

## **Amended Request for Silent Special Temporary Authority**

HC2 Station Group, Inc. (“HC2”) respectfully requests Special Temporary Authority (“STA”) to take W50EA-D (Memphis, TN; Facility ID 168014) silent for a period of up to six months while Licensee finalizes plans to transition Station to its permanent post-600 MHz incentive auction channel assignment.

Unique circumstances support this request.

***W50EA-D Will Transition to a Post-Auction Channel According to the Station’s Original Phase Assignment.*** HC2 recently acquired W50EA-D and has diligently prepared for the Station’s upcoming transition from channel 50 to channel 15. While HC2 hoped to begin operations on the station’s post-auction channel assignment early,<sup>1</sup> unforeseen challenges have delayed HC2’s transition. Accordingly, HC2 requested dismissal of HC2’s request for waiver of the Station’s post-incentive auction transition phase assignment, testing, and construction completion deadlines requested in HC2’s Legal STA application because waiver is no longer necessary.<sup>2</sup> The Media Bureau dismissed HC2’s application as requested on May 15, 2018. HC2 still plans to timely bring the station live on its post-auction channel according to its original phase assignment.<sup>3</sup>

***W50EA-D Is Collocated with a Full-Power Station that Recently Began its Post-Auction Transition Buildout.*** W50EA-D is currently collocated with WBUY-DT, a full-power station operating on channel 41 and licensed to Trinity Christian Center of Santa Ana, Inc. (“Trinity”) in the Holly Springs, Mississippi community of license. Trinity filed a request for special temporary authority to operate with a new temporary antenna for channel 41 while Trinity removes WBUY-DT’s main antenna and mounts a new antenna for its new channel assignment (channel 26).<sup>4</sup> The FCC’s Media Bureau granted Trinity’s Engineering STA application on February 23, 2018.

***Taking W50EA-D Dark for a Limited Period of Time During the Transition Period Frees Resources for the Post-Auction Transition.*** HC2 is operating in a resource-constrained environment due to the ongoing 600 MHz Incentive Auction repacking process. Broadcast stations seeking to build new broadcast facilities currently have access to far fewer resources than they would have otherwise, a factor that the FCC and its bureaus acknowledged could

---

<sup>1</sup> See W50EA-D, Digital Class A Legal STA Application, LMS File No. 0000048586 (filed Mar. 13, 2018).

<sup>2</sup> See W50EA-D, Amendment to a Digital Class A Legal STA Application, LMS File No. 0000048586 (filed May 15, 2018).

<sup>3</sup> W50EA-D is assigned to transition phase 1; phase testing period start date September 14, 2018; phase completion date November 30, 2018; construction permit deadline November 30, 2018.

<sup>4</sup> See WBUY-TV, DTV Engineering STA Application, LMS File No. 0000042196 (filed Feb. 14, 2018).

become an issue when designing the repacking process to facilitate this “once-in-lifetime opportunity to expand the benefits of mobile wireless coverage.”<sup>5</sup>

To save the time, effort and expense associated with multiple tower climbing and rigging projects, HC2 and Trinity combined resources and HC2 had its old antenna removed from and new antenna installed onto the collocated tower at the same time as Trinity had its primary antenna removed and temporary antenna installed.

Granting HC2’s request for an STA to take W50EA-D silent for a period of up to six months while HC2 finalizes construction and operations on W50EA-D’s post-auction channel promises to result in a timely, cost-effective resumption of service to the public by W50EA-D.

---

<sup>5</sup> See, e.g., *Incentive Auction Closing and Channel Reassignment Public Notice et al.*, Public Notice, 32 FCC Rcd 2786 (MB 2017) (“*Channel Reassignment PN*”); *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6597 ¶ 3 (2014).