

Request for Limited Extension of Time to Submit Invoices to LPTV
Broadcaster Reimbursement Fund

The Guenter Marksteiner Revocable Trust (“Licensee”), licensee of WHDT-LD, Boston, Massachusetts (Facility ID 59488) (“the Station”), hereby requests a short extension of the deadline to submit invoices for reimbursements related to the repack of the Station.^[1] While the Licensee is grateful for the Commission’s recently granted extension of its deadline until June 12, 2023, and mindful of the looming end of the program, additional extraordinary circumstances have arisen that necessitate that the Licensee, on the advice of the Fund Administrator, seek some additional time to submit invoices.

As the Commission is aware, the Licensee was poised to complete construction of the Station’s facility, but global supply chain issues delayed delivery of its antenna. This cost the Licensee its window of opportunity to complete construction and forced the Licensee to re-engineer the buildout. Cold weather in Boston area delayed exterior work on the Station’s transmission site until the Spring of 2023 at which time it was expected that construction would be able to wrap up.

However, the Licensee’s principal has suffered a catastrophic health emergency triggering end-of-life measures, including placing the license of the Station into a newly-created trust to allow for construction and liquidation of the Station without the license and reimbursements becoming entangled in estate administration. While the principal’s health condition is improving, during his incapacity, construction of a new multi-million dollar pedestrian sky bridge commenced at the Station’s rooftop transmitter site. Construction of the Station and the pedestrian sky bridge mutually interfere with each other so the Station’s landlord has made arrangements for the Station’s transmission facilities to be returned to the Station’s previous site. The Station’s previous site is equipped with an integrated window washing hoist that is capable of lifting the Station’s antenna in sections, thus obviating entirely the helicopter-assisted installation needed at its current site, along with its attendant costs and logistical challenges.

Notwithstanding the enormous and ongoing cost of the principal’s medical care, he has arranged to take an additional mortgage out on his home to continue to finance construction. While this process was initiated months ago, because the loan did not close prior to the start of hurricane season where the home is located, the addition of the lender as an additional insured on the required hurricane insurance has triggered a fraud review period. Closing on the loan is not slated until June 17th, which is after the Licensee’s current invoice submission deadline. Thus, even securing additional outside funding will not allow the Licensee to pay its vendors and submit the invoices for reimbursement before its current invoice deadline.

The Licensee and Fund Administrator have been working intensively to clear rejections of the invoices the Licensee previously submitted and it is expected that partial payments of the invoices will begin to be released in the next week. However, these payments are expected to be partial and not full payments. Thus, while the Licensee has submitted invoices for most every cost expected to

^[1] To the extent necessary a waiver is requested to file this request with fewer than 30 days remaining prior to July 1, 2023.

be incurred in completing the antenna installation, it will not receive payment in full of those invoices prior to the current June 12 deadline and will need to re-submit some of the same invoices for final payments after the June 12, 2023 deadline. The Fund Administrator has recommended that the Licensee submit the instant extension request seeking additional time up to June 29, 2023 to submit invoices for the remaining amounts due.

For these reasons, the Licensee respectfully requests an additional extension of the invoice submission deadline until June 29, 2023.