WAIVER REQUEST AND EXPLANATION FOR CP EXTENSION REQUEST

Pursuant to FCC Public Notice, DA-21-684, released June 11, 2021[1], KATN and KJUD License, LLC ("Vision"), licensee of low power television station K13KU, Delta Junction, Alaska, is submitting this application to flash-cut to digital facilities for the Station. Vision also hereby requests that this permit be granted with an extended expiration date of January 13, 2022, and requests waiver of the March 15, 2021 deadline to request such extension.

In support of its request, the permittee indicates that good faith efforts have been made to complete the Station's conversion to digital but the COVID-19 pandemic has significantly restricted access to and availability of engineering services, transmission equipment, tower crews and construction services. Prior to the pandemic, availability of such services, crews and equipment were constrained due to the repacking of full-power television stations. The financial uncertainty created by the pandemic has also made it more challenging to finalize plans involving potentially significant expense. The Station's location in Alaska makes the transmission site difficult to access during much of the year, which has delayed Vision's ability to finalize transition plans for the Station. As the Commission recently recognized in granting a waiver of the analog termination deadline to certain translators owned by the State of Alaska, the window in which to conduct tower work in Alaska can be extremely limited.[2] Vision anticipates completing construction during late summer 2021 prior to the onset of severe winter weather, but does not believe it will be able to do so by July 13, 2021.

Due to the above described events Vision respectfully requests a six-month extension of its digital construction permit until January 13, 2022. Vision understands that analog operations of the Station will not be extended and must terminate on July 13, 2021; after that date, Vision will request special temporary authority to remain silent while completing implementation of the facilities authorized in the permit. For the same reasons set forth above, Vision further requests waiver of the Commission's March 15, 2021 deadline for filing a request for extension of the July 13 construction permit expiration date. Grant of the requested waivers will serve the public interest by allowing these stations to continue to provide over-the-air service to their remote viewers, and will not harm any other broadcasters or users of the television spectrum or impact the transition of any other broadcasters to digital. To the extent necessary, Vision will separately request extension of this construction permit immediately upon its grant.

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[1] This Public Notice reminded those stations which had not filed for digital conversion construction permits and/or extensions of the upcoming July 13, 2021 deadline for the termination of analog low power television broadcasting.

[2] *See, In the Matter of State of Alaska Request for Waiver of Section 74.731(m) of the Commission's Rules – Low Power Television Analog Termination Date*, FCC 21-78, ¶ 11 (rel. June 21, 2021).