Edge Spectrum, Inc.
K48GC-D, FLORENCE, OR (Fac. ID 477)

Request for Limited Extension of Deadline to Submit Invoices for Reimbursement from TV Broadcaster Relocation Fund

Edge Spectrum, Inc. ("Licensee"), licensee of low power television station K48GC-D, Florence, OR (Fac. ID 477) (the "Station") hereby requests a limited extension of the deadline to submit invoices for reimbursement from the TV Broadcaster Relocation Fund from September 6, 2022 to October 21, 2022. Good cause exists to extend the Station's reimbursement deadline because Licensee was delayed in construction of the Station's post-Incentive Auction facilities for reasons beyond its control. As a result of delays in obtaining the necessary permits and equipment, the Licensee only recently completed construction and filed its license to cover. *See* LMS File No. 0000199235.

Because Licensee, due to circumstances beyond its control, was delayed in completing its repack-related work and finalizing its invoices for submission, the FCC should shift the Station's reimbursement deadline. In a June 8, 2022 Public Notice, the Incentive Auction Task Force and the Media Bureau indicated that they will consider "a limited extension" of a station's reimbursement deadline where an entity faces circumstances beyond its control.[1] Whereas the Commission previously would shift the entity seeking an extension to another deadline, because this is the last deadline the Public Notice indicated that the Task Force and the Bureau will consider whether the extension will "provide the staff with sufficient processing time to complete close-out procedures for all stations."

Here, as explained above, the delay is wholly outside Licensee's control. Licensee will submit its invoices and close out the Form 399 for the Station as soon as possible, and well before the deadline for the Commission to complete its close-out procedures for all stations.

Applying the September 6, 2022 invoice submission deadline to the Station under these circumstances is not in the public interest. Given the harm to Licensee of enforcing a deadline that does not account for the Station's circumstances, it would be unreasonable and inconsistent with Congress's charge for the FCC to reimburse costs "reasonably incurred" by a low power television station a result of the repack[2] to require Licensee to submit all invoices for the Station before September 6, 2022. Because Licensee has submitted all other expenses for the Station, the requested extension should not result in any significant disruption to the Commission's ability to complete the reimbursement process.

[1] *See Incentive Auction Task Force and Media Bureau Remind Reimbursement Program Participants That the Third and Final Filing Deadline Approaches in 90 Days*, MB Dkt. No. 16-306, GN Dkt. No. 12-268, DA 22-619 (rel. June 8, 2022).
[2] *See* 47 U.S.C. § 1452(k)(1).