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May 20, 2021

**VIA EMAIL DELIVERY**

Attn: *Larry Hannif-Ali, Audio Division, Media Bureau*  
[Larry.Hannif-Ali@fcc.gov](mailto:Larry.Hannif-Ali@fcc.gov)

Re: *Townsquare Media of Lafayette, LLC*  
*K277DQ, Lafayette, LA*  
*Facility ID No. 202286*  
*Construction Permit File No. BNPFT-20180501AAP*  
*Construction Deadline: June 11, 2021*

*Request for Waiver and/or Tolling of Construction Permit Deadline*

Dear Mr. Hannif-Ali:

Townsquare Media of Lafayette, 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 11, 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”).<sup>1</sup>

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

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<sup>1</sup> *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.”<sup>2</sup> As set forth below, such circumstances are present in the instant case.

Licensee’s efforts to complete construction of K277DQ remain frustrated due to continued disruptions caused by COVID-19. Specifically, Licensee was told by the tower crew that, due to a backlog of projects from the pandemic and weather-related emergency repairs, they are “significantly behind anticipated schedule” and will not be able to complete the work before the construction deadline.<sup>3</sup> Therefore, additional time is needed.

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 K277DQ construction permit by an additional six months.

Respectfully submitted,

/s/ Emilie de Lozier

Emilie de Lozier

Counsel for Townsquare Media of  
Lafayette, LLC

Attachment

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<sup>2</sup> *Id.*

<sup>3</sup> A statement from the tower crew, supporting the specifics of this request, is attached.

**ATTACHMENT – Statement from Louisiana Radio Communications, Inc.**



**LOUISIANA RADIO COMMUNICATIONS, INC.**

701 Martin Luther King Highway

PO Box 3143

Lake Charles, LA 70601

Phone (337) 436-7573 Fax (337) 310-2399

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To whom it may concern:

Louisiana Radio Communications, Inc. has been retained by; Townsquaremedia of Lafayette, LLC as the Licensee for FCC Facility ID # 202286 to perform the Tower Services necessary to effect the construction of station K277DQ as per the Construction Permit expiring 6/11/2021.

Due to unforeseen events last year arising from COVID-19; which caused labor shortages, and supply chain issues... being further compounded later in the year by two named storms (Hurricanes Laura and Delta) here in the Lake Charles/Lafayette area causing significant storm damage that has still not been fully repaired. Our crews have been significantly behind anticipated schedule, working full time with emergency jobs as priority and we have not been able to start on new construction.

At this time, considering labor and supply chain issues we don't anticipate being able to complete the construction of this facility within the current CP window and would request on behalf of the licensee for an extension of the current CP based on these extenuating factors.

Perry Vincent  
Louisiana Radio Communications, Inc.