

## **Exhibit in Support of Further Tolling of Construction Permit**

ION Media Jacksonville, License, Inc. (“ION”), licensee of television station WPXU-TV, Jacksonville, North Carolina (FCC Facility ID No. 37971) (the “Station”), pursuant to Section 73.3598(b) of the Commission’s rules, respectfully requests a waiver of the tolling provisions for the Station’s post-auction construction permit (“CP”) for Channel 16. See LMS File No. 0000072136, as extended in LMS File No. 0000074583, and CP period tolled in LMS File No. 0000105905. The Station is currently operating at reduced power on its post-auction Channel 16 using interim facilities pursuant to special temporary authorization (“STA”) (LMS File No. 0000106044). Due to significant construction delays, beyond ION’s control, the Station respectfully requests tolling of the Station’s CP for an additional 180-days.

The Station continues to experience significant construction challenges and delays due to engineering and construction issues at its leased tower site. In August 2019, the tower owner advised ION that a second site study determined that some of the tower’s guy anchors would require major modifications. After numerous delays in procuring the necessary construction materials, including delays occasioned by the COVID-19 shutdown, the tower owner has confirmed to ION that the modification work commenced on August 10, 2020. Upon completion of the modifications, ION will be able to commence installation of the Station’s permanent antenna.

As a result of these delays, which were not ION’s fault, it will not be possible for ION to complete the required work prior to the September 7, 2020 expiration of the Station’s current CP.

Since the Station is not able to operate on its permanent post-repack facility at this time, ION respectfully requests tolling of the Station’s CP and an additional 180-days to complete construction of the Station’s post-repack facility. This extension should allow the Station to work with the tower owner to complete the construction necessary for the Station’s permanent post-transition facility.

ION respectfully submits that a grant of this tolling request would be in the public interest because it would allow the Station to continue providing broadcast service to its viewers without disruption while construction of Station’s permanent post-repack facility is completed. In support of this request, ION emphasizes that the Station transitioned on time by the Phase 5 completion

deadline using interim facilities on its post-auction Channel 16. Therefore, grant of this request will not adversely impact the repack efforts of other stations, while allowing the Station to construct its permanent facilities and continue to serve its viewers.