thus, GPTC respectfully requests that its construction permits for its post-repack facilities for WGTB, WACS and WMUM-TV be extended for 180 days, or until December 30, 2020. The requested extension of time will not impact the repack efforts of other stations, as GPTC has filed STA requests to operation interim facilities on its post-transition channels for WGTB, WACS and WMUM-TV and plans to vacate the associated pre-transition channels and begin broadcasting on its post-auction channel on, or as soon as possible after, July 3, 2020.