## Before The Federal Communications Commission Washington, D.C. 20554

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# ORIGINAL Accepted / Filed

JUL 1 1 2018

Federal Communications Commission Office of the Secretary

In the matter of:

Machine Project KZUT-LP, Los Angeles, CA

Future Roots, Inc. KLDB-LP, Los Angeles, CA

Echo Park Film Center KFEP-LP, Los Angeles, CA

Reach for the Top, Inc. KTPC-LP, Venice, CA BMPL-20170612ACF BLL-20170629AAW BMLL-20170725ACA

**BMPL-20170329AAA** 

**BMPL-20170628AAS** 

BMPL-20160422AAF (KTPC-LP) BLL-20171010AAE (KTPC-LP)

Facility ID Nos. 197117, 196172, 196192, and 195799

### <u>Request for Extension for Response</u> to Letter of Inquiry dated June 15, 2018

The Low Power FM timeshare permitees ("Timeshare group") in Los Angeles on 99.1 FM, Machine Project, Future Roots, Echo Park Film Center and Reach For The Top, respectfully requests an extension of time to respond to the Letter of Inquiry dated June 15, 2018 to September 15, 2018. The undersigned counsel represents Machine Project, Future Roots, and Echo Park Film Center in this matter. Counsel is informed that while Reach For The Top is separately represented in this matter, it joins this request for an extension and has authorized the filing of this request on its behalf.

The timeshare group has engaged counsel to review the letter of inquiry (LOI) in context of the FCC Rules and the Administrative Procedures Act, who will facilitate the compilation of documents, affidavits and other information to be submitted to the Commission. An initial assessment of the comprehensive nature of the LOI covering a period of five years has brought the realization that the inquiry closely resembles that of a financial and performance audit not only of the broadcast facilities and agreements, but also of the non-profit status of the organizations. More time will therefore be needed to fully address all issues.

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Additionally, arranging for in-person meetings and compiling documents from each of the managing and voting representatives of the respective non-profit organizations is already incurring difficultly during the summer break, as various non-profit reps, staff, and/or volunteers have already made plans to travel on overlapping schedules.

Further, the LOI, which is dated as of June 16, 2018, was not actually received by all parties until the week of July 2<sup>nd</sup>, as many people are away from work during the Forth of July break.

Counsel has noted that no new documents appeared in the Correspondence Folder of KZUT-LP until after July 2<sup>nd</sup>, 2018. On July 6<sup>th</sup>, a PDF upload of the letter retroactively dated 6/15/2018 was noted in the CDBS folder, yet the scan of that letter bears a date stamp of June 27, 2018, while the PDF Properties of the LOI file shows a date of June 2, 2018.

As of Friday July 6<sup>th</sup>, only two of the groups confirmed receipt of the LOI. The last is expected on the week of July 9-13 at which time they are to check with counsel. This then leaves only two days from the original June 15<sup>th</sup> to respond and provide the documents sought in the LOI.

For the aforementioned circumstances, and given the detailed information that would need be audited and compiled covering a period of five years, we believe an extension is allowing until mid-September 2018 to fulfill the LOI would be reasonable. We appreciate your consideration for this request.

Respectfully Submitted, July 9, 2018 Man Sharffar

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#### **CERTIFICATE OF SERVICE**

I, Cindy Liu, hereby certify on this 9<sup>th</sup> day of July, 2018, that I have caused a copies of the foregoing document to be served by United States first class mail and/or by overnight mail (Federal Express) upon the following:

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