

Renewal of License Amendment – Adherence to Minimum Operating Schedule Narrative

HC2 acquired the license for WATV-LD, Facility ID: 67101, Orlando, FL pursuant to an assignment application. The acquisition was consummated on 2/2/2018.

The Assignor was: Abrahantes Communications, LLC. The Lead File Number was: BALDTL-20171124AAK and the Member File Number was: BALDTL-20171124AAL.

The station went silent on 2/27/2018 and filed a Silent Special Temporary Authority (“Silent STA”) request, FCC File Number: 0000048393, on 3/7/2018. The Silent STA was granted on 3/7/2018. The reason for the period of silence was that HC2 was operating in a resource-constrained environment due to the 600 MHz Incentive Auction repacking process. Station owners, particularly LPTV station owners which were deemed lower priority, that were seeking to build new broadcast facilities had access to far fewer resources such as tower crews and equipment than they would have had otherwise, a factor that the Commission and the Media Bureau acknowledged.¹ The station qualified for Displacement under the Special Displacement Window and filed a Displacement Application, FCC File Number: 000052731 on 4/16/2018 which was granted on 1/15/2019.

The station extended the Silent STA on 8/20/2018, FCC File Number: 00000590509. The specific reason for the silence was 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.² Thus, if required to resume transmission prior to the STA’s expiration date, the station 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 resumed operations on 11/11/2018 and filed a Resumption of Operations, FCC File Number: 0000063451, on 11/13/2018.

The station went silent on 11/11/2018 and filed a Silent STA request, FCC File Number: 0000063463, on 11/13/2018. 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: 000052731. The Silent STA request was granted on 11/13/2018.

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., *Channel Reassignment PN*.

The station extended the Silent STA on 5/10/2019, FCC File Number: 0000072602, as it worked towards continuing to build the Displacement facility. As of that date, the station had received a quote for its antenna and filter, internet, and the installation of electricity had been completed.

The station duly filed a Section 312(g) waiver request on 11/8/2019, FCC File Number: 0000072602, which was granted on 3/23/2020.³

The station resumed operations on 11/11/2019 and filed a Resumption of Operations, FCC File Number: 0000088785, on 11/12/2019.

The station went silent on 1/11/2020 and filed a Silent STA request, FCC File Number: 0000097087, on 1/13/2020. 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: 000052731. The Silent STA request was granted on 1/13/2020.

The station filed a License to Cover application, FCC File Number: 0000116697, on 6/29/2020. The License to Cover was granted on 6/30/2020. 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.