

## **EXTENSION REQUEST**

Point Broadcasting Company ("Point" or "Applicant"), permittee of a new low power television station K33QN-D ("Station") to serve Monterey, CA ("Point" or "Applicant") hereby requests a 180-day extension of the deadline under its construction permit ("Permit") for Facility ID: 182665, FRN: 0001530591 pursuant to the procedures set forth in the *Public Notice* dated March 4, 2021.<sup>1</sup>

Point's Permit for operations on Channel 33 was first granted on February 18, 2020 and is set to expire on July 13, 2021, a little less than 17 months after the grant date. While this was a little less than half the time normally provided for constructing a new television station, Point initially believed that it would be able to do so within that short 17-month time frame.<sup>2</sup> Point and its principals have deep experience in developing and building transmitter facilities, having established or rehabilitated many transmitter sites over a 33-year time span in numerous services, including but not limited to cell phone sites, microwave sites, and FM broadcast sites.

But this last year was different. Point's construction period unfortunately coincided precisely with the Covid-19 Pandemic, which has had devastating impact not only on the economy at large, but also on the finances of all broadcasters, and on the ability of technicians to travel to and install electronic equipment, antennas and lines in shelters and towers in a normal time frame. The Pandemic unleashed massive economic harm on the entire broadcast industry and its personnel, and Point was no exception. Point operates approximately 25 radio stations in California. Point suffered an unprecedented cash revenue decline of 26 percent in 2020 due to the Pandemic. In the industry, many staff members sadly had to be laid off or reduced to part-time service, and again Point was no exception. Airlines stopped flying, which made it difficult and ultimately impossible for Point's consulting engineers and installers in distant states or cities to go to its transmitter sites.

In spite of all of these challenges, Point has managed to accomplish the following with respect to the Station:

Point has engaged Anywave Communication Technologies to supply all the equipment necessary to construct the Station. Their quote is attached as an exhibit to this application. As noted in the quote, delivery has been promised by June 30, 2021, but delivery by that date cannot be guaranteed.

Likewise, Point has reconfirmed with American Tower Corporation that the tower space Point specified in the Permit is open and available for use as proposed. That particular tower has other space available as well, so Point is expecting to finalize a tower lease soon.

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<sup>1</sup> *Media Bureau Reminds Low Power Television and Television Translator Stations of July 13, 2021, Digital Transition Date*, Public Notice, DA 21-260 (MB Mar. 4, 2021).

<sup>2</sup> Point was granted other LPTV construction permits in 2020, which have 2023 expiration dates. While the underlying permit for this facility was granted in 2019, it still has not had a full 3 years in which to construct. While the current expiration date may be in error, we are nevertheless offering this request for extension in an abundance of caution.

And Point is working with its long-standing principal tower, antenna and line installer, Com Plus, for installation of the Station's antenna and lines in July 2021.

But Point's permit is expiring on July 13, 2021. It will be nearly impossible for Point to finish construction of the Station's site by that date, despite Point's desire to do so.

Accordingly, Point is requesting a 180-day extension of time to complete construction of the Station.

This extension of time, when coupled with the short 17-month initial construction period, is still much shorter than the typical 3-year construction period for broadcast stations.

This additional period of time is needed because the Pandemic is not yet over. Air Travel for Point's consulting engineers and installers is still severely restricted. Mask requirements and social distancing create great difficulties for technicians working in hot confined spaces such as transmitter buildings. Broadcast revenues are still far below normal levels.

And this particular project is requiring equipment to be manufactured remotely and shipped over long distances to the Station's transmitter site near the coast in Central California, and then installed by an expert crew of installers that is based hundreds of miles away in Los Angeles.

Even one person getting sick from Covid-19 anywhere in this supply chain, or within the installation crew, could cause the current construction deadline to be missed and the project, and Point's efforts and investment therein, entirely wasted.

Furthermore, California is the nation's most populous state, with much of its huge population concentrated along its coast, from San Francisco down to San Diego. That population has been severely impacted by the Pandemic. California has accordingly imposed extremely protective public health measures, requiring masks and social distancing nearly everywhere.

This project may require the installers to work in relatively close quarters and hence they may need to be vaccinated, depending on the circumstances. Currently vaccinations are available in California only to persons over 65 or with certain pre-existing conditions. Most antenna and tower installers are considerably younger than 65, so there is also a high risk of a delay due to the unavailability of vaccinations for their age bracket.

Point still hopes that construction of this station can be completed in early July, prior to the July 13 expiration of the construction permit. But, as this past year has taught everyone, circumstances can change quickly and often not for the better. Thus, this additional time is being sought in an abundance of caution. Applicant submits that a grant of this extension request would serve the public interest by providing additional time for Applicant to complete construction of the authorized facility and allow it to provide a new programming service to the viewing public.