

UPDATED EXHIBIT SUPPORTING EXTENSION OF ENGINEERING STA

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. We explain below the reasons that a further brief extension of the STA is necessary.

In Section I we reproduce email correspondence between LRT’s counsel and Kerry Cozad, the Director of Engineering for Continental Electronics Corporation, which reflects the recent chronology of LRT’s efforts to complete the KMYA project. We use this format on the theory that it might help the Bureau gain a more accurate sense of the dynamics of the delays LRT has confronted, than would a mere narrative alone. In Section II we briefly summarize the most recent of these delays in a standard bullet-point format that is less information-rich than the email correspondence, but which is easier to read.

I

The Bureau’s grant of our prior STA was predicated on delays in the delivery of the heat exchanger needed to complete the installation of KMYA’s main transmitter. Our expectation had been that it would arrive early enough in November (by November 5) to complete the project before Thanksgiving, thus avoiding the scheduling difficulties attendant to that holiday. This schedule was reflected in the following email correspondence from Kerry Cozad.

Kerry Cozad <kcozad@contelec.com>
Fri, Oct 22, 6:59 AM

Ron,

We checked on the status of the heat exchanger yesterday and they have come back with a revised ship date of November 5. This is caused by some parts availability issues.

Our lead engineer on the project is working with them to try and resolve that issue but it is looking like we are going to be into November before it is installed.

I hope to have additional updates early next week.

Regards

Kerry

However, the heat exchanger did not arrive until November 11. At that point the logistical challenges presented by the Thanksgiving holiday came into play. This dynamic, along with the plan and schedule for installation are reflected in the email correspondence below:

Kerry Cozad <kcozad@contelec.com>
Thu, Nov 11, 1:02 PM

Ron,

Heat exchanger has been delivered and we are starting the coordination with Harold for getting back on site.

What is our new extension date for being on air? Trying to work around the holidays, if possible.

Thanks

Kerry

Ronald Maines rdmaines@gmail.com

Fri, Nov 12, 9:20 AM

Hi Kerry - that's good news. The current deadline is November 30.

Ron

Kerry Cozad <kcozad@contelec.com>

Wed, Nov 17, 4:31 PM

Ronald,

We are working on coordinating the installation and commissioning the week of Nov 29 but it may slip into the next week (Dec 6).

The Thanksgiving holiday is impacting availability of personnel for next week.

As soon as we have the dates confirmed, I will send you an update.

Kerry

Ronald Maines rdmaines@gmail.com

Thu, Nov 18, 7:23 AM

Hi Kerry - thanks. Are you coordinating with Harold Stanton?

Ron

Kerry Cozad <kcozad@contelec.com>

Thu, Nov 18, 7:37 AM

Ron,

We are coordinating with Harold who is coordinating with an engineer to be at the site during the installation of the new heat exchanger and commissioning of the transmitter.

We are also coordinating with the local mechanical contractor who will be doing the heat exchanger change out (including the plumbing and electrical).

So we have two groups plus the CEC team that are trying to get everyone on site at the same time.

Kerry

Kerry W. Cozad
Director of Engineering
Continental Electronics Corporation
4212 S. Buckner Blvd.
Dallas, TX 75227

On November 28, Harold Stanton, LRT's field engineer, texted LRT's counsel this message:

The team will be there tomorrow [Monday, November 29] to begin installation of the heat exchanger. They will stay to complete the initial tests, then proof and finish.

The project's being completed during the week of November 29 (ie, by December 5) would mean that the November 30 deadline would not be met. Accordingly, LRT submitted (on November 29) a request for further extension of the STA terminal date to December 17.

The following Monday, December 6, CEC advised LRT's counsel as follows:

Mon, Dec 6, 7:54 AM

Ron,

Good news but not complete.

Replacing the heat exchangers and cleaning the water system took a little longer than anticipated. So we didn't get to the testing of the transmitters until late in the week.

But the water systems are now operational and the water has been treated with "antifreeze" to prevent a recurrence of last winter's situation. The 2kW transmitter was tested successfully and is now operating into the antenna.

We ran into two issues with the main 20kW transmitter. A reject load in the transmitter combiner had developed a couple of pinhole water leaks that we were able to patch. The supplier is going to provide a replacement that should be available this week.

Once the leaks were patched and we began testing of the 20kW, it was found that the output signal did not meet the frequency response criteria. This was previously checked during factory testing and was okay. We believe that a software problem has occurred with the correction circuit. Unfortunately, it could not be resolved at the site so Sunday I asked the engineers to bring the exciter back to CEC for further evaluation. Hopefully, that will get resolved today or tomorrow.

I should have an update tomorrow regarding a trip back to finish the 20kW commissioning. We want to complete this before the holidays.

Kerry

On Monday, December 13, CEC provided this update:

Mon, Dec 13, 7:50 AM

Ron,

Our tech returned to the KMYA site this past Saturday to check on the 2kW transmitter. This was to put the transmitter into Remote operation to allow the transmitter trays to be reset from a fault without having to go to the site.

The warranty replacement combiner load has been received at CEC. We are still working on the Exciter issue.

We also found a concern with the RF output switch that switches the 2kW and 20kW into the output patch panel. This has been returned to the supplier for realignment.

We have spoken with Harold about timing for returning to the site to finish the 20kW testing. With the holidays coming, the earliest timeframe looks like between Christmas and New Years but most likely will be the week after New Years.

Sorry for the additional delay. We are all looking forward to completing this project as quickly as we can.

Regards,

Kerry

Further updates came on December 15 and 16.

Wed, Dec 15, 2021 at 9:24 AM

Kerry Cozad <kcozad@contelec.com> wrote:

Ron,

Unfortunately, we have not resolved the exciter issue as of this morning. I realize that pushing the date out further also invites more scrutiny.

I will provide an update tomorrow based on what we find out today.

Regards

Kerry

Kerry Cozad

Thur, Dec 16, 10:47 AM

Ron,

We have received an update for the exciter software and are in the process of installation. Then we will need to run some testing here at the factory to confirm that was the solution.

Plan is to have an update on this next week.

We will be calling the switch supplier later today for an update on that repair but delay is not anticipated.

I am comfortable with the January 17th date.

Regards

Kerry

II

Summary of recent developments and projected completion date.

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<p>Week of November 29</p>	<p>Replaced heat exchangers and cleaned water system.</p> <p>Began testing the transmitters.</p> <p>The 2kW transmitter was tested successfully and is now operating into the antenna.</p> <p>Issue with the 20kW transmitter. Output signal did not meet the frequency response criteria. This had been checked during factory testing and was fine. Likely explanation is that a software problem occurred with the correction circuit – but this could not be resolved at the KMYA site. Kerry Cozad tells his onsite engineers to bring the exciter back to CEC for further evaluation.</p>
<p>Week of December 13</p>	<p>December 15, exciter issue not yet resolved.</p> <p>December 15, CEC discovers issue with RF output. Switch is returned to the supplier for realignment.</p> <p>December 16, CEC receives software update for the exciter and begins installation and testing. Status update is expected the week of December 20 but further problem is not anticipated.</p> <p>December 16, switch supplier advises that repaired switch will be delivered to CEC before holiday begins.</p>
<p>Week of January 3</p>	<p>Return to KMYA site to complete installation, testing, and proof.</p>

In light of the foregoing, LRT respectfully requests a brief further extension of its STA. In an abundance of caution we ask that the Bureau please approve Monday January 17, 2021 as the new terminal date.