

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
WSUA Broadcasting Corp.)	
)	FCC File Nos. 0000143587, 0000143588
Application for Assignment of License for)	
Stations WSUA-AM and W232DX-FX)	
Miami, FL)	
To: Office of the Secretary		
Attn: Chief, Audio Division, Media Bureau		

CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission’s rules,¹ WSUA Broadcasting Corp. and ATV Holdings, Inc. (“ATV”) (jointly, “Applicants”) respectfully request an extension of time in which to file their Opposition to the Petition to Deny filed on May 20, 2021 in the above-captioned matter (“Petition”) by Jose “Joe” Garcia (“Garcia”). Specifically, Applicants request that the deadline to file the Opposition to the Petition (“Opposition”) be extended to June 18, 2021.

Applicants recognize that pursuant to Section 1.46 (a) of the rules, the Commission does not routinely grant extensions of time. However, under the circumstances, a brief extension is appropriate in this case, and will not prejudice any party. As an initial matter, ATV’s counsel has contacted counsel for Garcia, and Garcia’s counsel stated that Garcia consents to the immediate consideration and grant of this request for an extension of time. Applicants have also orally

¹ 47 C.F.R. § 1.46.

notified counsel for Garcia and Media Bureau personnel responsible for acting on this Motion, of its filing.²

Grant of this Motion is in the public interest because it will ensure the Commission benefits from a fully developed record. The Commission has granted extensions of time for good cause shown³ and when the extension would result in the most complete and well-developed record possible or will allow for more accurate responses.⁴ Grant of the requested extension would fulfill these important public interest goals. Specifically, the Petition makes allegations that raise complex factual issues that will require more time for investigation than the 10 days provided for in the Commission's rules. Accordingly, the Applicants seek an extension of 17 days, to fully investigate the relevant facts and present a more accurate record to the Commission.⁵ This extension of a mere 17 days will not cause undue delay.

Finally, grant of the requested extension will not harm any party to the proceeding. As noted above, Garcia's counsel has indicated to ATV's counsel that Garcia consents to the brief extension requested herein.

² See 47 C.F.R. § 1.46(c).

³ See, e.g., *In re Application of Media General Broadcasting of South Carolina Holdings, Inc. for Renewal of License for Station WBTW(TV), Florence, SC*, Order Granting Extension of Time, 19 FCC Rcd 24744 (MB 2004).

⁴ See, e.g., *In re Amendment of Parts 2 and 25 of the Commission's Rules to Permit Operation of NGSO FSS Systems in the Ku-Band Frequency Range*, Order Extending Reply Comment Period, 16 FCC Rcd 7070 (WTB 2001). See also, *In re Fox Television Stations, Inc. Application for Renewal of License WWOR-TV, Secaucus, New Jersey*; *Application for Renewal of License of WNYW(TV), New York, New York*, Order, 29 FCC Rcd 10015, 10015 (MB 2014) (press of other business on counsel); *In re Bellizzi Broadcasting network, Inc. Station WEYW-LP, Key West, Florida*, Memorandum Opinion and Order, 30 FCC Rcd 13972 (2015) and *In re Bellizzi Broadcasting Network, Inc. Station WEYW-LP, Key West, Florida*, Motion for Extension of Time, MB Docket No. 13-244 at 1 (filed June 25, 2015) (counsel unavailable "during a portion of the Reply period").

⁵ Pursuant to the Commission's rules, the current deadline to file the Opposition to the Petition is Tuesday, June 1, 2021.

Accordingly, Applicants respectfully request that the Commission grant this Motion for Extension of Time, providing a June 18, 2021 deadline for filing the Opposition.

Respectfully submitted,

/s/ Francisco R. Montero

Francisco R. Montero
Seth L. Williams
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street
11th Floor
Arlington, VA 22209
(703) 812-0400
montero@fhhlaw.com
williams@fhhlaw.com

Counsel for ATV Holdings, Inc.

May 28, 2021

/s/ F. Reid Avett

F. Reid Avett
Womble Bond Dickinson LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036
202-857-4425

Reid.Avett@wbd-us.com

*Counsel for
WSUA Broadcasting Corp.*

CERTIFICATE OF SERVICE

I, Seth L. Williams, counsel for ATV Holdings, Inc., state that true copies of the foregoing Motion for Extension of Time were sent this 28th day of May 2021, via First Class Mail postage prepaid where indicated, and by email to:

Arthur V. Belendiuk, Esq.*
Smithwick & Belendiuk, P.C.
5028 Wisconsin Ave., NW
Suite 301
Washington, D.C.
200016

Albert Shuldiner
Chief, Audio Division, Media Bureau
Federal Communications Commission

James Bradshaw
Senior Deputy Division Chief
Audio Division, Media Bureau
Federal Communications Commission

Tom Hutton
Deputy Division Chief (Law)
Audio Division, Media Bureau
Federal Communications Commission

Christopher Clark
Assistant Division Chief
Audio Division, Media Bureau
Federal Communications Commission

/s/ Seth L. Williams
Seth L. Williams

* Service made by First Class Mail and by email