

REQUEST FOR FURTHER EXTENSION OF SILENT STATION AUTHORITY AND WAIVER OF SECTION 312(g) of COMMUNICATIONS ACT

KJLA, LLC (“KJLA”), the licensee of Station KSGA-LD, San Bernardino, California (FIN: 5342) (“KSGA” or “Station”), hereby requests a further, 30-day, extension of its silent station authority (LMS No. 0000150147)¹ (the “Extension Request”) and, in so doing, continue to waive the time limitations of Section 312(g) of the Communications Act owing to the Station’s current silent station status.

As reported in LMS Nos. 0000130416, 0000117660, and 0000150147, KSGA went silent as it commenced a Commission approved displacement and channel sharing arrangement process. In MX Group No. 25, in the special settlement window for low-power applicants,² KJLA and New York Spectrum Holding Company, LLC (“Spectrum”), the licensee of Station KVHD-LD, Los Angeles, California (FIN: 67901), were mutually exclusive applicants for displacement to Channel 3 at Los Angeles, California. Rather than proceed to the uncertainties of an auction, KJLA and Spectrum agreed to settle their mutual exclusivity and engage in a channel sharing arrangement on Channel 3. Under that channel sharing arrangement, KSGA is the sharer station and KVHD-LD is the sharee station. Construction permits have been issued to the two parties in LMS Nos. 0000131337 and 0000052735.

On July 13, 2020, the Station, operating on a channel designated for wireless operations, went silent as it commenced the construction process for the channel sharing arrangement on Channel 3. As it has made note of in its silent station initial and extension requests, KJLA has had to deal with impact of the Covid-19 pandemic on its ability to secure the equipment and contractors needed to construct the modified facilities for this channel sharing arrangement. Despite its best efforts, KJLA, has been unable to complete the required work and restore KSGA to operation within the one-year period provided by Section 312(g) and is now seeking a waiver of the statute and an extension of its STA.

As reported in the Extension Request, the principal impediment to the resumption of the Station’s operations as a channel sharing station has been its channel sharing partner, Spectrum. Owing to problems with Spectrum, the proposed tower site owner would not license space on its tower to KJLA. The result was that KJLA had to seek a new tower site.

In mid-June, 2021, after such diligent efforts, KJLA was able to negotiate a leasing arrangement with Sunset Ridge, LLC, the owner of a tower located in Claremont, California and one of the few alternatives to the Mt. Wilson antenna farm for Los Angeles television stations. After its engineering plans were revised to the Sunset Ridge tower, KJLA secured Commission approval for a minor modification of its license to operate from Sunset Ridge in LMS No. 0000150197.

¹ *Letter to KJLA, LLC*, released July 13, 2021.

² *Public Notice*, 33 FCC Rcd 10748 (IATF/MB 2018).

With the tower site leased and FCC consent received, KJLA proceeded to modify the equipment order it was negotiating with its equipment vendors. Owing to vendor issues and other problems arising from the Covid-19 pandemic on equipment and personnel, KJLA was unable to complete the necessary work on time and while the Station remained silent.

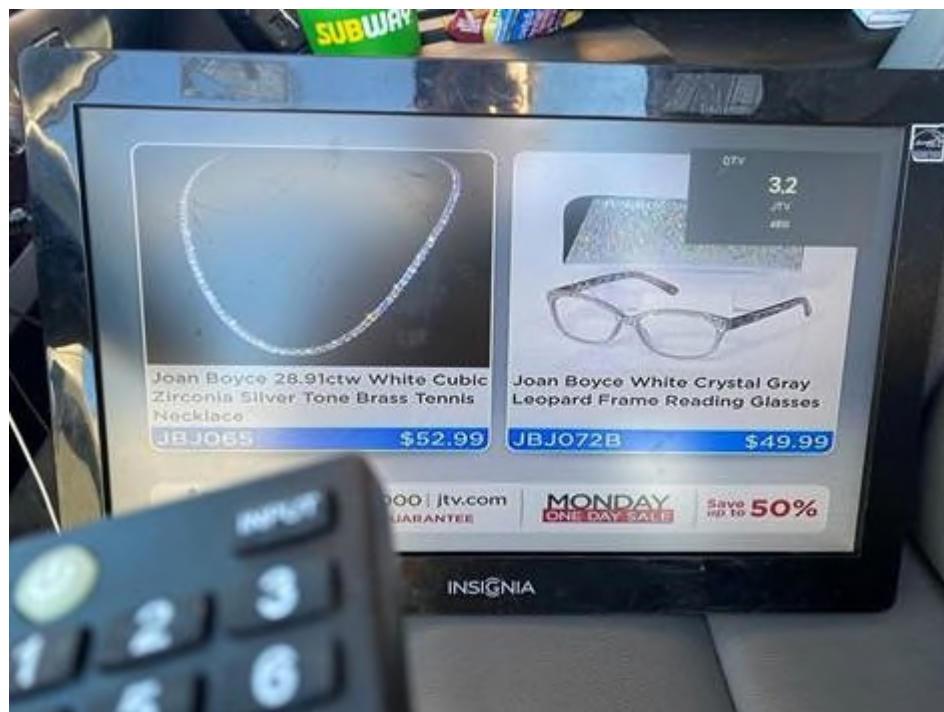
Following receipt of the extension sought in the Extension Request, KJLA has moved with diligence to undertake and complete construction of the modified facilities. The construction work is nearly completed and the Station is in a position to commence operations promptly. As evidence of the state of completion, KJLA is attaching hereto (Exhibit A) screenshots of the Station taken during equipment testing. These screenshots show that the Station has the ability to undertake broadcasting on its assigned channel and that only a few finishing touches on the Station's construction need to be completed.

However, on September 14, 2021, KJLA learned that it will not be able to commence operations on or before September 30, 2021, as it had expected. It learned, owing to transmitter site use issue, that the commencement of operations will need to be postponed to at least October 1, 2021.

The reason for the delay arises from the practices and policies of the site owner, which KJLA had not previously been cognizant of. The site owner treats its leasing arrangements on the basis of its fiscal years and uses the first day of a month as a customary starting point for leasing and licensing arrangements. Thus, as a practical matter, it is not possible for KJLA to commence operation of its facility on the basis of a commencement date other than the first calendar day of a month. KJLA is now operating on this basis and is timing final work completion and commencement of operation for October 1, 2021.

Consequently, KJLA requests, in an abundance of caution, a 30-day extension of its silent station authority in which to return the Station to operation. Given the state of construction of the Station, KJLA does not expect to use much of that time period in returning the Station to operation. KJLA is anxious to return the Station to serving its viewers and is ready, willing and able to do so within the short extension period being requested.

EXHIBIT A



4818-8912-1262