

**Request for Limited Extension of Deadline to Submit Invoices for Reimbursement
from TV Broadcaster Relocation Fund**

Word of God Fellowship, Inc. ("Licensee"), licensee of low power television station WSLF-LD, Port St. Lucie, FL (Fac. ID 2258) (the "Station") hereby requests a limited extension of the deadline to submit invoices for reimbursement from the TV Broadcaster Relocation Fund from September 6, 2022 to November 30, 2022. Good cause exists to extend the Station's reimbursement deadline because Licensee has been unable to submit its expenses due to an issue with the Commission's Licensing and Management System ("LMS").

The Licensee timely submitted its application for displacement to channel 21 on April 10, 2018. File No. 0000051784. On May 10, 2019, the Licensee filed an application to specify a different antenna. File No. 000072577. Rather than file the application as a modification of the existing displacement construction permit, the Licensee's engineering consultant filed the application as a new displacement application. The Licensee completed construction and filed its license to cover on March 2, 2022. However, because the displacement application was filed as a new application in May 2019 rather than as a modification, the Licensee has been unable to submit a Form 399 for the Station in LMS. As soon as this issue is resolved, Licensee will submit all of its invoices for the Station.

First, the Station is eligible for reimbursement. Under the Reimbursement Expansion Act, a station is eligible for reimbursement if it: (1) filed an application during the Commission's Special Displacement Window (April 10, 2018—June 1, 2018); (2) obtained construction permit following the Commission's Special Displacement Window; (3) was licensed or had a pending application for license prior to April 13, 2017; (4) was transmitting for at least 9 of 12 months between April 12, 2016 and April 13, 2017, and for at least two hours per day, and not less than 28 hours per calendar week; and (5) incurred costs because of the post-incentive auction broadcast transition.¹ The Station satisfies each of these criteria. The only reason the Licensee cannot submit the Station's expenses in LMS is because the Licensee's consultant filed a new displacement application in May 2019 rather than a modification of the existing application. But merely filing a new application does not render a station ineligible for reimbursement.²

Second, the deadline to submit expenses for the Station should be extended for the time necessary to reconfigure LMS to accept the Station's expenses and for the Licensee to submit its expenses, all of which have already been incurred. In a June 8, 2022 Public Notice, the Incentive Auction Task Force and the Media Bureau indicated that they will consider "a limited extension" of a station's reimbursement deadline where an entity faces circumstances beyond its control.³ Whereas the

¹ 47 U.S.C. § 1452(k).

² Nothing in the statute requires that the construction permit that is ultimately licensed is the permit that was applied for during the Special Displacement Window. *Cf. LPTV, TV Translator, and FM Broadcast Station Reimbursement; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 34 FCC Rcd. 1690 ¶ 26 (2019) (explaining that "if an LPTV/translator station displaced by the repacking process filed in the Special Displacement Window, had its application dismissed, and subsequently files a displacement application when the Media Bureau lifts the freeze on the filing of such applications, it will be eligible for reimbursement under the REA if its later-filed displacement application is granted").

³ See *Incentive Auction Task Force and Media Bureau Remind Reimbursement Program Participants That the Third and Final Filing Deadline Approaches in 90 Days*, MB Dkt. No. 16-306, GN Dkt. No. 12-268, DA 22-619 (rel. June 8, 2022).

Commission previously would shift the entity seeking an extension to another deadline, because this is the last deadline, the Public Notice indicated that the Task Force and the Bureau will consider whether the extension will “provide the staff with sufficient processing time to complete close-out procedures for all stations.”

Here, as explained above, the delay is wholly outside Licensee’s control due to a configuration issue in LMS. Licensee will submit its invoices and close out the Form 399 for the Station as soon as it can do so in LMS, and well before the deadline for the Commission to complete its close-out procedures for all stations.

Applying the September 6, 2022 invoice submission deadline to the Station under these circumstances is not in the public interest. Given the harm to Licensee of enforcing a deadline that does not account for the Station’s circumstances, it would be unreasonable and inconsistent with Congress’s charge for the FCC to reimburse costs “reasonably incurred” by a low power television station a result of the repack⁴ to require Licensee to submit all invoices for the Station before September 6, 2022. Because Licensee will immediately submit all invoices once the Form 399 becomes available in LMS, the requested extension should not result in any significant disruption to the Commission’s ability to complete the reimbursement process.

⁴ See 47 U.S.C. § 1452(k)(1).