

## **Amendment to 10-Week Transition Progress Report for WBAL-TV**

This amended 10-Week Transition Plan Progress Report is being filed in early May 2020, to provide an update on WBAL-TV's post-transition repack construction progress. On February 20, 2020, WBAL-TV timely filed its 10-Week Transition Plan Progress Report in LMS File No. [0000106289](#). At that time, WBAL-TV was a Phase 9 station. As of March 31, 2020, WBAL-TV has become a Phase 10 station (*see* phase changed granted in LMS File No. [0000108967](#)) as a result of the COVID-19 pandemic. *See Guidance for Stations in Phase 9 of the Post-Incentive Auction as a Result of the Novel Coronavirus (COVID-19) Pandemic*, Public Notice, DA 20-282, (rel. Mar. 17, 2020).

In early February 2020, the licensee filed an application to extend WBAL-TV's Phase 9 repack CP for a period of 180 days. *See* LMS File No. [0000104748](#) ("CP Extension Request").<sup>1</sup> At that time, the effects and impacts of the COVID-19 pandemic on the broadcast industry and nationwide transition were not known, and as of this early May filing it would probably be premature for the licensee to suggest that we have a full grasp on the ultimate impacts of COVID-19 on WBAL-TV's final repack construction. Indeed, with that in mind, attached to this exhibit is a letter dated April 22, 2020, from WBAL-TV's tower services vendor (Coast to Coast or "C2C") indicating that the COVID-19 pandemic crisis is still creating issues and uncertainty relating to the WBAL-TV repack project.

Indeed, subsequent to the April 22 letter, C2C advised that the helicopter availability to effectuate the complicated candelabra antenna replacement for WBAL-TV (and co-located WJZ-TV and WMAR-TV) remains, no pun intended, up in the air. The helicopter vendor apparently still has three aircraft stranded in South America which must be quarantined before they can be brought back into the United States. While there is some cautious optimism that a helicopter would be ready and available for the Baltimore antenna pick in July, there is definitely no set schedule yet because there are simply too many variables.

As of this filing, WBAL-TV anticipates—subject to further COVID-19 pandemic challenges, which are unknown and unknowable at this time—that it will cease operating on its pre-transition channel on July 3 (i.e., the final day of Phase 10). At that time—as discussed in the pending CP Extension Request—WBAL-TV will commence post-transition operations on its interim antenna, assuming that the interim antenna is installed in time (the likelihood of which, as of this filing, is uncertain).

Finally, there are 6 other stations that must transition at the same time as WBAL-TV, and the status of their respective repack construction projects is unpredictable and beyond the control of WBAL-TV; a couple of the stations have completed their construction while others are in various stages of construction. The six stations are WJZ-TV, WYOU, WNET, WWPX-TV, WHYY-TV, and WMAR-TV. The first five of those stations are tied to WBAL-TV as part of the former LSS 65, and

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<sup>1</sup> As things become clearer, WBAL-TV will file an amendment to the pending CP Extension Request because a CP extension will still be necessary in light of WBAL-TV's repack transition plan contemplation of the initial use of post-transition interim facilities.

WMAR-TV is tied to WBAL-TV because it is co-located with WBAL-TV (and WJZ-TV) and will be using the same tower service crew and helicopter to effectuate the completion of its repack transition. WBAL-TV has been—and will remain—in touch with these stations to continue coordination and planning efforts.

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April 22, 2020

Dear TTI Broadcasters,

I wanted to update you on the Coast to Coast field service operations as they relate to the WJZ, WBAL and WMAR repack projects.

As you all know Coast to Coast was ready to mobilize to Baltimore, MD for the WJZ, WBAL and WMAR repack projects in mid-March but we were forced to pull our crews out of the field in March due to the Covid-19 pandemic. Our field service operations have been shut down since mid-March not only for the safety of our crews and the safety of the individuals who would interact with our crews, but also so that we could adhere to the national and local level stay home orders that were put into place.

Though we committed to the stay home guidelines through 4/30/20, we are now looking at options to begin limited field service operations for repack work only beginning the first week of May. We will initially not be sending crews to urban jobsites where the crew would have a higher potential to catching or transmitting the coronavirus. Instead we will start field operations in some select southern states on non-urban jobsites.

The repack project on the TTI tower for WJZ, WBAL and WMAR is an extremely complex and lengthy project in downtown Baltimore, MD. Though we will soon be ready to dispatch crews and this project is next on the schedule we will not be able to send a crew at this time. Due to the complex scope of work on the TTI tower, along with the urban site location and level of the virus outbreak in the area, we will be moving this project back on the schedule until at least the week of 5/18/20. I know how important this particular repack project is, but there are a myriad of good reasons behind this decision, a few of which are as follows:

- Our crew members have currently been sheltered at home in areas less impacted by Covid-19 than the northeast region. We would essentially be sending crew members from a relatively safe area to one that still has several restrictions for non-essential workers, and Covid-19 cases are still on the rise.
- Some of our crew members rely on RV's for their lodging and campgrounds in MD are currently closed to travelers. The balance of our crew members rely on hotels and restaurants for lodging and food. Hotels are more than available, but we have our concerns when it comes to crew members in hotels where the Covid-19 has hit harder, especially if cases are still on the rise. I feel our crew members have a higher potential for exposure in hotels due to lack of control over the hygiene of other residents, as well as the hotel employees, or the common spaces in the hotel. We would also have such risk as someone else in the hotel testing positive, and then our crew members being quarantined due to potential contact. This would obviously have the potential to not only lock down the crew members, but completely stop the project in whatever state it is in at that time.
- There is still a shelter in place order in Maryland and non-essential work and travel are not permitted. Though we can technically fit into the mold of essential service, is it really essential for our crews to travel into this area and risk not only their exposure to Covid-19, but also the potential for them to then spread Covid-19 to every location the crew travels to from Baltimore? The stations are currently



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operating at full power and elevation, keeping the citizens of Baltimore and the surrounding area informed with good over the air service. Is potentially disrupting those perfectly good OTA signals in a national emergency essential? If these stations were operating at reduced power during a national emergency for any reason, I would be in the first truck heading to Baltimore to do whatever was needed to restore the station to full power, because that is truly essential, and that is what we do.

- The airlift service that has been contracted for this project is currently shut down when it comes to any work east of Kentucky. Further, they have been shut down completely for the last month and are currently using their aircraft for other work in the western United States. Though I feel good that by 7/4/20 the situation with Covid-19 will likely be much better, I do not know for sure what impact the last month of shut down will have on the airlift service. We are currently on the schedule for the work, but so were several other people before the airlift shut down. At this time, I have no true guarantee the Covid-19 situation will in fact be in check come July, and I have not real guarantee we will have the aircraft on 7/4/20. As an impacted nationwide contractor that also had to shut down, I completely understand the challenges the airlift company will have when they return to full operation.

To reiterate, Coast to Coast never wanted to shut down field operations. We have maintained all of our field service employee's payroll and health insurance over the last six weeks while they sheltered at home, and nobody is more ready to go to work than me and my people. We will begin some limited operations beginning 5/1 while following CDC guidelines as well as adhering to any local restrictions in the areas we plan to work in. Because of the CDC guidelines, along with current restrictions in Baltimore, we will have to wait a little longer before we are able to send the crew and equipment to the TTI site. I will continue to follow the progress of the Baltimore area as it relates to Covid-19 over the coming few weeks and then reevaluate the situation at that time. If at that time we can travel to Baltimore and follow the local and federal guidelines we will make plans for mobilization of the crew. If we are not able to get this job started by mid-May there is a high probability there could be difficulties meeting the transition deadlines for the three stations on the TTI tower.

I again apologize in advance for any inconvenience these plans may cause for TTI. We are the best in the business, and we are ready to get this project done, but these are uncharted times for this country. The safety and well-being of our employees, along with the TTI staff and the rest of the country, remain my number one priority.

Thank you for your support and understanding.

M. Todd Jackson, President  
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