

**Request for Special Temporary Authority to Remain Silent,
Tolling of Construction Permit Deadline, and
Waiver of Section 312(g) of the Communications Act**

Iglesia Pentecostal Vispera del Fin (“Iglesia”), licensee of KNIK-LP, Anchorage, AK (Facility ID 21492) (the “Station”), hereby requests retroactive Special Temporary Authority (“STA”) to remain silent and tolling of the Station’s construction permit and Commission’s analog-to-digital transition deadline for low power TV stations (or, alternatively, a waiver of the tolling rule to receive additional time to construct). Additionally, because the Station has been silent since July 13, 2021, Iglesia requests waiver of Section 312(g) of the Communications Act to permit the Station to remain silent beyond 12 consecutive months.¹ For the reasons set forth herein, grant of the STA, tolling request and waiver of Section 312(g) are in the public interest.

A construction permit deadline may be tolled where necessitated by circumstances beyond the licensee’s control.² The Commission will also entertain waivers of the tolling rule’s strict provisions and provide additional time for construction where “rare and exceptional circumstances” prevent construction.³ The Commission has acknowledged that licensees of stations in Alaska face unique challenges in transitioning low power TV stations to digital.⁴ Iglesia respectfully submits that, for a small, not-for-profit religious broadcaster, the ongoing pandemic and supply chain disruptions and unique environmental conditions of Alaska are circumstances beyond its control that have impeded and delayed construction of the Station’s digital facilities.

Iglesia acquired the station pursuant to grant of a long-form assignment application on July 30, 2021. *See* LMS File Nos. 0000133359 and 0000155666. The previous licensee had filed for and received a digital flash cut construction permit (“CP”) and an extension of the CP construction deadline through January 10, 2022. *See* LMS File Nos. 0000152141 (granted on July 12, 2021) and 0000152327 (granted on July 13, 2021). Due to a miscommunication between the previous licensee and Iglesia at the time of assignment and subsequent administrative oversight, Iglesia believed the Station received an STA to remain silent when it received its CP extension and did not file its own STA or tolling of the CP construction deadline beyond January 10, 2022. Iglesia has since requested ongoing assistance from FCC counsel to ensure that required filings for the Station are timely submitted going forward.

Since acquiring the Station, Iglesia has worked diligently toward constructing the Station’s digital facilities. It has negotiated a new multi-year Antenna site lease and purchased

¹ See 47 U.S.C. § 312(g).

² See 47 C.F.R. § 73.3598(b).

³ See *1998 Regulatory Review - Streamlining of Mass Media Applications, Rules and Processes*, Memorandum Opinion and Order, 14 FCC Rcd 17525, 17536, para. 42 (1999).

⁴ See *State of Alaska Request for Waiver of Section 74.731(m) of the Commission’s Rules - Low Power Television Analog Termination Date*, Order, 36 FCC Rcd 10765, 10769, at para. 11 (June 21, 2021) (noting that “necessary tower site work can only be completed for a short window of ‘Alaska Summer’ lasting approximately 12 weeks a year.”).

the equipment necessary to complete construction. The attached estimates and invoices show that Iglesia has spent over \$100,000.00 with Electronika America on equipment alone since October 2021. However, Iglesia has encountered several equipment delivery delays from the manufacturer's main factory in Italy associated with the COVID-19 pandemic and ongoing supply chain disruptions along with installation delays associated with difficulty getting on the schedule of the only tower crew in the area. Further impeding Iglesia's ability to construct the digital facility by January 10, 2022 was the fact that the tower site was covered in snow during the winter. Access to the site remained impossible even in March 2022 when Iglesia brought (at its own expense) the engineer of the transmitter and antenna manufacturer to Anchorage to do an inspection of the site.

Given the substantial resources that Iglesia has devoted to constructing the Station's digital facilities to resume operations, Iglesia respectfully requests tolling of the CP construction deadline and Commission's analog-to-digital transition deadline while it completes construction of the Station's digital facilities.

Grant of these requests would serve the public interest and promote equity and fairness. It would preserve the license of a station that (a) was required to suspend operations due to the LPTV digital transition (and, Iglesia believes, would have had to permanently discontinue operations if Iglesia had not purchased it), (b) faced unexpected delays in commencing digital operations due to an ongoing global pandemic, resulting supply chain issues, and environmental conditions unique to Alaska, and (c) has invested significant resources during an extraordinarily difficult time for small broadcasters to get the station back on air. Iglesia will continue to work diligently toward completing the Station's digital transition and, if authorized to do so, anticipates that the Station will be able to resume operations with its authorized facilities to serve the Anchorage, AK community this September.



ESTIMATE

Date	Estimate #
10/19/2021	6468

Name / Address
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA

Item	Description	Qty	Total
Encoder ATSC3.0	DTV Innovations Medusa broadcast Platform ATSC 1.0/ATSC 3.0 Complete Station Solution in a box 1RU highly configurable video server 2 - 3G SDI inputs 2 Gigabit Ethernet Interface Dual redundant Power Supply 1 Year warranty ATSC 3.0 Complete Station Solution software Include : - 1 Ch HD/SD MPEG2/H.264/HVEC Encoder - Support MPEG1L2, AAC, or Dolby AC3 audio Encoder - DASH Packager - MetaWright 3 - ATSC 3.0 ESG & Signaling Generator - ROUTE Encapsulator - Broadcast Gateway Terms: 100% Prepayment Delivery time 45 days after payment is received Call letters KNIK-LP , Anchorage, AK Ch 6	1	33,000.00
		Total	USD 33,000.00



ESTIMATE

Date	Estimate #
10/20/2021	6473

Name / Address
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA

Item	Description	Qty	Total
ALDEAST03x133x	ALDENA AST03x133x Yagi antenna 3 elements working band: 47÷88 MHz Band width: approx 3MHz GAIN: 7 dBd (9.2 dBi) VSWR: = 1.2:1 (-20.8 dB) POLARIZATION: Horizontal (or Vertical) IMPEDANCE: 50 Ohm unbalanced HALPOWER BEAMWIDTH: E-Plane - 60° H-Plane - 90° POLARIZATION: Horizontal (or Vertical) LIGHTNING PROTECTION: all metal parts DC grounded AVAILABLE VERSION AND CODE: AST03x1335 - N female connector - 600W AST03x1336 - DIN 7/16 female connector - 1400W AST03x1337 - EIA 7/8" flange - 2000 MECHANICAL DATA MATERIALS: mounting bracket and bolts in hot dip galvanized steel, stainless steel elements, Teflon isolators, silicon O-Rings, aluminum components MOUNTING: directly on supporting structure MOUNTING BRACKET: included for Ø 50÷114mm. pipe ICING PROTECTION: optional redone (code XRAST35) TREATMENTS: hot dip galvanized bracket, aluminum components military grade treated MIL-C-5541 ANTENNA DIMENSIONS: 2040x2520x150 mm WEIGHT: 12 Kg WIND SURFACE: 0.06 m2 front - 0.21 m2 side WIND LOAD (at 160Km/h and 30° C air temperature): 13.00 Kg front - 17.44 Kg side SURVIVAL WIND: 180Km/h PACKING DIMENSIONS: box: 2150x200x150 mm - 17Kg gross SPECIAL FEATURES: optional safety rope in parafil® and stainless steel turnbuckle (cod. XPAR & XTEN1.5T)	1	2,810.50
FREIGHT IN FACTO...	FREIGHT FROM: ITALY TO MIAMI PACKING: BOX: 2150x200x150 mm - 17Kg EXWORKS MIAMI, FL Call letters KNIK-LP , Anchorage, AK Ch 6	1	550.00
		Total	USD 3,360.50



ESTIMATE

Date	Estimate #
4/21/2022	6491

Name / Address
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA

Item	Description	Qty	Total
SIRAFMC01/04C	ANTENNA SYSTEM FOR ALASKA Call letters KNIK SIRA FMC01/04/5k Antenna system, circular elliptical polarization. composed by: 04 FMC01-C + Power divider and flexible coaxial cables. input power 5 kw cw, input connector EIA7/8. antenna height: 9 m. Antenna weight: 55 kg. Antenna wind load: 1.44 kn. frequency band 87.5 to 104 and 92 to 108 MHz. Gain: 4.5 dB or 2.82 times. PACKAGE NOT INCLUDED	1	5,746.30
FREIGHT IN FACTO...	FREIGHT FROM FACTORY TO MIAMI Pallet - 1900x820x850mm - 85kg Call letters KNIK-LP , Anchorage, AK Ch 6	1	1,872.00
		Total	USD 7,618.30



ESTIMATE

Date	Estimate #
10/19/2021	6469

Name / Address
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA

Item	Description	Qty	Total
ELETXVD600AACB1	<p>ELETTRONIKA TXVD600AACB1 Digital TV Transmitter. Power 600w RMS with dynamic adaptative automatic pre-correction. composed by: DynaMaia exciter. all standards available. Inputs: 02 x ASI with smart switch and streaming monitor. Dynamic automatic linear, non linear and static pre-correction. Built in Power Optimizer. Frequency agile VHF band 1 (CH 2 up to CH6). Crest factor compensation. Automatic bit rate adapter, PBRS and NULL test signal generator + DAT600AC power amplifier with redundant switching power supply (no external voltage regulator required), latest generation LDMOS technology. High efficiency. Voltage and current of each device available on screen as well as measurements of FWD power, REF power, Input power and Temperature. MER, SHOULDERS and SPECTRUM monitor. Redundant forced air cooling system. Remote control wired and serial (RS232, USB or RS485). Analog telemetry and interlock port DB9. Stringent mask filter. Installed in rack 20u. OPTIONAL: SNMP web server remote control. Dual drive. Full service mask filter. LP filter (only for special frequencies). IP Streaming input port. Touch Screen Monitor. SNMP & WEB server remote control. Dual Digital Standards</p> <p>*****Channel 6 Standard ATSC 3.0*****</p>	1	35,741.00
ELEWEBSERVERC...	ELETTRONIKA SNMP CARD KIT	1	600.00
COM-TECHHR6P110A	COM-TECH 2XHR6P110A 6-Pole DTV Filter B1. Cavity Size 110 mm. Frequency Range 47-100 MHz. Bandwidth 6-8 MHz. Temperature Stability < 4 kHz/K. Max Operating Temperature (Body) 65°C (149°F) Environmental Conditions -5 to +55°C (+23 to +131°F). Dimensions 490x207x515 mm. Weight 40 kg (88 lb.). Connectors available DIN716, EIA7/8, EIA1-5/8. Max power input ATSC: 2.1 kW RMS.	1	4,582.00
Total			



ESTIMATE

Date	Estimate #
10/19/2021	6469

Name / Address
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA

Item	Description	Qty	Total
	<p>3 year warranty . Delivery time 60 to 90 days (it needs to be determent) Units is ATSC 3.0 Equipment FOB Miami, Fl. Offer valid till 10/31/2021</p> <p>Terms: Delivery time 90 days after order is placed 3 years warranty Equipment FOB Doral, Fl. Payment: 50% for the order the rest before shipment</p> <p>*****This estimate does not include Labor, Encoder , Cable or connectors and accessories that maybe necessary for the Job*****</p> <p>Call letters KNIK-LP , Anchorage, AK Ch 6</p>		
		Total	USD 40,923.00



INVOICE

Date	Invoice #
3/7/2022	3795

PAID
04/13/2022

Bill To	Ship To
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA	

S.O. #	P.O No	Terms
3719		Due on receipt

Item Code	Qty.	Description	Price Each	Amount
PROFESSIONAL	1	One day visit to Anchorage, Alaska to do survey of the transmitter site 03/02/2022	2,150.00	2,150.00
PROFESSIONAL	1	Air tickets 2 people Alaska airlines on 03/02/22 return 03/03/2022	1,178.78	1,178.78
		Call letters KNIK-LP , Anchorage, AK Ch 6		0.00

	Total USD 3,328.78
NO CREDIT WILL BE ISSUED AFTER 40 DAYS FROM INVOICE DATE. WE RESERVE THE RIGH TO IMPOSE 20% RESTOCKING ON REGULAR ITEMS AND 50% ON SPECIAL ITEMS CREDIT RETURN. WARRANTY IS SUBJET TO MANUFACTURES TERMS AND CONDITIONS	2201 NW 102 PLACE, UNIT 5 DORAL FL. 33178 Ph: 305 5924506 Fax: 305 5943499



INVOICE

Date	Invoice #
6/20/2022	3802

Bill To
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA

Ship To

S.O. #	P.O No	Terms
3722		Due on receipt

Item Code	Qty.	Description	Price Each	Amount
ELEMIZAR50	1	ELETTRONIKA MIZAR50 FM TRANSMITTER POWER 50W, INPUTS 02 SCA + 01 MPX + 01 MONO. SWITCHING MODE POWER SUPPLY, RS232 or RS445 PORT FOR REMOTE CONTROL, FULL FUNTIONS FRONT DISPLAY. Mizar 50 210400097850	1,571.00	1,571.00
ELEEKA3000S	1	ELETTRONIKA DAT3.0 FM Amplifier. input power: 25w output power: 3kW, Microprocessor controlled, MOSFET Technology, switching mode power supply Dat4f 211200098084	10,385.00	10,385.00
		Esta unida ira intregada en el mismo Rack donde estara el transmisor de 600 wt Canal 6 .		0.00
		Falt facturar el labor y accesorios de instalacion.		0.00
		Call letters KNIK 87.7 Mhz		0.00

			Total	USD 11,956.00
NO CREDIT WILL BE ISSUED AFTER 40 DAYS FROM INVOICE DATE. WE RESERVE THE RIGH TO IMPOSE 20% RESTOCKING ON REGULAR ITEMS AND 50% ON SPECIAL ITEMS CREDIT RETURN. WARRANTY IS SUBJET TO MANUFACTURES TERMS AND CONDITIONS			2201 NW 102 PLACE, UNIT 5 DORAL FL. 33178 Ph: 305 5924506 Fax: 305 5943499	



INVOICE

Date	Invoice #
7/11/2022	3803

Bill To
Iglesia Pentecostal Vispera Del Fin DBA Centro Familiar Cristiano 10612 15th Ave. Seattle, WA 98106 USA

Ship To

S.O. #	P.O No	Terms
3720	KNIK	Due on receipt

Item Code	Qty.	Description	Price Each	Amount
UBIQUITI10Gbps...	1	UBIQUITY Direct Attach Copper Cable, SFP+, 10Gbps, 0.5 meter × 2	48.00	48.00
UBIQUITIDMPro	1	UBIQUITI Dream Machine Pro Smart Firewall and Router	664.00	664.00
UBIQUITISWPR...	1	UBIQUITY model Switch Pro 24 smart switcher 24 ports	634.28	634.28
SHIPPING	1	SHIPPING AND HANDLING to Miami	150.00	150.00
PROFESSIONAL	5	Assistance over the IP/phone to install all this equipment .	190.00	950.00
		Call Letters KNIK, Alaska		0.00
		This units are set up and waiting to be shipped along with the FM and TV transmitter going to Alaska.		

	Total USD 2,446.28
NO CREDIT WILL BE ISSUED AFTER 40 DAYS FROM INVOICE DATE. WE RESERVE THE RIGH TO IMPOSE 20% RESTOCKING ON REGULAR ITEMS AND 50% ON SPECIAL ITEMS CREDIT RETURN. WARRANTY IS SUBJET TO MANUFACTURES TERMS AND CONDITIONS	2201 NW 102 PLACE, UNIT 5 DORAL FL. 33178 Ph: 305 5924506 Fax: 305 5943499