Request for Special Temporary Authority

HC2 LPTV Holdings, Inc. respectfully requests Special Temporary Authority ("STA") to remain silent for a period of up to six months while it constructs a permanent broadcast facility for this Low Power Television ("LPTV") station. The FCC has a history of granting such requests, particularly where, as here, the request is supported by good cause and granting it would further the public interest.[1]

Unique circumstances support this request. HC2 LPTV Holdings, Inc. 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."[2]

Moreover, granting this request would not implicate Section 312(g) of the Act, which generally limits silent station authorizations to 12 months.[3] In contrast, the STA requested here would be for a period of up to six months.

For these reasons, the Media Bureau should expeditiously grant HC2 LPTV Holdings, Inc. request for an STA to remain silent on the station for a period of up to six months while it constructs a permanent broadcast facility.

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[1] *See, e.g.*, Application 0000034182, KZSD-LP, Facility ID 57054 (granting an LPTV station an STA extension on October 26, 2017, to allow the station to address "the fact that the Station's existing STA frequency will no longer be available in the reduced post-auction broadcast spectrum"); Application 0000030510, KDUG-LD, Facility ID 128855 (granting an LPTV station an STA extension on October 2, 2017, to accommodate its filing of a minor change application); Application 0000033847, KLFA-LD, Facility ID 13999 (granting an LPTV station an STA extension on October 17, 2017, to accommodate the station's concern "over whether [it] will be able to have a broadcast channel to operate on following repacking").

[2] *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).

[3] *See* 47 U.S.C. § 312(g).