

Renewal of License – Adherence to Minimum Operating Schedule Narrative

HC2 acquired the license for KSAA-LP, Facility ID: 20566, San Antonio, 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: BALTTL-20170918ACT. 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.

The station went silent on 7/12/2019 and filed a Silent Special Temporary Authority (“Silent STA”) request, FCC File Number: 0000078017 on 7/15/2019. The specific reason for the period of silence was the station was displaced during the Special Displacement Window. HC2 requested a Silent STA 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 Thus, if required to resume transmission prior to the STA’s expiration date, DTV America would have been forced to build a first facility to operate on the station’s current channel and then, soon after, a second facility to operate on the station’s new channel. The station was diligently building a facility pursuant to the technical specifications outlined in the Displacement Construction Permit, FCC File Number: 0000051684. The Silent STA was granted on 7/14/2019.

The station inadvertently did not file an extension to the Silent STA in a timely fashion.²

The station resumed operations when it filed a License to Cover, FCC File Number: 0000110645 on 3/31/2020. The License to Cover was granted on 5/28/2020. Since that date, the station has been operating pursuant to its authorized specifications.

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

² See Adherence to Operating Parameters disclosure.