

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0386 (July 2002)	FOR FCC USE ONLY
Extension of Existing Engineering STA		FOR COMMISSION USE ONLY FILE NO.
Read Instructions/FAQ before filling out form		

Section I - General Information

1.	Legal Name of the Applicant TOWER BROADCASTING LLC		
	Mailing Address 56 GAIL DRIVE		
	City OWEGO	State or Country (if foreign address) NY	Zip Code 13827 - 1057
	Telephone Number (include area code) 6076875544		E-Mail Address (if available)
	FCC Registration No 0023847197	Call Sign WELM	Facility ID Number 52120
2.	Contact Representative (if other than licensee/permittee) REID AVETT		Firm or Company Name WOMBLE BOND DICKINSON (US) LLP
	Mailing Address 2001 K STREET, NW SUITE 400 SOUTH		
	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20006 -
	Telephone Number (include area code) 2028574425		E-Mail Address (if available) REID.AVETT@WBD-US.COM
3.	Purpose: <input type="radio"/> Engineering STA <input checked="" type="radio"/> Extension of Existing Engineering STA File Number: BSTA - 20140131ALQ <input type="radio"/> Legal STA <input type="radio"/> Extension of Existing Legal STA		
4.	Service: AM		
5.	Community of License: City: ELMIRA State: NY		
6.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input checked="" type="radio"/> N/A (Fee Required)		
7.	Environmental Protection Act. The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an Exhibit is required. By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.		<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 33]
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		[Exhibit 34]

	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.	
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 GORDON ICHIKAWA	Typed or Printed Title of Person Signing SOLE MEMBER
Signature	Date (mm/dd/yyyy) 6/15/2022

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 13

Description: REQUEST FOR STA

THE APPLICANT SEEKS EXTENSION OF SPECIAL TEMPORARY AUTHORITY ('STA') TO OPERATE THE STATION USING A NON-DIRECTIONAL PATTERN AT NIGHT.

THE STATION IS CURRENTLY AUTHORIZED TO OPERATE 1) NON-DIRECTIONALLY, AT 5KW DURING THE DAYTIME AND 2) DIRECTIONALLY, AT 1KW DURING THE NIGHTTIME.

DUE TO DIPLEXING ISSUES, THE STATION IS UNABLE TO OPERATE IN A DIRECTIONAL MANNER DURING NIGHTTIME OPERATIONS. THE STATION IS NOT CREATING INTERFERENCE TO ANY OTHER STATIONS AND IS ABLE TO COVER ITS COMMUNITY OF LICENSE. DURING THE THIRD QUARTER OF 2022, APPLICANT WILL APPLY FOR A CONSTRUCTION PERMIT TO MODIFY THE WELM LICENSE FROM A CLASS B TO A CLASS D FACILITY TO ALLOW CONTINUED NONDIRECTIONAL NIGHT OPERATION, AND HAS RETAINED A TECHNICAL CONSULTANT TO PREPARE THIS APPLICATION. ACCORDINGLY, GRANT OF THE REQUESTED STA WOULD BE IN THE PUBLIC INTEREST.

Exhibit 33

Description: REQUEST FOR STA

THE APPLICANT SEEKS SPECIAL TEMPORARY AUTHORITY ('STA') TO OPERATE THE STATION USING A NON-DIRECTIONAL PATTERN AT NIGHT. THE STATION IS CURRENTLY AUTHORIZED TO OPERATE 1) NON-DIRECTIONALLY, AT 5KW DURING THE DAYTIME AND 2) DIRECTIONALLY, AT 1KW DURING THE NIGHTTIME. DUE TO DIPLEXING ISSUES, THE STATION IS UNABLE TO OPERATE IN A DIRECTIONAL MANNER DURING NIGHTTIME OPERATIONS. THE STATION IS NOT CREATING INTERFERENCE TO ANY OTHER STATIONS AND IS ABLE TO COVER ITS COMMUNITY OF LICENSE. DURING THE THIRD QUARTER OF 2022, APPLICANT WILL APPLY FOR A CONSTRUCTION PERMIT TO MODIFY THE WELM LICENSE FROM A CLASS B TO A CLASS D FACILITY TO ALLOW CONTINUED NONDIRECTIONAL NIGHT OPERATION, AND HAS RETAINED A TECHNICAL CONSULTANT TO PREPARE THIS APPLICATION. ACCORDINGLY, GRANT OF THE REQUESTED STA FOR A SIX MONTH PERIOD WOULD BE IN THE PUBLIC INTEREST.

Attachment 33

Exhibit 34

Description: CONTINUING CIRCUMSTANCES

A TRANSMITTER FAILURE DAMAGED ONE LEG OF THE DIPLEXER PRIOR TO RUNNING A PROOF ON IT; IN ADDITION, COVID-19 ADVERSELY AFFECTED THE LICENSEE'S ABILITY TO FIND TECHNICAL PERSONNEL TO PERFORM REPAIRS

AND TAKE MEASUREMENTS. ALTHOUGH WELM IS NOW ABLE TO MEET ITS LICENSED PARAMTERS, ISSUES REMAIN WITH THE ABILITY OF THE DIPLEXED STATION, WEHH, TO OPERATE WITHIN ITS LICENSED PARAMETERS. DUE TO THESE ISSUES, IT IS REQUESTED THAT AUTHORITY TO OPERATE AT VARIANCE DURING THE NIGHTTIME HOURS BE CONTINUED SO THAT THE APPLICANT CAN RESOLVE THESE ISSUES PERMANENTLY.

Attachment 34
