

REQUEST FOR WAIVER

Flinn Broadcasting Corporation ("FBC"), licensee of WBIH (Selma, AL), hereby respectfully requests a waiver of 47 CFR § 73.3700(b)(5)(iv) in connection with the subject Request for Extension. In support thereof, the following is shown:

Despite FBC's reasonable efforts, WBIH (a Phase 5, independent station) has been unable to complete construction of its new facility (on Channel 34) on time due to circumstances beyond its control. Specifically, as a Phase 5 station, FBC has experienced difficulty retaining and scheduling a tower crew to effectuate the WBIH tower modifications (for both the interim operation and the permanent operation). As the FCC is aware, tower crews have been in short supply and previous Phase 1-4 work has created trickle down delays. In the case of WBIH, the use of a top-mounted antenna necessitates significant tower modifications at the top of the tall tower (e.g., to allow for feed line modifications).

In addition, FBC has experienced similar Phase 5 delays occasioned by the General Contractor's previous Phase 1-4 commitments. The General Contractor has installed the Channel 34 interim facilities and FBC has pending a Request for STA covering the interim Channel 34 facilities. In addition, the permanent transmitter has been installed. At this point, what essentially remains is for the main antenna (and feed line) to be delivered and installed once a tower crew will commit to an installation date. FBC is cautiously optimistic that an early November installation will occur but has requested a December 31, 2019 extension date to cover any tower or equipment delivery delays.

Again, WBIH is an independent station and does not have the clout (and access) that major station groups have with respect to tower crews, equipment vendors and contractors (general and specific). WBIH has done everything in its control to build and effectuate the FCC-mandated channel change from Channel 29 to Channel 34 (including building interim facilities on Channel 34 which results in no interruption in service to the public).

It is respectfully submitted that grant of the subject extension request (and waiver) is in the public interest.