

## Request for Extension of Phase Deadline

Georgia Public Telecommunications Commission (“GPTC”), licensee of noncommercial educational TV stations WGTV, Athens, Georgia, WACS, Dawson, Georgia and WMUM-TV, Cochran (Macomb), Georgia, request an brief extension of its repack phase deadlines to provide sufficient time for it to complete construction of its interim repack facilities for all three GPTC stations. **GPTC requests an additional 10 days, i.e., until July 13, 2020 to operate on its pre-transition channels for WGTV, WACS and WMUM-TV.**

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.<sup>1</sup> WMUM-TV was originally assigned to Phase 9 of the repack, but moved to Phase 10 of the repack due to COVID-related issues.<sup>2</sup> WGTV and WACS were originally assigned to Phase 10 of the repack pursuant to the Closing and Reassignment Public Notice.<sup>3</sup> 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.<sup>4</sup> 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 antenna to maintain operations while the main antenna was being replaced. Each station’s tower also required some modifications due to repack.

As recently as early June, it looked like all three stations would be on their interim/standby antennas by July 3<sup>rd</sup>. However, tower crew scheduling issues and weather delays put all three projects behind schedule.

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<sup>1</sup> *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).

<sup>2</sup> *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).

<sup>3</sup> See footnote 2 above.

<sup>4</sup> See footnote 3 above.

Despite diligent efforts, GPTC's tower crew (which is the same crew for all three stations) has been unable complete the interim and standby antennas for WACS, WGTV and WMUM-TV and make them operational by July 3<sup>rd</sup>. It is thunderstorm season in Georgia and weather hampered expected progress at the first (WACS) site, thereby delaying work at the other sites.

GPTC will continue to work diligently on the channel transitions for WGTV, WACS and WMUM-TV and expects to commence broadcasting on its post-transition channels no later than July 13, 2020.

For the reasons set forth above, GPTC will not be able to complete buildout of its interim post-repack facilities for WGTV, WACS and WMUM-TV by the end of Phase 10 on July 3, 2020. Thus, GPTC respectfully requests that it be permitted to operate on its pre-transition channels for WGTV, WACS and WMUM-TV until July 13, 2020. The requested phase extension of time will not impact the repack efforts of other stations, as GPTC will secure interference consents or adjust power at the stations to avoid harmful interference beyond what the FCC allows.