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Of Counsel  
Christopher D. Imlay  
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June 4, 2020

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.; Room TWD-204  
Washington, D.C. 20554

**Re: WPZR-FM (Facility ID No. 88666)  
Emporia, VA  
Construction Permit File No. 0000100391**

**Request for Tolling of Construction Permit Deadline**

Dear Ms. Dortch:

Pursuant to Section 73.3598 of the Commission's Rules, and on behalf of Positive Alternative Radio, Inc. ("PAR"), the licensee of Radio Station WPZR-FM at Emporia, Virginia, we hereby submit in triplicate this request for the tolling of the authorized period of construction for underlying Construction Permit File No. 0000100391 (hereinafter referred to as the "WPZR Construction Permit"). A copy of the WPZR Construction Permit is attached. The WPZR Construction Permit is scheduled to expire on July 28, 2020.

In anticipation of meeting the July 28, 2020 deadline, PAR took many diligent steps towards constructing the modified facilities. Attached please find the following supporting documentation:

1. A December 3, 2019 purchase order with Crown Castle relating to a structural analysis, construction drawings, zoning service, permitting service, leasing and inspection services. (1 page)
2. A February 7, 2020 quotation statement from WFP, Inc. for a shelter to support the WPZR-FM transmitting equipment. (6 pages)
3. A February 18, 2020 letter from PAR to VFP, Inc. (1 page)
4. A March 10, 2020 purchase order from Crown Castle regarding construction services (1 page).

5. A May 6, 2020 purchase order from Crown Castle regarding construction services. (1 page).

Under normal circumstances PAR would be able to meet the July 28, 2020 deadline but the current coronavirus pandemic has resulted in local stay-at-home orders that have significantly reduced the availability of construction crews needed for the preparation of the WPZR transmitting site as well as for the installation of the new transmitting equipment. None of the service providers are willing to guaranty any type of service schedule at this time. These are matters beyond the control of PAR and certainly unique to the current coronavirus pandemic.

In light of the foregoing, PAR requests a 90-day extension of the July 28, 2020 construction deadline.

Also attached is a Declaration from the President of PAR attesting to the accuracy and veracity of the information provided in this extension request.

Should the Commission have any questions regarding these matters, or require any further information or documentation, please call or email the undersigned counsel.

Sincerely,



Cary S. Tepper

Attachments

cc: Victoria McCauley, Esq. (FCC – by email)  
James Bradshaw (FCC – by email)



# PURCHASE ORDER REQUEST

USA HEADQUARTERS

2000 CORPORATE DRIVE – CANONSBURG, PA 15317 – (724) 416-2000

**Customer** Positive Alternative Radio, Inc.  
**Address** 145 Jackson St NE  
Blacksburg VA 24060

**POR Number** 144564  
**Sent Date** Dec 03 2019

**Revision Number** 1  
**Revision Date** Dec 03 2019

**Project Management Vendor** Crown Castle - PMV  
**Project Mgr Contact** Joe Franzen  
Joe.Franzen@crowncastle.com  
**POR Creator Contact** Adriana Goglio  
Adriana.Goglio@crowncastle.com

| Line | Customer Reference | Crown Site Reference | Transaction Details   | Crown Order | Charge Code | Comment | Line Amount(s) | Total Amount(s)  |
|------|--------------------|----------------------|-----------------------|-------------|-------------|---------|----------------|------------------|
| 1    |                    | 858281               |                       |             |             |         |                |                  |
|      |                    |                      | Structural Analysis   | 509010      | 595799      |         | 2,500.00       |                  |
|      |                    |                      | Construction Drawings | 509010      | 595799      |         | 2,500.00       |                  |
|      |                    |                      | Zoning Service        | 509010      | 595799      |         | 850.00         |                  |
|      |                    |                      | Permitting Service    | 509010      | 595799      |         | 1,500.00       |                  |
|      |                    |                      | Order Entry/Leasing   | 509010      | 595799      |         | 500.00         |                  |
|      |                    |                      | Inspection Fee        | 509010      | 595799      |         | 2,500.00       |                  |
|      |                    |                      |                       |             |             |         |                | 10,350.00        |
|      |                    |                      |                       |             |             |         | <b>Total</b>   | <b>10,350.00</b> |

## **VFP, Inc.**

5410 Fallowater Lane  
Roanoke, Virginia 24018  
Phone 540.977.0500  
Fax 540.977.5555  
Web: [www.vfpinc.com](http://www.vfpinc.com)

February 7, 2020

Mr. David Hodges  
Positive Alternative Radio  
david@parfm.com

Quotation Number: PAR-1A

Reference: Your e-mail request for quotation of a 10' x 12' shelter.

Dear Mr. Hodges,

VFP is pleased to provide this revised quotation for a concrete shelter in response to your referenced request.

The revision includes increasing the amperage of the dedicated power and putting a 125 Amp breaker in the panel box to feed it

The proposed shelter is described below

### **Construction - Concrete**

- Size nominal 10" wide (10'6" wide with roof overhang) exterior x nominal 12' long exterior x nominal 9'2" high interior, one room concrete shelter
- Standard construction in accordance with VFP product specifications. The structural loads of the proposed concrete shelter are as follows:
  - 200 pounds per square foot distributed floor loading while on foundation
  - 125 pounds per square foot distributed floor loading while lifting
  - 100 pounds per square foot distributed roof load
  - 150 mph wind load
  - Seismic zone 4
- Exposed aggregate exterior
- The proposed shelter walls are capable of stopping 30.06 rifle fire per UL752 requirements. Unless otherwise specified, the shelter door is not bullet resistant.
- The proposed shelter walls will provide a two hour fire rating

DH

- The walls and ceiling will be insulated to R-11 with hardboard insulation
- The interior walls and ceiling will be sheathed with 3/4" backed white FRP board
- Light colored industrial grade vinyl tile floor covering
- One (1) 42" wide x 84" high insulated steel exterior door, with aluminum continuous tamper-proof hinge, passage style lever handle, deadbolt lockset and fiberglass weather hood
- One (1) hydraulic door closer

### **Power Distribution**

- One (1) surge arrestor related to panel board to protect the shelter, Scientific Atlantic Model 11214
- One (1) 200 Amp, 10,000 AIC, 120/240 VAC, single phase, 60 Hz, 40 space main breaker, snap-in utility power distribution panel, in a NEMA 1 surface mount enclosure (Cutler Hammer)
- Circuit breakers for all VFP installed equipment and customer loads as specified
- One (1) 125 Amp breaker to feed power drop for transmitter
- One (1) shelter wall penetration to serve as utility power service entry
- Four (4) 20 Amp specification grade duplex receptacles
- One (1) 20 Amp specification grade exterior duplex receptacle on a ground fault interrupter circuit
- One (1) dedicated 20 amp twist lock receptacle with plug located above customer's transmitter.
- One (1) dedicated equipment 120/240 AC circuit drop, 125 Amp routed in conduit to customer specified location on ceiling above the customer's transmitter.

### **Lighting**

- Four (4) four foot, LED light fixtures
- One (1) LED exterior door light with photo cell control

- One (1) LED emergency light

### **HVAC**

- One (1) three ton, 11 EER, 240 volt, single phase, wall mount air conditioning unit, with economizer, low ambient and compressor anti cycle controls and washable dust filters
- One (1) digital thermostat

### **Alarm Device Contacts**

The following alarm device contacts will be wired and brought to a location specified by the customer. The alarm wires will be coiled and tagged for identification per VFP standards. Unless otherwise stated in this proposal, termination at the customer's equipment is assumed to be provided by others.

There are no provisions for audible, visual or remote alarm monitoring offered, except where it is integral to the device offered or stated otherwise in this proposal.

- One (1) intrusion alarm switch with form "C" contacts rated .1 Amps at 28 VDC

### **Grounding**

- Provisions for the connection of a grounding electrode conductor to location inside shelter
- One (1) single point ground system

### **Accessories**

- One (1) three - port/waveguide entry panel with 3" sleeves and protective blank covers
- Six (6') of 12" wide cable ladder/tray
- One (1) ¼" x 4" x 20" copper ground bar
- One (1) service manual
- If requested, VFP will provide three (3) sets of shelter drawings with each shelter unit order. Typical foundation drawings based upon normal soil conditions are available to support calculations for recommended shelter tie down locations. No other foundation drawings are offered in the proposed shelter price. Additional foundation drawings can be provided and will be negotiated separately.

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Mr. David Hodges  
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- All wiring will be installed in surface mounted conduit or wireways if specified and will be in full compliance with ANSI/NFPA-70 - The National Electrical Code, latest revision.

### **Shelter Price**

The price for this shelter is **\$33,024.00**, exworks from Duffield, Virginia per the terms and conditions. This price does not include freight, off-load or set-up of the shelter at the site.

The *estimated* additional cost for VFP to transport this shelter to Warfield, VA is **\$3,750.00**. All transportation **will be billed at actual cost plus 12%** per the terms and conditions.

The estimated cost for a 50 ton crane for 8 hours with two riggers is **\$3,887.00**. **Crane is billed at actual plus 15%**

### **Lead Time**

Shelter completion is currently 14-16 weeks after approval of the preliminary drawings and state approval (where applicable). The preliminary drawings will be sent to the customer 20 working days after receipt of purchase order. VFP will confirm the delivery schedule based upon production commitments and availability of ancillary equipment at the time of order.

### **Shelter Set-up**

Shelter accessories may be removed as required for shipping at the discretion of VFP's Transportation Manager to facilitate shipping dimensions, safety, security, or to prevent damage to equipment. Any equipment removed for shipment will be packed in the shelter along with mounting hardware for reinstallation per VFP standards. VFP has not included the reinstallation of equipment in this offering. Unless otherwise provided for in writing, the reinstallation of equipment is assumed to be the responsibility of the customer.

### **Terms and Conditions**

All pricing is exclusive of sales tax, use tax, or other fees.

Use taxes and any other state or local taxes or fees will be the responsibility of the customer. If the sale is subject to any such taxes or other fees, then VFP, Inc. reserves the right, at any time (even after final payment by the customer for the shelter), to invoice separately for all such taxes or fees, together with any interest and penalties that may be imposed by the taxing or fee collecting authority. If this sale is exempt from any such taxes and fees, the customer must provide VFP with proof of any exemption (such as an exemption certificate) at the time the customer places its order.

This quotation is valid for 45 days.

Mr. David Hodges  
01/30/2020  
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Shelters and equipment installation services will be invoiced when complete and ready for customer inspection. Shipping, field service, and other services will be invoiced when completed. All other items will be invoiced when shipped.

Pending credit approval, standard terms are net 30 days from date of invoice regardless of shelter delivery status.

After completion and the payment terms of this letter are met, the shelter can be stored at VFP for up to 180 days at no charge. After 180 days, VFP will contact the customer to negotiate storage terms.

The provisions in this quotation are the only terms and conditions applicable to this offering. Any provisions made on buyers purchase orders are hereby rejected and will not become a part of this offering without seller's written consent. Issuance of a purchase order by buyer constitutes acceptance of the provisions described in this offering. The invalidity in whole or in part of any provision of this offer, shall not affect the validity of other provisions in this offering.

### **Transportation**

Delivery charges are based on normal site access for VFP over the road tractor-trailers. If the site is not accessible due to weather, unsuitable roadway, obstructions or other conditions VFP will, if possible, obtain the proper equipment to complete the delivery. All additional costs associated with such delivery conditions, will be billed at actual cost plus a 25% service charge.

In the event there is difficulty in getting into the job site because of unforeseen obstacles, VFP will not assume liability for any property damage as a result of being instructed by the customer's contractor to proceed; even though the VFP driver or contract carrier driver is aware of the potential for risk of damage to property.

VFP also assumes no responsibility for damage to the shelter as a result of inadequate right of ways to the job site. It will be the customer's responsibility to ensure there is proper access to the job site.

Unless previously arranged and confirmed in writing, VFP will require that a customer representative be at the job site at the time of delivery.

The customer will establish a single point of contact to coordinate schedules with VFP's transportation department.

For all deliveries prearranged without a customer representative on site and there are difficulties due to weather, unsuitable roadway, obstructions or other conditions VFP will, if possible, obtain the proper equipment to complete the delivery. All costs associated with such extraordinary delivery conditions will be billed to the customer at actual cost plus 25%.

DH

Mr. David Hodges

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Thank you for your interest in VFP and for the opportunity to provide this quotation. If you have any questions or require additional information, please call or email.

Sincerely,

Paul Pasqualini

Business Development Manager

DH



February 18<sup>th</sup>, 2020

VFP, Inc.  
5410 Fallowater Lane  
Roanoke, VA, 24018

To whom it may concern:

Positive Alternative Radio received a revised quote on 2/11/2020 for a 10'x12' concrete telecommunications shelter. This quote, reference number PAR-1A, is to provide construction of said shelter for our location in Warfield, Virginia. The price agreed to on the quote is \$33,024, exworks from Duffield, which does not include freight, off-load or set-up of the shelter at the site.

Included in this document will be the quote from 2/11/2020 provided to PAR.

We agreed to purchase the building, as quoted, from VFP.

Thank you,

David Hodges  
Director of Engineering  
Positive Alternative Radio



# PURCHASE ORDER REQUEST

USA HEADQUARTERS

2000 CORPORATE DRIVE – CANONSBURG, PA 15317 – (724) 416-2000

**Customer** Positive Alternative Radio, Inc.  
**Address** 145 Jackson St NE  
Blacksburg VA 24060

**POR Number** 155123  
**Sent Date** Mar 10 2020  
**Revision Number** 1  
**Revision Date** Mar 10 2020

**Project Management Vendor** Crown Castle - PMV  
**Project Mgr Contact** Joe Franzen  
Joe.Franzen@crowncastle.com  
**POR Creator Contact** Adriana Goglio  
Adriana.Goglio@crowncastle.com

| Line         | Customer Reference | Crown Site Reference | Transaction Details | Crown Order | Charge Code | Comment | Line Amount(s)   | Total Amount(s)  |
|--------------|--------------------|----------------------|---------------------|-------------|-------------|---------|------------------|------------------|
| 1            |                    | 858281               | Construction        | 509010      | 595799      |         | 12,593.00        | 12,593.00        |
| <b>Total</b> |                    |                      |                     |             |             |         | <b>12,593.00</b> | <b>12,593.00</b> |



# PURCHASE ORDER REQUEST

USA HEADQUARTERS

2000 CORPORATE DRIVE – CANONSBURG, PA 15317 – (724) 416-2000

**Customer** Positive Alternative Radio, Inc.  
**Address** 145 Jackson St NE  
Blacksburg VA 24060

**POR Number** 161884  
**Sent Date** May 06 2020  
**Revision Number** 1  
**Revision Date** May 06 2020

**Project Management Vendor** Crown Castle - PMV  
**Project Mgr Contact** Joe Franzen  
Joe.Franzen@crowncastle.com  
**POR Creator Contact** Erin Garrard  
Erin.Garrard@crowncastle.com

| Line | Customer Reference | Crown Site Reference | Transaction Details | Crown Order | Charge Code | Comment | Line Amount(s) | Total Amount(s)  |
|------|--------------------|----------------------|---------------------|-------------|-------------|---------|----------------|------------------|
| 1    |                    | 858281               |                     |             |             |         |                |                  |
|      |                    |                      | Construction        | 509010      | 595799      |         | 44,000.00      |                  |
|      |                    |                      | Crown 15% mark-up   | 509010      | 595799      |         | 6,600.00       |                  |
|      |                    |                      |                     |             |             |         |                | 50,600.00        |
|      |                    |                      |                     |             |             |         | <b>Total</b>   | <b>50,600.00</b> |

## Declaration of Edward A. Baker

Edward A. Baker, under penalty of perjury, declares as follows:

I am the President of Positive Alternative Radio, Inc. ("PAR"), the licensee of Radio Station WPZR-FM at Emporia, Virginia. I have reviewed the extension request prepared by our communications counsel. The statements set forth in that request as well as the supporting documentation are true and correct.

Executed this 3<sup>rd</sup> day of June, 2020



Edward A. Baker

Positive Alternative Radio, Inc.  
P.O. Box 889  
Blacksburg, Virginia 24063-0889

(540) 552-4281

**FM Broadcast Station Construction Permit**  
**File No. 0000100391**

# Federal Communications Commission

## FM BROADCAST STATION CONSTRUCTION PERMIT

**Permittee**

POSITIVE ALTERNATIVE RADIO,  
INC.  
P.O. BOX 889  
BLACKSBURG, VA, 24063

|                  |                    |
|------------------|--------------------|
| <b>Call Sign</b> | <b>Facility ID</b> |
| WPZR             | 88666              |

|                                  |  |                                      |
|----------------------------------|--|--------------------------------------|
| <b>File Number</b><br>0000100391 | <b>This Permit Modifies License File No.</b><br>0000072390 |                                      |
| <b>Filing Date</b><br>01/27/2020 | <b>Grant Date</b><br>03/18/2020                            | <b>Expiration Date</b><br>07/28/2020 |

|   |                                |                               |                            |
|---|--------------------------------|-------------------------------|----------------------------|
| <b>Community of License</b><br>City: EMPORIA<br>State: VA | <b>Frequency (MHz)</b><br>89.3 | <b>Station Channel</b><br>207 | <b>Station Class</b><br>C3 |
|---|--------------------------------|-------------------------------|----------------------------|

**Hours of Operation:** Unlimited

**Facility Type:** Noncommercial Educational

|  |  |
|--|--|
| <b>Transmitter</b><br>Certified for Compliance. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules. | <b>Transmitter Output Power</b><br>As required to achieve authorized ERP.              |
| <b>Antenna Type</b><br>Non-Directional   | <b>Antenna Coordinates (NAD 83)</b><br>Latitude 36-53-52.8 N<br>Longitude 77-48-10.3 W |
| <b>Major Lobe Directions</b><br>Not Applicable   |  |

|  |                                       |                                     |
|--|---------------------------------------|-------------------------------------|
|  | <b>Horizontally Polarized Antenna</b> | <b>Vertically Polarized Antenna</b> |
| <b>Effective Radiated Power in the Horizontal Plane (kW)</b> | 10.5                                  | 10.5                                |

|  |     |     |
|--|-----|-----|
| <b>Height of Radiation Center Above Ground (meters)</b>          | 112 | 112 |
| <b>Height of Radiation Center Above Mean Sea Level (meters)</b>  | 216 | 216 |
| <b>Height of Radiation Center Above Average Terrain (meters)</b> | 133 | 133 |

|   |  |
|---|--|
| <b>Antenna Structure Registration Number</b><br>1050682   | <b>Overall Height of Antenna Structure Above Ground (meters)</b><br>See the registration for this antenna structure. |
| <b>Obstruction Marking and Lighting Specifications for Antenna Structure</b><br>See the registration for this antenna structure.  |  |
| <b>Special Operating Conditions or Restrictions</b><br>The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines. |  |

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules(See Section 83.875).

Pursuant to Section 73.3598, this Construction Permit will be subject to automatic forfeiture unless construction is complete and application for license is filed prior to expiration.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.