

EXHIBIT SUPPORTING FURTHER EXTENSION OF ENGINEERING STA

LR Telecasting LLC is the licensee of repack station KMYA-DT, Camden, Arkansas. Pursuant to Special Temporary Authority, the Station has been operating at reduced power since it vacated its pre-auction channel. The current STA expiration date is August 31, 2020. The reasons for the STA have been set forth in an evolving narrative that LRT has provided to the Bureau multiple times over many months. Those facts have been the predicate for the Bureau's extending, several times, KMYA-DT's temporary authority to operate at variance from the parameters specified in its post-auction authorization.

In its prior STA extension request, granted by the Bureau on May 21, 2020 (LMS File No. 0000113816), LRT summarized the most recent facts as follows:

As the Commission is aware, construction of the post-repack facility was *in fact completed* in December 2019. The station could not be activated and a covering license application filed, however, because anomalous voltage readings raised a safety concern. In due course it was determined that these electrical anomalies resulted from an incompatibility between the electrical configuration of the power pole transformers and the configuration that the new transmitter requires in order to operate properly. The solution was to replace the legacy transformers.

The transformers are owned by Entergy, the local electric utility. Therefore, it was necessary for LRT to enter into an arrangement, termed by Entergy an *Agreement to Change Existing Facilities*, whereby Entergy would install the updated equipment for a fee paid by LRT. The paperwork to initiate that project was begun in late December 2019. As we apprised the Media Bureau in our previous tolling request, however, the Entergy personnel working on this matter suddenly stopped communicating. Numerous attempts by LRT to motivate their re-engagement were unsuccessful. At the end of the day, the only explanation LRT could fathom was that Entergy, in the exercise of its prerogative as a monopoly utility, simply decided to turn its attention elsewhere.

LRT's efforts to revivify the project continued to be unsuccessful. We assumed, moreover, that the inefficacy of those efforts was being exacerbated by the exigencies created by the COVID-19 pandemic. Earlier this week, counsel for LRT sent yet another email to one of Entergy's senior officers, imploring her assistance. Late yesterday (May 14) we received the following email from the Entergy engineer with whom LRT had originally worked last December:

In the referenced May 14 email, Entergy's engineer apologized for the company's silence. He attributed this to bureaucratic confusion exacerbated by the effects of COVID-19. He also indicated that Entergy was ready to move forward with the transformer-replacement work.

Heartened by this response, LRT sought from Entergy the necessary reissuance of the *Change Facilities* documentation. But again, inexplicably, Entergy failed to engage. LRT tried repeatedly over many weeks to obtain the documents. Last month, LRT received its first communication from Entergy since May – in an email requesting additional information in order to begin the papering process. LRT provided this information – whereupon Entergy again went silent until last week, when Entergy's engineer contacted LRT's counsel and the *Change Facilities* documents were finally received.

We are at a loss to explain Entergy's behavior but the pandemic appears genuinely to be a factor, at least insofar as the company's recent actions are concerned. The current business environment is fraught with

bizarre dynamics that are unique and wholly uncharacteristic of normal times. It would be presumptuous for LRT to second-guess Entergy's pandemic-related explanation for its behavior.

We can report that the recently-received *Change Facilities* documentation appears to be the complete paperwork needed to activate the project; and that LRT's counsel and Entergy's engineer, in the past week, have had half a dozen telephone conversations meant to ensure that the project is on track. We view this as reliable evidence of Entergy's *bona fides* and actual commitment.

Entergy's engineer has assured LRT that the project can be completed within 60 days. In an abundance of caution, we respectfully ask that the FCC afford LRT a 90-day extension of the current August 31 STA deadline – to November 30, 2020. Contemporaneous with the instant submission, LRT has filed a request for further tolling of the construction permit's expiration date, also to November 30, 2020.