

DECLARATION

1. My name is Max Rudolph. I am the General Manager for public television station KNCT-TV, in Belton, Texas, which is licensed to Central Texas College. I have responsibility for KNCT-TV and its digital transition.
2. On July 17, 2008 the Commission granted a Construction Permit for the planned digital conversion of our CH 46 digital (File No. BMPEDT-20080618AUE which modified BMPEDT 20070918ABT). The modified CP had an expiration date of February 17, 2009.
3. On November 5, 2008, we filed our DTV Transition Report on form 387 (File No. BDTRET-20081105ADY). This report, described in detail, our digital transition plan which had been in place since mid 2008.
4. On January 8, 2009 we requested an STA for early termination on January 28, 2009 of the analog service on pre transition DTV channel 38. We also asked to begin broadcasting on post transition Ch 46 on January 31, 2009. That STA was approved on January 22, 2009 (File No. BDSTA-20090108AAZ).
5. Construction was scheduled to begin on January 28, 2009. On January 23, 2009, I learned that the required manufacturer parts had been delayed until March. The needed parts were not delivered to the transmitter site until April.
6. On April 17, 2009 we filed a DTV transition report on form 387 (File No. BDTRET-20090416ATU). Our report, as allowed by the Commission's Third Report and Order, said construction would be completed by April 30, 2009 with planned early transition to final post transition facilities by that date.
7. Construction took place the last week of April, 2009. Analog service was terminated for Ch 46 on April 27, 2009. Ch 46 digital went on the air April 29, 2009.
8. During this transition period, we also filed DTV Education Reports on form 388 on October 8, 2008 (File No. BDEREDT-90081008ADL), January 9, 2009 (File No. BDEREDT-20090109ACC), April 9, 2009 (File No. BDEREDT-20090409AKQ) and July 6, 2009 (File No. BDEREDT-20090706ABF).
- 9) In reviewing this timeline, we realize now that we failed to file an extension request in connection with the CP which expired on February 17, 2009. We also did not file a license application to cover the construction which had been approved by the CP, but which was not completed until April, 2009.
- 10) I regret that the CP was allowed to expire on February 17, 2009, without an extension request, and that construction was completed in April, 2009 without an extension having been granted. I also regret the late filed license application and the late STA request.



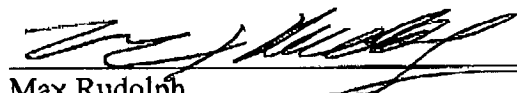
11) These errors were not intentional ones. The digital transition process was a complex one, with extra confusion caused by the changing deadlines for the final transition. In the middle of all the activity described above, KNCT' and I were overwhelmed by the magnitude of the local administrative and technical effort required for the transition. Our station has a very small staff and we were swamped by the process, and by an very large number of required FCC filings, which described in detail our digital transition plans. The Commission was kept fully advised, in those numerous reports, about our problems and our slipping dates for completing construction and making the digital transition. With all the FCC filings we were making, we simply did not realize we had overlooked the CP extension/license issue. These were honest mistakes, made by hard working people, who were tired, confused and under enormous time pressure. We don't have big consultant budgets. Maybe sometimes we just try to do too much on our own.

12. KNCT has always taken its FCC obligations seriously and we have a very good record of FCC compliance over the years. We have taken affirmative actions to protect against such problems in the future.

13. Thanks in advance for your consideration of our efforts to clear up these construction permit and licensing problems. Thanks also for understanding, that we have learned from this experience, and that we want to comply fully with all of the FCC's requirements.

I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Date: March 22, 2010



Max Rudolph
General Manager KNCT

