

EXHIBIT SUPPORTING EXTENSION OF ENGINEERING STA

LR Telecasting LLC (“LRT”) 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. Under the most recent extension of the STA its expiration date is August 31, 2021.

The post-auction construction permit for KMYA-DT also has a deadline of August 31, 2021, pursuant to tolling. Today we have filed a request for further tolling to extend the expiration date of the CP to November 1, 2021 (LMS File No. 0000158160). By the instant filing we seek a further extension of the STA, likewise to November 1, 2021. This will harmonize the end-dates of the CP and the STA.

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Although the Bureau is familiar with the background, we summarize it briefly below in §1. In §2 we report progress and describe the unforeseen obstacle necessitating the instant request.

§1. Construction of the post-repack facility was materially 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 anomalies resulted from an incompatibility between the electrical configuration of the power pole transformers and the configuration that the station’s new Continental Electronics transmitter requires in order to operate safely and properly.

Solving this problem required replacing the legacy power pole transformer bank. The transformers are maintained by Entergy, the local electric utility, whose jurisdiction extends to the power poles. Entergy finally replaced the transformers in late January 2021. This was expected to be the final step before the post-transition facility could be activated and a license-to-cover filed.

However, when testing of the new power pole transformers was initiated, an over-voltage occurred, causing damage to several pieces of electrical equipment in the transmitter building. The over-voltage resulted from an incompatibility between the newly-installed power pole transformers and a step-down transformer inside the transmitter building used to convert the incoming (higher) voltage to a (lower) voltage compatible with the building equipment.

The solution to this problem was to install a suitable step-down transformer. A local mechanical contractor, GLENN Mechanical, was engaged to handle this work. It was expected to be completed in early February. However, two matters disturbed that timeline. First, a family member of the individual in charge of the project contracted COVID-19 and passed away suddenly. This halted activity for three weeks. When the repercussions of that personal tragedy had settled and the project was again on track, GLENN Mechanical realized it had erred in thinking that the new transformer was in reserve locally. Instead, the equipment had to be ordered. At that juncture there was a further delay in delivery of the equipment caused by global supply chain backups.

The step-down transformer was installed on May 19 and 20. However, LR Telecasting’s field engineer and project manager – the person responsible for executing the final steps of the project – suffered a massive heart attack and was hospitalized for several weeks. His ongoing convalescence required that LRT find someone who could step into the project – in particular, a highly-competent person with relevant expertise and experience who could quickly be brought up to speed. LRT identified and engaged this resource. He was at that point finishing another project at a Repack station in Mobile, Alabama, but would be finished soon and then go immediately to the KMYA site in Camden, Arkansas.

§2. This transition occurred as projected. Subsequently, all matters required for completing construction were accomplished. It remained only for a team from Continental Electronics (the manufacturer of the Station’s post-auction transmitter) to travel to the KMYA site for the final electrical performance-testing. The CEC team arrived at the site on August 18. Because of the delay that had occurred since the transmitter’s original installation, CEC decided to perform conditioning work on the water cooling system prior to activating the

transmitter itself. The cooling pumps ran normally and no issues were identified. However, water leaks were detected in the heat exchanger and outside plumbing components. GLENN Mechanical was then brought back to the site to evaluate this situation. They determined that the plumbing components easily could be replaced but that the heat exchanger was too damaged and a new one would have to be secured.

In response – as a temporary solution that would enable LRT to meet the August 31 deadline – LRT’s field engineer¹ proposed installing a heat exchanger that previously had been used at the station and was still on hand in storage. This was a highly-informed recommendation: Our field engineer has five decades of technical experience and is intimately familiar with the KMYA-DT operation. He was highly confident that this alternative strategy would work, ensuring that the August 31 deadline would be met. On August 24, the used heat exchanger was moved to the transmitter facility, cleaned, and tested to confirm its soundness. Just as our field engineer had predicted, the used equipment functioned properly. LRT apprised CEC of this result and its decision to move forward with this temporary arrangement.

Continental Electronics, however, refused to endorse this plan. It’s view was that use of the substitute heat exchanger posed too significant a risk of damage to the new transmitter. In particular, according to CEC, tiny particles from potential corrosion in the substitute equipment and even algae residues could clog the cooling channels, compromising the new transmitter’s performance, or worse, causing component failures within the transmitter system as a whole.

Considering Continental’s stance, the cost of the new transmitter (in excess of \$400,000 in Repack Funds), the potential violation of warranty conditions if such conditions are not strictly observed, and – most important – the necessity for LRT to be confident in the new transmitter’s performance over the long term – LRT concluded that the prudent course was to accede to Continental and wait for the new heat exchanger to arrive. Continental advises that lead time for the delivery of this equipment is currently 4-5 weeks. Accordingly, they project that the installation can be finalized by the end of October.

For these reasons, LRT respectfully asks that its Special Temporary Authority be extended to Monday November 1, 2021.

¹ By this point our field engineer’s health had improved to the point that he was able to supervise work at a general level.