

RSN West, LLC
K38FW, Stateline, Nevada
Facility ID: 125590
Request for Extension of Special Temporary Authority

RSN West, LLC, (“RSN”) licensee of K38FW, Stateline, NV, hereby requests an extension of its special temporary authority to channel share with K31KH-D, Stateline, NV, a commonly owned low power television station serving substantially the same area, granted May 4, 2018. RSN requests that its authority to operate K38FW on channel 31 as a shared channel be further extended¹ until it can build out the new digital channel it obtained in the recent displacement window (displacement application file number: 0000053623, for K38FW, was granted September 28, 2018). Extension of the special temporary authority is necessary in order for the licensee to complete the construction of the facilities.

RSN is making this request in its current form at the instruction of the Commission staff due to the limitations of the Licensing and Management Systems (“LMS”) application system. Specifically, LMS does not allow an analog low power television station to file a construction permit to permit channel sharing with a digital low power television station.

Because this temporary channel sharing request involves two commonly-owned facilities there is no formal channel sharing agreement associated with this arrangement. Grant of this STA extension request would be in the public interest because it will allow K38FW to continue serving the viewers of Stateline, NV.

¹ A previous request to extend special temporary authority for an additional six months was granted on November 6, 2018. *See* LMS File No. 0000063322.