

Exhibit 4

Justification for STA

VegasTV, LLC (“VegasTV”) is licensee of Station KTUD-CD, Las Vegas, Nevada (the “Station”). Station KTUD is currently silent as a result of the financial problems of the licensee. In early January 2014, VegasTV declared bankruptcy under Chapter 7 of Title 11 of the United States Code in a filing to the United States Bankruptcy Court, District of Nevada (the “Court”). The Court appointed a Chapter 7 Trustee to manage and control VegasTV. An application was filed with the FCC for approval to transfer control of the licensee to the Chapter 7 Trustee (BTCDDTA-20140310ADC) and the Commission granted that application on March 21, 2014.

The Chapter 7 Trustee, at the Court’s direction, attempted to locate a Buyer for the VegasTV assets, including KTUD. Since the Chapter 7 Trustee acknowledged that he had no ability to temporarily operate the Station, a condition to acquiring KTUD was that the Buyer agree to do everything possible to recommence broadcasting on the Station as soon as possible. The necessity to resume broadcasting became more important, since the renewal application for KTUD is due to be filed no later than June 1, 2014.

At the request of the Trustee, the Court agreed to expedite its procedures. It held a special hearing, where, by an April 4, 2014 Order, it granted the Motion of the Chapter 7 Trustee to approve the assignment of the KTUD license to Mako Communications, LLC (“Mako”). Part of the reasoning behind the Court’s decision to hold an expedited hearing and issue its Order the following day approving the assignment of license to Mako was the importance of taking any and all actions required to resume broadcasting on KTUD as soon as possible.

As part of Mako’s agreement with the Chapter 7 Trustee to acquire certain assets of KTUD, no station equipment is being assigned. Before declaring bankruptcy, the prior

ownership of VegasTV stripped virtually all of the equipment and disposed of it to parts unknown. Therefore, there exists no studio equipment and almost no transmission equipment is available to operate KTUD. In addition, there is no lease for the antenna site which can be assigned to Mako. Mako is solely acquiring the station license, station files and intangible assets. That means that, in order to resume broadcast operations on KTUD, Mako must, in effect, reconstruct the Station.

However, Mako is the licensee of three other Las Vegas television stations. Those three stations operate using a broadband UHF panel array on a tower located only 150 feet from the KTUD licensed site. To expedite construction of KTUD, Mako proposes to co-locate KTUD and combine it with Mako's three other stations, so that the four stations will operate using a single antenna. Mako does not seek to expand KTUD's contours. Instead, it is attempting to resume broadcast operations on KTUD as quickly as possible by combining KTUD with the other stations in an existing UHF panel array. All four stations will broadcast through a single antenna using a combiner and will have the same pattern..

An application to grant the assignment of license for KTUD from VegasTV to Mako was filed on April 4, 2014, the same day as the release of the Court Order approving Mako as the Station Buyer (BALDTA-20140404ABA). In an effort to reconstruct KTUD and resume broadcasting as quickly as possible, the Chapter 7 Trustee, with the assistance of Mako, filed a minor change application to relocate the Station to the Mako tower, located barely 150 feet from the KTUD site (BPDTA-20140417ABS).

Because KTUD would duplicate the patterns of the other Mako television stations in the UHF panel array, the KTUD contour slightly exceeds the current KTUD footprint.

Consequently, the application violates the Media Bureau Public Notice, DA 13-618, released April 5, 2013, imposing limits on the filing and review of modification applications.

VegasTV, through the Chapter 7 Trustee, files this Request for an STA to broadcast temporarily from the Mako combined array, located 150 feet from the current KTUD site. VegasTV requests grant of this STA Request so that Station KTUD can resume broadcasting as quickly as possible. In the Asset Purchase Agreement by and between the Chapter 7 Trustee and Mako, which has been submitted by the parties in their assignment application, it is agreed that Mako will place KTUD on air as soon as possible. That Agreement commitment was approved by the Court Order.

The best and speediest way for Station KTUD to recommence programming is to broadcast from the Mako shared antenna site. Approval of the instant STA will accommodate a Bankruptcy Court decision that the Station operate as quickly as possible. In the past, the Commission has attempted to complement the actions of the Bankruptcy Court. In fact, the Commission has concluded that it “is obliged to reconcile its policies under the Communications Act with the policies of other federal laws and statutes, including the federal bankruptcy laws in particular.” *Dale J. Parsons, Jr.*, 10 FCC Rcd 2718, para. 11 (1995). Consequently, the FCC rarely stands in the way of carrying out a Bankruptcy Court Order. Granting the instant STA Request will also serve the public interest by providing expedited service to those viewers who have come to rely on KTUD.

In sum, it is imperative that KTUD resume broadcast operations as quickly as possible. Since the Chapter 7 Trustee is admittedly unable to operate KTUD successfully, even temporarily, the best way of achieving this is for KTUD to broadcast from the shared antenna of Mako Communications. This objective may be carried out by the immediate issuance of an STA

to the licensee and by Commission approval of the pending assignment application assigning the KTUD license to Mako, so that the Trustee may satisfy his twin obligations to have the Station resume broadcasting on KTUD and dispose of the KTUD license as quickly as possible. Such Commission actions will accommodate the Order of the Bankruptcy Court.