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*Please reply to ERWIN G. KRASNOW*  
*ekrasnow@gsblaw.com TEL EXT 2161*

June 3, 2011

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20007

Re: Application of CMCG Puerto Rico License LLC  
FCC File No. BDISDTA-20090824AFJ  
For Displacement Relief for  
Station WQQZ-CA, Ponce, PR,  
Facility Id. No. 32142  
Petition for Reconsideration and Reinstatement *Nunc Pro Tunc*

Dear Ms. Dortch:

Transmitted herewith on behalf of CMCG Puerto Rico License LLC, are an original and four copies of its Petition for Reconsideration and Reinstatement *Nunc Pro Tunc*, with respect to above-referenced application.

If there are any questions concerning this submission, please contact the undersigned directly.

Sincerely,

Erwin G. Krasnow

EGK:yg  
Enclosures

Before The  
Federal Communications Commission  
Washington, D.C. 20554

In re Application of	)	
	)	
CMCG PUERTO RICO LICENSE LLC	)	FCC File No. BDISDTA-20090824AFJ
	)	
For Displacement Relief for	)	
WQQZ-CA, Ponce, PR	)	Facility ID #32142
	)	
	)	
	)	

To: Chief, Video Division, Media Bureau

**Petition for Reconsideration  
and Reinstatement *Nunc Pro Tunc***

CMCG Puerto Rico License LLC ("CMCGPR"), through counsel and pursuant to Section 1.106 of the Commission's Rules, hereby respectfully petitions the Media Bureau for reconsideration of the staff letter dated April 29, 2011, dismissing the above-captioned displacement application of Station WQQZ-CA, Ponce, Puerto Rico (the "Applicaton"),<sup>1</sup>

On August 24, 2009, CMCGPR filed a displacement application for minor change seeking authority to change the channel of Class A television Station WQQZ-CA from 33 to 30. The Application was filed because Station WQQZ-CA's licensed Channel 33 facility was displaced by full-power Station WRUA-DT, formerly, WERO-DT, Channel 33, Fajardo, Puerto Rico, 103.9 kilometers distant.

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<sup>1</sup> Letter of Hossein Hashemzadeh, Deputy Chief, Video Division, to CMCG Puerto Rico License LLC, April 29, 2011 (the "Letter"), a copy of which is attached hereto for convenient reference as Attachment 1. Public Notice of the dismissal of the Application was given on May 5, 2011. See *Public Notice, "Broadcast Actions,"* Report No. 47480 at 2. This petition is timely filed within 30 days of that *Public Notice*.

On December 28, 2009, the Deputy Chief of the Video Division sent a letter to CMCGPR outlining interference to digital television station WORA-TV, Mayaguez, Puerto Rico, and to low power television station W31DL-D, Ponce, Puerto Rico. The Letter also advised CMCCPR that the Commission was not accepting or using the full service mask in its interference analysis until it becomes a part of the technical rules. On April 29, 2011, the Video Division advised CMCGPR that because a minor amendment to resolve the interference problems had not been filed within 30 days of the December 28, 2009 Letter, the Application was being dismissed.

**CMCGPR has no record of receiving the Video Bureau's 30-day Letter.** See Declaration of David J. Wilhelm, Vice President and Secretary of CMCGPR, attached hereto as Attachment 2. We submit that fairness dictates that the Bureau grant CMCGPR authority to file electronically the attached amended Application which has been revised to respond to the technical issues posed in the Video Division's December 29, 2009 Letter. See Attachment 3.

There is good cause to reinstate the Application as amended. Reinstatement will serve the public interest by conserving the resources of both the Commission and the licensee to process an application that has already been initially reviewed and by authorizing interference-free service to be provided to the public at the earliest time. The resubmission of the amended Application and this petition conform to Commission policy on reinstatement of dismissed applications *nunc pro tunc* – *i.e.*, to file a minor curative amendment in conjunction with a petition for reconsideration within thirty days of the dismissal of the application.<sup>2</sup>

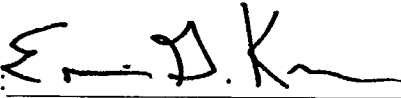
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<sup>2</sup> See Public Notice, "Commission Statement of Future Policy on Incomplete and Patently Defective AM and FM Construction Permit Applications," FCC 84-366, released August 2, 1984, 56 Rad. Reg.2d (P&F) 776 (1984).

For the reasons stated, CMCGPR respectfully requests that the Bureau grant this petition for reconsideration, and reinstate *nunc pro tunc* the Application, as amended.

Respectfully submitted,

**CMCG PUERTO RICO LICENSE LLC**

By: 

Erwin G. Krasnow, Esq.  
Its Attorney

Garvey Schubert Barer  
1000 Potomac Street, NW  
Fifth Floor, The Flour Mill Building  
Washington, DC 20007  
[ekrasnow@gsblaw.com](mailto:ekrasnow@gsblaw.com)

Date: June 3, 2011

**ATTACHMENT 1**

**Dismissal Letter**



Federal Communications Commission  
Washington, D.C. 20554

April 29, 2011

CMCG Puerto Rico License LLC  
900 Laskin Road  
Virginia Beach, VA. 23451

1800E3-RLG

In re: Low Power Television Application of:  
CMCG Puerto Rico License LLC  
Channel 30, Ponce, PR.  
File no.: BDISDTA-20090824AFJ  
Facility Id No.: 32142

Dear Applicant:

On December 28, 2009, the licensee as addressed above was sent a 30 day letter outlining interference to the Full Service Station WORA-TV, digital facility in Mayaguez, PR. and to the Low Power Station W31DL-D, digital facility in Ponce PR.

You were advised that we are not accepting or using the Full Service Mask in our interference analysis until it becomes part of our technical rules.

You were given the opportunity to file a minor amendment to resolve these specified interference problems within 30 days from the date of that letter. Your amendment must be filed electronically. If not so amended, your application will be considered incomplete and subsequently dismissed.

As of April 26, 2011, our records show that no amendment has been filed to resolve the interference issues as addressed above. Our current interference study shows the same interference as mentioned above, therefore; the above referenced application is considered incomplete and IS HEREBY DISMISSED.

Sincerely

Hossein Hashemzadeh  
Deputy Chief  
Video Division  
Media Bureau

C.C. CMCG Puerto Rico License LLC  
C/O – Erwin G. Krasnow, Esq.  
Garvey, Schubert, Barer  
1000 Potomac Street, N.W., 5<sup>th</sup> Floor  
Washington, DC 20007

**ATTACHMENT 2**

**DECLARATION OF DAVID J. WILHELM**



## DECLARATION

The undersigned David J. Wilhelm, Vice President and Secretary of CMCG Puerto Rico License LLC, does hereby declare and state the following:

1. In my position as Vice President and Secretary of CMCG Puerto Rico License LLC ("CMCGPR"), the licensee of Station WQQZ-CA, Ponce, Puerto Rico, I am responsible for the handling of all correspondence and filings involving the Federal Communications Commission. Individuals involved with Station WQQZ-CA are directed to bring to my immediate attention correspondence from the Commission that is addressed to CMCGPR.

2. Until the Media Bureau's dismissal of the WQQZ-CA displacement application on April 29, 2011, I was unaware of the existence of the Video Division's letter under date of December 28, 2009. I checked with Erwin Krasnow, CMCGPR's counsel, and Clarence Beverage, CMCGPR's consulting engineer, and both advised me that they were not aware of the existence of the aforementioned 30-day letter until April 29, 2011.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct. Executed on June 2, 2011.



David J. Wilhelm

**ATTACHMENT 3**

**Application as Amended**

Federal Communications Commission Washington, D.C. 20554  <b>FCC 301-CA</b>	Approved by OMB 3060-0932 (February 2005)	FOR FCC USE ONLY
<b>APPLICATION FOR AUTHORITY TO CONSTRUCT OR MAKE CHANGES IN A CLASS A TELEVISION BROADCAST STATION</b>		FOR COMMISSION USE ONLY FILE NO. -

**Section I - General Information**

1.	Legal Name of the Applicant CMCG PUERTO RICO LICENSE LLC		
	Mailing Address 900 LASKIN ROAD		
	City VIRGINIA BEACH	State or Country (if foreign address) VA	ZIP Code 23451 -
	Telephone Number (include area code) 7574379800	E-Mail Address (if available)	
	FCC Registration Number:	Call Sign WQQZ-CA	Facility ID Number 32142
2.	Contact Representative (if other than Applicant) ERWIN G. KRASNOW, ESQ.		
	Firm or Company Name GARVEY SCHUBERT BARER		
	Mailing Address 1000 POTOMAC STREET, N.W. 5TH FLOOR		
	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20007 -
	Telephone Number (include area code) 2029657880	E-Mail Address (if available) EKRASNOW@GSBLAW.COM	
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input checked="" type="radio"/> N/A (Fee Required)		
4.	Facility Information a. Service Type: <input type="radio"/> Analog <input checked="" type="radio"/> Digital b. Community of License: City: PONCE State: PR		
5.	<b>Purpose of Application:</b> <div style="display: flex; justify-content: space-between;"> <div> <input type="radio"/> New station  <input type="radio"/> Major Change in licensed facility  <input type="radio"/> Minor Change in licensed facility  <input type="radio"/> Digital Flash Cut  <input checked="" type="radio"/> Displacement [Exhibit 1]  <div style="margin-left: 100px;"><input type="radio"/> Analog   <input checked="" type="radio"/> Digital</div> </div> <div> <input type="radio"/> Major Modification of construction permit  <input type="radio"/> Minor Modification of construction permit  <input checked="" type="radio"/> Amendment to pending application  <input type="radio"/> Digital LPTV Companion Channel           </div> </div> a. File number of original construction permit or pending application:   BLTTL-19981208JA  If an amendment, submit as an Exhibit a listing by Section and Question Number the portions of the pending application that are being revised.		

[Exhibit 2]

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

## Section II - Legal

1. <b>Certification.</b> Licensee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Licensee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2. <b>Continued Eligibility.</b> License certifies that its station does, and will continue to broadcast: (a) a minimum of 18 hours per day; and (b) an average of at least 3 hours per week of programming each quarter produced within the market area served by the station, or the market area served by a group of commonly controlled low-power or Class A stations that carry common local programming produced within the market area served by such groups.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 3]
3. <b>Local Public Notice.</b> (For major change Applicants Only) Applicant certifies that it will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	<input type="radio"/> Yes <input type="radio"/> No
4. <b>Rebroadcast Certification.</b> (For Applicants proposing translator rebroadcasts that are not the licensee of the primary station) Applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted.	<input type="radio"/> Yes <input type="radio"/> No
5. <b>Auction Authorization.</b> If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.  <b>An exhibit is required unless this question is inapplicable.</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A [Exhibit 4]
6. <b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)	
Typed or Printed Name of Person Signing DAVID J. WILHELM	Typed or Printed Title of Person Signing ASSISTANT SECRETARY
Signature	Date 6/2/2011

## SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name CLARENCE M BEVERAGE	Relationship to Applicant (e.g., Consulting Engineer) BROADCAST ENGINEERING CONSULTANT	
Signature	Date 6/2/2011	
Mailing Address COMMUNICATIONS TECHNOLOGIES, INC. P.O. BOX 1130		
City MARLTON	State or Country (if foreign address) NJ	Zip Code 08053-

Telephone Number (include area code)  
8569850077

E-Mail Address (if available)  
CBEVERAGE@COMMTECHRF.COM

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

### SECTION III - Engineering (Digital)

#### TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. All items must be completed. The response "on file" is not acceptable.

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

#### TECH BOX

1.	Channel Number: 30																																																																								
2.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 18 Minutes 4 Seconds 46 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 66 Minutes 45 Seconds 3 <input checked="" type="radio"/> West <input type="radio"/> East																																																																								
3.	Antenna Structure Registration Number: <input checked="" type="checkbox"/> Not Applicable [Exhibit 8] <input type="checkbox"/> Notification filed with FAA																																																																								
4.	Antenna Location Site Elevation Above Mean Sea Level: 559 meters																																																																								
5.	Overall Tower Height Above Ground Level: 21.3 meters																																																																								
6.	Height of Radiation Center Above Ground Level: 18.3 meters																																																																								
7.	Maximum Effective Radiated Power (ERP): 0.75 kW																																																																								
8.	Transmitter Output Power: 0.08 kW																																																																								
9.	<p>a. Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under <a href="http://licensing.fcc.gov/prod/cdbb/pubacc/prod/cdbb_pa.htm">CDBS Public Access</a> (<a href="http://licensing.fcc.gov/prod/cdbb/pubacc/prod/cdbb_pa.htm">http://licensing.fcc.gov/prod/cdbb/pubacc/prod/cdbb_pa.htm</a>). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search. <input type="radio"/> Nondirectional <input type="radio"/> Directional "Off-the-shelf" <input checked="" type="radio"/> Directional composite</p> <p>Manufacturer BEL Model BAN4000RR</p> <p>b. Electrical Beam Tilt: 0.75 degrees <input type="checkbox"/> Not Applicable</p> <p>c. Directional Antenna Relative Field Values: <input type="checkbox"/> N/A (Nondirectional or Directional "Off-the-shelf")</p> <p>Rotation (Degrees): 155 <input type="checkbox"/> No Rotation</p> <table border="1"> <thead> <tr> <th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th></tr> </thead> <tbody> <tr> <td>0</td><td>1</td><td>10</td><td>0.939</td><td>20</td><td>0.822</td><td>30</td><td>0.661</td><td>40</td><td>0.501</td><td>50</td><td>0.343</td></tr> <tr> <td>60</td><td>0.209</td><td>70</td><td>0.106</td><td>80</td><td>0.035</td><td>90</td><td>0.016</td><td>100</td><td>0.013</td><td>110</td><td>0.05</td></tr> <tr> <td>120</td><td>0.05</td><td>130</td><td>0.05</td><td>140</td><td>0.05</td><td>150</td><td>0.05</td><td>160</td><td>0.05</td><td>170</td><td>0.05</td></tr> <tr> <td>180</td><td>0.05</td><td>190</td><td>0.05</td><td>200</td><td>0.05</td><td>210</td><td>0.05</td><td>220</td><td>0.05</td><td>230</td><td>0.05</td></tr> <tr> <td>240</td><td>0.05</td><td>250</td><td>0.05</td><td>260</td><td>0.013</td><td>270</td><td>0.016</td><td>280</td><td>0.035</td><td>290</td><td>0.106</td></tr> </tbody> </table>	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	0	1	10	0.939	20	0.822	30	0.661	40	0.501	50	0.343	60	0.209	70	0.106	80	0.035	90	0.016	100	0.013	110	0.05	120	0.05	130	0.05	140	0.05	150	0.05	160	0.05	170	0.05	180	0.05	190	0.05	200	0.05	210	0.05	220	0.05	230	0.05	240	0.05	250	0.05	260	0.013	270	0.016	280	0.035	290	0.106
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value																																																														
0	1	10	0.939	20	0.822	30	0.661	40	0.501	50	0.343																																																														
60	0.209	70	0.106	80	0.035	90	0.016	100	0.013	110	0.05																																																														
120	0.05	130	0.05	140	0.05	150	0.05	160	0.05	170	0.05																																																														
180	0.05	190	0.05	200	0.05	210	0.05	220	0.05	230	0.05																																																														
240	0.05	250	0.05	260	0.013	270	0.016	280	0.035	290	0.106																																																														

300	0.209	310	0.343	320	0.501	330	0.661	340	0.822	350	0.939
Additional Azimuths		155	1								

## Relative Field Polar Plot

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

10. **Out-of-channel Emission Mask:** ☐ Simple ☒ Stringent

**CERTIFICATION**

11. **Interference.** The proposed facility complies with all of the following applicable rule sections. 47.C.F.R Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027 and 74.794 (b). ☒ Yes ☐ No  
See Explanation in [Exhibit 9]

12. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an **Exhibit is required.** ☒ Yes ☐ No  
See Explanation in [Exhibit 10]  
  
By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

13. **Channels 52-59.** If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:

☐ The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.

☐ Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.

**PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.**

**Exhibits****Exhibit 1**

**Description:** BASIS FOR DISPLACEMENT

THE WQQZ-CA LICENSED CHANNEL 33 FACILITY IS DISPLACED BY WERO-DT, CHANNEL 33 FAJARDO, PUERTO RICO, 103.9 KM DISTANCE. THIS APPLICATION PROPOSES TO AUTHORIZE WQQZ-CA TO OPERATE ON CHANNEL 30.

**Attachment 1****Exhibit 2**

**Description: BASIS FOR THE AMENDMENT**

THE INSTANT AMENDMENT IS SUBMITTED IN ORDER TO PROVIDE TO THE FCC THE INFORMATION REQUIRED IN ITS LETTER TO CMCG PUERTO RICO LICENSE LLC DATED DECEMBER 29, 2009. THE AMENDMENT REVISES SECTION III OF THE APPLICATION.

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**Attachment 2****Exhibit 8****Description: STRUCTURE**

THE STRUCTURE IS AN EXISTING 70 FOOT TALL (21.3 METERS) GUYED TOWER. BASED ON TOWAIR ANALYSIS THE STRUCTURE IS MORE THAN 8 KILOMETERS FROM THE NEAREST AIRPORT AND DOES NOT REQUIRE REGISTRATION.

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**Attachment 8****Exhibit 9****Description: INTERFERENCE**

BASED ON OET-69 MAINFRAME ANALYSIS THE PROPOSED FACILITY WILL NOT CAUSE IMPERMISSABLE INTERFERENCE.

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**Attachment 9****Exhibit 10****Description: ENVIRONMENTAL ANALYSIS**

THE TOWER AND BUILDING ARE EXISTING.

APPLICANT WILL CEASE TRANSMISSION OR LOWER POWER AS REQUIRED TO MEET OET-65 WORKER EXPOSURE GUIDELINES.

THE PROPOSED ANTENNA SYSTEM CONSISTS OF A BELCO BAN4000, HORIZONTALLY POLARIZED, 4 DIPOLE, PANEL, ANTENNA, WITH A RADIATION CENTER 18.3 METERS ABOVE GROUND. UTILIZING FORMULA 10 OF OET BULLETIN NO. 65, EDITION 97-01, A VALUE F OF 0.25 HAS BEEN USED TO CALCULATE THE POWER DENSITY 2 METERS ABOVE GROUND. THE MAXIMUM CALCULATED POWER DENSITY IS 5.9 UW/CM SQUARED FOR AN ERP OF 750 WATTS. THIS VALUE IS 1.56 % OF THE ALLOWABLE 379.3 UW/CM SQUARED POWER DENSITY FOR UNCONTROLLED ENVIRONMENTS FOR TV CH 30. BASED ON THIS ANALYSIS IT IS BELIEVED THAT THE PROPOSED FACILITY IS IN COMPLIANCE WITH OET-65 GUIDELINES FOR PUBLIC EXPOSURE.

THE TOWER BASE WILL BE FENCED TO PREVENT UNAUTHORIZED ACCESS.

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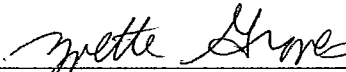
**Attachment 10**

**CERTIFICATE OF SERVICE**

I, Yvette Graves, hereby certify that on this 3rd day of June, 2011 copies of the foregoing "Petition for Reconsideration and Reinstatement *Nunc Pro Tunc*" have been served by hand delivery upon the following:

Barbara Kreisman\*  
Chief, Video Division  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Hossein Hashemzadeh\*  
Deputy Chief, Video  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

  
Yvette Graves

\*Denotes service to the FCC's Washington, D.C. filing location.