

Renewal of License Amendment – Adherence to Minimum Operating Schedule Narrative

HC2 acquired the license for W20EJ-D, Facility ID: 125192, San Juan, PR pursuant to an assignment application. The acquisition was consummated on 11/14/2017.

The Assignor was: Howard Mintz. The Lead File Number was: BALDTL-20170918ADE and the Member File Number was: BALDTL-20170918ADF.

Prior to the acquisition, the station went silent on 9/20/2017 and filed a Silent Special Temporary Authority (the “Silent STA”) request, FCC File Number: 0000030139, on 9/27/2017. The Silent STA was granted on 9/27/2017. The reason for the period of silence was “due to the transmitter site being destroyed in Hurricane Irma.”

The station extended the Silent STA on 3/15/2018, FCC File Number: 0000048808. The Silent STA extension was granted on 8/17/2018. The reason for the extended period of silence was the Licensee was working diligently to rebuild the broadcast facility after the devastating effects of Hurricane Irma. Additionally, the reason for the extended period of silence was to avoid the inefficiency and waste associated with building a second, duplicative broadcast facility that could only be used for a short period of time given the displaced status of the station. Specifically, the station was displaced as part of the repacking process and would have needed to build a separate facility to operate on a new channel.¹ The station was diligently building its new displacement facility as outlined in the Displacement Construction Permit, FCC File Number: 0000053103, which was granted on 5/24/2018.

The station extended the Silent STA on 9/17/2018, FCC File Number: 0000059620. The Silent STA extension was granted on 12/13/2018. The reason for the extended period of silence was, “Pursuant to Public Notice DA 18-901, Licensee seeks continuation of Silent STA due to the catastrophic nature of Hurricane [Irma]. The Licensee continues to work diligently to facilitate operations, however recovery has been exacerbated by the difficulty in restoring electrical service. Licensee asks for additional time to resume operations which will occur prior to the date of March 6, 2019.” At the time, the Licensee was not aware of an opportunity to file a 312(g) waiver but understood permission to remain silent was granted through Public Notice DA 18-901.²

The station resumed operations when it filed a License to Cover application, FCC File Number: 0000068137, on 2/27/2019. The License to Cover was granted on 3/1/2019. Since that date, the station has been operating pursuant to its authorized specifications.

¹ See, e.g., *Channel Reassignment PN*.

² See attached Discontinued Operations exhibit included in the License Renewal application.