

Request for Extension of LPTV Digital Construction Permit File No. 0000049158

Alma Vision Hispanic Network, Inc. (“AlmaVision”), licensee of LPTV Station WEYS-LP (Ch. 6), Miami, Florida (Facility ID 6035) (“WEYS” or the “Station”), hereby requests a six-month extension of time, from July 13, 2021 to January 13, 2022, to complete the construction of its digital flash-cut facility authorized in Construction Permit File No. 0000049158 (the “CP”). As will be demonstrated below, although AlmaVision has made substantial progress in planning for the conversion of the Station to digital operations, it has nonetheless been delayed this past year by unforeseen circumstances beyond its control – the COVID-19 pandemic -- as well as the necessity to devote limited financial resources to another LPTV station it owns.

I. Steps Taken Toward Construction

AlmaVision has made progress toward converting the Station to a digital facility by taking the following steps:

(1) In February of 2021, AlmaVision had its consulting engineer, Darryl DeLawder of DeLawder Communications, Inc., review the transmitting facilities authorized under the CP in anticipation of requesting quotes from equipment suppliers for the required digital transmitting equipment. That review resulted in Mr. DeLawder recommending that AlmaVision increase the efficiency of its transmitting antenna by changing from an omnidirectional antenna to a directional antenna. AlmaVision decided to follow Mr. DeLawder’s recommendation and will shortly file an application to modify the CP by specifying the directional antenna.

(2) With the decision to change the Station’s antenna made, AlmaVision requested and obtained a quote from AnyWave Communications Technologies (“AnyWave”) for all transmitting equipment needed for the Station’s digital operations. The quote from AnyWave was received on March 11, 2021. AlmaVision plans to place its equipment order as soon as practicable after the CP modification is granted.

(3) In view of the fact that AlmaVision leases the Station’s transmitter site, its representatives recently communicated with the site owner regarding the changes in transmitting equipment to be made at the site in connection with the Station’s conversion to digital operations, including the planned use of a directional antenna. AlmaVision learned that before the directional antenna may be installed, the site owner will require a structural analysis of the tower at AlmaVision’s cost. AlmaVision intends to schedule the structural analysis immediately upon receiving the above mentioned CP modification.

II. Unforeseen Circumstances and Financial Hardship

Like the vast majority of broadcasters, AlmaVision experienced an unforeseen financial setback this past year due to the substantial adverse impact of the COVID-19 pandemic on its operations and revenues. Indeed, because of the unanticipated uncertainty and financial stress caused by the pandemic, AlmaVision had to prioritize and limit its expenditures to when and where they were most needed. In 2020, those expenditures necessarily were devoted to ensuring the continued operation of

AlmaVision's only other licensed LPTV station, KTAV-LD, Los Angeles (Facility ID 6791), which had been licensed to operate on guardband Channel 46. Due to the Commission requirement that all LPTV stations operating on guardband channels terminate such operations by July 13, 2020, AlmaVision expended substantial resources to initially displace KTAV-LD to Channel 21 by July 13, 2020, and thereafter relocate the KTAV-LD transmitting facilities to a new site in August 2020. With the pandemic-induced financial setback and uncertainty, coupled with the necessary expenditure of financial resources on KTAV-LD, AlmaVision necessarily decided to push back construction of the WEYS digital facility until the latter part of the construction period under the CP.

III. Request for Six-Month Extension of Construction Period

While, it may be possible for AlmaVision to construct the WEYS digital facility before the current July 13, 2021 deadline, an additional six months for completion will guarantee the Station's ongoing service of Spanish language programming to the Miami community. Indeed, without an extension of the construction period, AlmaVision would have to obtain expedited equipment delivery from AnyWave because its quote for the project indicated a delivery date by July 31, 2021. (A copy of AlmaVision's quote from AnyWave will be made available to the Commission staff if requested.) Moreover, AlmaVision believes that it would be hard-pressed to immediately secure financing for the construction project in order to meet the current July 13, 2021, deadline. However, an extension of time, through January 13, 2022, will provide AlmaVision a needed "cushion" to build back its own financial resources and/or obtain third-party financing for its construction costs.

As set forth above, AlmaVision has proceeded in good faith toward the conversion of WEYS to digital operations. While it has made progress, it has also been impeded this past year by pandemic-induced financial strains and uncertainty, as well as the necessity to devote financial resources toward ensuring the continuing operation of its other LPTV station. AlmaVision submits that these circumstances justify an extension of time to complete the construction of the WEYS digital facility. In that regard, while AlmaVision certainly hopes to construct the digital facility as soon as practicable (and is incentivized to do so by the fact that its analog operation must terminate by July 13, 2021), out of an abundance of caution and prudence, a six-month extension of the construction period, to and including January 13, 2021, is respectfully requested.