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May 13, 2021

VIA EMAIL DELIVERY

Attn: *Larry Hannif-Ali, Audio Division, Media Bureau*
Larry.Hannif-Ali@fcc.gov

Re: *Townsquare License, LLC*
K277DO, Shreveport, LA
Facility ID No. 202287
Construction Permit File No. BNPFT-20180502AAL
Construction Deadline: June 8, 2021

Request for Waiver and/or Tolling of Construction Permit Deadline

Dear Mr. Hannif-Ali:

Townsquare License, LLC (“Licensee”) holds the above-captioned construction permit. By its counsel and pursuant to Sections 1.3 and 73.3598(b) of the Commission’s Rules, Licensee hereby requests a waiver of the June 8, 2021 construction deadline for the above-referenced construction permit pursuant to the Commission’s guidance issued in the Public Notice released on September 10, 2020 (“Public Notice”).¹

In the Public Notice, the Bureau noted that it may in appropriate cases grant a waiver of the construction deadline based on “rare and exceptional circumstances beyond the permittee’s control,” holding that, to the extent the COVID-19 pandemic has hindered the ability of an applicant to construct its translator facilities, those specific difficulties would constitute such a rare and exceptional circumstance beyond the permittee’s control. The Public Notice recognized that “shutdowns associated with the pandemic have forced stations to halt construction, have

¹ *Media Bureau Announces Availability of Construction Deadline Waivers for Certain FM Translator Stations Awarded in Auctions 99 and 100*, Public Notice, DA 20-1059 (MB rel. Sept. 10, 2020).

disrupted equipment availability and deliveries, and have interrupted travel for tower and equipment installers.”² As set forth below, such circumstances are present in the instant case.

Licensee has suffered multiple disruptions from the COVID-19 pandemic, causing the delay in construction of K277DO. For example, progress on the translator build out initially stalled last March when the lead engineer was forced to stop work on the project and focus exclusively on dealing with the technical and administrative fallout from the pandemic.³ In addition, the Shreveport/Texarkana area suffered two major storms, including the unprecedented Winter Storm Uri in February. Construction was impossible in the immediate aftermath of each storm and, thereafter, tower crews were unavailable for months while they prioritized emergency, storm-related work. Licensee has also run into difficulties sourcing equipment, with increased lead times from equipment manufacturers due to COVID-19-related supply shortages.

In light of the fact that delays to completing construction are due to circumstances beyond its control, Licensee submits that the public interest will be served by waiving the construction deadline for the K277DO construction permit by an additional six months.

Respectfully submitted,

/s/ Emilie de Lozier

Emilie de Lozier

Counsel for Townsquare License, LLC

Attachment

² *Id.*

³ A statement from the engineer, supporting the specifics of this request, is attached. Certain information has been redacted from the statement to protect privacy.

ATTACHMENT – Statement from Townsquare Engineer

To whom it may concern,

My duties at Townsquare Media in Shreveport, LA and Texarkana, TX as Chief Engineer include; Chief Operator (Shreveport, LA), IT Manager and other general engineering duties as assigned. During COVID-19 my workload has caused my mode of operation to be purely reactive due to the amount of time taken to perform task related to the pandemic. Approximately 80 IT users had to be migrated from working at a station to working at home. Live remote broadcast due to quarantine situations for approximately 20 people. Following CDC guidelines increased the amount time it took to perform task related to work.

Furthering the delay of construction were two major storms. In August, Hurricane Laura a category 4 hurricane passed over my AOR, and I spent several day preparing and several day cleaning up. Tower crews reported that they were not available for four to five months, due to rebuilding/repairing towers in Louisiana and Texas. I also am responsible for the operation of the FEMA PEP KWKH transmitter, which takes a considerable amount of time to test prior to a known threat, due the isolated nature of FEMA transmitting equipment. In February "SNOVID" Winter Storm struck Louisiana and Texas, which required preparation and cleanup. Roads became impassable for almost a week. Tower crews reported that they were not available for several months due to repairing towers in Louisiana, Texas and Arkansas. I have not been able to schedule a tower crew for non-emergency related work.

Increased lead times have been observed from equipment manufacturers due to supply shortages caused by COVID-19. This is affecting multiple industries. I currently have not received a transmitter that was ordered on April 10th, 2021.

For reasons stated above the construction of K277DO will not be completed prior to the expiration. I respectfully request an extension of the construction permit for K277DO.

Very Respectfully,

/s/ Greer Harris

Greer Harris

Chief Engineer

Townsquare Media Shreveport-Bossier/Texarkana

KEEL, KWKH, KVKI-FM, KXKS-FM, KRUF, KTUX

KKYR-FM, KPWW, KYGL, KMJI, KOSY

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