

**Request for Special Temporary Authority:  
Limited Extension of the Invoice Filing Deadline**

Ventana Television, Inc. (“Licensee”), hereby respectfully requests a limited extension to the filing deadline by which eligible entities must submit all remaining invoices and documentation to the TV Broadcaster Relocation Fund (“Fund”), through November 7, 2022. The Commission will grant a limited extension for circumstances that are outside of the licensee’s control.<sup>1</sup> In this case, Licensee seeks a limited two-month extension by which to complete and apply for reimbursement related to field studies that will verify its stations’ newly-repacked service contours, as well as other filings related to closing out the Licensee’s stations.<sup>2</sup> These field studies are necessary to ensure that Licensee’s stations (identified in Attachment A) operate within their authorized service areas and do not cause harmful interference to other nearby licensed operators. Further, because the field studies and any close-out procedures can be completed by November 7, the limited extension requested herein would not impact the Fund’s ability to rescind unobligated amounts to the U.S. Treasury by July 3, 2023.<sup>3</sup>

In order to confirm that the service contours for Licensee’s newly repacked facilities accurately reflect the stations’ authorized service areas, Licensee has entered into a services agreement with a third-party vendor to evaluate the stations’ signal patterns. However, this vendor is unable to perform the services required prior to the close-out filing deadline. The vendor’s operational schedule is spread thin due to obligations to other stations seeking the same service and are subject to the same filing deadline. The vendor estimates that the soonest it would be able to begin work on all the repacked stations is September 2022. Despite this high demand, the vendor is one of a small group of specialists to use unmanned aerial vehicles (“UAVs”) to perform field studies. Through the use of UAVs and the vendor’s cutting-edge RF measurement systems, the vendor is able to produce highly accurate and detailed service contour reports for broadcast stations and a variety of other services. There are few, if any, other providers of this type of service, particularly those that would be able to service Licensee’s geographically diverse footprint in an efficient and cost-effective manner.

Moreover, Licensee is unable to submit the services’ invoices and request reimbursement until after the service has been completed. As a result, Licensee would be time-barred from recouping the costs of these necessary services absent an extension.

An extension would also be in the public interest because it would ensure that the service contours of Licensee’s LPTV stations match the stations’ respective FCC authorizations, thereby serving customers within their respective contours while at the same time safeguarding other licensed operators from harmful interference. Licensee has been filing invoices and relevant documentation for reimbursement over the past several years and has continued to

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<sup>1</sup> *Invoice Filing Deadlines Established for Reimbursement from the TV Broadcaster Relocation Fund*, Public Notice, 35 FCC Rcd 11273, para. 13 (2020).

<sup>2</sup> Attachment A to this request for STA includes a list of stations for which Licensee is seeking an invoice filing extension.

<sup>3</sup> *Id.*

August 22, 2022

actively communicate with the Fund Administrator in order to ensure that the Fund has all necessary materials to evaluate and approve Licensee's repack expenses.

As discussed above, an extension that would permit Licensee to complete these final steps in its stations' repack process is (a) necessary for reasons outside of Licensee's control; (b) would not impact the Fund's ability to rescind unobligated amounts back to Treasury; and (c) would serve the public interest.

**Attachment A:  
Station List**

<b>Community of License</b>	<b>Station Call Sign</b>	<b>Facility ID</b>
Atlanta, GA	W13DQ-D	61199
St. Louis, MO	K15KP-D	49175
Kansas City, MO	K15MB-D	49176
New Orleans, LA	K20MM-D	61030
Wichita, KS	K29NL-D	61044
Columbus, OH	W17EB-D	49182
Birmingham, AL	W18ET-D	61208
Portsmouth, VA	W26EV-D	49409
Raleigh, NC	W33EI-D	61209
Corsicana, TX	K07AAF-D	42342
St. Petersburg, FL	W32FH-D	61201
Knoxville, TN	W30EG-D	167727
Des Moines, IA	K32NM-D	64174
Jacksonville, FL	W30EE-D	61205
Spokane, WA	K29NM-D	71624
Tulsa, OK	K30OK-D	61018
Shreveport, LA	K30QB-D	61056
Huntington, WV	W26EW-D	49407
Champaign, IL	W27EL-D	49185
Roanoke, VA	W32EW-D	49408
Tucson, AZ	K35OU-D	71623