EXHIBIT IN SUPPORT OF FURTHER TOLLING

LR Telecasting LLC ("LRT") is the licensee of repack station KMYA-DT, Camden, Arkansas. Pursuant to Special Temporary Authority, the Station has been operating at reduced power since it vacated its pre-auction channel in late 2018.[1] The reasons for this have been set forth in an evolving narrative that LRT has provided to the Bureau multiple times over many months. Those facts have been the predicate for the Bureau's extending or tolling, several times, KMYA-DT's deadline to complete the build-out of its facility at the parameters specified in its post-auction authorization.

§1. Our most recent tolling request is LMS File No. 0000133199. For the sake of efficiency we reproduce below the facts recited in that submission. The updated information bearing on the instant request then begins at §2.

> Construction of the post-repack facility was materially completed in December 2019. The station could not be activated and a covering license application filed, however, because anomalous voltage readings raised a safety concern. In due course it was determined that these anomalies resulted from an incompatibility between the electrical configuration of the power pole transformers and the configuration that the station's new Continental Electronics transmitter requires in order to operate safely and properly.
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> Solving this problem required replacing the legacy power pole transformer bank. The transformers are maintained by Entergy, the local electric utility, whose jurisdiction extends to the power poles. Entergy finally replaced the transformers in late January. This was expected to be the final step before the post-transition facility could be activated and a license-to-cover filed.
>
> However, when testing of the new power pole transformers was initiated, an over-voltage occurred, causing damage to several pieces of electrical equipment in the transmitter building. The over-voltage resulted from an incompatibility between the newly-installed power pole transformers and a step-down transformer inside the transmitter building used to convert the incoming (higher) voltage to a (lower) voltage compatible with the building equipment.
>
> The solution to this problem is to install a suitable step-down transformer. A local electrical company (GLENN Mechanical) was engaged to handle this work. It was expected to be completed in early February. However, two matters disturbed that timeline. First, a family member of the individual in charge of the project contracted COVID-19 and passed away suddenly. This halted activity for almost three weeks. When the repercussions of that personal tragedy had settled and the project was again on track, GLENN Mechanical realized it had erred in thinking that the new transformer was in reserve locally. Instead, the equipment had to be ordered and will not arrive for three weeks.

§2. In our prior tolling request we stated that activation of the post-transition facility was expected to occur by the first week in April. Unfortunately, there was a further delay in delivery of the transformer and it will not arrive until later this week.[2] In addition, once the transformer arrives, GLENN Mechanical will not be able to install it immediately. In the face of fluctuations in the delivery schedule, the company understandably assigned its electricians to projects involving known variables or projects ready to be implemented.

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[1] A request to extend our Technical STA is being filed contemporaneously herewith.

[2] At this particular time in the supply chain ecosystem for transformer components, such delays are not uncommon. *See, e.g.*, https://solutions.borderstates.com/supplycontinuity/transformer-lead-time-update-5/.

We can, however, provide the Bureau with a substantiated schedule for the installation. At the end of this Exhibit is a copy of GLENN Mechanical's Work Order 764. This record indicates that the installation will occur on **May 19 and 20.** The work order also reflects that KMYA has paid in advance for the transformer and for the installation services.

Once the transformer is installed, Continental Electronics – the manufacturer of the station's post-transition transmitter – will do the final testing and proof.[3] This should take about a day and a half.

Assuming the foregoing projections, construction should be complete (and KMYA-DT should be able to submit its covering license application) no later than the end of May. *In an abundance of caution*, LRT respectfully asks that its construction deadline be tolled until June 30, 2021.

* * *

Waiver of the Tolling Rule. "Stations may seek a waiver of the tolling rule to receive additional time to construct in the case where 'rare or exceptional circumstances' prevent construction." *Transition Procedures Public Notice* at ¶ 43. The circumstances of this case are rare and exceptional and waiver is appropriate because the underlying purpose of the Tolling Rule would be compromised if it were enforced according to its literal terms.

Waiver of the 90-day Rule. Applications for extensions of a construction deadline are to be filed at least 90 days prior to the deadline. In the present case, as explained above, it was not possible to comply with this requirement. To the extent necessary, we request that the 90-day rule be waived.

[GLENN Mechanical Work Order 764 is on the following page]

[3] This final step in the construction of the facility had been delayed pending resolution of the electrical problems associated first with the pole attachment transformer bank owned by Entergy, and then by the unexpected need for the new step-down transformer, as described above.

GLENN MECHANICAL
www.glennmechanical.com

*** REPRINT ***

Work Order

Number: 764
Alt. WO No.:

Customer: KMYA-DT LR Telecasting
#17787 OFF OF 335
El Dorado, AR 71730

KMYA-DT LR Telecasting
OFF OF 335
El Dorado, AR 71730

Work Order Status: Closed
Call Type: QUOTE
Problem: INDUSTRIAL
Est. Hours/Priority: 1.00 / High
Map:
Payment Expected by: Check
Taxable?: YES **Tax at:** Cust **Rate:**
PO Number:

Special:

Comments: Remove and install New 112KVA proposal.

Contacts:

WO Contact: Ronald Maines - (801) 319-6360

Parts:

Labor:

Work Order Notes:

PROJECT: REMOVE AND INSTALL NEW 112KVA TRANSFORMER

We are pleased to offer our services for the following:

Demolition:
Remove existing transformer and dispose of.

Supply and install:
Qty 1 - 112KVA 480V - 208/120V WYE-WYE three phase transformer.
Includes all labor and materials.

Total - $8,485.87

Comments & Notes

PAYMENT RECEIVED WORK SCHEDULED FOR MAY 19-20, 2021