

Exhibit 1

By this application, Communication Properties, Inc. ("CPI"), the licensee of Television Station KFFX, Pendleton, Oregon, hereby requests a six-month extension of time within which to construct the DTV facilities for KFFX. The KFFX-DT construction permit bears an expiration date of December 5, 2002. *See* FCC File No. BPCDT-19991101AIU. CPI therefore requests an extension of that construction permit until June 5, 2003.

On June 5, 2002, CPI was granted an extension of the KFFX-DT construction permit until December 5, 2002. *See* FCC File No. BEPCDT-20020430AAU. The KFFX-DT construction permit was granted only three weeks before its initial May 1, 2002 expiration. During the four months since the grant of its first extension request, CPI has been awaiting consummation of the pending sale of KFFX to Mountain Licenses, L.P. ("MLLP") (*see* FCC File No. BAPCT-19991116AJR), which will assume responsibility for the construction of the KFFX-DT facilities. The Commission's prior grant of the KFFX assignment of license application was expressly conditioned on the divestiture by Broadcasting Licenses, Limited Partnership ("BLLP"), an affiliate of MLLP, of its interest in Television Station KBKI, Walla Walla, Washington. That divestiture is required to take place prior to or concurrent with the consummation of the sale of KFFX to MLLP.

CPI has been in regular contact with MLLP regarding the KBKI divestiture, and understands that MLLP has previously advised the Commission of the inherent difficulties associated with the sale of a stand-alone television station in Walla Walla, Washington.¹ CPI has also been advised that MLLP encountered unanticipated FCC processing delays of a KBKI facilities modification application (to increase the station's ERP 1.86 kW to 316 kW) that was critical to the sale of KBKI. *See* FCC File No. BMPCT-20011002AAV. That application was granted on June 20, 2002. Shortly thereafter, on August 20, 2002, BLLP filed an application requesting Commission consent to the assignment of the license of KBKI to Cadena Mundial of Washington, LLC. The KBKI assignment application has been accepted for filing. *See* BALCT-20020820AAU and Public Notice, Report No. 25317, released September 11, 2002, at p. 1. CPI anticipates that the sale of KFFX of MLLP will be consummated promptly upon the consummation of the sale of KBKI to Cadena Mundial of Washington, LLC.

¹ Specifically, it is CPI's understanding that MLLP has advised the Commission that Walla Walla is located in the Tri-Cities portion of Yakima-Pasco-Richland-Kennewick, Washington ("Yakima-Tri-Cities") DMA, which is typified by television satellite operations, and that it is a matter of Commission record that stand-alone television stations like KBKI that operate in this portion of the Yakima-Tri-Cities DMA face daunting economic challenges. *See Retlaw Broadcasting of Eugene, L.L.C.*, 14 FCC Rcd 6667 (1999).

Furthermore, it should be noted that the Yakima-Tri-Cities DMA is a very small television market (the 125th ranked television market). As set forth in the 2001 Broadcasting/Cable Yearbook, there are only 203,450 television households in that television market. Only a portion of these households is within the Pendleton station's coverage area, and only a small fraction of these households is currently equipped with digital receivers. The small size of the DMA and the financial difficulties of operating a stand-alone television station in such a market are factors that compelled CPI to agree to sell KFFX to MLLP in the first instance. As noted above, these factors also stalled the sale of KBKI, which in turn delayed the consummation of the assignment of KFFX to MLLP. But for these delays, MLLP would have completed its acquisition of KFFX months ago and assumed responsibility for construction of the station's digital facilities. For all the foregoing reasons, an extension of the KFFX-DT construction permit is clearly warranted and amply justified. The Commission has granted DTV permit extensions under similar circumstances. *See* FCC File No. BEPCDT-20020301AIC (for KTVZ, Bend, Oregon) and BEPCDT-20020225ACB (for KVTM, Laredo, Texas).