



September 7, 2021

Ms. Barbara Kreisman
Chief, Video Division Media Bureau
Federal Communications Commission
45 L Street NE
Washington DC, 20554

Via Email and LMS

Re: Request for Tolling Waiver
K40KC-D, Tulsa, OK
K44GH-D, Alexandria, MN
WFRW-LD, Enterprise, AL
K48KJ-D, Geneva, MN
K47JE-D, Olivia, MN
K47JC-D, Wadena, MN
KHVM-LD, Minneapolis, MN
K43JQ-D, Bismarck, ND
KHFD-D, Dallas, TX
Fac ID Nos. 14883, 130185 and
187829, 130199, 130213, 130216,
130940, 131348 and 127785
LMS File Nos. 0000155984,
0000156010, 0000156012,
0000156640, 0000156641,
0000156643, 0000156648,
0000156651 and 0000156638

Dear Ms. Kreisman:

Edge Spectrum, Inc. is in receipt of your letter dated August 10, 2021, regarding the above-referenced request for waiver of the Commission's tolling provisions and tolling of the Station's construction permit expiration date. In that letter the Media Bureau requested: 1) a detailed accounting of all steps taken to complete construction since the grant of the construction permit; 2) a detailed accounting of any and all circumstances outside of our control that prevented construction since the grant of the construction permit; 3) A detailed account of what construction remains and a timeline plan of how and when we expect to complete construction and begin operations.

This letter serves as a response to these questions and appropriate amendments have been electronically filed for the above referenced stations.

With regards to question one, Edge Spectrum has made great progress towards completion of its required builds identified in this letter. As the Commission knows, vendor negotiations are conducted based on scale. As a result, the timeline for these negotiations and orders is the same for each facility. Edge Spectrum required equipment from three vendors: Comark for transmitters and Dielectric and Kathrein for antennas.

In person visits with Comark were conducted in August of 2018, February and September of 2019, January and July of 2020. In addition to emails, conference meetings, and the in-person meetings at trade shows.

A tour of the Dielectric facilities was conducted in September of 2018, in addition to emails, conference meetings, and the in-person meetings at trade shows. Due to a mistake by the vendor, Dielectric notified Edge Spectrum in June of 2020 that it required additional engineering confirmation prior to the placement of antenna orders.

In person meetings with Kathrein were done in January and September of 2019, March and October of 2020. Final quotes were received and reviewed in February of 2020.

Site surveys for all construction permits were required and conducted between April and June of 2020 despite the COVID-19 pandemic.

With regard question 2, the circumstances outside of our control that prevented construction since the grant of the construction permit, each of these stations was displaced as a result of the voluntary incentive auction of broadcast television spectrum.

As the Bureau is aware, displacements occurred in May of 2018. Planning and construction of a new facility cannot begin until after frequencies have been assigned by the Commission. Processing of displacement applications for LPTV extended until the Fall of 2019.

Upon frequency assignment, Edge Spectrum applied for repack reimbursement made available pursuant to the Reimbursement Expansion Act via Form 399 in September 2019. Form 399 approvals were not granted until early 2020 and as a result procurement of necessary equipment could not begin in earnest until April 2020.

To address question 3, the status of equipment orders for each of the above-referenced construction permits is as follows:

K40KC-D, Tulsa, OK

Transmitter ordered 12/31/2020, Comark sales order # S010730

K44GH-D, Alexandria, MN

Transmitter ordered 12/31/2020, Comark sales order # S010738
Antenna ship date 6/22/2021

WFRW-LD, Enterprise, AL

Transmitter initially ordered through R&L Media Systems but failed to deliver.
New Transmitter ordered 6/4/2021, Anywave sales order # AC2106-0118
Antenna ship date 8/6/2021, invoice # 11969

K48KJ-D, Geneva, MN

Transmitter ordered 12/31/2020, shipped 3/15/2021, Comark sales order # S010719

K47JE-D, Olivia, MN

Transmitter ordered 2/8/2021, shipped 3/30/2021, Comark sales order # S010767

K47JC-D, Wadena, MN

Transmitter ordered 12/31/2020, Comark sales order # S010747

KHVM-LD, Minneapolis, MN

Transmitter ordered 12/31/2020, Comark sales order # S010721
Antenna ship date 6/22/2021

K43JQ-D, Bismarck, ND

Transmitter ordered 12/31/2020, Comark sales order # S010741

KHFD-D, Dallas, TX

Transmitter ordered 12/31/2020, shipped 3/30/2021, Comark sales order # S010750

All equipment deliveries are actively being staged to the various transmitter sites. Installation schedules are being finalized with installers to complete construction within the six-month extension period, as of this date.

Sincerely,



Randy Weiss
Edge Spectrum, Inc.