

EXHIBIT 32
CIRCUMSTANCES WARRANTING EXTENSION OF STA

Reach Communications, Inc. (“Reach”), by its attorneys, submits the foregoing request for extension of Special Temporary Authority (“STA”) to operate Station W271AP at variance from its licensed parameters. Reach was initially granted an STA on August 8, 2012, *see* File No. BSTA-20120807AAQ; on February 25, 2013, the Commission extended the STA to August 26, 2013. *See* File No. BESTA-20130206AAA

In late 2011, Reach and Educational Media Foundation (“EMF”) each agreed to modify their respective translator stations in the Jacksonville, FL area in order to improve their services while avoiding potential interference to one another’s operations. EMF filed for, and was granted, a construction permit for minor changes to its station, and has since completed the changes authorized by that construction permit. *See* File Nos. BMPFT- 20120130ADC; BLFT- 20120514AFH. Reach filed for, and was granted, a construction permit for minor changes to Station W271AP. *See* File No. BPFT-20111003AFW (the “Permit”). Specifically, the Permit authorized Reach to operate on Channel 272 instead of the originally-authorized Channel 271, and authorized operations at higher power than originally authorized. The Permit will expire on November 14, 2014.

Reach promptly prepared to modify the facilities to operate on Channel 272, so as to avoid interference to other stations, including the modified operations of EMF. However, pending Reach’s receipt of the necessary equipment, Reach’s lease for the transmitter site authorized under both the existing W271AP license and the Permit expired. Despite negotiations, Reach and the landlord have been unable to come to terms for a new lease, and Reach’s operations at its current site are on a month-to-month basis.

In light of the inability to obtain a new lease for the current site, Reach filed for a further modification of the Permit, which modification was granted on May 31, 2013. *See* File No. BMPFT-20130327ACX (the “Modified Permit”). Preparations to construct the facilities as authorized under the Modified Permit have begun, in cooperation with the proposed assignee of Station W271AP.¹ Additionally, Reach is in discussions with another translator licensee to ensure that the operations of the modified W271AP will not affect those third-party operations.

Consequently, Reach has been unable to complete the construction of W271AP in exact accordance with the Permit, but has taken substantial steps toward obtaining permanent authority for facilities that can operate without harm to other licensees by applying for the Modified Permit and working with other licensees to ensure that the modifications to W271AP can be implemented promptly and without interference to any party. Due to the potential for interference to other licensees, Reach cannot return to operations on Channel 271 in accordance with its license. A further extension of the STA is therefore necessary in order to avoid the

¹ *See* File No. BALFT-20130411ACD.

disruption of Reach's services to the public until construction in full accord with the Modified Permit can be completed.

For all the foregoing reasons, Reach respectfully submits that an extension of STA for an additional six-month period would serve the public interest, and should be expeditiously granted.