

Exhibit in Support of Further Tolling of Construction Permit

ION Television License, LLC, licensee of television station WPPX-TV, Wilmington, Delaware (FCC Facility ID No. 51984) (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 34. See LMS File No. 0000034931, as extended in LMS File No. 0000072539, and CP period further tolled in LMS File No. 0000116301. The Station continues operating at reduced power on its post-auction Channel 34 using interim facilities pursuant to special temporary authorization ("STA") (LMS File No. 0000117652). Due to construction delays outside of ION's control, the Station respectfully requests tolling of the Station's CP for an additional 180-days.

ION continues to experience construction challenges at the tower site owned and operated by ABC, Inc. ("ABC") and CBS/Westinghouse of PA Inc. ("CBS") (ABC, together with CBS, collectively "Owner"), known as the Philadelphia Joint Venture Tower (the "Tower"). As stated in the Station's last tolling request, ION was awaiting a final antenna mount design and a construction timeline from CBS, manager of the Tower site.

On June 22, 2020, ION received a preliminary structural design. On July 30, 2020, CBS informed ION that the structural plan would need to change due to mechanical failure to ABC's top mount antenna. Accordingly, a new structural design would be necessary in order to accommodate ION's main antenna. On August 14, 2020, CBS notified ION that ABC had selected a new antenna and a new structural study was under way. To date, however, ION has not received a final antenna mount design or construction timeline from CBS in spite of numerous requests by ION for an update.

As a result of this further delay, which is not ION's fault, it will not be possible for ION to complete the required work prior to the January 23, 2021 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 Owner to finalize plans for and complete the Tower modifications necessary for installation of the Station's permanent post-transition facility.

ION respectfully submits that a grant of this request of further tolling of CP 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 4 completion deadline using interim facilities on its post-auction Channel 34. Therefore, grant of this request will not adversely impact the repack efforts of other stations.