

Exhibit 1-1

Special Request to Delay Processing of This application

Refuge Media Group (RMG) is *respectfully requesting* the Commission delay further processing of this application until *after* the Low Power FM (LPFM) application filing window (scheduled around October 15, 2013) and its subsequent applications for such stations are accepted for filing and Construction Permits (CPs) are granted. The reasons for this request are set forth below:

1. The specified channel has zero LPFM grid points. However, this application cannot be granted on the channel specified because it is short spaced. There are 4 minor channel changes¹ that could be made to clear this short-spaced condition, however, those channels all have LPFM grid points which are also short spaced, thus this proposal cannot be granted on those channels either.
2. Given that this application is within the Minneapolis/St. Paul LPFM grid, RMG is making this request to afford the opportunity to make minor changes with respect to **actual** CPs *rather* than grid points, which are merely *potential* locations for new LPFM stations. It is not possible that all of those grid points will have LPFM proposals without Mutually Exclusivities. Therefore one or more of this application's 2nd and 3rd adjacent channels *might* be available once the LPFM CP's have been granted.
3. If the Commission would grant this request to delay, in the event an adjacent channel *is* available that does not have prohibited overlap with any of the LPFM CP's, RMG would file an amendment that would specify the appropriate minor changes (including, but not limited to a change in channel, location, etc.) in accordance to the minor changes rules specified in 47 CFR Sec 74.1233(a)(1). In the event no adjacent channel proves to be available, RMG will then request dismissal of this application.
4. As stated in #1 above, the specified channel is short-spaced. The reason RMG desires to remain on the current channel *for now* is to afford a greater opportunity to find a possible open channel after new LPFM CP's are granted. The channel can be changed up or down 2 and 3 channels, making a total of 4 potential channels².

Conclusion: RMG, in good faith and in accordance to all the procedures set forth for applying for a new translator station in auction 83 in 2003, filed for a new translator station for St. Paul, MN. Had there not been new rules in the creation of the LPFM service with respect to FM translators, which were issued while the original short form (Tech Box) application was pending (file # BNPFT-20030310BHL), this application, which was mutually exclusive with other applicants³, could very well have been granted through settlement and/or engineering amendments. However, the usual settlement procedures, as provided for in 47 CFR § 74.1233, were in effect "waived" in favor of potential LPFM applicants due to LPFM rules changes with respect to pending MX'd translator proposals in the top markets. This has and will result for many translators' proposals in dismissals that could have otherwise been granted. In lieu of this, RMG is *respectfully requesting* delaying further processing of this application, as specified above, for one more attempt to get a CP granted.

¹ SEE 47 CFR Sec 74.1233(a)(1)

² *ibid*

³ This MX'd group contained only NCEFM applicants.