

To: FCC

From: International Communications Network, Inc. (KSDY)

Re: Request for Limited Extension of Deadline for International Communications Network, Inc. (ICN) to Submit Invoices for Reimbursement for the TV Broadcaster Relocation Fund

International Communications Network (ICN), licensee of full power digital television broadcast station KSDY, 901 Lane Avenue, Suite 200, San Diego, CA 91914 Facility ID 56830, Call letters: KSDY, hereby seeks a limited extension, to and including September 06, 2022, of its current March 22, 2022 deadline to submit all remaining invoices for reimbursement from the TV Broadcaster Relocation Fund ("Fund").

By its Public Notice, *TV Broadcaster Relocation Fund Invoice Filing Deadline Approaches in Sixty Days*, DA 22-72 (rel. Jan. 21, 2022) ("Notice"), the Incentive Auction Task Force and Media Bureau ("Bureau") reminded certain television broadcasters, those repacked to different channels as a collateral consequence of the Commission's Incentive Auction, of the March 22, 2022 deadline for full power and Class A stations assigned to Phases 6-10 of the repack. The Notice (at n. 6) also made clear that, in appropriate circumstances, the Commission would entertain requests for limited extension of a station's deadline from the second to the third deadline. As shown below, KSDY's request to shift to the final submission deadline is due to unforeseen circumstances beyond its control occurring proximate to the final submission deadline.

KSDY has previously chronicled for the FCC multiple facts demonstrating that the Station repack is a project of unusually broad scope and complexity and hereby incorporates by reference that information into the instant request. KSDY has taken - and continues to take - its repack-related obligations seriously and, despite complex and unique challenges, has made substantial efforts to finalize its transition and timely submit reimbursement invoices to the Commission. Since the October 2021 First Extension Request, KSDY has been working diligently to make efficient use of its extension and to account for and finalize all outstanding steps to project completion.

This extension request follows KSDY's extensive efforts during the period after grant of its First Extension Report to find a competent and reliable tower company able and available to undertake certain necessary repack work as identified in the First Extension Request. Specifically, KSDY has worked to secure the services of a competent tower company and antenna vendor in an immediate position to provide the necessary rigging, equipment, tooling, labor and oversight to perform a complete plumb & tension of the 2,060' Guyed Tower (eight

levels of guy wires). This proved unusually difficult due to extraordinary factors previously identified by KSDY, some such as the parts and delivery in addition to a backlog of parts and available riggers. This is not foregoing other factors that remain unique in 2022 - the effect of the COVID-19 pandemic on everything from the equipment supply chain to the availability of skilled personnel, as well as the historic demand for competent tower crews associated with the repack.

As KSDY has explained, the equipment is on backorder and an additional six (6) months will be needed. Due to a backlog of qualified riggers and the challenges of the supply chains we have been notified that we are in the six (6) month window and will be notified accordingly.

Another rare, exceptional, and complicating circumstance that persists to this day is the COVID-19 pandemic. This international public health crisis directly and negatively impacted multiple aspects of this project and the broadcasting industry more generally. Those impacts include curtailing travel options of principals and crew, further compressing their schedules, already crowded due to the national Incentive Auction-related repack, and adding cascading layers of complication and delay to the ability of workers to safely perform the work required by a project on our tower. ICN recognizes that the commission has acknowledged the "fluid and challenging situation caused by the novel coronavirus (COVID-19)" in universally postponing, sua sponte, certain filing deadlines of broadcasters. COVID-19 continues to disrupt and dislocate various post-construction processes, including the need to coordinate multiple aspects of the reimbursement process with multiple companies and individuals including, but not limited to, our internal staffing.

ICN can now report that its persistence in seeking a qualified company to perform the necessary tower work has borne. Our office continues to make best efforts in maintaining communication with vendors to continue with the completion of the project(s).

The facts and circumstances presented herein amply justify grant of this requested limited extension. ICN has acted with diligence throughout this process, over multiple years, in a good faith effort to meet repack deadlines in a manner consistent with this project's complexity and risk. The Station's record encompasses many of the factors relevant to Commission analogous consideration of extension request - including the complexities associated with tall towers, tower crew unavailability, and impacts of COVID-19.

The public interest will clearly be served, and not suffer, by grant of this request. For all of the foregoing reasons, we respectfully request the Commission grant of a limited extension to September 06, 2022 of the deadline for ICN, to submit KSDY repack-related invoices for Fund reimbursement is amply justified.

Thank you for your time and consideration with this time sensitive matter.

Respectfully submitted,
Maxwell Agha