

## **Renewal of License – Adherence to Minimum Operating Schedule Narrative**

HC2 acquired the license for K07AAD-D, Facility ID: 52923, Ft. Worth, TX pursuant to an assignment application. The Assignor was: Mako Communications, LLC. The Lead File Number was: BALDTL-20170918ACA and the Member File Number was: BALDTL-20170918ACG. The acquisition was consummated on 12/26/2017. Accordingly, the certifications contained in this narrative cover the period from 12/26/2017 to the present.

Upon consummation, the station went silent on 8/14/2017 and filed a Silent Special Temporary Authority (“Silent STA”) request, FCC File Number: 0000029264. The specific reason for the period of silence was, “This station, [K31GL (now K007AD)], was in a combined UHF broadband array with LPTV KHPK. KHPK, as part of the spectrum repack process, was rebuilt on a high VHF channel. To accomplish the rebuild of KHPK, the UHF panel array shared between KHPK and K31GL was removed and replaced with a VHF antenna. Due to the removal of the UHF broadband array, K31GL can no longer broadcast till such time as a new UHF antenna is made available or K31GL is rebuilt on a new post-repack channel.” The Silent STA was granted on 8/14/2017.

The station inadvertently did not extend the Silent STA in a timely fashion.<sup>1</sup>

The station filed a Silent STA request, FCC File Number: 0000046300 on 3/1/2018. The specific reason for the period of silence was, “This station, K31GL, was in a combined UHF broadband array with LPTV KHPK. KHPK, as part of the spectrum repack process, was rebuilt on a high VHF channel. To accomplish the rebuild of KHPK, the UHF panel array shared between KHPK and K31GL was removed and replaced with a VHF antenna. Due to the removal of the UHF broadband array, K31GL can no longer broadcast till such time as a new UHF antenna is made available or K31GL is rebuilt on a new post-repack channel.” The Silent STA was granted on 3/1/2018.

The station resumed operations on 8/5/2018 when it filed a Resumption of Operations, FCC File Number: 0000058869 on 8/13/2018.

The station went silent on 8/5/2018 and filed a Silent STA request, FCC File Number: 0000058871 on 8/13/2018. The specific reason for the period of silence was, “HC2 is operating in a resource-constrained environment due to the ongoing 600 MHz Incentive Auction repacking process. Station owners seeking to build new broadcast facilities currently have access to far fewer resources than they would have otherwise, a factor that the FCC and its bureaus acknowledged could become an issue when designing the repacking process to facilitate this ‘once-in-lifetime opportunity to expand the benefits of mobile wireless coverage.’”<sup>2</sup> Additionally, the station was

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<sup>1</sup> See Adherence to Operating Parameters exhibit.

<sup>2</sup> See, e.g., *Incentive Auction Closing and Channel Reassignment Public Notice et al.*, Public Notice, 32 FCC Rcd 2786 (MB 2017) (“*Channel Reassignment PN*”); *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6597 ¶ 3 (2014).

waiting for a grant of the pending Displacement Application, FCC File Number: 0000051676, which was ultimately granted on 1/4/2019.

The station filed an STA Extension, FCC File Number: 0000067802 on 2/11/2019. The specific reason for the period of extended silence was, “The station is displaced as part of the repacking process and needs to build a separate facility to operate on a new channel.”<sup>3</sup>

The station duly filed a Section 312(g) waiver request on 7/30/2019, FCC File Number: 0000067802, which was granted on 3/23/2020.<sup>4</sup>

The station resumed operations when it filed a License to Cover, FCC File Number: 0000105504 on 2/6/2020. The License to Cover was granted on 2/10/2020. Since that date, the station has been operating pursuant to its authorized specifications.

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<sup>3</sup> See, e.g., Channel Reassignment PN

<sup>4</sup> See attached Discontinued Operations exhibit included in the License Renewal application.