

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:

Basis for STA Extension

As described in previous STA requests, control cable failure at tower #3 rendered Station WADB's directional antenna system inoperative. Far above-normal rainfall during 2018 made access difficult to the wetland portion of the WADB site near tower #3. After the water receded, Licensee successfully obtained new estimates for buried cabling installation to replace damaged cables to towers #1 and #3. Licensee has identified a company to repair the towers, but the licensee has been unable to start the repairs. There has been ongoing construction that would have impacted any partial proof or adjustment.

Construction of the four-story apartment building at a site immediately adjacent to the northwest side of the WADB transmitter property is complete, as is construction of a new retention basin for this property. Construction of two new, large warehouse-type buildings on sites immediately adjacent to the south/southeast side of the transmitter property also is complete. This construction involved heavy equipment such as cranes (which reradiate) operating over an approximately 40-acre area, with activity coming within approximately 400 ft of tower #1. Such activity has likely resulted in significant ground conductivity changes surrounding the WADB array, the impact of which can only be assessed now that all construction is complete.

On October 5, 2021, Licensee was notified of upcoming reconfiguration of antennas, cabling, and related hardware by a tenant on the adjacent detuned tower (ASR #1044430). In late February 2022, the WADB ground system was significantly damaged by trenching activity to bring utilities to a new AT&T Wireless building (constructed over a portion of the WADB ground system) at the detuned tower. Repairing the damage required the utility trenches to be reopened, and over 40 severed ground radials near WADB towers #1 and #2 needed to be located, spliced, and in many cases partially replaced. These repairs were completed in May 2022. To Licensee's knowledge, the on-tower portion of AT&T Wireless's installation on the detuned tower is currently stalled, to resume at an unknown date.

In addition, Verizon and DISH Wireless currently have sizeable antenna installations pending on the detuned tower. While pre-construction monitor point measurements were made in June 2022, these projects have encountered delays due to the protracted AT&T Wireless project.

Finally, although construction on buildings on neighboring properties mostly concluded during the most recent STA period, as described above, new reradiation sources such as new parking lot light poles have been identified.

In light of the above, Licensee respectfully requests a further extension of its STA to operate WADB(am) non-directionally (see BSTA-20160126ABE). Licensee will promptly notify the Commission when the station is able to resume licensed operations.