

**AMENDMENT TO  
EXHIBIT SUPPORTING FURTHER EXTENSION OF CONSTRUCTION DEADLINE  
AND REQUEST FOR FURTHER WAIVER OF THE TOLLING RULE**

LR Telecasting LLC is the licensee of KMYA-DT, Camden, Arkansas (the Station). The Station timely ceased operation on its pre-auction channel and initiated operation on its post-auction channel. Under two STAs, the second of which expires November 27, 2019 (File No. 0000072911) the Station has been operating at reduced power.

On May 24, 2019 the Media Bureau tolled the expiration date of the Station's construction permit through September 30, 2019. The Commission found that rare and exceptional circumstances – unexpected and unavoidable delays in the production of the primary transmission line – justified this action.

Consistent with the Station's representations in its earlier request for tolling, production of the primary transmission line was completed well in advance of the September 30 deadline. Accordingly, construction of the Station in full harmony with the specifications of its post-auction authorization was scheduled for the first week in September. All preparations further to that undertaking (the arrival of equipment not yet on site, a tower crew, etc.) had been arranged.

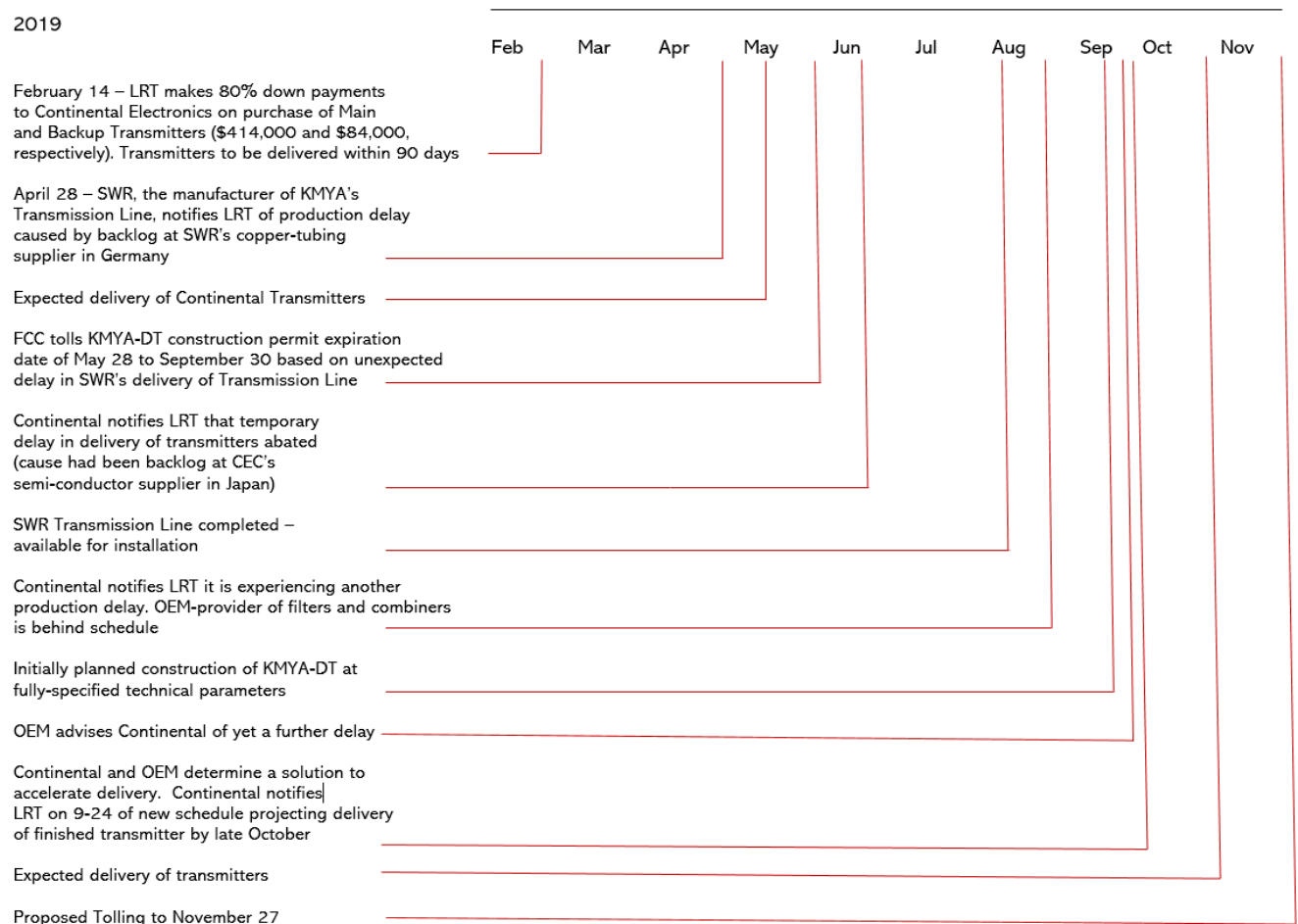
In mid-August, Continental Electronics, the manufacturer of the main and backup transmitters, notified LR Telecasting that it was experiencing production delays. Specifically, the OEM who provides Continental Electronics with filters and combiners was behind schedule.

The Director of Engineering for Continental Electronics is Kerry Cozad. In recent email correspondence with counsel for LRT, he explained:

Here is the background for the transmitter equipment delivery for KMYA-DT, licensed for Camden, Arkansas serving Little Rock. Continental Electronics is providing main (Model CTX724) and alternate (Model CTX706A) transmitters for operation on Channel 18. The transmitter amplifier cabinets for both transmitters were complete in late June 2019. We have been preparing them for factory testing. The external RF Systems (combiners and filters) are provided by another OEM and were expected to be delivered to CEC in mid August 2019 to allow final factory testing of the transmitter system.

These items did not start shipping from the OEM until the second week of September 2019 which does not allow CEC enough time to factory test the systems to confirm compliance to the customer and FCC specifications. Our understanding is that the delay is due to the volume of equipment going through the OEM's factory and delays from their suppliers for parts. Based on these delays, we anticipate that the shipping of the transmitter system to the KMYA site will most likely occur around October 30, 2019.

In a telephone call with LRT's counsel on Saturday September 21, Mr. Cozad indicated that a message he had received from the OEM on Friday September 20 gave him reason to think that Continental's delivery date would be pushed into November.



Finally, we have kept the instant exhibit brief in light of the closeness of the current construction permit expiration date. As the staff recalls, our previous two filings relating to KMYA-DT's efforts are copious in their factual details. We incorporate them by reference here, though a review of the information they contain is not necessary to resolve the present request.

[Attachment on following page]

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From: **Kerry Cozad** <[kcozad@contelec.com](mailto:kcozad@contelec.com)>  
Date: Tue, Sep 24, 2019 at 5:16 PM  
Subject: RE: background email  
To: Ronald Maines <[rdmaines@gmail.com](mailto:rdmaines@gmail.com)>

Updated background email with additional inputs from OEM. Things are a little better today in regards to the probability of receiving the needed parts over the next couple of weeks.

Kerry

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Ron,

Here is the explanation for the delay in delivery of the transmitter equipment for KMYA-DT, licensed for Camden, Arkansas serving Little Rock.

Continental Electronics is providing main (Model CTX724) and alternate (Model CTX706A) transmitters for KMYA-DT's operation on Channel 18.

The transmitter amplifier cabinets for both transmitters were complete in late June 2019. The external RF Systems (combiners and filters) are being provided by Electronics Research, Inc. (ERI). We expected combiners and filters to be delivered to CEC in mid August. This would have allowed final factory testing of the complete transmitter system and delivery to LR Telecasting in time for their planned completion of construction in September.

In mid-August ERI told us they were experiencing delays and expected to start shipping the second week in September. According to ERI, the delays were due to the unexpected, repack-related volume of equipment going through their factory and delays from their own parts suppliers. This included delays in engineering design work and backlogs for fabrication and testing. A partial shipment (mask and harmonic filters) for the alternate transmitter occurred but the key components for the main transmitter (combiner and mask filter) still had not shipped as of September 19, 2019.]

On Friday September 20, the OEM notified us that the parts still were not ready. On Monday, September 23, CEC contacted ERI to discuss ways to further expedite the deliveries. From those discussions, it was determined that there were enough parts available to complete the combiner and with expedited assembly and testing the projected date for delivery of the combiner is now September 30, 2019. This will allow CEC to begin preliminary testing of the main transmitter system next week.

Due to unanticipated difficulties in testing the mask filter, the projected date for delivery of the mask filter slipped into October. The testing issues should be resolved this week and we anticipate receipt of the mask filter by October 8, 2019.

CEC will check again with ERI on the progress of the mask filter later this week. Once we receive the mask filter, testing can be completed within two weeks and installation at the KMYA site immediately thereafter.

If you need additional information, please let me know.

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

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