

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
WSUA Broadcasting Corporation	)	File Nos.: 0000143587, 0000143588
	)	Facility Ids: 55403, 202459
Application for Assignment of License for	)	
Stations WSUA-AM, and W232DX-FX.	)	
Miami, Florida		

To: The Commission  
Attn: Chief, Audio Division, Media Bureau

**CONSENT MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's rules,<sup>1</sup> Jose "Joe" Garcia ("Mr. Garcia") respectfully requests an extension of time in which to file his Replies to the Oppositions to Petition to Deny filed on June 21, 2021, in the above captioned matter by ATV Holdings, Inc. ("ATV") and WSUA Broadcasting Corporation ("WSUA Broadcasting"). Specifically, Mr. Garcia requests that the deadline to file the Replies to Oppositions to the Petition ("Replies") be extended to July 15, 2021.<sup>2</sup>

Pursuant to Section 1.46 (a) of the rules, the Commission does not routinely grant extensions of time. However, a brief extension is appropriate in this case, and will not prejudice any party. As an initial matter, Mr. Garcia's counsel has contacted counsel for ATV and WSUA Broadcasting and they have consented to the immediate consideration and grant of this request for an extension of time. Mr. Garcia's counsel has notified the Audio Division of the Media Bureau responsible for acting on this Motion. The Commission has granted extensions of time

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<sup>1</sup> 47 C.F.R. § 1.46.

<sup>2</sup> Pursuant to the Commission's rules, the current deadline to file the Replies is Monday, June 28, 2021.

for good cause shown<sup>3</sup> and when the extension would result in the most complete and well-developed filing. Grant of this Motion is in the public interest because it will ensure the Commission benefits from a developed record. An extension of 17 days will not cause undue delay.

Grant of the requested extension would fulfill these important public interest goals. Specifically, both parties filed extensive Oppositions with several multipage exhibits attached. These exhibits are complex. They must be reviewed, analyzed and a response must be drafted. This will require more time than the 5 days provided by the Commission's rules.

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<sup>3</sup> 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).

<sup>4</sup> 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").

Accordingly, Mr. Garcia seeks an extension of 17 days to fully investigate the relevant facts and present a more accurate record to the Commission.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Arthur V. Belendiuk".

By: \_\_\_\_\_  
Arthur V. Belendiuk

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June 22, 2021

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via email and first class mail to the following:

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Arthur V. Belendiuk