

## **CP EXTENSION REQUEST EXHIBIT**

The instant application is filed pursuant to FCC Public Notice, DA-20-724, released July 13, 2020, “Media Bureau Reminds Low Power Television and Television Translator Stations of July 13, 2021 Digital Transition Date” and FCC Public Notice, DA-21-260, released March 4, 2021, “Media Bureau Reminds Low Power Television and Television Translator Stations of July 13, 2021 Digital Transition Date.” In the July 13, 2020 Public Notice, the following is, *inter alia*, stated:

“In addition to ceasing analog operations by the digital transition date, transitioning LPTV/translator stations that experience delays in completing their digital facilities may seek one last extension of time of their digital construction permits, of not more than 180 days, to be filed no later than March 13, 2021, which is four months prior to the July 13, 2021, transition date. An application for extension of time to construct must include an exhibit demonstrating that failure to meet the construction deadline is due to circumstances that are either unforeseeable or beyond the licensee’s control and that the licensee has taken all reasonable steps to resolve the problem expeditiously. Such circumstances include, but are not limited to: (1) delays in obtaining zoning or other approvals, or similar constraints; (2) inability to obtain equipment; or (3) financial hardship.”

The March 4, 2021 Public Notice states, *inter alia*, the following:

“Extension applications must include: (a) a detailed accounting of all steps taken by the station to complete construction of the proposed facilities including dates for each action; (b) a detailed accounting of any and all circumstances outside of the station’s control that prevented the station from completing construction including dates of each circumstance; and (c) a timeline plan of how and when the station expects to complete construction and begin operations. Extension applications claiming financial hardship must include: (a) an itemized estimate of the cost of meeting the build-out requirements; (b) a detailed statement explaining why its financial condition precludes such an expenditure; (c) a detailed accounting of the applicant’s good faith efforts to meet the deadline, including its good faith efforts to obtain the requisite financing and an explanation why those efforts were unsuccessful; and (d) an indication when the applicant reasonably expects to complete construction.”

The Permittee requests a six (6) month extension of time to complete construction. At the outset, it should be noted that, due to the current COVID-19 Pandemic, an unforeseeable event, it has been a challenge to construct. *See* the attached Declaration of Matthew Davidge. Mr.

Davidge explains the problems encountered and provides a timeline to complete construction.

It is thus urged that the Permittee be granted the requested six (6) month extension, to and including January 13, 2022.

## **DECLARATION**

Matthew Davidge states, under penalty of perjury, the following:

I am the Chief Financial Officer of Roseland Broadcasting, Inc. ("RBI").

RBI holds construction permits for ten (10) facilities. Specifically:

- W14DM-D, Augusta, Georgia, Channel 14 (Facility ID No. 184020)
- W34EC-D, Chattahoochee, Florida, Channel 24 (Facility ID No. 182543)
- K04RL-D, Amarillo, Texas, Channel 4 (Facility ID No. 187582)
- K03IT-D, Orange, Texas, Channel 3 (Facility ID No. 187584)
- K13NY-D, Tyler, Texas, Channel 13 (Facility ID No. 187585)
- NEW, Redding, California, Channel 13 (Facility ID No. 183127)
- K26KT-D, Eldon, Missouri, Channel 26 (Facility ID No. 182824)
- K26KH-D, Columbia, Missouri, Channel 26 (Facility ID No. 182794)
- K02RA-D, Beaumont, Texas, Channel 2 (Facility ID No. 187583)
- KRKG-LP, Lewiston, Missouri, Channel 9 (Facility ID No. 128562)

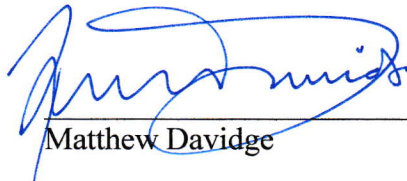
It should be noted that for KRKG-LP, Lewiston, Missouri, (Facility ID No. 128562), the permittee is SagamoreHill of Ottumwa, LLC, but that entity is 100% owned by RBI. In addition, for K02RA-D, Beaumont, Texas (Facility ID No. 187583), the permittee is SagamoreHill of Beaumont, LLC, which is also 100% owned by RBI.

RBI is 100% female and minority owned. RBI's business plan was to build all the permits in relative close proximity to one another timewise. The theory was that there would be substantial savings by ordering the equipment as a batch.

In acquiring the permits, RBI was able to utilize a lending source. Once the array of permits were assembled, the lending source was unwilling to provide the necessary financing due to the uncertainty of the Pandemic. As a result, funds for lease deposits and equipment purchases did not materialize.

On or about February 1, 2021, RBI commenced renewed negotiations with its lending source. Subject to a grant of the extension of the construction permits, RBI has been advised that the necessary funds shall be made available. Thus, RBI submits the following timeline:

- April 15, 2021: Close on financing;
- May 10, 2021: Execute leases and pay requisite security deposits;
- June 1, 2021: Order equipment;
- October 15, 2021: Commence construction and installation.



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Matthew Davidge

March 11, 2021