



**PENSACOLA  
CHRISTIAN  
COLLEGE®**

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November 23, 2020

I, Jeff Surgeon, Manager of Stations for Pensacola Christian College, Inc., certify under penalty of perjury that the following is true and accurate to the best of my knowledge:

I am the Manager of Stations for Pensacola Christian College's radio stations including non-commercial educational W205BR, (facility id 88492), an FM translator licensed to Elmira, NY, and I am the individual at the College with responsibility for W205BR and other non-commercial educational College stations. My career in broadcasting in working with radio stations has spanned 31 years. The College has been licensee of W205BR since 2002 providing service to the surrounding residents.

The Station was scheduled to be back on air at a new tower site before expiration of its extended STA on October 4, 2020, but as stated below, and in the statement of Gordon Ichiwaka, with GRI Telecom, Inc., charged with construction of the Station at the new site, due to COVID-19, GRI Telecom, Inc. was unable to obtain a tower crew in time for the Station to be on air by October 4, 2020. He further states he has now found a tower crew and he has scheduled to perform the installation of the Station's equipment in mid-November and no later than November 20, 2020, and he did so. As of November 20, the installation was completed.

The following is the background to the current status and reflects substantial efforts by the College to return the station's on-air service.

Due to damage to its antenna from a wind storm, and after unsuccessful efforts for repair, including an inspection of the antenna, it was determined that intermittent operation issues required a new antenna and W205BR was taken off the air on October 3, 2019. We obtained Special Temporary Authority to remain silent which was granted on December 2, 2019.

Our next step on October 29, 2019, was to obtain permission from the tower owner to replace our antenna. We contacted Mark Cicora, the county employee with the Emergency Operations Center ("EOC"), who we were accustomed to communicating as to the tower and who was the governmental employee handling the tower for the governmental landlord, Chemung County. We found out that a new EOC staff member, Kristan Card, had taken over this project within EOC and needed time to look into the College's need to install a new antenna. On November 20, 2019, she responded as follows:

*"Hi Jeff- I am copying my new coworker Doug Houper on this as well, as we have been having meetings on our radio system which included discussion regarding Crane Road Tower. We have been told that the tower is overloaded, some portions of the tower as much as 400% overloaded, and no tower climbers are willing to do any work on the tower due to the safety hazards. I am not sure who you hire, but I think Doug and I will have to have a conversation with the County Executive regarding this matter. We now have knowledge about the condition of the tower and the safety issues, I am not sure we should allow anyone to climb the tower due to liability issues, and there will need to be decisions made regarding the future of this tower. I apologize for delaying you, but we are all new at this part of the job and we need to research this before we can speak to you about your equipment. Thank you for your understanding in this matter."*

The County's Kristan Card apologized for the delay to our repair efforts, but it appeared due to safety and liability issues the Station might not be able to stay on the tower but we did not give up hope.

Never the less given the concerns with the current site, and to avoid more delay in restoring service, on November 22, 2019, I contacted Don Hunt with a local television station WETM, as to the prospects of locating our antenna on their tower. We continued negotiations as to a lease into 2020, as to a location for the translator antenna and other essential terms but on February 12, 2020, the negotiations stopped as we could not reach agreement.

As the COVID-19 pandemic arrived in March 2020 on a widespread basis, our College began protective measures including working from home. Normal days were no longer normal and we were hindered in working out a solution for the Station and the inefficiencies associated with the Coronavirus delayed our efforts. Pensacola Christian College founded in 1974 has an enrollment of approximately 5000 students from all over the country and world, and a significant number of professors, support staff and employees at the College. As with many colleges and universities around the country, all at our College were severely and adversely impacted by the steps needed to help contain the Coronavirus.

By April, we determined the Chemung County tower was not going to be available and we were released from that lease. During that month, I searched for other tower site locations but wasn't finding a clearly acceptable site. One location was a GRI Telecom, Inc. tower that might work and we followed up with them. In view of the upcoming expiration of the October STA on May 30, 2020, we requested and were granted an extension of the STA to October 4, 2020. We narrowed our prospective sites to that of GRI Telecom, Inc. and pursued details with Gordon Ichiwaka of that company. We began discussions in earnest in June and July as to details, antenna location possibilities and rent. GRI Telecom, Inc. presented us with a formal Lease document reflecting our

discussions to review and we decided this site and the lease terms were acceptable. Gordon Ichiwaka, who manages GRI Telecom, Inc., communicated on July 27, 2020, that it would install our antenna, satellite dish and other equipment at the tower with a tower crew obtained by GRI Telecom, Inc. This agreement was an important factor in our acceptance of a Lease as our home base in Pensacola, FL and problems with travelling made it more difficult for us to handle the installation.

Immediately after July 27, 2020, we contacted our consulting engineer, Tim Sawyer, to prepare an application to modify the Station's site to the GRI Telecom, Inc. tower. On August 3, 2020, an application for a construction permit for modification of license was filed. A grant of a construction permit was issued on August 18, 2020.

On September 6, 2020, GRI Telecom, Inc. confirmed they would immediately schedule a tower crew. We had also ordered needed equipment for the Station for construction in accordance with the construction permit. The equipment was shipped on September 6, 2020, to Elmira to enable the installation of the equipment at the site. Also, GRI Telecom, Inc. had moved our satellite dish and transmitter from the old site to the new GRI Telecom, Inc. site.

We felt all was in order and the Station would be back on air at a new site well before expiration of its extended STA on October 4, 2020. As stated in the statement of Gordon Ichiwaka, GRI Telecom, Inc., charged with construction, due to the COVID-19 pandemic GRI Telecom, Inc. was unable to obtain a tower crew in time. He further states that he found a crew which was scheduled to perform the construction. That has been accomplished and the installation was completed.

In conclusion, as is evident, throughout the timeframe above, we took diligent and prudent steps to return the Station to on air operation to serve our listeners who have been loyal to us over the years since the College placed the station on air in 2002. I will also note that we are unaware of anytime during the past 18 years when the Station was off the air. As demonstrated, but for GRI Telecom, Inc.'s problems arising from the COVID-19 pandemic, which were beyond our control, W205BR would have easily returned to on air operation before October 4, 2020. Accordingly, we respectfully request reinstatement of the W205BR license to enable it to return to operation as the facility is constructed in accordance with the construction permit for the GRI Telecom, Inc. tower site.

By   
Jeff Surgeon, Manager of Stations,  
Pensacola Christian College, Inc.