

# Shainis & Peltzman, Chartered

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December 3, 2021

**VIA E-MAIL AND REGULAR U.S. MAIL** (Shaun.Maher@fcc.gov)

Federal Communications Commission  
Office of the Secretary  
45 L Street NE  
Washington, DC 20554  
Attn: Shaun Maher

**Re: W45BZ, Jacksonville, FL (the "Station")  
Facility ID No. 16394  
Notification of License Expiration**

Dear Mr. Maher:

Deepak Viswanath, by his attorney, submits his Reply to the September 28, 2021 Letter of Inquiry signed by the Chief, Video Division, Media Bureau (copy attached).<sup>1</sup> The Commission's letter references that, pursuant to the Commission's *Incentive Auction R&O*, low power television and television translator stations on Channel 45 were required to cease operations no later than the end of the post-Incentive Auction transition period: July 13, 2020.

*See in the Matter of Expanding the Economic and Innovation Opportunities of Spectrum*

*Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567, 7021-22, paras. 128-29

(2014). The Commission states that it appears that the Station had been silent for the prior 12 consecutive month period. Specifically, the Commission states that there is no record that the Station had resumed operations by July 13, 2021. Thus, the Commission states, pursuant to

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<sup>1</sup> Attachment A.

# Shainis & Peltzman, Chartered

FCC Office of the Secretary

Shaun Maher

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Section 312(g) of the Communications Act of 1934, as amended, the Station's license has expired as a matter of law.

## **BACKGROUND**

The following filings will be referenced in order to fully put all matters pertaining to the Station operation in a proper perspective. On June 14, 2021, Mr. Viswanath filed a Tolling Request (LMS File No. 0000150129) (Attachment B). Attached to that Tolling Request was an invoice dated March 7, 2021 for a translator to be used at the facility. That invoice specified a 90-day delivery date. Also attached to that submission was a June 11, 2021 email from Larson Associates USA, Inc., which states the following:

"I regret to inform you that we have been delayed on construction of the W45BZ Jacksonville, FL Transmitter Site, Antenna and the 1-5/8" Coaxial Cable. Delays have been caused by the Corona19 Virus, this Winters Deep Freeze weather event, and shipping challenges which have created a backlog of projects for us to finish. Assuming everything is mostly back to normal now, we should be able to complete construction in approximately 6 months."

At the request of Commission staff, on June 15, 2021, the Tolling Request was withdrawn (Attachment C) (LMS File No. 0000150129) with the following explanation:

"At the suggestion of Commission staff, the instant Tolling Request is being withdrawn so that it can be replaced with an Extension Request."

On June 16, 2021, a Request for Extension of Construction Permit (File No. 0000150248) was filed (Attachment D).<sup>2</sup> Attached to that submission was similar documentation that had been submitted relative to the Tolling Request. Furthermore, also requested was a waiver of the

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<sup>2</sup> This submission was urged by the staff rather than Tolling.

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extension request date, in which the Permittee pointed out that it did not believe that an extension would be necessitated.

On July 7, 2021, the pending extension of the construction permit was amended to reflect documentation from Elettronika America, Inc., the manufacturer of the pertinent transmitter (Attachment E). Specifically, the following was presented:

“Yesterday, Gov. DeSantis, declared a State of Emergency for 15 counties, including Miami Dade, where we are based.

The severe weather and high winds are impacting our operations significantly.

Deliveries of transmitters to our warehouse, as well as staffing to ship and install new transmitters will be delayed.

As the storm is just hitting us now, we don't [sic] what damage will be caused in the Miami Dade area.

Based on past storm destruction, it may take us four to six weeks to get back to schedule.

We will do our best to get your transmitter out as soon as possible.”

On June 21, 2021, the Commission was notified that the Station had gone dark on February 7, 2021 (Attachment F) (LMS File No. 0000150695). The Station was broadcasting post January 2020. *See* Declaration of Deepak Viswanath (Attachment G).

Finally, on July 14, 2021, a Request for Engineering STA was filed at the Commission (LMS File No. 00001528835) (Attachment H). Specifically, Special Temporary Authority was requested due to a loss of site. Accordingly, an STA was requested to broadcast at a new tower height.

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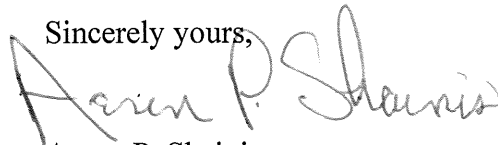
Shaun Maher

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The above recitals of various filings will demonstrate that, while operation may have been sporadic and unconventional, nevertheless, the licensee was attempting to proceed in all sincerity to keep its operation alive. It should be noted that at the time of the submission of the renewal, September 30, 2020, the Station was operational. Clearly, the ramifications of the COVID-19 pandemic are beyond the control of the licensee. The pandemic is clearly a basis for tolling. Moreover, it is common knowledge that the State of Florida was very hard-hit by the pandemic as well as inclement weather events and the State was eventually shut down by order of the Governor. This further impeded the ability to construct the displaced facility. Accordingly, under these circumstances, it is respectfully urged that the Commission look favorably upon the request for extension of the construction permit.<sup>3</sup> If there are any questions with respect to this matter, please communicate with the undersigned.

Sincerely yours,



Aaron P. Shainis

Enclosure

cc via email (w/ encl): Barbara Kreisman

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<sup>3</sup> If the Commission would prefer, the licensee would be willing to refile its Tolling request.

# ATTACHMENT A



Federal Communications Commission  
Washington, D.C. 20554

September 28, 2021

Sent via Certified Mail and Electronic Mail

Deepak Viswanath  
120 Commerce Drive  
Suite 120-A  
Plano, TX 75093  
[aaron@s-plaw.com](mailto:aaron@s-plaw.com)

In re: **W45BZ, Jacksonville, FL**  
Facility ID No. 16394  
**Notification of License Expiration**

Dear Licensee:

The station referenced above was licensed on digital channel 45.<sup>1</sup> Pursuant to the Commission's *Incentive Auction R&O*, low power television and television translator stations on channel 45 were required to cease operations no later than the end of the post-Incentive Auction transition period: July 13, 2020.<sup>2</sup> It appears the Station has been silent for the prior 12 consecutive month period. There is no Commission record that the station has resumed operations by July 13, 2021. Therefore, pursuant to section 312(g) of the Communications Act of 1934, as amended (Act),<sup>3</sup> the station's license has expired as a matter of law.<sup>4</sup>

This letter provides you 30 days to provide evidence<sup>5</sup> that our information is incorrect and that, in fact, the station operated with authorized facilities since July 13, 2020. Please provide the operational status of the station since July 13, 2020, including the date(s) the station has been silent, the date(s) the station operated, and the channel(s) on which the station operated. We also note that in the station's license renewal application, which was filed on September 30, 2020, more than two months after the station was required to go silent, the licensee certified that the station was "currently on the air

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<sup>1</sup> See CDBS File No. BLTTL-20020806AAA.

<sup>2</sup> See *In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567, 7021-22, paras. 128-29 (2014) (*Incentive Auction R&O*).

<sup>3</sup> See 47 U.S.C. § 312(g); *Eagle Broad. Group, Ltd. v. FCC*, 563 F.3d 543 (D.C. Cir. 2009); *A-O Broad. Corp.*, Memorandum Opinion and Order, 23 FCC Rcd 603 (2008).

<sup>4</sup> Section 312(g) of the Act provides that if a broadcast station fails to transmit broadcast signals with its authorized facilities for any consecutive 12-month period, then the station license granted for the operation of that broadcast station expires at the end of that period, notwithstanding any provision, term, or condition of the license to the contrary, except that the Commission may extend or reinstate such station license to promote equity and fairness. 47 U.S.C. § 312(g).

<sup>5</sup> This evidence must indicate the location, effective radiated power and antenna height above ground level for **all periods of operation**. Also include copies of all leases, personnel records (including payroll records appropriately redacted to protect the privacy of individual employees), engineering records, and station records, including EAS logs, for all periods. In addition, you must provide copies of all invoices, bills, checks written or received, credit card charges, wire transfers or deposits of funds relating to the Station's operation. In addition, if the Station uses accounting software to maintain financial records, provide printouts of the data recorded for this period. You **must also include pictures** of the Station's studio facilities and transmission facilities during this time frame and provide exact Station coordinates.

broadcasting programming intended to be received by the public.”<sup>6</sup> Please clarify whether this certification was accurate, what channel the station was operating on, and under what authorization the station was operating. If the certification was incorrect, please provide an explanation. The written response to this letter must be supported by a declaration by an individual with personal knowledge of the facts and signed under penalty of perjury that the facts and information provided in the response are both true and correct.

If you fail to provide such documented evidence within 30 days from the date of this letter or provide a showing that reinstatement is warranted pursuant to the equity and fairness provision of section 312(g),<sup>7</sup> the Commission's public and internal databases **WILL BE MODIFIED** to indicate that the broadcast license for the referenced station is **EXPIRED**, that the station's license is **CANCELED** as a matter of law, and that the station's call sign is **DELETED**.

Finally, we note that it is imperative to the safety of air navigation that any prescribed painting and illumination of the station's tower be maintained until the tower is dismantled. Accordingly, the owner of the towers where the referenced station's transmitting antenna is located is required to maintain the tower in the manner prescribed by our rules and the terms of the cancelled licenses.<sup>8</sup>

Documents sent in response to this letter shall be addressed to FCC, Office of the Secretary, 45 L Street, NE, Washington, DC 20554, and emailed to Shaun Maher at the address below.

Please direct any questions concerning the content of this letter to Shaun Maher, Attorney, phone (202-418-2324), or e-mail (Shaun.Maher@fcc.gov).

Sincerely,

/s/

Barbara Kreisman  
Chief, Audio Division  
Media Bureau

cc (via electronic mail): Aaron Shainis, Esq.

<sup>6</sup> See LMS File No. 0000123238. Although the Station's license renewal was granted on February 19, 2021, section 312(g) provides: "if a broadcasting station fails to transmit broadcast signals for any consecutive 12-month period, then the station license granted for the operation of that broadcast station expires at the end of that period, notwithstanding any provision, term, or condition of the license to the contrary . . ." See 47 U.S.C. 312(g) (*emphasis added*). Furthermore, grant of the Station's license renewal application did not provide it any authority to operate on channel 45. *Incentive Auction R&O*, 29 FCC Rcd at 7021-22, paras. 128-29.

<sup>7</sup> See e.g. *A-O Broad. Corp.*, Memorandum Opinion and Order, 23 FCC Rcd 603, 617, para. 27 ("This limited, discretionary provision is phrased as an exception to the general rule that most affected licenses will be forfeited"). The Commission has exercised its authority to reinstate an expired license to "promote equity and fairness" only where the station failed to provide service for 12 consecutive months due to compelling reasons beyond the licensee's control. See, e.g., *V.I. Stereo Communications Corp.*, Memorandum Opinion and Order, 21 FCC Rcd 14259 (2006); *Community Bible Church*, Letter, 23 FCC Rcd 15012, 15014 (MB 2008); *Mark Chapman, Court-Appointed Agent*, Letter, 22 FCC Rcd 6578 (MB 2007). The Commission has declined to reinstate licenses where the failure to transmit a broadcast signal was due to the licensee's own actions, finances, and/or business judgment. See, e.g., *A-O Broadcasting*, 23 FCC Rcd at 617, para. 27; *ETC Communications, Inc.*, Letter, 25 FCC Rcd 10686 (MB 2010); *Kirby Young*, Letter, 23 FCC Rcd 35 (MB 2008).

<sup>8</sup> See 47 U.S.C. §303(q); 47 CFR §§17.1 *et seq.* and 73.1213. See also *Streamlining the Commission's Antenna Structure Clearance Procedure*, Report and Order, 11 FCC Rcd 4272, 4293 (1995) (tower owner bears primary responsibility for maintaining tower painting and/or lighting).

# ATTACHMENT B





# Licensing and Management System

Approved by OMB (Office of Management and Budget) 3060-0016  
December 2014

## Tolling

Reference Copy FAQ

File Number: 0000150129 | Submit Date: 06/14/2021 | Call Sign: W45BZ | Facility ID: 16394 | FRN: 0007248180 | State: Florida | City: JACKSONVILLE  
Service: LPD | Purpose: Tolling | Status: Dismissed | Status Date: 06/15/2021 | Filing Status: InActive

### APPLICATION SECTIONS

- General Information
- Applicant Information
- Contact Representatives
- Tolling
- Certification
- Attachments

### General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	Yes

### Applicant Information

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#### Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
Deepak Viswanath	120 Commerce Drive Suite 120-A Plano, TX 75093 United States	+1 (202) 293-0567	aaron@s-plaw.com	Individual

#### Authorization Holder Name

- ☐ Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

### Contact Representatives (1)

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Contact Name	Address	Phone	Email	Contact Type
Aaron P Shainis FCC Legal Counsel Shainis & Peltzman, Chartered	1850 M Street NW Suite 240 Washington, DC 20036 United States	+1 (202) 293-0567	aaron@s-plaw.com	Legal Representative

### Tolling Questions

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Section	Question	Response
Applicant certifies that construction cannot be completed due to:	Legal reasons beyond station's control (e.g., litigation, international coordination):	
	Severe financial hardship (e.g., bankruptcy, negative cash flow):	
	other reasons (e.g., natural disasters):	Yes
	Has the construction period for this station been previously extended?	No
	Applicant requests that the time within which to complete construction be extended until:	01/15/2022

Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	
Authorized Party to Sign	<b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b> Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. <b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</b>	
	I certify that this application includes all required and relevant attachments.	Yes
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	Deepak Viswanath Owner  06/14/2021

## Attachments

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File Name	Uploaded By	Attachment Type	Description
Tolling Exhibit.pdf	Applicant	All Purpose	Tolling Exhibit

Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Phone: 1-888-225-5322  
TTY: 1-888-835-5322  
Fax: 1-866-418-0232  
E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

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Media  
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Wireline  
Offices

### **Tolling Exhibit**

Attached is an invoice dated March 7, 2021 for a transmitter to be used at the facility. The seller is Elettronika America USA Corp. The purchase order specifies a 90-day delivery date.

Also attached is a June 11, 2021 email from Larson Associates USA, Inc., which states the following:

“I regret to inform you that we have been delayed on construction of the W45BZ Jacksonville, FL Transmitter Site, Antenna and the 1-5/8” Coaxial Cable. Delays have been caused by the Corona19 Virus, this Winters Deep Freeze weather event, and shipping challenges which have created a backlog of projects for us to finish. Assuming everything is mostly back to normal now, we should be able to begin construction in approximately 6 months.”

COVID-19 is clearly an event which was beyond the control of Mr. Viswanath. There was no way he could have foreseen that construction would have been significantly delayed. Accordingly, it is submitted that tolling is appropriate.



# Invoice

Date	Invoice #
3/7/2021	3908

ELETRONIKA AMERICA USA CORP

Bill To
Banah TV Inc. Sathya Wiswanah 8694 Palermo St. Holliswood, NY 11423 USA

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
1	<p>Elettronika TXUD2000AAC UHF Digital TV Transmitter, Power 2Kw RMS, Composed by DynaMaia ATSC digital transmitter with Dynamic automatic pre correction (linear, non linear and static pre correction). Crest factor correction. Tilt correction. Built in Power Optimizer. Test signal generator PBRS. Frequency agile in the UHF band (CH14 to CH69) Dual ASI or SMPTE310 input with smart switch. Input streaming monitor MER, SHOULDER and SPECTRUM monitor. and DAT2000AC power amplifier with redundant switching power supply (no external voltage regulator required), latest generation LDMOS technology. High efficiency. Voltage and current of each device available on screen as well as measurements of FWR power, REF power, Input power and Temperature. Logger. Redundant forced air cooling system. Remote control wired and serial (RS232, USB or RS485). Analog telemetry and interlock port DB9. Stringent mask filter. Installed in rack 28u. Includes 8 pole Full service mask filter. LP filter (only for special frequencies). GPS receiver for SFN. IP Streaming input.</p> <p>ATSC 3.0 ready, upgrade Available extra charge will apply.</p> <p>Terms: 3 year warranty in Miami, Fl            Delivery time in Italy 45 days IN FACTORY iTALY + Ocean Shipment delivery time Italy to Miami 45 days (Ocean Shipment included in the price) Total delivery time 90 days after order is placed            Note: For air expedite shipment from Italy to Miami Additional fees will apply.</p> <p>Payment:            50% for the order            50% Upon receipt            Note: Call Letters W45B2</p>	74,133.50	74,133.50

NO CREDIT WILL BE ISSUED AFTER 40 DAYS FROM INVOICE DATE.  
 WE RESERVE THE RIGRH TO IMPOSE 20% RESTOCKING ON REGULAR ITEMS  
 AND 50% ON SPECIAL ITEMS CREDIT RETURN.  
 WARRANTY IS SUBJET TO MANUFACTURES TERMS AND CONDITIONS

**Total** \$74,133.50

2201 NW 102 Place Suite 5  
 Miami Florida. 33172  
 Ph: +1 305 5924506 Fax: +1 305 5943499



Deepak &lt;dvis36@gmail.com&gt;

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**W45BZ Antenna and Cable Installation**

1 message

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**slarson@larsonusa.com** <slarson@larsonusa.com>  
To: Deepak Viswanath <dvis36@gmail.com>  
Cc: "plarson@larsonusa.com" <plarson@larsonusa.com>

Fri, Jun 11, 2021 at 9:37 AM

Mr. Viswanath

I regret to inform you that we have been delayed on construction of the W45BZ Jacksonville, FL Transmitter Site, Antenna, and the 1-5/8" Coaxial Cable. Delays have been caused by the Corona19 Virus, this Winters Deep Freeze weather event, and shipping challenges which have created a backlog of projects for us to finish. Assuming everything is mostly back to normal now, we should be able to begin construction in approximately 6 months.

*Sid Larson CEO*

Wireless Services

1200 Commerce Drive

Suite 120

Plano, TX 75093

(972) 612-1373 office

(214) 668-0416 cell (best way)

slarson@larsonusa.com

LARSONUSA.COM

# ATTACHMENT C



## Withdrawal of Tolling

Reference Copy FAQ

File Number: 0000150129 | Submit Date: 06/15/2021 | Call Sign: W45BZ | Facility ID: 16394 | FRN: 0007248180 | State: Florida | City: JACKSONVILLE  
Service: LPD | Purpose: Tolling Withdrawal 0000054939 | Status: Withdrawn | Status Date: 06/15/2021 | Filing Status: Active

## APPLICATION SECTIONS

General Information  
Applicant Information  
Contact Representatives  
Certification  
Attachments

## General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	Yes

## Applicant Information

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## Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
Deepak Viswanath	120 Commerce Drive Suite 120-A Plano, TX 75093 United States	+1 (202) 293-0567	aaron@s-plaw.com	Individual

## Authorization Holder Name

- ☐ Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

## Contact Representatives (1)

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Contact Name	Address	Phone	Email	Contact Type
Aaron P Shainis <i>FCC Legal Counsel</i> Shainis & Peltzman, Chartered	1850 M Street NW Suite 240 Washington, DC 20036 United States	+1 (202) 293-0567	aaron@s-plaw.com	Legal Representative

## Certification

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Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	



Section	Question	Response
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR. See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	
Authorized Party to Sign	<b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b> Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. <b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</b>	
	I certify that this application includes all required and relevant attachments.	Yes
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	<b>Deepak Viswanath</b> <i>Owner</i>  06/15/2021

## Attachments

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File Name	Uploaded By	Attachment Type	Description
TOLLING WITHDRAWAL EXPLANATION.pdf	Applicant	All Purpose	Tolling Withdrawal Explanation

Submit a help request for assistance or contact (877) 480-3201 or TTY: (717) 338-2824 | [Pay Fees ↗](#)

Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Phone: 1-888-225-5322  
TTY: 1-888-835-5322  
Fax: 1-866-418-0232  
E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

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FCC Digital Strategy  
Open Government Directive  
Plain Writing Act  
RSS Feeds & Email Updates  
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Wireless  
Wireline  
Offices

### **TOLLING WITHDRAWAL EXPLANATION**

At the suggestion of Commission staff, the instant Tolling Request is being withdrawn so that it can be replaced with an Extension Request.

# ATTACHMENT D



## Extension of a Construction Permit

Reference Copy FAQ

File Number: 0000150248 | Submit Date: 06/16/2021 | Call Sign: W45BZ | Facility ID: 16394 | FRN: 0007248180 | State: Florida | City: JACKSONVILLE  
Service: LPD | Purpose: Extension of CP | Status: Pending | Status Date: 06/16/2021 | Filing Status: Active

## APPLICATION SECTIONS

[General Information](#)  
[Applicant Information](#)  
[Contact Representatives](#)  
[Tolling](#)  
[Certification](#)  
[Attachments](#)

## General Information

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Aaron P Shainis <i>FCC Legal Counsel</i> Shainis & Peltzman, Chartered	1850 M Street NW Suite 240 Washington, DC 20036 United States	+1 (202) 293-0567	aaron@s-plaw.com	Legal Representative

## Tolling Questions


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Section	Question	Response
Applicant certifies that construction cannot be completed due to:	Legal reasons beyond station's control (e.g., litigation, international coordination):	
	Severe financial hardship (e.g., bankruptcy, negative cash flow):	
	other reasons (e.g., natural disasters):	Yes
	Has the construction period for this station been previously extended?	No
	Applicant requests that the time within which to complete construction be extended until:	01/13/2022

Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	
Authorized Party to Sign	<b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b> Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. <b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</b>	
	I certify that this application includes all required and relevant attachments.	Yes
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	<b>Deepak Viswanath</b> Owner  06/16/2021

## Attachments

File Name	Uploaded By	Attachment Type	Description
EXTENSION EXHIBIT.pdf	Applicant	All Purpose	EXTENSION EXHIBIT
REQUEST FOR WAIVER OF EXTENSION REQUEST DATE.pdf	Applicant	All Purpose	REQUEST FOR WAIVER OF EXTENSION REQUEST DATE

[Submit a help request for assistance or contact \(877\) 480-3201 or TTY: \(717\) 338-2824](#) | [Pay Fees](#) 

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Washington, DC 20554

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TTY: 1-888-835-5322  
Fax: 1-866-418-0232  
E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

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### **Extension Exhibit**

Attached is an invoice dated March 7, 2021 for a transmitter to be used at the facility. The seller is Elettronika America USA Corp. The purchase order specifies a 90-day delivery date.

Also attached is a June 11, 2021 email from Larson Associates USA, Inc., which states the following:

“I regret to inform you that we have been delayed on construction of the W45BZ Jacksonville, FL Transmitter Site, Antenna and the 1-5/8” Coaxial Cable. Delays have been caused by the Corona19 Virus, this Winters Deep Freeze weather event, and shipping challenges which have created a backlog of projects for us to finish. Assuming everything is mostly back to normal now, we should be able to begin construction in approximately 6 months.”

COVID-19 is clearly an event which was beyond the control of Mr. Viswanath. There was no way he could have foreseen that construction would have been significantly delayed. Accordingly, it is submitted that the July 13, 2021 date be extended. The permittee is committed to building the station within the requested extended time period.



# Invoice

Date	Invoice #
3/7/2021	3908

ELETTRONIKA AMERICA USA CORP

Bill To
Banah TV Inc. Sathya Wiswanah 8694 Palermo St. Holliswood, NY 11423 USA

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
1	<p>Elettronika TXUD2000AAC UHF Digital TV Transmitter, Power 2Kw RMS, Composed by DynaMaia ATSC digital transmitter with Dynamic automatic pre correction (linear, non linear and static pre correction). Crest factor correction. Tilt correction. Built in Power Optimizer. Test signal generator PBRs. Frequency agile in the UHF band (CH14 to CH69) Dual ASI or SMPTE310 input with smart switch. Input streaming monitor MER, SHOULDER and SPECTRUM monitor. and DAT2000AC power amplifier with redundant switching power supply (no external voltage regulator required), latest generation LDMOS technology. High efficiency. Voltage and current of each device available on screen as well as measurements of FWR power, REF power, Input power and Temperature. Logger. Redundant forced air cooling system. Remote control wired and serial (RS232, USB or RS485). Analog telemetry and interlock port DB9. Stringent mask filter. Installed in rack 28u. Includes 8 pole Full service mask filter. LP filter (only for special frequencies). GPS receiver for SFN. IP Streaming input.</p> <p>ATSC 3.0 ready, upgrade Available extra charge will apply.</p> <p>Terms: 3 year warranty in Miami, Fl Delivery time in Italy 45 days IN FACTORY iTALY + Ocean Shipment delivery time Italy to Miami 45 days (Ocean Shipment included in the price) Total delivery time 90 days after order is placed Note: For air expedite shipment from Italy to Miami Additional fees will apply.</p> <p>Payment: 50% for the order 50% Upon receipt Note: Call Letters W45B2</p>	74,133.50	74,133.50
<p>NO CREDIT WILL BE ISSUED AFTER 40 DAYS FROM INVOICE DATE. WE RESERVE THE RIGH TO IMPOSE 20% RESTOCKING ON REGULAR ITEMS AND 50% ON SPECIAL ITEMS CREDIT RETURN. WARRANTY IS SUBJET TO MANUFACTURES TERMS AND CONDITIONS</p>		<b>Total</b>	\$74,133.50
		<p>2201 NW 102 Place Suite 5 Miami Florida. 33172 Ph:+1 305 5924506 Fax:+1 305 5943499</p>	





Deepak &lt;dvis36@gmail.com&gt;

---

**W45BZ Antenna and Cable Installation**

1 message

---

**slarson@larsonusa.com** <slarson@larsonusa.com>  
To: Deepak Viswanath <dvis36@gmail.com>  
Cc: "plarson@larsonusa.com" <plarson@larsonusa.com>

Fri, Jun 11, 2021 at 9:37 AM

Mr. Viswanath

I regret to inform you that we have been delayed on construction of the W45BZ Jacksonville, FL Transmitter Site, Antenna, and the 1-5/8" Coaxial Cable. Delays have been caused by the Corona19 Virus, this Winters Deep Freeze weather event, and shipping challenges which have created a backlog of projects for us to finish. Assuming everything is mostly back to normal now, we should be able to begin construction in approximately 6 months.

*Sid Larson CEO*

Wireless Services

1200 Commerce Drive

Suite 120

Plano, TX 75093

(972) 612-1373 office

(214) 668-0416 cell (best way)

slarson@larsonusa.com

LARSONUSA.COM

**REQUEST FOR WAIVER OF EXTENSION REQUEST DATE**

The Permittee requests a waiver of the March 13, 2021 extension request date. *See* Public Notice, DA 20-724, released July 13, 2020. In this regard, the permittee did not believe that an extension would be necessitated.

# ATTACHMENT E



## Amendment to an Extension of a Construction Permit

Reference Copy    FAQ

File Number: 0000150248 | Submit Date: 07/07/2021 | Call Sign: W45BZ | Facility ID: 16394 | FRN: 0007248180 | State: Florida | City: JACKSONVILLE  
Service: LPD | Purpose: Amendment | Status: Review | Status Date: 07/07/2021 | Filing Status: Active

## APPLICATION SECTIONS

General Information  
Applicant Information  
Contact Representatives  
Tolling  
Certification  
Attachments

## General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	No

## Applicant Information

Back to Top ↑

## Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
Deepak Viswanath	120 Commerce Drive Suite 120-A Plano, TX 75093 United States	+1 (202) 293-0567	aaron@s-plaw.com	Individual

## Authorization Holder Name

☐ Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

## Contact Representatives (1)

Back to Top ↑

Contact Name	Address	Phone	Email	Contact Type
Aaron P Shainis <i>FCC Legal Counsel</i> Shainis & Peltzman, Chartered	1850 M Street NW Suite 240 Washington, DC 20036 United States	+1 (202) 293-0567	aaron@s-plaw.com	Legal Representative

## Tolling Questions

Back to Top ↑

Section	Question	Response
Applicant certifies that construction cannot be completed due to:	Legal reasons beyond station's control (e.g., litigation, international coordination):	
	Severe financial hardship (e.g., bankruptcy, negative cash flow):	
	other reasons (e.g., natural disasters):	Yes
	Has the construction period for this station been previously extended?	No
	Applicant requests that the time within which to complete construction be extended until:	01/13/2022

Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	
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W45BZ CP Ext Amendment.pdf	Applicant	Amendment	Amendment

Submit a help request for assistance or contact (877) 480-3201 or TTY: (717) 338-2824 | Pay Fees <sup>↗</sup>

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E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

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Media  
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Wireline  
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ELETTRONIKA AMERICA USA CORP

Bill To
Banah TV Inc. Sathya Wiswanah 8694 Palermo St. Holliswood, NY 11423 USA

P.O. No.	Terms	Project

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NO CREDIT WILL BE ISSUED AFTER 40 DAYS FROM INVOICE DATE.  
 WE RESERVE THE RIGH TO IMPOSE 20% RESTOCKING ON REGULAR ITEMS  
 AND 50% ON SPECIAL ITEMS CREDIT RETURN.  
 WARRANTY IS SUBJET TO MANUFACTURES TERMS AND CONDITIONS

**Total** \$74,133.50

2201 NW 102 Place Suite 5  
 Miami Florida. 33172  
 Ph: +1 305 5924506 Fax: +1 305 5943499





Deepak &lt;dvis36@gmail.com&gt;

---

**W45BZ Antenna and Cable Installation**

1 message

---

slarson@larsonusa.com <slarson@larsonusa.com>  
To: Deepak Viswanath <dvis36@gmail.com>  
Cc: "plarson@larsonusa.com" <plarson@larsonusa.com>

Fri, Jun 11, 2021 at 9:37 AM

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*Sid Larson CEO*

Wireless Services

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Suite 120

Plano, TX 75093

(972) 612-1373 office

(214) 668-0416 cell (best way)

slarson@larsonusa.com

LARSONUSA.COM

**REQUEST FOR WAIVER OF EXTENSION REQUEST DATE**

The Permittee requests a waiver of the March 13, 2021 extension request date. *See* Public Notice, DA 20-724, released July 13, 2020. In this regard, the permittee did not believe that an extension would be necessitated.

**AMENDMENT**

July 7, 2021

**VIA LMS FILING**

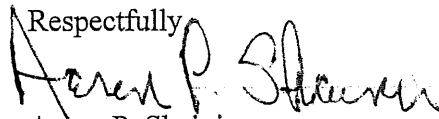
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: W45BZ, Jacksonville, FL  
Facility ID No. 16394  
LMS File No. 0000150248**

Dear Sir/Madam:

The above-referenced request for Extension of a Construction Permit is hereby amended by the attached documentation from Elettronika America Inc., the manufacturer of the pertinent transmitter.

Respectfully



Aaron P. Shainis  
Counsel for  
Deepak Viswanath

Enclosure

## Call letters W45B2 Jacksonville

maria@elettronika.com <maria@elettronika.com>

Tue 7/6/2021 10:11 AM

To: deepakv dallas44.com <deepakv@dallas44.com>

Hello Deepak,

Yesterday, Gov. DeSantis, declared a State of Emergency for 15 counties, including Miami Dade, where we are based.

The severe weather and high winds are impacting our operations significantly.

Deliveries of transmitters to our warehouse, as well as staffing to ship and install new transmitters will be delayed.

As the storm is just hitting us now, we don't what damage will be caused in the Miami Dade area.

Based on past storm destruction, it may take us four to six weeks to get back to schedule.

We will do our best to get your transmitter out as soon as possible.

Best regards,

**Maria Quintero**

Elettronika America Inc / Merserca inc.

2201 NW 102 PL. Unit 5

Miami, FL. 33172

Ph. 305 5924506

Cell. 786 200 7070

Fax. 305 5943499

maria@elettronika.com

[www.elettronika.com](http://www.elettronika.com)

[www.Plisch.de](http://www.Plisch.de)>

YouTube Channel: [Elettronika Group USA](#)

Instagram: @elettronika

# ATTACHMENT F



Suspension of Operations and Silent Authority of an Analog LPTV  
Station Application

Authorization

Reference Copy      FAQ

File Number: 0000150695    Submit Date: 06/22/2021    Call Sign: **W45BZ**    Facility ID: **16394**    FRN: **0007248180**    State: **Florida**    City: **JACKSONVILLE**  
Service: **LPA**    Purpose: **Request for Silence STA**    Status: **Granted**    Status Date: **07/06/2021**    Expiration Date: **07/13/2021**    Filing Status: **Active**

APPLICATION SECTIONS

- General Information
- Applicant Information
- Contact Representatives
- Station Status
- Certification
- Attachments

General Information

Section	Question	Response
---------	----------	----------

Applicant Information

Back to Top ↑

Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
DEEPAK VISWANATH Sole Proprietorship Doing Business As: DEEPAK VISWANATH	120 COMMERCE DRIVE SUITE 120-A PLANO, TX 75093 United States	+1 (202) 293- 0567	aaron@s- plaw.com	Other

Authorization Holder Name

☐ Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

Contact Representatives (1)

Back to Top ↑

Contact Name	Address	Phone	Email	Contact Type
Aaron P Shainis FCC Legal Counsel Shainis & Peltzman, Chartered	1850 M Street NW Suite 240 Washington, DC 20036 United States	+1 (202) 293-0567	aaron@s-plaw.com	Legal Representative

Station Status

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Question	Response
Date Station Went Silent	06/22/2021

Certification

Back to Top ↑

Section	Question	Response
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Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR. See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	
Authorized Party to Sign	<b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b> Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. <b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</b>	
	I certify that this application includes all required and relevant attachments.	Yes
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	<b>Deepak Viswanath</b> <i>Sole Proprietor</i>  06/22/2021

## Attachments

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File Name	Uploaded By	Attachment Type	Description
W45BZ Silence Exhibit.pdf	Applicant	General Information	Silence Exhibit

Submit a help request for assistance or contact (877) 480-3201 or TTY: (717) 338-2824 | [Pay Fees ↗](#)

Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

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E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

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**W45BZ Silence Exhibit**

The station went silent when it found out that it was required to be silent as a result of FCC Public Notice DA 20-573, released June 1, 2020.

The Station went dark on February 7, 2021. The date of June 22 is used on this instant application, per Media Bureau instruction, due to having inadvertently not been filed timely.

# ATTACHMENT G

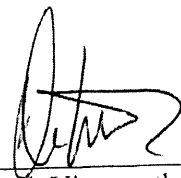
## DECLARATION

Deepak Viswanath hereby states, under penalty of perjury, the following:

I am the licensee of Facility ID No. 16394, Jacksonville, Florida (the "Station"). The Station was operational until February 7, 2021. Due to problems relative to obtaining equipment relative to implementation of the digital operation, it was not possible to timely construct the Station. The Station ceased operation on February 7, 2021.

I have been advised that full implementation of the construction permit would be possible within the next 45 days.

I have reviewed the attached response and, to the best of my knowledge and belief, it is true and correct.

  
\_\_\_\_\_  
Deepak Viswanath

December 3, 2021

# ATTACHMENT H



## Analog LPTV Engineering STA Application

Reference Copy [FAQ](#)

File Number: 0000152835 | Submit Date: 07/14/2021 | Call Sign: W45BZ | Facility ID: 16394 | FRN: 0007248180 | State: Florida | City: JACKSONVILLE  
Service: LPA | Purpose: Engineering STA | Status: Pending | Status Date: 07/14/2021 | Filing Status: Active

## APPLICATION SECTIONS

[General Information](#)[Fees, Waivers, and Exemptions](#)[Applicant Information](#)[Contact Representatives](#)[Channel and Facility Information](#)[Antenna Location Data](#)[Antenna Technical Data](#)[Certification](#)[Attachments](#)

## General Information

Section	Question	Response
---------	----------	----------

## Fees, Waivers, and Exemptions

Section	Question	Response
Fees	Is the applicant exempt from FCC application Fees?	No
	Indicate reason for fee exemption:	
Waivers	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	

Application Type	Fee Code	Fee Amount
Engineering STA	MGL	\$200.00
Total		\$200.00

## Applicant Information

[Back to Top ↑](#)

## Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
DEEPAK VISWANATH Applicant Doing Business As: DEEPAK VISWANATH	120 COMMERCE DRIVE SUITE 120-A PLANO, TX 75093 United States	+1 (202) 293- 0567	aaron@s- plaw.com	Other

## Authorization Holder Name

☐ Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

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[Back to Top ↑](#)

Contact Name	Address	Phone	Email	Contact Type
Aaron P Shainis FCC Legal Counsel Shainis & Peltzman, Chartered	1850 M Street NW Suite 240 Washington, DC 20036 United States	+1 (202) 293-0567	aaron@s-plaw.com	Legal Representative

## Channel and Facility Information

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Section	Question	Response
Facility ID	16394	
State	Florida	
City	JACKSONVILLE	
LPA Channel	26	

## Primary station proposed to be rebroadcast:

[Back to Top ↑](#)

Facility Id	Call Sign	City	State
-------------	-----------	------	-------

## Antenna Location Data

[Back to Top ↑](#)

Section	Question	Response
Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1235223
Coordinates (NAD83)	Latitude	30° 16' 51.9" N+
	Longitude	081° 34' 12.2" W-
	Structure Type	GTOWER-Guyed Structure Used for Communication Purposes
	Overall Structure Height	317.9 meters
	Support Structure Height	282.2 meters
	Ground Elevation (AMSL)	2.4 meters
Antenna Data	Height of Radiation Center Above Ground Level	15.2 meters
	Height of Radiation Center Above Mean Sea Level	17.6 meters
	Effective Radiated Power	2.61 kW

## Antenna Technical Data

[Back to Top ↑](#)

Section	Question	Response
Antenna Type	Antenna Type	Directional Custom
	Do you have an Antenna ID?	Yes
	Antenna ID	1001109
Antenna Manufacturer and Model	Manufacturer:	SIRA
	Model	UTV01
	Rotation	200 degrees
	Electrical Beam Tilt	Not Applicable

Section	Question	Response
DTV and DTS: Elevation Pattern	Mechanical Beam Tilt	Not Applicable
	toward azimuth	
	Polarization	Horizontal
	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	No
	Uploaded file for elevation antenna (or radiation) pattern data	
	Frequency Offset:	None

#### Directional Antenna Relative Field Values (Pre-rotated Pattern)

Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.108	90	0.889	180	0.015	270	0.010
10	0.235	100	0.772	190	0.011	280	0.010
20	0.438	110	0.615	200	0.010	290	0.010
30	0.585	120	0.474	210	0.010	300	0.010
40	0.743	130	0.270	220	0.010	310	0.010
50	0.868	140	0.127	230	0.010	320	0.014
60	0.960	150	0.063	240	0.010	330	0.021
70	1.0	160	0.038	250	0.010	340	0.035
80	0.972	170	0.023	260	0.010	350	0.056

#### Additional Azimuths

Degree  $V_A$

#### Certification

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Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	

Section	Question	Response
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR. See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	
Authorized Party to Sign	<b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b> Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. <b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</b>	
	I certify that this application includes all required and relevant attachments.	Yes
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	<b>Deepak Viswanath</b> <i>Sole Proprietor</i>  07/14/2021

## Attachments

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File Name	Uploaded By	Attachment Type	Description
STA Request Letter 7-13-21.pdf	Applicant	All Purpose	Description of circumstances for STA and description of the proposed transmission facility.
W45BZ STA RFR Exhibit.pdf	Applicant	General Information	Exhibit that confirms the proposed facility will not need an environmental assessment due to RF exposure.
W45BZ tvixstudy analysis..txt	Applicant	General Information	Interference analysis from the proposed facility. The analysis confirms no interference is caused and the applicant will accept the incoming interference.

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Washington, DC 20554

Phone: 1-888-225-5322

TTY: 1-888-835-5322

Fax: 1-866-418-0232

E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

No Fear Act Data

FCC Digital Strategy

Open Government Directive

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**GREG BEST  
CONSULTING, INC.**

16100 Outlook Avenue  
Stilwell, KS 60085  
816-792-2913

## **STA FOR W45BZ**

July 13, 21

Dear Sir,

This document will describe the circumstances that create the request for the Special Temporary Authorization (STA) for W45BZ (FAC ID 16394) and the description of the facility proposed for authorization.

The licensee for W45BZ received a construction permit for displacement to channel 26 (FCC file 0000054939) and was in the process of assembling and building the station. However, circumstances beyond its control have led to the situation where W45BZ must cease its analog facility operation before it has been able to create the digital facility according to its construction permit.

Specifically, the lease negotiation for tower space has resulted in the requirement to move to a different tower height. In addition, while the transmitter, antenna, and transmission line have been procured for the location, new transmission line needs to be procured for the new height. The current station is operating in its licensed mode but since the analog cessation occurs July 13<sup>th</sup>, 2021, this STA is necessary to allow the licensee to reach some of its viewership. The licensee has ceased operation on its analog channel as of July 13<sup>th</sup>, consistent with the FCC LPTV analog cessation date. Per FCC operation, a silent LPTV may not receive any CP extension. By granting this STA, it will allow the resolution of the negotiation identifying a new tower height, allow the licensee to modify the construction permit to reflect the tower height, and then build the station resulting in a license to cover. The STA will serve the public interest.

The licensee of W45BZ has alternative equipment to quickly install a transmitter, transmission line, and temporary antenna to meet the facility proposed in this STA. The equipment consists of a FCC approved 1000 W transmitter complete with full service emission mask filter, 100 ft of 7/8" flexible coax transmission line, and a Sira Model UTV-01 panel antenna oriented at 270 degrees. The proposed antenna will be mounted at a height of 50 ft and will radiate an Effective Radiated Power of 2.61 kW as indicated by following calculation.

Transmitter Power = 200 W post emission mask filter  
Transmission line loss = 0.84 dB for 100 ft of 7/8" flex cable (or 82.4 % line efficiency)  
Antenna gain of 15.85 (12.0 dB)  
The ERP equals  $200 \times .824 \times 15.85 = 2.61 \text{ kW}$

The proposed facility will not cause interference to any authorized facility, and will not create an RF Exposure hazard as identified by the exhibits attached to this application. The applicant can then fulfill its build and license the station.

Sincerely,



Consulting Engineer

**GREG BEST  
CONSULTING, INC.**

16100 Outlook Avenue  
Stilwell, KS 66085  
816-792-2913

July 13, 2021

Dear Sir,

This will serve as the exhibit to confirm that no significant Environmental Impact Assessment as defined in FCC Rule 1.1307 for the proposed facility is necessary. The site is not an Native American religious site, nor located in a flood plain area, nor officially designated wilderness area, nor officially designated wildlife preserve. Likewise, the proposed change of the facility does not include any lighting changes, nor creates any land disturbance or surface features to the existing facility.

To ensure the proposed facility does not create an RF Radiation Hazard, the calculation for this proposed facility is calculated below. The RF radiation near the ground (2 meters above ground) can be calculated using the OET-65 formula for broadcast television stations taking into account the following factors

S= power density in watts per square meter

P= total Effective Radiated Power from the antenna

F= field radiated on the axis to the ground level

R= distance to the ground level (actually 2 meters above ground)

Therefore, given the following data for the proposed facility:

P= 2.61 kwatts

R=Radiation center above ground level – 2 meters)  
= 15.2 meters

F= 0.1 for UHF antennas

The RF radiation near the ground level can be calculated with the following result:

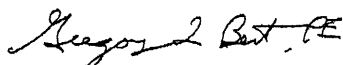
4.97  $\mu\text{watts/cm}^2$

which is 1.37 % of the general population exposure limit of 363  $\mu\text{w/cm}^2$  for this channel 26 facility

Since the contribution from this RF source is less than 5% of the MPE limit for Occupational/Controlled Exposure or General Population/Uncontrolled Exposure at any point on the ground, proposed facility is not considered a "significant contributor" to the RF exposure environment pursuant to OET Bulletin 65, Edition 97-01. The licensee, in coordination with the other users of the antenna facility, will reduce power or cease operation as necessary to protect persons having access to the tower or antenna from RF energy in excess of the FCC guidelines.

Should you have any questions regarding this information please contact me.

Sincerely,



President



Federal  
Communications  
Commission

## Licensing and Management System

General Information

Fees, Waivers, and  
Exemptions

Approved by OMB (Office of Management and Budget) 3060-0386

July 2002

# Analog LPTV Engineering STA Application

Reference Copy

FAQ

File Number: 0000152835 | Submit Date: 07/14/2021 | Call Sign: W45BZ | Facility ID: 16394 | FRN: 0007248180 | State: Florida | City: JACKSONVILLE

Service: LPA | Purpose: Engineering STA | Status: Pending | Status Date: 07/14/2021 | Filing Status: Active

Channel and Facility  
Information

Antenna Location Data

Antenna Technical Data

Certification

Attachments

## General Information

Section	Question	Response
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## Fees, Waivers, and Exemptions

Section	Question	Response
Fees	Is the applicant exempt from FCC application Fees?	No
	Indicate reason for fee exemption:	
Waivers	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	

Application Type	Fee Code	Fee Amount
Engineering STA	MGL	\$200.00
Total		\$200.00

## Applicant Information

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### Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
DEEPAK VISWANATH Applicant Doing Business As: DEEPAK VISWANATH	120 COMMERCE DRIVE SUITE 120-A PLANO, TX 75093 United States	+1 (202) 293- 0567	aaron@s- plaw.com	Other

### Authorization Holder Name

☐ Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

## Contact Representatives (1)

[Back to Top ↑](#)

Contact Name	Address	Phone	Email	Contact Type
Aaron P Shainis FCC Legal Counsel Shainis & Peltzman, Chartered	1850 M Street NW Suite 240 Washington, DC 20036 United States	+1 (202) 293-0567	aaron@s-plaw.com	Legal Representative

APPLICATION SECTIONS

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Channel and Facility Information

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Section	Question	Response
Facility ID	16394	
State	Florida	
City	JACKSONVILLE	
LPA Channel	26	

Primary station proposed to be rebroadcast:

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Facility Id	Call Sign	City	State
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Antenna Location Data

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Section	Question	Response
Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1235223
Coordinates (NAD83)	Latitude	30° 16' 51.9" N+
	Longitude	081° 34' 12.2" W-
	Structure Type	GTOWER-Guyed Structure Used for Communication Purposes
	Overall Structure Height	317.9 meters
	Support Structure Height	282.2 meters
	Ground Elevation (AMSL)	2.4 meters
Antenna Data	Height of Radiation Center Above Ground Level	15.2 meters
	Height of Radiation Center Above Mean Sea Level	17.6 meters
	Effective Radiated Power	2.61 kW

Antenna Technical Data

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Section	Question	Response
Antenna Type	Antenna Type	Directional Custom
	Do you have an Antenna ID?	Yes
	Antenna ID	1001109
Antenna Manufacturer and Model	Manufacturer:	SIRA
	Model	UTV01
	Rotation	200 degrees
	Electrical Beam Tilt	Not Applicable

Degree	Value	Degree	Value	Degree	Value	Degree	Value
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Degree  $V_A$ 

## Certification

Certification Back to Top ↑

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Washington, DC 20554

**APPLICATION SECTIONS**

Phone: 1-888-225-5322

TTY: 1-888-835-5322

General Information

Fax: 1-866-418-0232

E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

Fees, Waivers, and  
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