

REQUEST for WAIVER of the CONSTRUCTION DEADLINE  
for  
FM BROADCAST TRANSLATOR STATION K296HP

In accordance with the FCC's decision in MB Docket 13-249, announced by Public Notice, DA-20-1059, released September 10, 2020, Las Vegas Broadcasting LLC hereby requests extension of the permit, File No. BNPFT-20180509ABI, for construction of FM broadcast translator station K296HP in North Las Vegas, Nevada.

The permit for this station was awarded in the Commission's 2018 filing window pursuant to an application filed by Las Vegas Broadcasting, which is the licensee of AM radio broadcast station KSHP, 1280 kHz (DA-2) in Aurora.

Las Vegas Broadcasting operates mainly with a Radio Shopping Show format, as it has done for many decades. Sadly, this format was particularly vulnerable to the calamity wrought on the station's service area by the Covid19 pandemic, including governmental orders that forbade employees to come to work, and that limited the ability of listeners to leave their homes to patronize sponsors of the Radio Shopping Show.

Another important aspect of the station's business had been local sports broadcasts. However, when local sporting contests were cancelled due to Covid19,

the station's revenue from sponsors of those games fell precipitously. The dramatic nature of the changes in the station's revenue levels is apparent from the attached financial statements that compare station income in the second and third quarters of 2020 (when the Pandemic made its full force felt in the Las Vegas area) with the like quarters of 2019.

Specifically, in the second quarter of 2020 (April through June), station revenue declined from \$98,997 to \$51,612, a decline of \$47,355, or almost 48%. Because expenses could not be slashed in line with the revenue drop, what had been a tiny operating profit in the second quarter of 2019 (thanks to a bit of rental income) changed to a catastrophic operating loss of \$12,688. This would have been even worse if the licensee had been able to continue to make required debt service payments as before.

Likewise, in the third quarter of 2020, station revenue dropped from \$94,337 to \$44,379, a plunge of \$49,958, or nearly 53%. With this slide in revenue, the commissions payable to sales representatives also receded, and other expenses were slashed in order to prevent the station's operating loss of \$25,516 in the 3<sup>rd</sup> quarter of 2019 of from widening even in the like quarter of 2020.

The licensee could supply additional, similar data for the ensuing quarters, but the above should be sufficient to make the point that KSHP was among the

stations severely hurt by the Pandemic. Station resources that had been expected to be adequate to cover the cost of construction of the translator suddenly were no longer available.

The Commission demonstrated that it was well aware of the plight of such licensees when, in its public notice of September, 2020, it encouraged affected licensees to seek waiver of the FY 2020 regulatory fee requirement, about the same time as it issued the above-cited public notice committing to grant waivers to the instant class of FM translator permittees.

The proposed Las Vegas translator is important in terms of KSHP's ability to strengthen its footprint in the market, especially considering that listenership in the area now is overwhelmingly on the FM side, with many listeners never bothering to check their AM dials. Nevertheless, the translator facility as originally permitted would cover only a very small area. As a result, the licensee was unsure whether the facility would prove worth the expense of constructing it. Very recently, however, the licensee's engineering consultant has redesigned the proposed antenna system, producing a very significant increase in the area to be served by the translator.

With that improvement, and with the station's revenues starting to recover now that vaccination from Covid19 has become common, Las Vegas Broadcasting

anticipates being able to construct the modified FM translator facility within the next six months. The application for modification of the translator permit has already been prepared and will be filed with the Commission later this week.

Accordingly, Las Vegas Broadcasting requests waiver of the current construction deadline so as to allow it to complete construction of translator station K288EA within the ensuing six months.

# Las Vegas Broadcasting LLC

## Income Statement

Quarter-to-Date Only, June 2019 - 6 quarters back, June 2020 - 2 quarters back

	3 Months Ended June 30, 2019	3 Months Ended June 30, 2020	Variance Fav/<Unf>	% Var
Income				
RADIO ADVERTISING	80.00	80.00	0.00	
LOCAL SPOTS	180.00	480.00	(300.00)	-62.5 %
SPORTS/GAME SPOTS	8,585.00	4,500.00	4,085.00	90.8 %
RADIO SHOP/AM	63,787.00	23,134.00	40,653.00	175.7 %
E COMMERCE	5,389.00	4,322.00	1,067.00	24.7 %
ADVERTISER REBATE	(1,404.00)	0.00	(1,404.00)	
AM INFORMERCIALS	22,349.94	19,096.00	3,253.94	17.0 %
TOTAL Income	98,966.94	51,612.00	47,354.94	91.8 %
***** NET INCOME	98,966.94	51,612.00	47,354.94	91.8 %
***** GROSS PROFIT	98,966.94	51,612.00	47,354.94	91.8 %
Expenses				
ELECTRICITY/WATER	762.97	1,091.39	328.42	30.1 %
REPAIRS/MAINT-AM/FM	180.45	0.00	(180.45)	
OUTSIDE ENGINEER	4,050.00	4,050.00	0.00	
SALARIES-PROGRAMMING	11,906.03	6,142.00	(5,764.03)	-93.8 %
LINES/SPECIAL WIRES	459.75	1,320.63	860.88	65.2 %
ROYALTIES/LICENSE FEE	550.66	974.14	423.48	43.5 %
SALARY-SALES MGR	(833.00)	2,400.00	3,233.00	134.7 %
RADIO SHOP SHOW WAGES	9,499.25	4,142.75	(5,356.50)	-129.3 %
SALARIES-SALES STAFF	28,212.34	19,321.20	(8,891.14)	-46.0 %
ADVERTISING	245.70	0.00	(245.70)	
SELLING & PROMOTIONAL	1,385.65	3,375.73	1,990.08	59.0 %
TRAVEL EXPENSE/SALES	97.41	0.00	(97.41)	
SIMPLE PLAN	974.53	480.95	(493.58)	-102.6 %
CORPORATE OFC REIM	600.00	0.00	(600.00)	
PAT HONAN	1,666.67	0.00	(1,666.67)	
SALARY-GEN MGR	8,000.00	0.00	(8,000.00)	
RENT	8,259.00	8,259.00	0.00	
ELECTRICITY	1,130.00	1,323.02	193.02	14.6 %
REPAIR/MAINTENANCE	165.00	130.00	(35.00)	-26.9 %
G&A MEALS/ENTERTAINMENT	60.00	0.00	(60.00)	
TELEPHONE	3,131.77	3,499.72	367.95	10.5 %
DONATIONS	25.00	0.00	(25.00)	
DUES & SUBSCRIPTIONS	370.00	90.00	(280.00)	-311.1 %

	<i>3 Months Ended June 30, 2019</i>	<i>3 Months Ended June 30, 2020</i>	<i>Variance Fav/&lt;Unf&gt;</i>	<i>% Var</i>
STATIONERY & OFC SUPPLY	2,476.75	2,179.95	(296.80)	-13.6 %
CRCD/BANK FEES	3,632.75	2,161.06	(1,471.69)	-68.1 %
POSTAGE	632.95	805.96	173.01	21.5 %
INTEREST EXPENSE	8,779.14	3.76	(8,775.38)	33387.8 %
FREIGHT & EXPRESS	52.19	0.00	(52.19)	
INSURANCE	3,005.66	483.65	(2,522.01)	-521.5 %
GROUP INSURANCE	2,310.97	1,096.05	(1,214.92)	-110.8 %
DENTAL/ VISION INSURANCE	292.29	183.39	(108.90)	-59.4 %
STATE FRANCHISE TAX	300.00	300.00	0.00	
TAXES-ER/FICA/FUTA/SUI	6,215.20	3,770.01	(2,445.19)	-64.9 %
BUSINESS TAX	157.23	127.09	(30.14)	-23.7 %
SALES & USE TAX	12.81	0.00	(12.81)	
TOTAL Expenses	108,767.12	67,711.45	(41,055.67)	-60.6 %
***** OPERATING PROFIT	(9,800.18)	(16,099.45)	6,299.27	39.1 %
Other Income and Expenses				
RENTAL INCOME	10,233.00	3,411.00	6,822.00	200.0 %
FINANCE CHARGE INCOME	434.89	0.00	434.89	
TOTAL Other Income and Expenses	10,667.89	3,411.00	7,256.89	212.7 %
***** PROFIT BEFORE TAXES	867.71	(12,688.45)	13,556.16	106.8 %
***** NET PROFIT	867.71	(12,688.45)	13,556.16	106.8 %

# Las Vegas Broadcasting LLC

## Income Statement

Quarter-to-Date Only, September 2019 - 5 quarters back, September 2020  
- 1 quarter back

	3 Months Ended September 30, 2019	3 Months Ended September 30, 2020	Variance Fav/<Unf>	% Var
Income				
RADIO ADVERTISING	80.00	0.00	80.00	
LOCAL SPOTS	1,508.00	230.00	1,278.00	555.7 %
SPORTS/GAME SPOTS	7,370.00	0.00	7,370.00	
OTHER CHARGES/LINE, ETC.	12.00	0.00	12.00	
RADIO SHOP/AM	51,751.49	21,050.00	30,701.49	145.9 %
E COMMERCE	5,214.00	2,414.00	2,800.00	116.0 %
AM INFORMERCIALS	28,401.94	20,685.00	7,716.94	37.3 %
TOTAL Income	94,337.43	44,379.00	49,958.43	112.6 %
***** NET INCOME	94,337.43	44,379.00	49,958.43	112.6 %
***** GROSS PROFIT	94,337.43	44,379.00	49,958.43	112.6 %
Expenses				
ELECTRICITY/WATER	1,203.74	1,311.77	108.03	8.2 %
OUTSIDE ENGINEER	4,050.00	4,050.00	0.00	
SALARIES-PROGRAMMING	12,376.00	6,316.25	(6,059.75)	-95.9 %
LINES/SPECIAL WIRES	320.96	922.20	601.24	65.2 %
ROYALTIES/LICENSE FEE	5,358.91	410.50	(4,948.41)	-1205.5 %
SALARY-SALES MGR	7,757.09	5,816.00	(1,941.09)	-33.4 %
RADIO SHOP SHOW WAGES	9,258.50	(1,050.95)	(10,309.45)	-981.0 %
SALARIES-SALES STAFF	43,493.93	19,933.65	(23,560.28)	-118.2 %
SELLING & PROMOTIONAL	1,651.95	1,037.48	(614.47)	-59.2 %
TRAVEL EXPENSE/SALES	256.88	0.00	(256.88)	
SIMPLE PLAN	2,107.12	409.11	(1,698.01)	-415.0 %
SALARY-GEN MGR	4,000.00	1,200.00	(2,800.00)	-233.3 %
RENT	8,259.00	8,259.00	0.00	
ELECTRICITY	1,621.94	1,121.52	(500.42)	-44.6 %
REPAIR/MAINTENANCE	200.00	85.00	(115.00)	-135.3 %
G&A MEALS/ENTERTAINMENT	90.00	0.00	(90.00)	
TELEPHONE	3,103.31	2,306.19	(797.12)	-34.6 %
DONATIONS	51.00	0.00	(51.00)	
DUES & SUBSCRIPTIONS	50.00	120.00	70.00	58.3 %
STATIONERY & OFC SUPPLY	4,625.79	5,151.65	525.86	10.2 %
CRCD/BANK FEES	2,873.46	1,577.03	(1,296.43)	-82.2 %
POSTAGE	915.87	863.17	(52.70)	-6.1 %
INTEREST EXPENSE	5,852.76	4,243.25	(1,609.51)	-37.9 %

	<i>3 Months Ended</i> <i>September 30, 2015</i>	<i>3 Months Ended</i> <i>September 30, 2021</i>	<i>Variance</i> <i>Fav/&lt;Unf&gt;</i>	<i>% Var</i>
INSURANCE	2,919.00	2,826.67	(92.33)	-3.3 %
GROUP INSURANCE	173.17	2,651.25	2,478.08	93.5 %
DENTAL/ VISION INSURANCE	(54.59)	143.90	198.49	137.9 %
LEGAL & ACCOUNTING	0.00	800.00	800.00	100.0 %
STATE FRANCHISE TAX	350.00	350.00	0.00	
CHILD SUPPORT	0.00	67.52	67.52	100.0 %
TAXES-ER/FICA/FUTA/SUI	5,243.65	3,168.94	(2,074.71)	-65.5 %
BUSINESS TAX	142.81	83.21	(59.60)	-71.6 %
REAL ESTATE TAX	2,042.57	0.00	(2,042.57)	
SALES & USE TAX	1.19	0.00	(1.19)	
TOTAL Expenses	130,296.01	74,174.31	(56,121.70)	-75.7 %
***** OPERATING PROFIT	(35,958.58)	(29,795.31)	(6,163.27)	-20.7 %
Other Income and Expenses				
RENTAL INCOME	10,233.00	6,822.00	3,411.00	50.0 %
FINANCE CHARGE INCOME	209.29	0.00	209.29	
TOTAL Other Income and Expenses	10,442.29	6,822.00	3,620.29	53.1 %
***** PROFIT BEFORE TAXES	(25,516.29)	(22,973.31)	(2,542.98)	-11.1 %
Provisions for Taxes				
IL REPLACEMENT TAX	0.00	900.00	900.00	100.0 %
TOTAL Provisions for Taxes	0.00	900.00	900.00	100.0 %
***** NET PROFIT	(25,516.29)	(23,873.31)	(1,642.98)	-6.9 %