

8.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.	[Exhibit 34]
9.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date (mm/dd/yyyy)

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 34
Description:

Request to Extend STA
Sacred Heart University, Incorporated
Station WSHU(AM), Westport, Connecticut
June 2022

WSHU(AM) Narrative

SACRED HEART UNIVERSITY, INCORPORATED (“SHU”), RESPECTFULLY REQUESTS A FURTHER EXTENSION OF ITS SPECIAL TEMPORARY AUTHORIZATION (“STA”) TO OPERATE WSHU(AM) WITH TEMPORARY FACILITIES, USING THE FRONTIER TELEPHONE COMPANY TOWER AS A SUPPORT FOR A TEMPORARY SLOPING DIPOLE ANTENNA.

SHU FILED AN APPLICATION FOR A PERMANENT SITE IN SEYMOUR, CONNECTICUT, WHICH WAS GRANTED BY THE FCC. SEE BPH-20140821AFR. AFTER THE ADOPTION OF THE FIRST REPORT AND ORDER, FURTHER NOTICE OF PROPOSED RULE MAKING, AND NOTICE OF INQUIRY IN THE MATTER OF AM REVITALIZATION OF THE AM RADIO SERVICE, SHU AND ITS ENGINEERS RE-EVALUATED THE ANTICIPATED MOVE TO SEYMOUR. RELAXATION OF THE COMMUNITY COVERAGE REQUIREMENTS CAUSED SHU AND ITS ENGINEERS TO DISCUSS THE POSSIBILITY OF MAKING THE CURRENT, TEMPORARY TRANSMITTER SITE IN WESTPORT, CONNECTICUT PERMANENT, GIVEN ITS PREFERABLE LOCATION. FURTHER TECHNICAL ANALYSIS REVEALED THAT, BECAUSE THE FCC HAD NOT CHANGED THE ALLOCATION RULES YET, SHU WOULD BE FORCED TO DECREASE THE POWER OF WSHU FROM 1 KW TO 175 WATTS OMNI, WHICH WOULD NOT BE IN THE BEST INTEREST OF THE PUBLIC OR SHU.

NOW THAT THE FCC HAS ADVISED SHU THAT THE ALLOCATION SITUATION IS NOT LIKELY TO CHANGE AND SHU MUST LOOK TO AN ALTERNATIVE LICENSABLE FACILITY, IT IS CLEAR THAT REDUCED POWER OPERATION CAN NOT BE AVOIDED. SHU AND ITS ENGINEERING FIRM HAVE BEEN TESTING DIFFERENT METHODS OF FEEDING THE TOWER AT THE STA SITE, USING METHOD OF MOMENTS, AND BELIEVE THAT AN INTERNAL FEED SYSTEM WILL MEET FCC FILING REQUIREMENTS. SHU PLANS TO IMPLEMENT THAT SYSTEM AND, IF IT PERFORMS AS ANTICIPATED, IT WILL BE FORMALIZED AS PART OF A 301 APPLICATION FOR CONSTRUCTION PERMIT WHICH SHU EXPECTS TO FILE AS SOON AS POSSIBLE.

SINCE THE SUBMISSION OF THE LAST REQUEST TO EXTEND THE STA, FIRST, SHU WAS DELAYED IN TESTING THE NEW ANTENNA BECAUSE AN OSPREY BIRD NEST WAS FOUND ON THE TOWER. THEN, CONSTRUCTION PROJECTS IN THE SURROUNDING AREA DELAYED TESTING BECAUSE THERE WAS NO ACCESS TO THE TOWER SITE. A TEMPORARY ROAD TO THE SITE HAS NOW BEEN COMPLETED AND THE FEDERAL PROTECTION REQUIREMENTS HAVE ALSO BEEN RESOLVED. SHU HAS SCHEDULED A RIGGING CREW TO RECONFIGURE THE ANTENNA WHICH WILL THEN UNDERGO TESTING. HOPEFULLY A NEW FORM 301 CAN BE FILED IN THE NEAR FUTURE.

ACCORDINGLY, SHU RESPECTFULLY REQUESTS A FURTHER EXTENSION OF THE WSHU STA UNTIL THE FORM 301 APPLICATION IS FILED AND GRANTED.