

Statement of Leslie ("Hap") Griffin

1. My name is Hap Griffin. I am the project manager (an independent contractor) for the repack of the noncommercial educational PBS member stations licensed to South Carolina Educational Television Commission ("SCETV"). Under my project management, SCETV has successfully completed nine (9) TV repacks to new channels during the 39-month repack period. The last remaining SCETV station needing to repack to its post-transition channel is Station WITV, Charleston, South Carolina.
2. I worked at SCETV for thirty-four (34) years, from 1978-2012, and I was a registered professional engineer (RPE) in the State of South Carolina until I retired. In 2017, I was retained by SCETV as a project manager to manage all ten (10) of its station repacks, including WITV.
3. During my time at SCETV, I was responsible for building SCETV's 11 DTV station transitions. As project manager, I have worked on 10 TV repacks for SCETV in the last two years. I am deeply familiar with SCETV's stations, the transmitter sites, its tower crew, the equipment, and the typical weather conditions in South Carolina.
4. SCETV has used the same tower crew for all ten (10) repack projects. This tower crew has been working through our repack 10-station queue over the entire phased transition. When the tower crew finished one SCETV station repack, it would move to the next one.
5. The tower crew remained on schedule until approximately March 2020, when COVID hit. Around that time period, the tower crew was working on the repack of Station WHMC, but due to COVID, hotels were not available, and the tower crew was forced to commute, which meant only ½ days of tower work could be completed. In the queue, WHMC was the tower repack project immediately prior to WITV. WHMC was originally planned to be completed well before May 1, 2020 but was granted a phase change to move from Phase 9 to Phase 10 as a result of the COVID-19 pandemic. WHMC's repack was completed on or about June 3, 2020. The COVID-related delay in completing the repack for WHMC resulted in the WITV repack work starting well over a month later than planned because the same tower crew was scheduled to do the WHMC repack and the WITV repack work.
6. The original transition plan involved moving the existing pre-transition antenna to a different tower leg at the same height as existing, and installing a new post-transition UHF antenna along with a new transmission line (the original line was installed in 1989 and was of an obsolete design spare sections no longer available). When I first submitted this plan more than two years ago to the tower owner's engineer at the time, he was agreeable. In the meantime, the tower was sold and, for the first time, in a meeting on April 30, 2020 (in which we had anticipated the discussion would focus on coordinating the upcoming work), the new tower owner's engineer expressed concern with the plan of adding a second transmission line to the tower. The tower owner's engineer strongly suggested that we use an existing transmission line that they had been using as part of a standby antenna system at 1600 feet AGL for any temporary repack operations. At that point, our transition plan for WITV changed to move our existing WITV antenna (which operates on WITV's pre-transition channel) to the 1600 foot level and attach it to the tower owner's existing transmission line to remain on air while our original main line and antenna was replaced.
7. In May 2020, an additional unexpected issue surfaced with the tower landlord. On or about May 11, 2020, the tower crew headed to the WITV site to deliver and unload the transmission

and line for the WITV repack. At that time, I learned that the tower owner was insisting on a full tower structural study before allowing access to the tower site (so that the WITV repack could begin). The WITV repack was stymied at that point.

8. When SCETV was planning its 10-station repack, the WITV tower site was under different ownership/management than it is now. The new tower owners had different requirements for work on the tower – it is believed this is due to the tower owners insurance policy covering multiple station sites.
9. The tower owner would not permit the repack tower work to start until a structural study was performed. I provided information to the structural engineers for the tower study on or about May 12, 2020 and received confirmation of receipt of the information.
10. On or about May 25, 2020, I contacted the tower owner and the structural engineer to ask about status. I was told that the time to finish the analysis was quoted to be 4-6 weeks, at which point WITV could have access to the tower to start its repack work. Obviously, this would not have allowed WITV sufficient time to meet the July 3, 2020 deadline.
11. On or about May 26, 2020, I proposed a new alternative plan and worked with the tower owner's representatives on a solution to allow the WITV repack to proceed more quickly by lightening the load on the tower for interim operation purposes. The compromise solution involved allowing the tower work to proceed by using a lightweight "pretransition" interim antenna (200-300 pounds approximately) that SCETV already had in its possession (it was used as part of the WHMC repack) while the structural study was performed. This compromise solution also simplified the structural study analysis.
12. On June 1, 2020, SCETV issued a Purchase Order for the WITV structural study, based on my new alternate plan. The Purchase Order requested a delivery date of June 11, 2020. The tower structural study was completed on June 18, 2020. The tower structural study was based on the alternative I had proposed to "lighten the load" on the tower.
13. While the structural study was pending completion, the compromise with the tower owner was finalized on or about June 11, 2020.
14. However, the tower crew then encountered additional complications and further delays with the tower owner's insurance company. The insurance company required the tower crew company to sign an agreement, but there were disputes about the agreement terms relating to risk. The tower company's counsel had to become involved to resolve the issues.
15. When the insurance issues were resolved and the tower crew was finally allowed to commence work at the site, the plan was still for WITV's (lightweight) pre-transition interim antenna to be installed in order to avoid broadcast service outage while the main antenna was replaced. At this point in time, SCETV had been delayed by well over a month (approximately 6 weeks) in accessing the WITV tower for repack work, plus the earlier delay of well over a month due to COVID.
16. Note that from the initial project planning two years prior until all of these delays were encountered and resolved, it was not envisioned that a post-transition interim antenna would be necessary since SCETV had made full plans to be able to stay completely on the air on our pre-transition channel until the post-transition facility would be completed. The two systems would be built in parallel.
17. The tower crew started to work on the WITV tower on or about June 15th.

18. At that point in time, SCETV and I believed that the either the July 3, 2020 deadline or, if necessary, the July 13, 2020 deadline could be met. My belief was based on 34 years of experience working in broadcasting in the State of South Carolina and my experience building 11 DTV transitions and managing SCETV's prior nine (9) repacks.
19. As of June 19, 2020, work had progressed well and WITV was operating on the pre-transition interim antenna.
20. Rain, wind and thunderstorms from June 20-25, 2020 delayed full progress by the tower crew during the week, but the new WITV main antenna was mounted on June 27, 2020.
21. On or about June 30, 2020, it was determined that WITV should proceed to seek an extension of time to remain on its pre-transition channel past July 3, 2020 and until July 13, 2020 as it was impossible to meet the July 3, 2020 deadline. I understand that this request was filed in LMS by SCETV on June 30, 2020 and granted by the FCC on July 2, 2020.
22. The tower crew worked through the weekend of June 27th and 28th and installed the new post-transition main antenna and elbow complex. The tower crew then turned to the removal of the old transmission line and the installation of the new transmission line.
23. The new WITV transmitter was installed and tested by July 1, 2020.
24. Based on the tower company records:
 - a. On or about July 1, 2020, the tower crew began working on the transmission line removal.
 - b. On or about July 7-9, 2020, there were additional weather delays.
 - c. By about July 8, the tower crew had the new line approximately 280 feet up the tower, with 800 feet of old line remaining to be taken down, but rain impeded full progress.
 - d. On or about July 9, 2020, there were weather delays due to fog, but the tower crew had been to remove 300 more feet of old line and install 160 more feet of new line.
 - e. On or about July 10, 2020, the tower crew records show that the crew began working at 7 am but could not make full progress due to weather delays.
 - f. As of the end of the day on July 10, 2020, the tower crew had 740 feet of the new line installed (approximately 1850 feet total required) and approximately 500 feet of old transmission line still to remove.
25. Based on my experience and in consultation with SCETV's very experienced tower crew, I believe that SCETV can finish the WITV transmission line project and begin to operate from its new repack channel on or before July 22, 2020, weather permitting. This involves removing the remaining old line, installing the remaining new line, ordering and having manufactured and shipped a special cut length of line that can only be measured once all of the line is up, purging the line by vacuum, pressurizing the line, and bringing in a manufacturer's engineer for the final system testing. My opinion, however, is based on weather conditions permitting several more full days of tower work, which may or may not occur.

I make this statement under penalty of perjury.

Name: Leslie W. Griffin, Jr.
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Date: 7/11/2020