

2019 Third Quarter Transition Progress Report Due on October 10 for Stations Being Repacked

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Each full power and Class A TV station being repacked must file its next quarterly Transition Progress Report with the FCC by **October 10, 2019**. The Report must detail the progress a station has made in constructing facilities on its newly-assigned channel and in terminating operations on its current channel during the months of July, August and September 2019.¹

Following the 2017 broadcast television spectrum incentive auction, the FCC imposed a requirement that television stations transitioning to a new channel in the repack file a quarterly Transition Progress Report by the 10th of January, April, July, and October of each year. The first such report was due on October 10, 2017.

The next quarterly Transition Progress Report must be filed with the FCC by **October 10, 2019**, and must reflect the progress made by the reporting station in constructing facilities on its newly-assigned channel and in terminating operations on its current channel during the period from July 1 through September 30, 2019. The Report must be filed electronically on *FCC Form 2100, Schedule 387* via the FCC's Licensing and Management System (LMS), accessible at <https://enterpriseefiling.fcc.gov/dataentry/login.html>.

The Transition Progress Report form includes a number of baseline questions, such as whether a station needs to conduct a structural analysis of its tower, obtain any non-FCC permits or FAA Determinations of No Hazard, or order specific types of equipment to complete the transition. Depending on a station's response to a question, the electronic form then asks for additional information regarding the steps the station has taken towards completing the required item. Ultimately, the form requires each station to indicate whether it anticipates that it will meet the construction deadline for its transition phase.

These quarterly reports will continue for each repacked station until that station has completed construction of its post-repack facilities, has ceased operating on its pre-auction channel, and has reported that information to the FCC. Until then, the Reports must be filed each quarter as well as:

- Ten weeks before the end of a station's assigned construction deadline;
- Ten days after completion of all work related to constructing a station's post-repack facilities; and
- Five days after a station ceases operation on its pre-auction channel.

More information about the specific transition phases and related deadlines can be found in [this CommLawCenter article on the subject](#).

¹ In a March 28, 2019 Public Notice, the FCC waived the quarterly Transition Progress Report requirement with regard to Phase 3 stations for the report due on April 10, 2019, with regard to Phase 5 stations for the report due on July 10, 2019, and with regard to Phase 8 stations for the report due on January 10, 2020. In all three cases, the quarterly deadline falls within days of the deadline for those stations' 10-Week Report (which stations must continue to timely file), making the quarterly report redundant. See *infra*.