EXHIBIT SUPPORTING REQUEST
FOR FURTHER TOLLING OF CONSTRUCTION PERMIT
TO DECEMBER 31, 2019

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 Special Temporary Authority that expires November 27, 2019 (LMS File No. 0000072911) the Station has been operating at reduced power. This temporary modality has been necessary because delays in delivery of the Station's main transmitter have prevented the complete build-out of the facility at the parameters specified in its post-auction authorization. On October 2, 2019, the Media Bureau tolled the expiration date of the Station's construction permit through November 27, 2019 (LMS File No. 0000081968).

Reason for the Delay. Continental Electronics Corporation (CEC) is the transmitter manufacturer. The Director of Engineering for CEC is Kerry Cozad.

Attachment 1 below is an email from Mr. Cozad describing (a) CEC's efforts to ensure delivery of the transmitter in time for LR Telecasting to meet the November 27 deadline, and (b) the current status of this undertaking. Mr. Cozad explains that CEC's production of the transmitter had been completed, testing had been completed, and delivery of the transmitter to LRT had been scheduled – when CEC realized that its subcontractor for the heat exchanger would not be shipping that piece of equipment until November 27, the current construction deadline. Mr. Cozad states that "[t]he reason this had not come up sooner is that CEC has an inhouse cooling system and the actual heat exchanger for this transmitter was not needed for factory testing. We were focused on addressing the parts shortages that impacted the factory testing." (Attachment 1 – Email correspondence from Kerry Cozad to Ronald Maines, Counsel for LRT, November 12, 2019.)

Current Schedule. Mr. Cozad explains that CEC has arranged for the heat exchanger to be shipped directly to KMYA's site, for arrival no later than December 3. The transmitter itself was shipped to KMYA on November 18 (see Attachment 2 – Email correspondence from Ron Petrasek, CEC's Program Manager, confirming that this occurred). Mr. Cozad states that CEC's team will have the heat exchanger installed and running at the KMYA site by December 6, conduct testing December 7-8, and complete all facets of the installation by December 10.

Attachment 3 is a calendar reflecting this plan.

Waiver of the Tolling Rule. "Stations may seek a waiver of the tolling rule to receive additional time to construct in the case where 'rare or exceptional circumstances' prevent construction." *Transition Procedures Public Notice* at ¶ 43. The circumstances of this case are rare and exceptional and waiver is appropriate because the underlying purpose of the Tolling Rule would be compromised if it were enforced according to its literal terms.

Waiver of the 90-day Rule. Applications for extensions of a construction deadline are to be filed at least 90 days prior to the deadline. In the present case, as explained above, it was not possible to comply with this requirement. To the extent necessary, we request that the 90-day rule be waived.

* * *

The Commission's records will reflect that more than a million dollars in reimbursement funds have been invested in the equipment required for KMYA-DT's post-auction facility to be built. Unexpected and uncontrollable delays in the delivery of this equipment have delayed the Station's construction. That

outcome finally can be realized within the next few weeks. For these reasons we respectfully request further tolling of the expiration of KMYA-DT's post-auction authorization to December 31, 2019. A request for further extension of the STA is being filed contemporaneously herewith.

ATTACHMENT 1

On Tue, Nov 12, 2019 at 11:59 AM Kerry Cozad <kcozad@contelec.com> wrote:

Dear Ronald,

We received the final RF component (mask filter) from ERI last week. This was later than previously planned so to compensate for this additional delay, we had proceeded with the transmitter testing without that filter.

We now anticipate that the factory testing of the 20 kW (main) transmitter will be completed this week so that packing of the transmitters can be completed with shipment to the KMYA site occurring on November 18, 2019.

In parallel with the transmitter testing, we have been coordinating with the station consulting engineer and the contractors that the station is planning to use for the facility improvements and will also be providing support work to CEC for the installation portion of our contract with KMYA. Through this coordination, meeting the November 27th date for going on-air has been on schedule.

However, during the coordination discussions last week, it was discovered that the supplier of the heat exchanger for the main transmitter had not scheduled it for shipment from the factory in Ohio until November 27th. The heat exchanger for the alternate transmitter had already been delivered to CEC. Because the main transmitter heat exchanger system is larger than the alternate system, additional design work and manufacturing time was required. This time was not accounted for in the previous schedules that we had shared with you.

The reason that this had not come up sooner is that CEC has an inhouse cooling system and the actual heat exchanger for this transmitter was not needed for factory testing. We were focused on addressing the parts shortages that impacted the factory testing.

We have looked into using the alternate transmitter heat exchanger for the main transmitter but it is not sized for the licensed transmitter power. Other alternatives for expediting the availability of a heat exchanger are not feasible for the same reason.

The heat exchanger should arrive no later than December 3. Additionally, we are arranging for it to be drop shipped to the KMYA site instead of delivering to the CEC factory first. This should save over a week of shipping time. We have checked several times with the supplier about the November 27 ship-date and believe it is reliable.

If the heat exchanger is on site by December 3, we would have it installed and running by December 6 which will allow us to do testing over the weekend (December 7-8). We would need to do some over the air testing at that time. Complete commissioning would occur by Tuesday December 10.

We will be able to install most of the facility equipment and the transmitter systems prior to the delivery of the 20kW heat exchanger. This will keep the delay past November 27th to a minimum.

Please let me know if you need additional information.

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

ATTACHMENT 2

From: Ronald Petrasek <rpetrasek@contelec.com>
Sent: Monday, November 18, 2019 2:17:18 PM
To: David Carlson <DCarlson@kmya-tv.com>

Hi David,

The delivery truck left our facility at noon today for delivery Tuesday morning.

Best Regards,

Ron Petrasek
Program Manager
Continental Electronics Corp
4212 S. Buckner Blvd
Dallas, TX 75227
Office (214)275-2365

ATTACHMENT 3

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	11-18 Shipment of transmitter to KMYA-DT site	11-19 Delivery of transmitter to KMYA-DT site	11-20	11-21 Installation of transmitter system →	11-22	11-23
	11-25		11-27 Shipment of heat exchanger to KMYA-DT site			
12-1	12-2	12-3 Heat exchanger arrives at transmitter site			12-6 Heat exchanger installed and operational	12-7 Testing →
12-8 Testing	12-9 Testing	12-10 Commissioning of transmitter system	12-11	12-12	12-13	12-14
12-15		12-17 Construction of post-auction facility complete				
12-22						
12-29		12-31 Revised deadline to complete construction				