

Explanatory Exhibit for CP Extension Request

Pikes Peak Television, Inc. (“Permittee”), licensee of KTLO-LP and holder of the construction permit for KTLO-LD (LMS File No. 0000123936) (the “CP”), respectfully requests a six month extension of time to construct the facilities authorized by the CP, up to and including January 13, 2022. The Permittee is filing this extension request pursuant to the Public Notice requiring the filing of such extension requests by March 15, 2021.¹

The Permittee’s construction of permanent facilities for KTLO-LD has been complicated by the fact that the station has been displaced multiple times across multiple channels—both before and after the incentive auction—including displacements by several full-power stations, and additional displacement due to T-Mobile’s post-auction deployment of broadband service in the 600 MHz band. (*See, e.g.*, CDBS File Nos. BDISTTL-20071019AQO, BDISTTL-20080910ACG, BDISDTL-20120119ADQ, and BDISDTL-20121128ALK; LMS File No. 0000052546.) As a result of those multiple displacements, the Permittee faced substantial uncertainty regarding channel availability for the station’s continued operations. Because of such uncertainty, the Permittee did not renew the lease covering KTLO-LP’s pre-displacement licensed facilities, and has been operating under special temporary authority with a small rooftop interim facility since 2012.

Having finally landed on the availability of Channel 29 for the station, the Permittee had planned to construct KTLO-LP displacement facilities at its licensed tower site. However, the Permittee encountered difficulties in negotiating the terms of a lease and has determined that it is not economically feasible to return to the licensed tower site.

Instead, and as reflected in the CP, the Permittee now plans to construct KTLO-LP’s displacement facilities on a tower that it owns and uses for radio station KRDO(AM). However, the Permittee recently discovered that the KRDO(AM) tower will require costly reinforcement to support the displacement facilities. These substantial and unanticipated displacement expenses are difficult for the Permittee to justify, and the Permittee is continuing to evaluate its options and the attendant expenses, including the potential for reimbursement of the expenses from the TV Broadcaster Relocation Fund.

In sum, the Permittee respectfully requests an additional six months in which to continue to evaluate its options and determine the best path forward to construct permanent facilities for the station. The requested extension is further warranted to provide the Permittee with additional time to try and identify a manner by which to retain the Telemundo-affiliated station’s delivery of its Spanish-language programming, news, and emergency alerts to the native-Spanish speaking community that the station serves—important public interest service delivered to a vulnerable portion of the viewing public.

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¹ *Media Bureau Reminds Low Power Television and Television Translator Stations of July 13, 2021 Digital Transition Date*, Public Notice, 35 FCC Rcd 6977 (MB 2020); *see also Media Bureau Reminds Low Power Television and Television Translator Stations of July 13, 2021, Digital Transition Date*, Public Notice, DA 21-260 (rel. Mar. 4, 2021) (modifying filing deadline to March 15, 2021, pursuant to Rule Section 1.4).