Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re Application of	)	
	)	
TRI-STATE BROADCASTING	)	
ASSOCIATION, INC.	)	FCC File No. BPED-20151208AAB
	)	
For Modification of License of KJTF(FM),	)	Facility ID No. 175433
North Platte, Nebraska	)	

To: Marlene H. Dortch, Secretary
Office of the Secretary
Attn: Chief, Media Bureau, Audio Division

MOTION FOR EXTENSION OF TIME

Tri-State Broadcasting Association, Inc. ("Tri-State"), licensee of Station KJTF, North Platte, Nebraska, by its counsel, hereby requests an extension of time to file its Opposition with respect to the Petition to Deny ("Petition") filed by Pappas Telecasting of Central Nebraska, L.P. ("Pappas"), licensee of Station KWNB-TV, Hayes Center, Nebraska. In support of its request, Tri-State submits the following:

On December 8, 2015, Tri-State filed a minor change application for Station KJTF. Over thirty (30) days later, Pappas filed its Petition, arguing that the KJTF application should be dismissed.

Initially, it is noted that the Commission's rules do not contemplate a Petition to Deny being filed against a station's minor change application. *See* 73.3584(a) of the FCC's rules. The Pappas filing should be treated as an Informal Objection filed under Section 73.3587 of the Commission's rules. Pappas cannot transform its filing into a Petition to Deny and, thereby, circumvent the Commission's rules by styling its filing as a "Petition to Deny." *See Davina Sashkin, Esq.*, 27 FCC Rcd 2920, 2922 (MB 2012).

Under Section 73.3587 of the rules, there is no limitation on the time for filing Oppositions to Informal Objections. As such, legally, Tri-State should not be required to seek an extension with respect to its Opposition.

However, Tri-State does seek to move this case along and, therefore, it states its intent to file its Opposition within the next two weeks, no later than February 17, 2016. It will be necessary to address Pappas' engineering argument in an Opposition, and Tri-State's consulting engineer has been unavailable recently as a result of the major snow storm which hit the Washington, D.C. area and last weeks' filing window for FM translators. Counsel for Pappas has been notified of this extension request and has courteously stated that she will interpose no objection to its approval. The Media Bureau, Audio Division has also been notified of this extension request.

Accordingly, for the foregoing reasons, Tri-State requests an extension of time to respond to the Pappas Petition until and including Wednesday, February 17, 2016.

Respectfully submitted,

TRI-STATE BROADCASTING
ASSOCIATION, INC.

By: _____
Lee J. Peltzman
Its Attorney

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February 3, 2016

CERTIFICATE OF SERVICE

I, Malinda Markland, hereby certify that I have sent, this 3rd day of February, 2016, by U.S. Mail, copies of the foregoing MOTION FOR EXTENSION OF TIME to the following:

Kathleen Victory, Esq.
Fletcher, Heald & Hildreth PLC
1300 North 17th St., 11th Floor
Arlington, VA 22209

Peter Doyle, Esq.*
Chief, Audio Division, Media Bureau
Federal Communications Commission
445 12th Street SW
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*sent via e-mail

Malinda Markland

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