

Renewal of License Amendment – Adherence to Minimum Operating Schedule Narrative

HC2 Broadcasting License, Inc. (“HC2”) acquired the license for WWBK-LD, Facility ID: 190695, Richmond, VA pursuant to an assignment application granted as part of the Consent Decree, 32 FCC Rcd 9129 (MB 2017). The acquisition was consummated on 11/9/2017.

The Assignor was: King Forward, Inc. The Lead File Number was: BALD TT-20170713AAG and the Member File Number was: BALD TL-20170713AAQ.

Prior to acquisition, the station went silent on 9/1/2017 and filed a Silent Special Temporary Authority (“Silent STA”) request, FCC File Number: 0000029765, on 9/11/2017. The Silent STA Request was granted on 9/9/2017. The reason for the period of silence was outlined in the Media Bureau’s *DTV America Corporation et al.*, Consent Decree, 32 FCC Rcd 9129 (MB rel. Oct. 31, 2017) (“Consent Decree”).

The station extended the Silent STA on 2/23/2018, FCC File Number: 0000043481. The specific reason for the extended period of silence was due to the recent acquisition. Additionally, the exhibit stated, “HC2 is committed to quickly deploying LPTV service on these stations and is currently surveying its resources and developing construction and operation plans. 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.’”¹

The station resumed operations on 8/20/2018 when it filed a Resumption of Operations application, FCC File Number: 0000059148, on 8/27/2018.

The station went silent on 8/20/2018 and filed a Silent STA request, FCC File Number: 0000059151. The specific reason for the silence was due to HC2 diligently building its new displacement facility as outlined in the Displacement Construction Permit, FCC File Number: 0000051589, which was granted on 7/30/2018. Additionally, HC2 was “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 The Silent STA Request was granted on 8/27/2018.

¹ 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).

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).

The station extended the Silent STA on 2/14/2019, FCC File Number: 0000067916. The specific reason for the extended period of silence was, “The Applicant hereby submits that its intent is to not extend, delay, or otherwise impact the station’s planned return to air date. All efforts are underway to meet required FCC deadlines, and the station plans to be on the air prior to the station’s 312(g) deadline of August 19, 2019. To date, the Station has concluded, to the best of the licensee’s knowledge, that it has the requisite site assurances to finalize construction of the Station’s facilities. The Station has received its transmitter, installed its electric and internet components, determined its tower crew, and has received its antenna. Currently, the Station is waiting on a tower structural analysis and plans to complete the necessary construction.”

The station duly filed a Section 312(g) waiver request on 8/20/2019, FCC File Number: 0000067916, which was granted on 3/23/2020.³

The station resumed operations pursuant to the technical specifications outlined in the Engineering STA application, FCC File Number: 0000080882, which was filed on 9/4/2019. The Engineering STA was granted on 9/5/2019.

The station went silent on 3/13/2020 and filed a Silent STA request, FCC File Number: 0000107863 on 3/13/2020. The specific reason for the silence was that the station was diligently building its new displacement facility as outlined in the granted Displacement Construction Permit, FCC File Number: 0000051589. The Silent STA request was granted on 3/13/2020.

The station resumed operations when it filed a License to Cover application, FCC File Number: 0000108657, on 3/23/2020. The License to Cover was granted on 4/23/2020. Since that date, the station has been operating pursuant to its authorized specifications.

³ See attached Discontinued Operations exhibit included in the License Renewal application.