

January 13, 2022

The purpose of this document is to satisfy the request for certain information by the Federal Communications Commission. The information that was requested is as follows:

1. Date the Stations finished construction
2. Information demon starting construction was completed (electric bills, program logs, invoices for the construction, etc.).
3. Documentation regarding the stations non-profit status and information about their revenue over the past three years showing that they would be unable to afford a forfeiture given their late filings. The ideal information would be their taxes from the last three years (2020, 2019, 2018).
4. A brief written request that the Commission, instead of forfeiture, issue an admonishment for the late filings.
5. Engineering STAs seeking permission to continue operating their applications during the pendency of the license to cover application.

We have determined that the conversion from analog to digital occurred in two steps. K09HI and K11HE made the conversion on June 20, 2018 whereas K13HK converted on June 10, 2019.

Attached, is a copy of all expenditures made by the TV District during two fiscal years starting with July, 2018 and ending in June, 2020. All payments of electric bills are highlighted.

The Garfield County TV District is a government entity formed under the laws of the State of Montana covering Special Purpose Districts. Reports are made annually to the State Department of Administration which are also attached. These Accounting Reports indicate an ending balance of \$4,677.11 for fiscal year ending 6/30/20. For fiscal year 2021, the ending balance is \$8,777.45.

There is no question that the TV District failed to notify the Commission of its conversion to digital and failed to file the proper License to Cover applications in a timely manner. But, as stated in a "Pleading before the FCC" attached to the License to Cover applications, they thought they had instructed a reputable agency to file on their behalf. One can also clearly see that they do not possess the funds for a financial penalty. Consequently we request that the Commission consider an admonishment rather than a forfeiture.

Engineering STA's were filed in December, 2021.

Respectfully submitted on behalf of the Garfield County TV District,

Charlie Cannaliato  
Consulting Engineer