

Kristi Thompson

From: David Folkenflik <DFolkenflik@npr.org>
Sent: Friday, May 8, 2026 8:32 PM
To: Brendan Carr
Cc: Greg Watson
Subject: [EXTERNAL]: ABC/Disney filing

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Chairman Carr:

Wanted to get your reaction to the filing by Paul Clement & co on behalf of Disney/ABC. What do you make of it?

I'll be on the air tomorrow morning and would value your input.

Best
Dave

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Kristi Thompson

From: dja@commlaw.tv
Sent: Tuesday, May 19, 2026 11:53 PM
To: David Brown; Evan Morris; Alexander Sanjenis; Brendan Carr; Anna Gomez; Olivia Trusty
Subject: [EXTERNAL]: Bridge News LLC Petition for Reconsideration
Attachments: Petition for Reconsideration.pdf

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This document has been filed with the FCC through the Commission's ECFS System this evening.

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In the Matter of)
)
Bridge News LLC)

PETITION FOR RECONSIDERATION

The Video Division of the Media Bureau has issued an *Order* against Bridge News LLC, the licensee of various LPTV, Class A, and full-service broadcast stations, directing it to file early renewal applications for all of its stations pursuant to Section 73.3579(c) of the Commission’s Rules. The directive is unprecedented, and contrary to past Commission practice and policy. The only issue for which Bridge News LLC is being “investigated” involves a factually-settled matter concerning an ownership-reporting matter, for which only a forfeiture would be warranted. For the Media Bureau to take the draconian step of requiring the filing of early renewal applications for all of Bridge News LLC’s stations goes far beyond Commission precedent; and is beyond the delegated authority of the Media Bureau. Consequently, the Media Bureau’s Order is arbitrary and capricious, and should immediately be rescinded.

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In the Matter of)
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Bridge News LLC)

PETITION FOR RECONSIDERATION

Background

The ownership of Bridge News did not change during the period encompassing the years 2022-23. Additional licenses were applied for by Bridge News in 2023 for seven Class A stations (WBYD-CD, WJGN-CD, KSVN-CD, W36EX-D, WJYL-CD, KRET-CD, and WTNG-CD), and four full-service stations (KKAI, KUPU, KTNL-TV, and KDMD). The ownership of Bridge News was misstated, however, in the applications for acquisition of Stations KKAI (File No.

0000222030, filed on October 4, 2023), KUPU (File No. 0000222037, filed on October 4, 2023), KDMD (File No. 0000232208, filed on December 11, 2023), KTNL-TV (File No. 0000232209, filed on December 11, 2023), WJYL-CD (File No. 0000226236, filed on November 14, 2023), KRET-CD (File No. 0000219810, filed on August 24, 2023), W36EX-D (File No. 0000216835, filed on June 16, 2023), WJGN-CD (File No. 0000212618, filed on March 16, 2023), WBYP-CD (File No. 0000211405, filed on February 24, 2023), WTNG-CD (File No. 0000220916, filed on September 12, 2023) and KSVN-CD (File No. 0000210975, filed on February 17, 2023), and the subsequent Bridge News 2023 Biennial Ownership Report (File No. 0000227857, filed on February 7, 2024), to incorrectly state that the sole owner and Manager and possessor of 100% voting rights and equity of Bridge News LLC was “Vincent Bodiford.”

That was in error. The correct statement of the owners and other attributable officers and managers of Bridge News LLC should have been listed as follows:

MBX Wyoming, Inc.	100% voting Member	100% equity
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(the 100% owner of MBX Wyoming is Manoj Bhargava, who is a United State citizen. The officers of MBX Wyoming, Inc. are as follows: Manoj Bhargava is the President, Treasurer, and Secretary as well as the CEO of MBX Wyoming, Inc. Chris Fowler is the Vice President of Finance of MBX Wyoming, Inc.)

Manoj Bhargava: Manager

Vincent Bodiford: Chief Executive Office and Manager

It was discovered in March 2024 that although Bridge News accurately had stated its correct ownership structure in the prior-filed applications filed for Stations WXII-LD and WMNN-LD (File Nos. 0000180466 and File No. 0000180467, consummated March 24, 2022), and that Bridge News ownership did not ever change in a substantial manner between March 24, 2022 and 2024, Bridge News inadvertently incorrectly stated its overall ownership in the

subsequently filed Class A and full-service assignment applications (as well as in a subsequent Ownership Report) filed in 2023 and 2024, resulting in a technical violation of Section 310(d) of the Commission's Rules. 47 C.F.R. §310(d). Bridge News' counsel learned of the error on March 7, 2024, and applications for transfer of control (Lead Application File Nos. 0000240949, 0000240957, and 0000240961) were promptly filed with the FCC by Bridge News on March 15, 2024. As already has been explained in response to a Letter of Inquiry issued by the Video Division:

Bridge News President of OTA Operations Scott Centers and counsel Dan J. Alpert were first to become aware that Bridge News' previously filed applications and ownership reports were likely incorrect when information was being prepared in conjunction with another application being prepared on behalf of Manoj Bhargava for the acquisition of an interest in Audacy License LLC, Lead File No. 0000241074, and it was brought to their attention by counsel for Audacy that MBX Wyoming owns 100% of Bridge News and Manoj Bhargava owns 100% of MBX Wyoming. In conjunction with that application, FCC counsel for Audacy contacted FCC counsel for Bridge News on or about March 7, 2024, concerning the preparation of an exhibit to that application that was being prepared which reflected that MBX Wyoming (100% owned by Manoj Bhargava) was 100% owner of Bridge News. ... That information conflicted with information filed with the FCC previously by Bridge News. Upon further inquiry with Vincent Bodiford and corporate counsel for Bridge News, it was determined by Bodiford, Centers, and Alpert that (i) the information obtained by counsel for Audacy was in fact correct, (ii) the information filed with the FCC by Bridge News for various applications and licenses was in fact incorrect; and (iii) transfer of control applications needed to be filed by Bridge News immediately in order to correct the ownership information on file with the FCC. Preparation of transfer of control applications began immediately, and were filed with the FCC on March 15, 2024.

Response to Letter of Inquiry at 3. In other words, the error was *discovered* by Bridge News, voluntarily and quickly *reported to the FCC* by Bridge News, and was quickly *attempted to be fixed* by Bridge News, over two years ago. Importantly, Vincent Bodiford (the party previously reported erroneously to have been owner and in "control" of Bridge News) is no longer even employed by Bridge News, and is in fact, deceased.

This ownership matter is the only matter raised by the Video Division in its *Order*. In the past, where allegations have been made of parties being in control of a Commission licensee without prior FCC approval, the matter has routinely been handled at the Bureau level simply

through the issuance of notices of inquiry, followed by consent decrees or the imposition of forfeitures under Section 1.80 of the Commission rules. See, e.g., Capstar TX LLC, 27 FCC Rcd 3919 (Enf. Bur. 2012); Tama Broadcasting, Inc., 24 FCC Rcd 1612 (Enf. Bur. 2009); *Hughes Communications, Inc.*, 24 FCC Rcd 3694 (Enf. Bur. 2009) (consent decree permitted where licensee where licensee discovered an unauthorized transfer of control and disclosed the matter one week later); *KCCS, LLC*, 39 FCC Rcd 10850 (MB 2024) (forfeiture issued for undisclosed transfer of control); *Birach Broadcasting Corp.*, 25 FCC Rcd 2643 (Enf. Bur. 2010).

Despite repeated efforts to resolve the matter with the FCC, the three transfer of control applications have now been pending for over two years. After it was believed that the matter was about to be resolved by Consent Decree, the Video Division's *Order* unexpectedly was released, which now requires the filing of early renewal applications. The *Order* stated:

1. The FCC has been investigating Bridge News, LLC, for compliance with its obligations as a licensed broadcaster. Specifically, the FCC has been investigating Bridge News, LLC for possible violations of the FCC's prohibition on unauthorized transfers of control of the station licenses. While Bridge News, LLC has purported to respond to two FCC Letters of Inquiry (LOIs), the FCC has determined that additional actions are appropriate at this time.
2. Specifically, FCC rules provide that whenever the FCC regards an application for a renewal of a license as essential to the proper conduct of an investigation, the FCC has the authority to call the broadcaster's licenses in for early renewal. Doing so both allows the FCC to conduct its ongoing investigation and enables the FCC to ensure that the broadcaster has been meeting its public interest obligations more broadly.
3. The FCC determines that calling in Bridge News, LLC's licenses early for renewal, at this time, under the FCC's Communications Act's public interest standard is essential within the meaning of agency regulations. Therefore, Bridge News, LLC is hereby directed to file license renewal applications for all of their licensed stations within 30 days--in other words, by May 27, 2026.

Order, DA 26-412 (MB, April 27, 2026) (footnotes omitted).

A listing of the outstanding Bridge News station licenses affected by the *Order*, together with their previous license expiration dates, is attached hereto as Attachment A. Copies of the most recent grants for renewal of licenses are attached hereto as Attachment B. The applications

for renewal of license or else for initial licenses were granted on the dates shown in Attachment B. As seen therein, under the previously granted Applications for renewal or for license, the currently outstanding licenses for Bridge News were not due to expire until **December 1, 2028** (for Station W25FQ-D); **February 1, 2029** (for Stations WWRJ-LD, W29FX-D, W16CA-D, WDGT-LD, WEWF-LD, WOFT-LD, WOFT-LD, WQFT-LD, WGCT-LD, WGCT-LD, W19EX-D, WBMN-LD, K06PT-D, W19EX-D, WBMN-LD, and WZVC-LD); **April 1, 2029** (for Stations WRDP-LD, WZVC-LD, W33ER-D, W25FX-D, and WRDP-LD); **June 1, 2029** (for Stations KTVV-LD, KKAF-LD, and KHEF-LD); **August 1, 2029** (for Stations WJYL-LD and WIIW-LD); **October 1, 2029** (for Stations WHNE-LD, WMNN-LD, and WXII-LD); **December 1, 2029** (for Stations W17EH-D, WCHU-LD and W36EX-D); **February 1, 2030** (for Stations KUKC-LD and K06PT-D); **April 1, 2030** (for Stations K26PF-D, K06QJ-D and WUMN-LD); **August 1, 2030** (for Stations KADF-LD, KMBA-LD, KVVV-LD, KVHC-LD, KULC-LD, K34MX-D and K03IJ-D); **October 1, 2030** (for Stations K34QY-D, K08QN-D, KGLR-LD, KKIC-LD, WXCX-LD, KDNU-LD, KVPA-LD, KSVN-LD, KCVB-LD, and K15NV-D); **December 1, 2030** (for Stations KFLA-LD, K27PE-D, KBNK-LD, KSAO-LD, KBNI-LD, KWSM-LD, KRET-CD, KSDX-LD, KILA-LD, and KJOU-LD); **February 1, 2031** (for Stations KTNL-TV, KDMD, KLDY-LD, K06QP-D, K25QK-D, KKAI, KUPU, KBLT-LD) and K21LB-D; **April 1, 2031** (for Station WRDP-LD); **June 1, 2031** (for Stations WBXZ-LD, WHTV-LD, WVBG-LD, and W24EU-D); and **August 1, 2031** (for Stations W24EU-D and WBYD-LD).

ARGUMENT

I. **The Grant of Bridge News' Prior Renewal and License Applications Are Final Orders.**

An action of a Bureau of the Federal Communications Commission (FCC) is considered final and no longer subject to appeal or reconsideration when the following conditions are met:

- **Exhaustion of Administrative Remedies:** Under 47 U.S.C. § 155, the filing of an application for review by the full Commission is a condition precedent to judicial review of any order issued by a subordinate unit of the FCC, such as a Bureau. If no application for review is filed, the Bureau's order becomes final and subject to judicial review. However, if an application for review is filed, the Bureau's order is rendered non-final until the full Commission acts on the application. *Ga. Power Co. v. Teleport Communs. Atlanta, Inc.*, 346 F.3d 1047 (2003).
- **Expiration of Time for Filing Appeals or Reconsideration:** The time for filing a petition for reconsideration or an application for review is generally 30 days from the date of public notice of the Bureau's action, as prescribed by 47 U.S.C. § 405, and . § 1.106 (Petitions for reconsideration in non-rulemaking proceedings). If no petition or application is filed within this period, the Bureau's action becomes final. 47 U.S.C. § 405, 47 C.F.R. § 1.106 (Petitions for reconsideration in non-rulemaking proceedings).
- **Resolution of Pending Applications or Petitions:** If a petition for reconsideration or an application for review is filed, the Bureau's action remains non-final until the FCC disposes of the petition or application. For example, if the full Commission denies an application for review, the Bureau's action becomes final upon the issuance of the Commission's decision . *Ga. Power Co. v. Teleport Communs. Atlanta, Inc.*, 346 F.3d 1047 (2003).
- **No Further Review or Stay:** An action is final when it has not been reversed, stayed, enjoined, or otherwise set aside, and no timely request for administrative or judicial review, reconsideration, or stay is pending. Additionally, the time for the FCC to set aside the action on its own motion must have expired. For instance, under , § 1.102 Effective dates of actions taken pursuant to delegated authority.. the effect of a Bureau's action may be stayed if a petition for reconsideration or application for review is filed, but once the FCC completes its review and issues a final decision, the action becomes final . § 1.102 Effective dates of actions taken pursuant to delegated authority, *Bridge Capital Investors v. Susquehanna Radio Corp.*, 458 F.3d 1212 (2006).
- **Judicial Review Considerations:** Judicial review is only available for final agency actions. If a party files a petition for reconsideration or an application for review, the underlying Bureau action is rendered non-final and unreviewable by the courts until the FCC issues a final decision. This principle is supported by case law, which holds that ongoing agency review renders an order non-final for judicial review purposes, and any petition for review filed before the agency's final decision is "incurably premature." *Ga.*

Power Co. v. Teleport Communs. Atlanta, Inc., 346 F.3d 1047 (2003), *Small Bus. in Telecomms. v. FCC*, 251 F.3d 1015 (2001).

Once an FCC action becomes administratively final, it is generally not subject to further review or modification. This principle is rooted in the public interest in ensuring certainty, convenience, and order in administrative proceedings. Under federal law, administrative finality is a dominant principle, as reflected in *Greater Boston Television Corp. v. FCC*, 463 F.2d 268 (1971). Once an FCC order becomes final -- either because it was not appealed within the statutory timeframe or because it was affirmed on judicial review—the FCC is generally bound by that finality. As the Commission has stated:

Staff action taken pursuant to delegated authority generally becomes final and not subject to administrative review forty days after the release of public notice announcing the action,²⁵ unless a petition for reconsideration or an application for review has been filed.²⁶ The Commission has made exceptions to the administrative doctrine of finality when ministerial errors have occurred in processing an application²⁷ or when manifestly unconscionable consequences would result from a failure to revisit a case.²⁸ Otherwise, the Commission will honor the public interest in ensuring certainty, convenience, and order by freezing the administrative record at a predetermined point in time.²⁹

²⁵ See *id.* § 1.117(a).

²⁶ See *id.* §§ 1.106, 1.115.

²⁷ *In re VSS Enterprises, LLC*, Memorandum Order and Opinion, 18 FCC Rcd 6225, 6227 (2003).

²⁸ See *In re Radio Para La Raza*, Memorandum Order and Opinion, 40 FCC 2d 1102 (1973).

²⁹ See *Golden State Broadcasting*, 102 FCC 2d at 797.

Riverside Ministries and Christian Voice of Central Ohio, Inc., 23 FCC Rcd 10360, 10363 ¶ 7 (MB 2008). Accord, *Frontier Broadcasting Co. v. FCC*, 296 F.2d 443, 445 (1961) (the holder of a construction permit awarded by a final order -- *e.g.*, an order that is never appealed -- has a "high degree of protection" under the Communications Act).

None of those situations apply in this case. Thus, the FCC's grants of the Bridge News' renewal and license to cover applications (granting each station in this case either a renewal license term for a full eight-year term or an initial license term applicable to the license period for stations in each stations' state) are currently administratively final, and it was improper and

legally impermissible for the Video Division retroactively, on its own volition, to retract the finality of those actions and to shorten the current license term to “May 27, 2026.”

II. The Video Division’s Application of Section 73.3539(c) of the Commission’s Rules is Unprecedented, and Contrary to Commission Precedent Restricting Application of the Rule.

The FCC has the authority to require the filing of an early application for the renewal of a license, but that right is limited. Under Section 73.3539(c) of the Commission’s Rules, the FCC may direct a licensee to file an early renewal application when it deems such action essential to the proper conduct of a hearing or investigation. 47 C.F.R. § 73.3539(c). In such cases, the FCC specifies a particular deadline for the filing of the renewal application. Additionally, under 47 U.S.C. § 308(a) of the Communications Act, the FCC also may grant or require early renewal applications in cases of emergency. These emergencies may involve danger to life or property, damage to equipment, or situations arising during a national emergency proclaimed by the President or Congress. In such cases, the FCC may bypass normal licensing procedures and require or grant renewals under terms and conditions it prescribes. However, any authorization granted under these emergency provisions does not extend beyond the duration of the emergency. 47 U.S.C. § 308. These provisions illustrate the FCC’s discretion to mandate early renewal applications in situations where public interest, safety, or administrative necessity justifies such action.

The FCC has never previously required an FCC broadcast licensee to file an application for early renewal. Section 73.3539 states:

(c) Whenever the FCC regards an application for a renewal of license as essential to the proper conduct of a hearing or investigation, and specifically directs that it be filed by a date certain, such application shall be filed within the time thus specified. If the licensee fails to file such application within the prescribed time, the hearing or investigation shall proceed as if such renewal application had been received.

47 C.F.R. § 73.3539(c). In this case, although the *Order* states: “the FCC has been investigating Bridge News, LLC for possible violations of the FCC’s prohibition on unauthorized transfers of control of the station licenses,” that matter is not even a subject of debate – Bridge News *already* has *admitted* that inadvertently the ownership structure that was presented to and approved by the Commission was not accurate with respect to Stations WBYD-CD, WJGN-CD, KSVN-CD, W36EX-D, WJYL-CD, KRET-CD, WTNG-CD, KKAI, KUPU, KTNL-TV, and KDMD, and has been willing to accept a forfeiture regarding that error. Long-form applications for approval of the corrected ownership structure (which is ownership which already was approved by the Commission for two of Bridge News’ stations WXII-LD and WMNN-LD (File Nos. 0000180466 and 0000180467)) currently are on file with the FCC. Lead Application File Nos. 0000240949, 0000240957, and 0000240961.

Moreover, the FCC *already* has been conducting an investigation concerning this matter in conjunction with the already-filed transfer of control applications. The Video Division *already* has issued two Inquiry Letters in conjunction with those applications, and is free to *continue* its investigation in connection to those already-pending applications. In this circumstance, the requirement to filing *additional* applications cannot be validly considered to be “essential to the proper conduct of an investigation” where applications *already* have been filed and are pending before the FCC, and the conduct *already* is being investigated. Cf. *Walt Disney Company and American Broadcasting Company*, FCC 26-416 (MB April 28, 2026), where no applications are already under scrutiny, and no investigation with respect to any such pending applications already is pending with regard to pending applications.

FCC precedent establishes a clear standard: “the Commission...will adhere to its practice of not requiring the filing of early renewal applications absent some compelling reason.” *In re Stangland*, 9 F.C.C.2d 683, 684 (1967).

Similarly, in *Knox Broadcasting*, 29 F.C.C.2d 47 (1971), a party sought to have a licensee's authorization revoked or subject to an application for renewal of license in advance of the date specified in the Commission's rules. The Commission denied that effort, stating:

Our review of the submissions of the parties does not disclose the existence of any question of fact, law or policy which is incapable of resolution outside the hearing process and which would, therefore, justify the exercise of our discretion under Section 312 of the Communications Act (See: *Anthony Martin-Trigona*, 18 RR 2d 581 (1970); *Salem Broadcasting Company*, 1 FCC 2d 655, 6 RR 2d 160 (1965)) to direct the licensee of KKDA to show cause why its license for that station should not be revoked. Neither have we been able to find any compelling reason for demanding the submission of an application for renewal of license in advance of the date specified in Section 1.539(c) of the Commission's rules. (See: *Sioux Empire Broadcasting Company*, 9 FCC 2d 683, 10 RR 2d 1031 (1967); *National Antivivisection Society v. F.C.C.*, 3 RR 2d 2027 (1964)). It follows that KNOK's subject Petition must be denied.

Id. at 50.

In even the seminal case of *RKO General, Inc.*, 1 FCC Rcd 1081 (1986), the Commission declined to set stations' licenses for early renewal:

Section 73.3539(c) of the Commission's Rules provides that the Commission may call for the early filing of a renewal application where it "regards an application for a renewal of license as essential to the proper conduct of a hearing or investigation" Mainstream requests that we call for the early filing of WOR-TV's renewal application, pursuant to the rule. We have stated, however, that we would not call for the early filing of a renewal application "absent some compelling reason." *Sioux Empire Broadcasting Co.*, 9 F.C.C.2d 683, 684 (1967). The matters alleged by Mainstream, as described above, concern unresolved issues as to RKO's activities after the issuance of station WOR-TV's license in March, 1983. We do not consider such unresolved issues to be "compelling circumstances."

Similarly, in *Greater Portland Broadcasting Corp.*, 3 FCC Rcd 1953 (1988), a licensee was accused of anticompetitive conduct aimed at keeping a competitor off the air. The Commission stated:

the Commission has never specifically set out pleading requirements for persons requesting the early filing of renewal applications, except to state that it would grant such a request only for "serious" or "compelling reasons." See, e.g., *Sioux Empire Broadcasting Co.*, 9 FCC2d 683, 684 (1967).

Id. at 1954; *Accord, RKO General*, 6 FCC Rcd 6569, ¶ 21 (1991); *Sandab Communications Limited Partnership II*, 13 FCC Rcd 14413 ¶ 65 (1998) (Commission denies requiring the filing on an early renewal application, after finding no “compelling reasons”):

Upon review of the information now before us, we find that the allegations in Portland's pleadings fail to raise[] any substantial and material questions regarding Columbia's conduct. Accordingly, we see no reasons to invoke our discretionary authority under Section 73.3539(c) of the rules.

Greater Portland Broadcasting Corp., 3 FCC Rcd 1953, 1955 (1988).

As far back as 1963, the Commission noted that the Commission has always been circumspect in its discretionary use of the callup procedure. *William L. Ross*, 25 R.R. 360, 364 ¶ 11(1963). As the Commission stated in *Robert E. Thomas and Ferris A. Maloof*, 17 F.C.C.2d 375 (1969):

The Commission, as a matter of policy, will not advance the filing date of the renewal application of an existing station...

We followed this in *Bigbee Broadcasting Co.*, F.C.C. 63-260, 25 R.R. 88 (1963), and also in *William L. Ross*, F.C.C. 63-366, 25 R.R. 360 (1963), pointing out there that the Commission has always been circumspect in its discretionary use of the callup procedure. Accordingly, the applicant's request in this regard will be denied.

Id. at ¶ 16. There has been no reported instance where a change in this policy has been announced.

In short, there has not been even one reported case in which the Commission has ever previously invoked Section 73.3539(c) (or its predecessor, Section 1.539(c)) to require the early “callup” of a Commission license. In light of the investigations that already have been conducted and can still be conducted by virtue of the pending transfer of control applications; and in light of prevailing Commission precedent, the Video Division’s action was arbitrary and capricious, beyond its delegated authority, and contrary to Commission precedent.

III. The Video Division's Action Was Beyond the Authority Delegated to the Media Bureau Under Section 0.61 of the Commission's Rules.

Due to the unprecedented nature of the Video Division's action targeting licenses for early renewal, the Video Division's action was beyond the Media Bureau's delegated authority. The Video Division *Order* was an action of the Media Bureau, and not the Commission itself. The Media Bureau operates under delegated authority as outlined in § 0.61 of the Commission's Rules and Section § 0.283 of the Commission's Rules. Under these rules, certain matters must be referred to the FCC *en banc* for resolution. These include issues presenting novel questions of law, fact, or policy that cannot be resolved under existing precedents, as well as matters involving significant penalties or rulemaking proceedings requiring public notice and comment. 47 C.F.R. § 0.61 and 47 C.F.R. § 0.283. Thus, the Media Bureau cannot unilaterally initiate an early renewal if it involves such matters.

In short, the Media Bureau is restricted from acting on matters that involve novel or unusual issues without referring them to the FCC. This limitation ensures that significant policy decisions or deviations from established procedures are addressed at the Commission level. 47 C.F.R. § 0.283. Quite simply, it has *never* been Commission policy in the past to require the filing of early renewal applications simply to resolve ownership issues and errors in Commission filings, as are presented in this case.

CONCLUSION

Throughout its brief history of owning stations before the FCC, Bridge News has provided quality programming to the public and has served the public interest. Other than one ownership error, which was voluntarily disclosed and has attempted to be rectified, Bridge News has a spotless record of compliance with all FCC rules and regulations.

Legitimate questions have been raised about the motivation underlying the Commission's *Order* against Bridge News. Bloomberg News reports that the Video Division's action "surprised some agency employees" and was issued to "function as a blueprint for future license investigations...and it also creates plausible deniability that license renewals are only targeting Disney."¹ This belief is consistent with concerns being expressed by the United States Senate. In a Letter dated May 7, 2026, Chairman Carr has been requested to respond to a letter from members of the United States Senate stating:

The Commission issued a ... renewal order against Bridge News, LLC on April 27, 2026 – one day before the Disney order. Did you intentionally time the orders so that the Bridge News order would precede the Disney order in the public record?

Attachment C at 3.

As the National Association of Broadcasters has stated:

The FCC's broadcast license renewal process must be grounded in predictability, fairness and transparency, principles reflected in the license terms Congress established and later extended. The Media Bureau's nearly unprecedented request for one company to quickly reapply for all of its licenses – rather than utilize its traditional enforcement process – runs contrary to these principles and creates significant uncertainty for all broadcasters.

Broadcast stations already face intense challenges as they work to deliver trusted journalism, lifesaving emergency services, community programming and election coverage. The FCC must be careful to avoid actions that create further instability for the local stations viewers and listeners depend on."

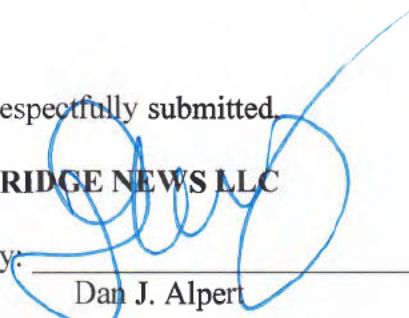
Attachment D. Shortening Bridge News' license terms in these circumstances, and requiring an unprecedented requirement of the filing of early renewal applications, is unnecessary, arbitrary and capricious, and contrary to Commission precedent.

¹ <https://www.msn.com/en-us/money/companies/abc-license-renewal-call-surprised-fcc-staff-and-shattered-norms/ar-AA221DnA?ocid=finance-verthp-feeds>

WHEREFORE, for all of these reasons, it is respectfully requested that this Petition be granted, and that the Video Division's *Order* against Bridge News LLC be reconsidered, rescinded, and withdrawn.

Respectfully submitted

BRIDGE NEWS LLC

By: 

Dan J. Alpert

Its Attorney

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May 19, 2026

Attachment A

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Fac ID	Call Sign	City	State
182186	K15NG-D	MESQUITE	NV
28566	KFLA-LD	LOS ANGELES	CA
186672	K27PE-D	GUSTINE	CA
20559	KBNK-LD	FRESNO	CA
34578	KSAO-LD	SACRAMENTO	CA
41123	KBNI-LD	SANTA MARIA	CA
31355	KWSM-LD	SANTA MARIA	CA
10536	KRET-CD	PALM SPRINGS	CA
168576	KSDX-LD	SAN DIEGO	CA
60519	KTNL-TV	SITKA	AK
25221	KDMD	ANCHORAGE	AK
25219	KLDY-LD	ANCHORAGE	AK
183022	K06QP-D	JUNEAU	AK
25222	K25QK-D	ANCHORAGE	AK
83180	KKAI	KAILUA	HI
89714	KUPU	WAIMANALO	HI
182846	KBLT-LD	ANCHORAGE	AK
185411	K21LB-D	LINCOLN CITY	OR
186686	WVCC-LD	WESTMORELAND	NH
14317	WBXZ-LD	BUFFALO	NY
127812	WHTV-LD	NEW YORK	NY
74018	WVBG-LD	GREENWICH	NY
129632	W24EU-D	ERIE	PA
68395	WBYD-CD	PITTSBURGH	PA
50144	WIVX-LD	CLEVELAND	OH
168787	KBNY-LD	MONTEREY	CA
50148	W27DG-D	MILLERSBURG	OH
129642	KILA-LD	CHERRY VALLEY	CA
130272	KJOU-LD	BAKERSFIELD	CA
181856	WRDP-LD	COLUMBUS	GA
182020	W25FQ-D	FLORENCE	SC
182301	W19EX-D	GAINESVILLE	FL
182322	WBMN-LD	OCALA	FL
183492	K06PT-D	COLUMBIA	MO
183588	WZVC-LD	ATHENS	GA
184641	K26PF-D	SAINT CLOUD	MN
185711	W33ER-D	AUGUSTA	GA
185777	W25FW-D	COLUMBUS	GA
186640	K34QY-D	GOLDEN VALLEY	AZ
186641	K08QN-D	GOLDEN VALLEY	AZ
186719	K19NF-D	SOCORRO	NM
187860	K06QJ-D	SIOUX FALLS	SD
188768	W17EH-D	QUINCY	IL

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 4/1/2030*
 12/3/2029*

Attachment B

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000189822, was granted on 11/18/2022 for a term expiring on 08/01/2030.

This is your License Renewal Authorization for station K03IJ-D

Facility ID: 183495

Location: COLLEGE STATION,TX

Innovative Media Technologies, Inc.

5174 McGinnis Ferry Road Suite 133

Alpharetta, GA 30005



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington, MI, 48331

Call Sign File Number

K06PT-D 0000254122

Facility ID: 183492**NTSC TSID:** 10910**Digital TSID:** 10911**This License Covers Construction
Permit No.**

0000184981

Grant Date 10/02/2024		Expiration Date 02/01/2030
Hours of Operation Unlimited		
Station Location City COLUMBIA State MO	Frequency (MHz) 82.0 - 88.0	Station Channel 6

Antenna Structure Registration Number 1027181	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 39-0-52.1 N Longitude 92-16-32.7 W	Antenna Type Directional
Description of Antenna Make SCA Model TVO-4	Major Lobe Directions 70.0 250.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 3 kW 4.77 DBK	
Height of Radiated Center Above Ground (Meters) 151	Height of Radiated Center Above Mean Sea Level (Meters) 405.5
Out-Of-Channel Emission Mask Simple	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington, MI, 48331

Call Sign File Number

K06QJ-D 0000254649

Facility ID: 187860**NTSC TSID:** 10922**Digital TSID:** 10923**This License Covers Construction
Permit No.**

0000184985

Grant Date 10/02/2024		Expiration Date 04/01/2030
Hours of Operation Unlimited		
Station Location City SIOUX FALLS State SD	Frequency (MHz) 82.0 - 88.0	Station Channel 6

Antenna Structure Registration Number 1042104	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 43-30-18.0 N Longitude 96-33-23.0 W	Antenna Type Directional
Description of Antenna Make JAM Model JA/LS-OM-8	Major Lobe Directions 0.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 3 kW 4.77 DBK	
Height of Radiated Center Above Ground (Meters) 170	Height of Radiated Center Above Mean Sea Level (Meters) 604.9
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196960, was granted on 01/26/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station K06QP-D

Facility ID: 183022

KETCHIKAN TV, LLC

Location: JUNEAU,AK

PO Box 1471

Evergreen, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign File Number

K08QN-D 0000193003

Facility ID: 186641**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000190287

Grant Date 06/10/2022	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City GOLDEN VALLEY State AZ	Frequency (MHz) 180.0 - 186.0 Station Channel 8

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 35-20-6 N Longitude 114-12-56 W	Antenna Type Directional
Description of Antenna Make SAM Model SAM-160	Major Lobe Directions 180.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 1 kW 0.00 DBK	
Height of Radiated Center Above Ground (Meters) 7	Height of Radiated Center Above Mean Sea Level (Meters) 1040.3
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) 7.6

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
W17EH-D	0000240011

Facility ID: 188768

NTSC TSID:

Digital TSID:

**This License Covers Construction
Permit No.**

0000215088

Grant Date 03/01/2024		Expiration Date 12/01/2029
Hours of Operation Unlimited		
Station Location City QUINCY State IL	Frequency (MHz) 488.0 - 494.0	Station Channel 17

Antenna Structure Registration Number 1011390	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 39-57-4.0 N Longitude 91-19-54.0 W	Antenna Type Non-Directional
Description of Antenna Make Alive Model ATC-BCE212M-V2-17	Major Lobe Directions N/A
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 139	Height of Radiated Center Above Mean Sea Level (Meters) 370.6
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000203370, was granted on 04/20/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station K21LB-D

Facility ID: 185411

Location: LINCOLN CITY,OR

Innovative Media Technologies

5174 McGinnis Ferry Road Suite 133

Alpharetta, GA 30005



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196961, was granted on 01/26/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station K25QK-D

Facility ID: 25222

Location: ANCHORAGE,AK

KETCHIKAN TV, LLC

PO BOX 1471

EVERGREEN, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington, MI, 48331

Call Sign File Number

K26PF-D 0000256325

Facility ID: 184641

NTSC TSID: 10924

Digital TSID: 10925

**This License Covers Construction
Permit No.**

0000226660

Grant Date 10/31/2024	Expiration Date 04/01/2030
Hours of Operation Unlimited	
Station Location City SAINT CLOUD State MN	Frequency (MHz) 542.0 - 548.0 Station Channel 26

Antenna Structure Registration Number 1210568	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 45-34-20.5 N Longitude 94-21-2.3 W	Antenna Type Directional
Description of Antenna Make Alive Telecom Model ATC-BCE28CW-V2-26	Major Lobe Directions 50.0
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 89.9	Height of Radiated Center Above Mean Sea Level (Meters) 456.3
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195810, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station K27PE-D

Facility ID: 186672

Location: GUSTINE,CA

Lowcountry 34 Media, LLC

14 Tuxedo Drive

Beaufort, SC 29907



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000188912, was
granted on 01/04/2023 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station K34MX-D

Facility ID: 125712

Location: ODESSA,TX

Lowcountry 34 Media, LLC

14 Tuxedo Drive

Beaufort, SC 29907



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign File Number

K34QY-D 0000193005

Facility ID: 186640**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000190286

Grant Date 06/08/2022	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City GOLDEN VALLEY State AZ	Frequency (MHz) 590.0 - 596.0
	Station Channel 34

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 35-20-6 N Longitude 114-12-56 W	Antenna Type Directional
Description of Antenna Make ELTI Model ELTI UHF Panel	Major Lobe Directions 90.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 3 kW 4.77 DBK	
Height of Radiated Center Above Ground (Meters) 6	Height of Radiated Center Above Mean Sea Level (Meters) 1039.3
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) 7.6

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000185932, was
granted on 08/02/2022 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station KADF-LD

Facility ID: 32281

Location: AUSTIN,TX

Joseph W. Shaffer

P.O. BOX 10310

PRESCOTT, AZ 86304



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000203343, was granted on 02/04/2026 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KBLT-LD

Facility ID: 182846

Location: ANCHORAGE,AK

Bridge News LLC

38955 Hills Tech Dr.

Farmington Hills, MI 48331



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195885, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KKDJ-LD

Facility ID: 41123

Location: SANTA MARIA,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195882, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KJE0-LD

Facility ID: 20559

Location: FRESNO,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000192733, was
granted on 01/10/2023 for a term expiring on
10/01/2030.

This is your License Renewal Authorization for station KCVB-LD

Facility ID: 69693

Location: LOGAN,UT

CACHE VALLEY BROADCASTING, LLC

P.O. BOX 3942

LOGAN, UT 84323



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196955, was granted on 01/17/2024 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KDMD

Facility ID: 25221

Location: ANCHORAGE,AK

KETCHIKAN TV, LLC

29793 Ruby Ranch Road PO Box 1471
Evergreen, CO 80439

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195228, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KFLA-LD

Facility ID: 28566

Location: LOS ANGELES,CA

Roy William
Mayhugh

1872 NE Brown Dr.
Madras, OR 97741



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000189935, was
granted on 09/29/2022 for a term expiring on
10/01/2030.

This is your License Renewal Authorization for station KGLR-LD

Facility ID: 182107

Location: SPARKS,NV

New Line Media Communications LLC

3495 Lakeside Drive # 1228

Reno, NV 89509



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000135003, was granted on 06/09/2021 for a term expiring on 06/01/2029.

This is your License Renewal Authorization for station KHMf-LD

Facility ID: 58284

Location: FORT SMITH,AR

KTV MEDIA, LLC

17200 CHENAL PARKWAY SUITE 300 - 267
LITTLE ROCK, AR 72223



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195314, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KILA-LD

Facility ID: 129642

Location: CHERRY VALLEY,CA

Roy William

Mayhugh

1872 NE Brown Dr.

Madras, OR 97741



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195881, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KJOU-LD

Facility ID: 130272

Location: BAKERSFIELD,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000135001, was granted on 06/09/2021 for a term expiring on 06/01/2029.

This is your License Renewal Authorization for station KKAF-LD

Facility ID: 48534

Location: FAYETTEVILLE,AR

KTV MEDIA, LLC

17200 CHENAL PARKWAY SUITE 300 - 267
LITTLE ROCK, AR 72223



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000190754, was
granted on 01/19/2023 for a term expiring on
10/01/2030.

This is your License Renewal Authorization for station KKIC-LD

Facility ID: 74409

Location: BOISE,ID

COCOLA BROADCASTING COMPANIES LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196959, was granted on 01/26/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KLDY-LD

Facility ID: 25219

Location: ANCHORAGE,AK

KETCHIKAN TV, LLC

PO BOX 1471

EVERGREEN, CO 80437



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000185938, was
granted on 08/02/2022 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station K34FM-D

Facility ID: 67880

Location: AUSTIN,TX

Joseph W. Shaffer

P.O. BOX 10310

PRESCOTT, AZ 86304



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195889, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KMBY-LD

Facility ID: 168787

Location: Monterey,CA

COCOLA BROADCASTING COMPANIES, LLC

706 WEST HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196044, was granted on 07/19/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KRET-CD

Facility ID: 10536

Location: PALM SPRINGS,CA

PO Box 5377 41625 ECLECTIC SUITE J1
PALM DESERT, CA 92260

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195883, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KSA0-LD

Facility ID: 34578

Location: SACRAMENTO,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196486, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KSDX-LD

Facility ID: 168576

Location: SAN DIEGO,CA

Estrella Television License LLC

1845 Empire Avenue

Burbank, CA 91504



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000192709, was granted on 01/04/2023 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KSVN-CD

Facility ID: 168239

Location: OGDEN,UT

Azteca Broadcasting Corporation

4215 West 4000 South

West Haven, UT 84401

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196953, was granted on 02/22/2024 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KTNL-TV

Facility ID: 60519

Location: SITKA,AK

Ketchikan TV, LLC

P.O. Box 1471 29833 Ruby Ranch Road
Evergreen, CO 80437

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000134930, was granted on 06/09/2021 for a term expiring on 06/01/2029.

This is your License Renewal Authorization for station KTVV-LD

Facility ID: 57547

Location: HOT SPRINGS,AR

PINNACLE MEDIA, LLC

PO Box 23808

LITTLE ROCK, AR 72221



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000160875, was granted on 01/21/2022 for a term expiring on 02/01/2030.

This is your License Renewal Authorization for station KUKC-LD

Facility ID: 191352

Location: KANSAS CITY,MO

MEDIA VISTA KANSAS CITY, LLC

1110 Pine Ridge Road Suite 301

Naples, FL 34108



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000188321, was granted on 01/04/2023 for a term expiring on 08/01/2030.

This is your License Renewal Authorization for station KULC-LD

Facility ID: 182050

Location: PORT ARTHUR,TX

Lowcountry 34 Media, LLC

14 Tuxedo Drive

Beaufort, SC 29907



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000201873, was granted on 01/19/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KUPU

Facility ID: 89714

Location: WAIMANALO,HI

Hawaii Catholic TV, Inc.

PO Box 15

Honolulu, HI 96810

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000187964, was
granted on 02/15/2023 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station KVHC-LD

Facility ID: 125586

Location: KERRVILLE,TX

5GTV, LLC

500 Summer Street #502
Stamford, CT 06901



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000192522, was granted on 09/30/2022 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KVPA-LD

Facility ID: 33773

Location: PHOENIX,AZ

Estrella Television License LLC

1845 EMPIRE AVENUE

Burbank, CA 81504



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000186977, was granted on 08/02/2022 for a term expiring on 08/01/2030.

This is your License Renewal Authorization for station KVVV-LD

Facility ID: 6690

Location: HOUSTON,TX

Sovryn Holdings, Inc.

450 Park Avenue 30th
Floor

New York, NY 10022



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195892, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KWSM-LD

Facility ID: 31355

Location: SANTA MARIA,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000191478, was granted on 10/13/2022 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KXCY-LD

Facility ID: 186316

Location: CHEYENNE,WY

Roseland Broadcasting, Inc.

888C 8th Avenue #733

New York, NY 10019



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122149, was granted on 10/13/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station W16CA-D

Facility ID: 126708

Location: HOMESTEAD,FL

CAYO HUESO NETWORKS, LLC

PO Box 471

EVERGREEN, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

W19EX-D 0000266946

Facility ID: 182301**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000213178

Grant Date 02/27/2025		Expiration Date 02/01/2029
Hours of Operation Unlimited		
Station Location City GAINESVILLE State FL	Frequency (MHz) 500.0 - 506.0	Station Channel 19

Antenna Structure Registration Number 1035360	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 29-32-12.0 N Longitude 82-23-59.0 W	Antenna Type Directional
Description of Antenna Make Dielectric Model TLP-8F/VP OS	Major Lobe Directions 290.0
Antenna Beam Tilt (Degrees Electrical) 1.0	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 207.3	Height of Radiated Center Above Mean Sea Level (Meters) 226.8
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000212462, was granted on 07/12/2023 for a term expiring on 08/01/2031.

This is your License Renewal Authorization for station W24EU-D

Facility ID: 129632

Lowcountry 34 Media, LLC

Location: ERIE,PA

14 Tuxedo Drive

Beaufort, SC 29907



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign File Number

W25FQ-D 0000215753

Facility ID: 182020**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000214692

Grant Date 06/01/2023	Expiration Date 12/01/2028
Hours of Operation Unlimited	
Station Location City FLORENCE State SC	Frequency (MHz) 536.0 - 542.0 Station Channel 25

Antenna Structure Registration Number 1048802	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 34-16-18.0 N Longitude 79-43-33.0 W	Antenna Type Directional
Description of Antenna Make ELTI Model ELTI UHF Panel	Major Lobe Directions 60.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 1 kW 0.00 DBK	
Height of Radiated Center Above Ground (Meters) 11	Height of Radiated Center Above Mean Sea Level (Meters) 48.2
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign	File Number
W25FW-D	0000221308

Facility ID: 185777**NTSC TSID:** 10354**Digital TSID:** 10355**This License Covers Construction
Permit No.**

0000218613

Grant Date 09/28/2023		Expiration Date 04/01/2029
Hours of Operation Unlimited		
Station Location City COLUMBUS State GA	Frequency (MHz) 536.0 - 542.0	Station Channel 25

Antenna Structure Registration Number 1219605	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 32-35-55.4 N Longitude 85-12-19.7 W	Antenna Type Directional
Description of Antenna Make Dielectric Model DLP-12M (BA)	Major Lobe Directions 270.0 290.0 310.0 330.0 350.0
Antenna Beam Tilt (Degrees Electrical) 1	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 82	Height of Radiated Center Above Mean Sea Level (Meters) 278.9
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000144279, was granted on 09/08/2021 for a term expiring on 10/01/2029.

This is your License Renewal Authorization for station W27DG-D

Facility ID: 50148

Location: MILLERSBURG, OH

IMAGE VIDEO TELEPRODUCTIONS, INC.

6755 FREEDOM AVE., N.W.

NORTH CANTON, OH 44720



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122148, was granted on 10/13/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WKIZ-LD

Facility ID: 4323

Location: KEY WEST,FL

CAYO HUESO NETWORKS, LLC

PO Box 471

EVERGREEN, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
W33ER-D	0000218372

Facility ID: 185711**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000217785

Grant Date 08/01/2023	Expiration Date 04/01/2029
Hours of Operation Unlimited	
Station Location City AUGUSTA State GA	Frequency (MHz) 584.0 - 590.0 Station Channel 33

Antenna Structure Registration Number 1059412	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 33-30-21.0 N Longitude 81-57-43.0 W	Antenna Type Directional
Description of Antenna Make Dielectric Model DLP-12M/VP (AER)	Major Lobe Directions 190.0 210.0 230.0 250.0 270.0
Antenna Beam Tilt (Degrees Electrical) 1	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 125.4	Height of Radiated Center Above Mean Sea Level (Meters) 269.0
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000158106, was granted on 09/12/2023 for a term expiring on 12/01/2029.

This is your License Renewal Authorization for station W36EX-D

Facility ID: 37238

Location: ALTON,IL

Liberty Communications, Inc.

PO Box 1044 3401 Fosterburg Road

Alton, IL 62002

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
WBMN-LD	0000266947

Facility ID: 182322**NTSC TSID:** 10912**Digital TSID:** 10913**This License Covers Construction
Permit No.**

0000213176

Grant Date 02/27/2025		Expiration Date 02/01/2029
Hours of Operation Unlimited		
Station Location City OCALA State FL	Frequency (MHz) 488.0 - 494.0	Station Channel 17

Antenna Structure Registration Number 1035360	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 29-32-12.0 N Longitude 82-23-59.0 W	Antenna Type Directional
Description of Antenna Make Dielectric Model TLP-120/VP	Major Lobe Directions 205.0
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 182.9	Height of Radiated Center Above Mean Sea Level (Meters) 202.4
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000207783, was
granted on 05/10/2023 for a term expiring on
06/01/2031.

This is your License Renewal Authorization for station WBXZ-LD

Facility ID: 14317

Location: BUFFALO,NY

Steven D. Ritchie

7729 AKRON ROAD

LOCKPORT, NY 14094



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000213456, was granted on 04/11/2024 for a term expiring on 08/01/2031.

This is your License Renewal Authorization for station WBYD-CD

Facility ID: 68395

Location: PITTSBURGH,PA

Bridge News LLC

38955 Hills Tech Dr.

Farmington Hills, MI 48331

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000155276, was granted on 11/12/2021 for a term expiring on 12/01/2029.

This is your License Renewal Authorization for station WCHU-LD

Facility ID: 129745

Location: Oakwood hills,IL

Venture Technologies Group, LLC

5670 Wilshire Blvd., Suite 1620

Los Angeles, CA 90036



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122150, was granted on 10/13/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WDGT-LD

Facility ID: 6046

Location: MIAMI,FL

CAYO HUESO NETWORKS, LLC

PO Box 471

EVERGREEN, CO 80437



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122936, was granted on 03/19/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station W05DH-D

Facility ID: 183761

New Hola TV LLC

Location: Jupiter,FL

6115 Lake Avenue

West Palm Beach, FL 33405



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000119812, was granted on 12/17/2021 for a term expiring on 12/01/2028.

This is your License Renewal Authorization for station WFDY-LD

Facility ID: 182003

Location: MYRTLE BEACH,SC

MARQUEE BROADCASTING INC.

4400 Brookeville Rd

Brookeville, MD 20833



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000123217, was granted on 03/04/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WGCT-LD

Facility ID: 128357

Location: Tampa,FL

Robert W Carr

23114 NE 69TH AVENUE
MELROSE, FL 32666



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000118816, was
granted on _____ for a term expiring on
12/01/2028.

This is your License Renewal Authorization for station WTNG-CD

Facility ID: 167158

Location: LUMBERTON-PEMBROKE,NC

Mercy's Bridge Media, LLC

PO Box 526 P.O. BOX 526

Cordova, NC 28330

This Authorization must be uploaded to its online public inspection file with the station's
License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000208588, was granted on 08/23/2023 for a term expiring on 06/01/2031.

This is your License Renewal Authorization for station WHTV-LD

Facility ID: 127812

Location: New York,NY

Venture Technologies Group, LLC

150 S Arroyo Pkwy #103

Pasadena, CA 91105



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000144280, was
granted on 09/08/2021 for a term expiring on
10/01/2029.

This is your License Renewal Authorization for station WIVX-LD

Facility ID: 50144

Location: AKRON,OH

IMAGE VIDEO TELEPRODUCTIONS, INC.

6755 FREEDOM AVE., N.W.

NORTH CANTON, OH 44720



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000115088, was granted on 10/13/2020 for a term expiring on 10/01/2028.

This is your License Renewal Authorization for station WJGN-CD

Facility ID: 66549

Location: CHESAPEAKE,VA

THE UNION MISSION

3000 NORTH LANDING ROAD

VIRGINIA BEACH, VA 23456

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000141430, was granted on 10/13/2021 for a term expiring on 08/01/2029.

This is your License Renewal Authorization for station WJYL-CD

Facility ID: 6837

Location: JEFFERSONVILLE,IN

WJYL, LLC

P.O. Box 2605

Clarksville, IN 47131

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000145924, was granted on 09/08/2021 for a term expiring on 10/01/2029.

This is your License Renewal Authorization for station WMNN-LD

Facility ID: 184267

Location: LAKE CITY,MI

FREELANCER TELEVISION BROADCASTING, INC.

320 W. 13TH STREET

CADILLAC, MI 49601



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122948, was granted on 03/19/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WOFT-LD

Facility ID: 128367

Location: Ocala, FL

BUDD BROADCASTING CO., INC.

4190 NW 93RD AVENUE

GAINSVILLE, FL 32653



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
WRDP-LD	0000264874

Facility ID: 181856

NTSC TSID: 10926

Digital TSID: 10927

**This License Covers Construction
Permit No.**

0000233576

Grant Date 02/14/2025		Expiration Date 04/01/2029
Hours of Operation Unlimited		
Station Location City COLUMBUS State GA	Frequency (MHz) 482.0 - 488.0	Station Channel 16

Antenna Structure Registration Number 1032658	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 32-27-29.0 N Longitude 84-53-8.0 W	Antenna Type Directional
Description of Antenna Make Alive Telecom Model ATC-BCE410BR-VB-16	Major Lobe Directions 5.0 235.0
Antenna Beam Tilt (Degrees Electrical) 1.0	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 150	Height of Radiated Center Above Mean Sea Level (Meters) 267.3
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000119280, was granted on 02/11/2021 for a term expiring on 12/01/2028.

This is your License Renewal Authorization for station WSCG-LD

Facility ID: 69449

Location: BEAUFORT, ETC.,SC

MARQUEE BROADCASTING INC.

4400 BROOKEVILLE RD

BROOKEVILLE, MD 20833



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000118816, was
granted on _____ for a term expiring on
12/01/2028.

This is your License Renewal Authorization for station WTNG-CD

Facility ID: 167158

Location: LUMBERTON-PEMBROKE,NC

Mercy's Bridge Media, LLC

PO Box 526 P.O. BOX 526

Cordova, NC 28330

This Authorization must be uploaded to its online public inspection file with the station's
License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000172285, was granted on 03/29/2022 for a term expiring on 04/01/2030.

This is your License Renewal Authorization for station WUMN-LD

Facility ID: 191416

Location: MINNEAPOLIS,MN

MEDIA VISTA MINNEAPOLIS, LLC

1110 Pine Ridge Rd Suite 301

Naples, FL 34108



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000208877, was
granted on 05/10/2023 for a term expiring on
06/01/2031.

This is your License Renewal Authorization for station WVBG-LD

Facility ID: 74018

Location: GREENWICH,NY

WIRELESS ACCESS, LLC

PO Box 260 50 SWART STREET
MARGARETVILLE, NY 12455



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000204335, was granted on 03/15/2023 for a term expiring on 04/01/2031.

This is your License Renewal Authorization for station WCC-LD

Facility ID: 186686

Location: WESTMORELAND,NH

Milachi Media, LLC

482 Harbor Drive North

Indian Rocks Beach, FL 33785



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000121757, was granted on 02/18/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WWRJ-LP

Facility ID: 39420

Location: JACKSONVILLE,FL

U.S. TELEVISION, L.L.C.

P.O. BOX 3041

JENA, LA 71342



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000145962, was
granted on 10/13/2021 for a term expiring on
10/01/2029.

This is your License Renewal Authorization for station WXII-LP

Facility ID: 16651

Location: CEDAR,MI

FREELANCER TELEVISION BROADCASTING, INC.

320 W. 13TH ST.

CADILLAC, MI 49601



Federal Communications Commission

TELEVISION TRANSLATOR BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

K15NG-D 0000189026

Facility ID: 182186**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

BNPDTL-20090825APE

Grant Date 04/13/2022	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City MESQUITE State NV	Frequency (MHz) 476.0 - 482.0 Station Channel 15
This authorization reissued to TINY TORTOISE INVESTMENTS, LLC on 03/05/2026. Call Sign Compliance	

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 36-49-55.4 N Longitude 114-3-34.2 W	Antenna Type Directional
Description of Antenna Make SCA Model 4DR-16-2HW	Major Lobe Directions 172.0 225.0 278.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 0.5 kW -3.01 DBK	
Height of Radiated Center Above Ground (Meters) 17	Height of Radiated Center Above Mean Sea Level (Meters) 587
Out-Of-Channel Emission Mask Simple	Overall Height of Antenna Structure Above Ground (Meters) 18

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000201851, was granted on 09/20/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KKAI

Facility ID: 83180

Kailua Television, LLC

Location: KAILUA,HI

PO Box 8969 P.O. Box 8969

Honolulu, HI 96810

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195889, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KMBY-LD

Facility ID: 168787

Location: Monterey,CA

COCOLA BROADCASTING COMPANIES, LLC

706 WEST HERNDON AVENUE

FRESNO, CA 93650



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
WZVC-LD	0000253901

Facility ID: 183588**NTSC TSID:** 10902**Digital TSID:** 10903**This License Covers Construction
Permit No.**

0000226647

Grant Date 09/13/2024		Expiration Date 04/01/2029
Hours of Operation Unlimited		
Station Location City ATHENS State GA	Frequency (MHz) 524.0 - 530.0	Station Channel 23

Antenna Structure Registration Number 1020944	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 34-5-1.1 N Longitude 83-19-19.3 W	Antenna Type Directional
Description of Antenna Make Alive Telecom Model ATC-BCE210MR-V2-23	Major Lobe Directions 70.0
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 106.7	Height of Radiated Center Above Mean Sea Level (Meters) 372.6
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

K19NF-D 0000234030

Facility ID: 186719**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000220945

Grant Date 01/08/2024	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City SOCORRO State NM	Frequency (MHz) 500.0 - 506.0 Station Channel 19

Antenna Structure Registration Number 1055979	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 34-25-0.5 N Longitude 106-50-40.1 W	Antenna Type Non-Directional
Description of Antenna Make Dielectric Model DLP-12B	Major Lobe Directions N/A
Antenna Beam Tilt (Degrees Electrical) 1	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 30	Height of Radiated Center Above Mean Sea Level (Meters) 1479.3
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Innovative Media Technologies Inc.
7742 Spalding Dr
Suite 465
Norcross, GA, 30092

Call Sign	File Number
W17EH-D	0000169061

Facility ID: 188768

NTSC TSID:

Digital TSID:

**This License Covers Construction
Permit No.**

0000154571

Grant Date 11/26/2021		Expiration Date 12/03/2029
Hours of Operation Unlimited		
Station Location City QUINCY State IL	Frequency (MHz) 488.0 - 494.0	Station Channel 17

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 39-57-46.8 N Longitude 91-23-36.3 W	Antenna Type Directional
Description of Antenna Make SCA Model CL-1469	Major Lobe Directions 180.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) .005 kW -23.01 DBK	
Height of Radiated Center Above Ground (Meters) 5.8	Height of Radiated Center Above Mean Sea Level (Meters) 188.8
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) 6

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000128576, was granted on 04/02/2021 for a term expiring on 04/01/2029.

This is your License Renewal Authorization for station WGCB-LD

Facility ID: 69450

Location: HINESVILLE-RICHMOND,GA

MARQUEE BROADCASTING INC.

4400 BROOKEVILLE RD

BROOKEVILLE, MD 20833



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

WIIW-LD 0000232650

Facility ID: 168068

NTSC TSID:

Digital TSID:

**This License Covers Construction
Permit No.**

0000213351

Grant Date 02/01/2024		Expiration Date 08/01/2029
Hours of Operation Unlimited		
Station Location City NASHVILLE State TN	Frequency (MHz) 470.0 - 476.0	Station Channel 14

Antenna Structure Registration Number 1050735	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 36-8-27.0 N Longitude 86-51-56.0 W	Antenna Type Directional
Description of Antenna Make Alive Model ATC-BCE312UA-V1-14	Major Lobe Directions 20.0 90.0 160.0
Antenna Beam Tilt (Degrees Electrical) 0.75	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 211.2	Height of Radiated Center Above Mean Sea Level (Meters) 416.9
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000144818, was
granted on 09/08/2021 for a term expiring on
10/01/2029.

This is your License Renewal Authorization for station WHNE-LD

Facility ID: 168737

Location: DETROIT,MI

TAIT BROADCASTING, LLC

27251 STATE ROAD 54 SUITE B14-124

WESLEY CHAPEL, FL 33544



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000191734, was granted on 09/30/2022 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KDNV-LD

Facility ID: 67876

Location: LAS VEGAS,NV

LVNV Broadcasting Company LLC

3111 Bel Air Dr. Unit 25D

Las Vegas, NV 89109



Attachment C

United States Senate

May 7, 2026

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Dear Chairman Carr,

The Federal Communications Commission's (FCC) order, sent at your directive, to The Walt Disney Company to file early license renewals for its eight ABC broadcast stations — coming just one day after President Donald Trump publicly demanded ABC fire late-night host Jimmy Kimmel — is an extraordinary abuse of power. This order is the latest and most extreme step in your use of the FCC's licensing authority as a cudgel against broadcasters whose editorial choices displease the President. You have effectively converted the FCC's authority over the public airwaves into an instrument of presidential retribution against constitutionally protected speech. The FCC must immediately rescind this order and explain its conduct.

The FCC order, sent under your leadership, appears to be a blatant effort to punish Disney for its editorial decision-making, notably its refusal to fire Kimmel over a recent joke. On Monday last week, both President Trump¹ and First Lady Melania Trump² demanded that Disney fire Kimmel over his joke — speech clearly protected under the First Amendment. One day later, you directed the FCC to send the early-renewal order³ to Disney — reportedly surprising FCC career staff.⁴ Although the three-paragraph order did not mention Kimmel's joke or Trump's comments, the timing speaks volumes. This action appears to penalize Disney for refusing to capitulate to Trump's demands to fire Kimmel and to send a message to other broadcasters: Modify your speech to favor Trump or face the FCC's wrath. Moreover, with the exception of a different order on Monday of last week⁵ — possibly timed to give you cover for the Disney order that would come the next day — the FCC appears not to have used its authority⁶ to call in licenses for early renewal in over half a century, and it has never invoked that authority to target

¹ Donald J. Trump (@realDonaldTrump), Truth Social (Apr. 27, 2026 1:26 PM), <https://truthsocial.com/@realDonaldTrump/posts/116477838570626860>.

² Melania Trump (@FLOTUS), X (Apr. 27, 2026 10:19 AM), <https://x.com/FLOTUS/status/2048769128513585618>.

³ Federal Communications Commission Order DA 26-416, In the Matter of The Walt Disney Company et al. (Apr. 28, 2026), <https://docs.fcc.gov/public/attachments/DA-26-416A1.pdf>.

⁴ Kelcee Griffis & Saijel Kishan, *ABC License Renewal Call Surprised FCC Staff and Shattered Norms*, Bloomberg (Apr. 29, 2026), <https://www.bloomberg.com/news/articles/2026-04-29/abc-license-renewal-call-surprised-fcc-staff-and-shattered-norms>.

⁵ FCC Order DA 26-413, In the Matter of Bridge News, LLC (Apr. 27, 2026), <https://docs.fcc.gov/public/attachments/DA-26-413A1.pdf>.

⁶ 47 CFR § 73.3539(c).

constitutionally protected speech or satisfy a president's personal vendetta against a company.⁷ The Disney early-renewal order is thus an unprecedented and unconstitutional abuse of the Commission's powers.

The Trump administration's sustained, public campaign against Disney also lays bare the pretextual and politically motivated nature of this order. Over the past 18 months, President Trump and you have repeatedly threatened Disney, ABC, and its stations for engaging in constitutionally protected speech. In January 2025, just a few days after you became FCC chairman, the FCC reinstated a frivolous complaint against ABC based on its moderation of a 2024 presidential debate.⁸ Over the following months, President Trump repeatedly called on the FCC to revoke licenses from broadcasters because of their news coverage, including licenses of ABC stations.⁹ And then in September 2025, you told a podcast host — following a different joke from Kimmel that angered Trump and his allies — that Disney and ABC could “do this the easy way or the hard way,” and said that “there's going to be additional work for the FCC ahead” unless ABC affiliates “find ways to change conduct and take action, frankly, on Kimmel[.]”¹⁰ This mafia boss threat provoked a bipartisan backlash but your message was clear: the FCC, with you as chairman, was ready to serve as Trump's speech police.

The campaign against Disney and its editorial decision-making, culminating in last week's early-renewal order, is an egregious abuse of power and a clear violation of the First Amendment. Although the FCC has the authority to ensure broadcasters operate in the public interest, it cannot serve as President Trump's roving censor, threatening to revoke licenses against broadcasters whose editorial content — including a comedian's jokes — displeases the President. In fact, before serving as chairman, you frequently recognized the importance of the First Amendment and the freedom of speech, including for comedians. As you previously explained: “From Internet memes to late-night comedians, from cartoons to the plays and poems as old as organized government itself - Political Satire circumvents traditional gatekeepers & helps hold those in power accountable. Not surprising that it's long been targeted for censorship.”¹¹ Now, you are doing exactly that — targeting political satire for censorship.

⁷ Although the FCC does not have a public list of early-renewal orders, a petition to the Commission in 2018 indicated that the agency last called in licenses for early renewal in 1972. *See* Petition to Require Filing of Early Renewal Applications, American Cable Association (Nov. 26, 2018) 4 n.9 (identifying just three early-renewal orders in the past 75 years, the last coming in 1972). This letter seeks to confirm that early-renewal record.

⁸ *See, e.g.,* David Shephardson, *FCC reinstates complaints against ABC, CBS and NBC for 2024 election coverage*, Reuters (Jan. 23, 2025), <https://www.reuters.com/business/media-telecom/fcc-reinstates-complaints-over-abc-presidential-debate-harris-tv-appearances-2025-01-22/>.

⁹ *See, e.g.,* Donald J. Trump (@realDonaldTrump), Truth Social (Aug. 24, 2025, 9:59 PM), <https://truthsocial.com/@realDonaldTrump/posts/115086929873163909>.

¹⁰ *See, e.g.,* Gene Maddaus, *FCC Chairman Threatens ABC Over Jimmy Kimmel's Remarks About Charlie Kirk's Killer*, Variety (Sept. 17, 2025), <https://variety.com/2025/tv/news/brendan-carr-abc-fcc-jimmy-kimmel-charlie-kirk-1236522406/>.

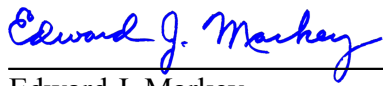
¹¹ Brendan Carr (@BrendanCarrFCC), X (Feb. 20, 2020, 10:18 PM), <https://x.com/BrendanCarrFCC/status/1230693195828400129>.

You should direct the FCC to immediately rescind the order calling in Disney's ABC station licenses for early renewal. To help the public understand your basis for this action, please respond in writing to the following questions by May 21, 2026:

1. Please describe the timing and process by which you determined that the Commission should issue the early-renewal order.
 - a. When did you first direct Commission staff to begin drafting the Disney order, and on what date was the final text approved for release?
 - b. What internal legal review, including by the Office of General Counsel, was conducted before the order was issued?
 - c. Did you consider, but reject, any less aggressive enforcement steps prior to issuing the order? If so, please identify them.
 - d. The Commission issued a procedurally similar early-renewal order against Bridge News, LLC on April 27, 2026 — one day before the Disney order. Did you intentionally time the orders so that the Bridge News order would precede the Disney order in the public record?
2. Please provide a status update on each open FCC investigation into Disney or its ABC stations.
 - a. When was Disney's last response to each of these inquiries, and how many pages of documents has Disney produced as part of these investigations?
 - b. Has Disney been unresponsive to these investigations?
 - c. Please describe the justification for issuing the early-renewal order amidst these ongoing investigations.
3. Between April 22, 2026, and April 28, 2026, did you, your staff, or any other FCC personnel communicate with the White House, any other component of the Executive Office of the President, or any individual acting on their behalf regarding Disney, ABC, Jimmy Kimmel, or the early-renewal order? If so, please describe each communication, including the participants and substance.
4. Please identify each prior instance in which the Commission has invoked 47 CFR § 73.3539(c) to call in the licenses of a broadcaster for early renewal, including a summary of the grounds for each instance.

Thank you for your attention to this important issue.

Sincerely,



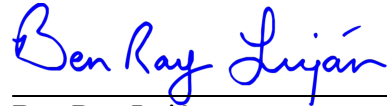
Edward J. Markey
United States Senator



Charles E. Schumer
United States Senator



Maria Cantwell
United States Senator



Ben Ray Lujan
United States Senator



John Hickenlooper
United States Senator



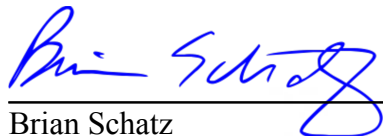
Mazie K. Hirono
United States Senator



Jacky Rosen
United States Senator



Bernard Sanders
United States Senator



Brian Schatz
United States Senator



Adam B. Schiff
United States Senator



Chris Van Hollen
United States Senator



Elizabeth Warren
United States Senator

cc.

Chairman Carr

May 7, 2026

Page 5

The Honorable Anna M. Gomez

Commissioner

Federal Communications Commission

45 L Street, N.E.

Washington, DC 20554

The Honorable Olivia Trusty

Commissioner

Federal Communications Commission

45 L Street, N.E.

Washington, DC 20554

Attachment D

FOR IMMEDIATE RELEASE
April 29, 2026

CONTACT
Carrie Healey

☎ (202) 429-5350
✉ chealey@nab.org

✖ Post

NAB Statement on FCC Calling in Broadcast Licenses for Early Renewal

The following statement can be attributed to NAB President and CEO Curtis LeGeyt:

"The FCC's broadcast license renewal process must be grounded in predictability, fairness and transparency, principles reflected in the license terms Congress established and later extended. The Media Bureau's nearly unprecedented request for one company to quickly reapply for all of its licenses – rather than utilize its traditional enforcement process – runs contrary to these principles and creates significant uncertainty for all broadcasters.

Broadcast stations already face intense challenges as they work to deliver trusted journalism, lifesaving emergency services, community programming and election coverage. The FCC must be careful to avoid actions that create further instability for the local stations viewers and listeners depend on."

About NAB

The National Association of Broadcasters is the premier advocacy association for America's broadcasters. NAB advances radio and television interests in legislative, regulatory and public affairs. Through advocacy, education and innovation, NAB enables broadcasters to best serve their communities, strengthen their businesses and seize new opportunities in the digital age. Learn more at nab.org.

###

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that true and correct copies of the forgoing Petition for Reconsideration are being sent electronically, via email, to the following:

The Hon. Brenden Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

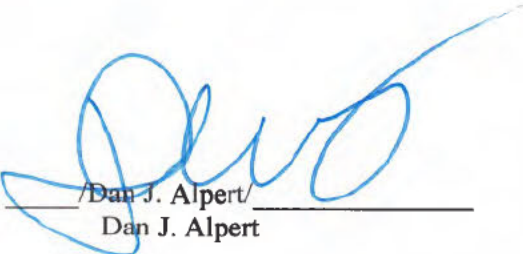
The Hon. Anna M. Gomez
Commissioner
Federal Communications Commission
45 L Street NE
Washington, DC 20554

The Hon. Olivia Trusty
Commissioner
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Alexander Sanjenis
Acting Bureau Chief
Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Evan Morris
Deputy Chief
Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

David Brown
Chief, Video Division
Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554



Dan J. Alpert
Dan J. Alpert

Kristi Thompson

From: Paul M. Smith (b) (6)
Sent: Tuesday, May 12, 2026 2:06 PM
To: Brendan Carr
Subject: [EXTERNAL]: Broadcasters

You don't often get email from (b) (6). [Learn why this is important](#)

CAUTION: This email originated from outside of the Federal Communications Commission. Do not click on links or open attachments unless you recognize the sender and trust the content to be safe. If you suspect this is a phishing attempt, please use the 'Report Message' feature in Microsoft Outlook or forward the email to the NSOC.

Brendan Carr,

I find your attacks on comedians and news organizations that don't favor President Trump to be appalling and completely un-American. Jimmy Kimmel is not the enemy of the American people. Disney is not the enemy of the people. CNN is not the enemy of the people. Attacks on our First Amendment rights...THAT'S the enemy. Have you even READ the Constitution. Free speech is the FIRST amendment. Not the second. Not the eighth. It's the very first one. I suggest that you go read that document.

Furthermore, I would remind you that you do not work for Donald Trump. You work for the American people. Get your head out of your ass.

An American citizen who votes,

Paul Smith

Kristi Thompson

From: Eric Moberg (b) (6)
Sent: Wednesday, April 29, 2026 1:36 PM
To: Brendan Carr; hakeem.jeffries@mail.house.gov; senator_schumer@schumer.senate.gov
Cc: fox5dc@fox.com; community@people.com; desk@wcnc.com; director@whca.press; editors@cjr.org; edit.features@wsj.com; editors@barrons.com; editor@kansan.com; AJC-Politics@ajc.com; investigates@cbsnews.com; investigations@ft.com; investigations@seattletimes.com; news.tips@abc.com; newstips@bostonherald.com; news@pressherald.com; news@kboi2.com; stories@democracynow.org; tips2@bloomberg.net; tips@cnn.com; tips@nbcuni.com; angie.orellanahernandez@washpost.com; c.versano@newsweek.com; k.plummer@newsweek.com; 60min@cbsnews.com; flockwood@arkansasonline.com; Jamie.riley@ajc.com; Jeff@baptistnews.com; jnichols@captimes.com; karen.travers@abc.com; lee.fang@theintercept.com; lockbox@washpost.com; Lois.Norder2@ajc.com; letters@kpfa.org; morning@npr.org; megan.lebowitz@nbcuni.com; dwalmsley@globeandmail.com; anna.clark@propublica.org; bjansen@usatoday.com; BHarris@gannett.com; principals@semafor.com; a.backus@newsweek.com; ruth@wisconsinexaminer.com; s.haq@newsweek.com; cook.sara@cbsnews.com; s.odriscoll@newsweek.com; marc.caputo@axios.com; tmurphy@motherjones.com; david.philipps@nytimes.com; (b) (6); fair@fair.org; gkelly@bayareanewsgroup.com; haley.britzky@cnn.com; ktan@businessinsider.com; laura.gersony@gannett.com; mperezcarrillo@gannett.com; pholley@texasmonthly.com; rachel.scott@abc.com; upfront@kpfa.org; weijia.jiang@cbsnews.com; politicsnewsletter@nbcuni.com; zolan.kanno-youngs@nytimes.com; shelby.grad@latimes.com; brad.schrader@ajc.com; m.mishra@newsweek.com; mhanna@inquirer.com; guardian.letters@theguardian.com; (b) (6); c.schoppa@newsweek.com; andrew.solender@axios.com; Sisonke.Msimang@theintercept.com; (b) (6); j.royston@newsweek.com; mkwrites4000@proton.me; countingthecost@aljazeera.net; max@punchbowl.news; a.daftari@newsweek.com; insidestory@aljazeera.net; william.vaillancourt@thedailybeast.com; info@follybahthibault.com; tips@rawstory.com; info@punchbowl.news; raheem.hosseini@sfchronicle.com; mary.bruce@abc.com; ccann@usatoday.com; josh@joshgerstein.com; cuneyt@axios.com; mgoldin@ap.org; (b) (6); davidcay@me.com; stalcott@semafor.com; daniel.dale@cnn.com; cmartel@thehill.com; scoops@huffpost.com; mike@axios.com; jim@axios.com; annabella.Rosciglione@thedailybeast.com; Kaitlan.Collins@cnn.com; Dave@axios.com; editorial@allthatsinteresting.com; editor@levernews.com; prayerservice@sd.mil; (b) (6)
Subject: [EXTERNAL]: CHAIRMAN!!!!!!!!!!!!!!!!!!!!!!!!!!!!!! Fwd: [ACT NOW] Tell Congress to impeach Brendan Carr

You don't often get email from (b) (6) [Learn why this is important](#)

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How in the HELL did so called “Free Press Action” get an FCC email license?

Are you the chairman or not?

Are you gonna make television great again or not?

P.S. Who was funnier on Carson: Jonathan Winters or George Benson impersonating Moms Mabley?

<https://www.youtube.com/watch?v=3e5SNae-xWc>

<https://www.youtube.com/watch?v=uGgzb5NRV-8>

Eric,

We are so sick of Brendan Carr's pathetic mafioso threats against broadcasters his boss Donald Trump doesn't like. Carr has tarnished his office and weaponized the FCC, choosing time and time again to kneel before the president instead of upholding his constitutional oath.

Join us in urging Congress to impeach Brendan Carr and put an end to these abuses of power. **One click on the link or button will instantly add your name to our petition if we have your details on file.**

To the United States Congress:

FCC Chairman Brendan Carr, Trump's top censor, has repeatedly weaponized his agency's authority to intimidate broadcasters and bully media outlets.

His efforts to control the media undermine the First Amendment — he is willing to destroy a free press and corrupt the FCC to keep the White House happy.

The federal government should not be in the business of censoring differing opinions. **Brendan Carr is unfit for duty and must answer for his corruption. Impeach him now.**

Then read Heather's message below to learn more about how Brendan Carr has crossed the line too many times.

Thanks,

All of us at Free Press Action

We're making it easier than ever to take action with us: If we already have your information in our records, you just need to click one of the links or buttons below to instantly sign the petition.

[Tell Congress to Impeach Brendan Carr](#)

Eric,

FCC Chairman Brendan Carr has — once again — escalated his attacks on the First Amendment.

On Tuesday, **the FCC issued an order to kick off early license reviews of ABC's broadcast station licenses. This extraordinary move follows Trump's calls for ABC to fire Jimmy Kimmel — again.¹**

Since becoming chairman, Carr has repeatedly attacked the network and opened at least three dubious investigations, each time after ABC programming upset Trump. In September 2025, Disney — ABC's parent company — temporarily suspended Kimmel after **Carr made those infamous mafioso threats in response to a joke Kimmel told during his late-night monologue.**

The FCC has the authority to review station licenses every eight years, but calling for an early license renewal is *extremely rare*. This is far from a standard FCC procedure. Carr can dress up his actions all he wants, but his motivations are clear: **He is abusing his position to silence dissent**, serving at the president's beck and call.

We've seen Carr violate his oath to uphold the Constitution again and again. **It's time for Congress to impeach him. [Add your name if you're with us.](#)** **One click on the link or button will instantly add your name to our petition if we have your details on file.**

To the United States Congress:

FCC Chairman Brendan Carr, Trump's top censor, has repeatedly weaponized his agency's authority to intimidate broadcasters and bully media outlets.

His efforts to control the media undermine the First Amendment — he is willing to destroy a free press and corrupt the FCC to keep the White House happy.

The federal government should not be in the business of censoring differing opinions. **Brendan Carr is unfit for duty and must answer for his corruption. Impeach him now.**

ADD YOUR NAME

The FCC order claims that the license review stems from an ongoing probe into Disney's DEI practices, and not from anything Kimmel said. **That is flimsy cover at best, and it doesn't make things better. The administration's ongoing attacks on lawful and important DEI programs are immoral and misleading too.**²

The timing of this license review suggests unconstitutional retribution for a joke that Trump didn't like. **This dangerous attack on free speech won't stand up to any First Amendment test.** But we need to fight back to get Carr out and to make sure Disney doesn't roll over.

[Join us in urging Congress to hold Brendan Carr accountable and impeach him now.](#) **One click on the link or button will instantly add your name to our petition if we have your details on file.**

Thank you for taking action,

Heather and the rest of us at Free Press Action

1. "FCC Plans to Challenge ABC Station Licenses Amid Kimmel Controversy," CNN, April 28, 2026

2. "COMPLICIT: Corporate Media's Capitulation to Trump's Attacks on Diversity, Equity and Inclusion," Free Press, January 21, 2026

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Kristi Thompson

From: Alexandra Steigrad <asteigrad@nypost.com>
Sent: Tuesday, April 28, 2026 11:54 AM
To: Brendan Carr
Subject: [EXTERNAL]: Disney/ Kimmel

You don't often get email from asteigrad@nypost.com. [Learn why this is important](#)

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Hi Brendan-

I am looking for comment on Semafor/ CNN's report that you are moving to review Disney's broadcast licenses.

Please let me know. I am working on this now with a 1p deadline. Thanks-Alex

--

ALEXANDRA STEIGRAD

MEDIA REPORTER, *New York Post*

[1211 AVENUE OF THE AMERICAS, NEW YORK, NY 10036](#)

MOBILE: (b) (6)

asteigrad@nypost.com

NEW YORK POST

Kristi Thompson

From: Steve Roberts <steve@lexpolitica.com>
Sent: Monday, June 1, 2026 12:09 PM
To: wendy.granato@abc.com
Cc: Brendan Carr; Courtney Cowper
Subject: [EXTERNAL]: Equal Time Request: Spencer Pratt
Attachments: Pratt for Mayor 2026 - Equal Time 6-1-26.pdf

Importance: High

Some people who received this message don't often get email from steve@lexpolitica.com. [Learn why this is important](#)

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Dear Ms. Granato –

Please see the attached letter containing an equal time request from my client, Pratt for Mayor 2026, related to an episode of *Jimmy Kimmel Live!* airing on your broadcast station last week. Given the proximity to the mayoral election, I look forward to your prompt response.

Sincerely, Steve Roberts



Steve Roberts

Co-Chair, Political Law Group

202.294.1613 | steve@lexpolitica.com

Washington, DC

www.LexPolitica.com | [LinkedIn](#) | [@Lex_Politica](#)

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lexpolitica.com

202.417.3529

info@lexpolitica.com

June 1, 2026

Station Manager

ABC Affiliates in the Los Angeles market

cc: Brendan Carr, Chairman, Federal Communications Commission
Courtney Cowper, Special Assistant to Chairman Carr

Re: Equal Time Request

Dear Station Manager:

I represent Pratt for Mayor 2026, the campaign committee for Spencer Pratt, a legally qualified candidate for the Mayor of Los Angeles. We respectfully demand that ABC and all affiliated stations serving viewers within the city limits of Los Angeles, California, provide my client with equal time afforded to Karen Bass by her campaign surrogate Jimmy Kimmel, **clearly on behalf of** that candidate. On May 27, 2026, using your broadcast facilities through his show *Jimmy Kimmel Live!*, Kimmel again hijacked his own efforts at comedy by acting as a campaign spokesperson, chiding his viewers who dared to deviate from establishment orthodoxy.

As you are well aware, federal law provides that: “If any licensee shall permit any such candidate to use its facilities, it shall afford equal opportunities to all other candidates for that office to use such facilities. Such licensee shall have no power of censorship over the material broadcast by any such candidate.” 47 U.S.C. § 315(a); 47 C.F.R. § 73.1941(a).

The Federal Communications Commission (FCC) recently reiterated that the equal opportunities requirement exists to ensure that “no legally qualified candidate for office is unfairly given less access to the public airwaves than their opponent.”¹ In doing so, the FCC emphasized that the statutory bona fide news exemptions are limited in scope and do not apply where programming decisions are motivated by partisan purposes or intended to advance or harm a candidate. The Commission has long required that programming decisions regarding content, format, and participants be based on *newsworthiness* rather than partisan purposes and that “**the content, format and participants not be intended for the political advantage of candidates**” (emphasis added). The FCC has further stated that programming designed for the “specific advantage of a candidate” falls outside the scope of the bona fide news exemptions.

¹ FCC Media Bureau Public Notice DA 26-68 (Jan. 2026). Importantly, the FCC further clarified that currently airing late-night television programs do not enjoy automatic exemption from Section 315 and noted that it has not been presented with evidence that any currently airing late-night television program qualifies for the bona fide news exemption.

In particular, the FCC recently reminded broadcasters that, when “free time is provided for use by **or on behalf of** candidates, a record of the free time provided shall be placed in the political file”² (emphasis added). Such an entry in the political file triggers eligibility for an equal time request, the adherence to which is “central to a broadcast licensee’s obligation to operate in the public interest.”³

The FCC has also recently reminded broadcasters of their “longstanding public interest obligations” and emphasized its intent to ensure that broadcasters continue to comply with the public-interest obligations that underpin their licenses.⁴ As the FCC explained, broadcast licensees operate pursuant to *licenses granted in the public interest* and remain responsible for programming transmitted over their facilities. These obligations are particularly important in the context of election-related programming, where Congress and the Commission have sought to prevent broadcasters from using the public airwaves to advance partisan political objectives or provide unequal access to or on behalf of candidates for public office.

Here, on May 27, 2026, using spectrum afforded to you by the United States, your station broadcast an episode of *Jimmy Kimmel Live!*, a nationally-televised program made available through the facilities of ABC-affiliated broadcast stations. During the broadcast, the program’s host, Jimmy Kimmel, not only failed at his attempts at humor (as usual), but in doing so, delivered a nearly six-minute monologue as a clear surrogate **on behalf of** the Bass campaign.

Kimmel’s statement went well beyond ordinary commentary regarding public affairs and instead functioned as direct election advocacy. These specific phrases against my client include:

- “His profession is to be a screaming guy on a reality show”
- “Even though he had no private insurance on his house and doesn’t believe in climate change, he is understandably upset about his house burning down”
- “Does he have solutions to those problems? No”
- “Grew up wealthy and popular but isn’t very wealthy or popular anymore”
- “He’s living at the Hotel Bel-Air and using campaign money to do so”
- “He himself doesn’t even want to be mayor”

Uncoincidentally, these talking points are indistinguishable from similar remarks from the Bass campaign.⁵ Predictably, Kimmel is squarely on the talking points.

By expressly directing viewers to not vote for Pratt, Kimmel’s segment advocated against one candidate while favoring that candidate’s principal opponent on her behalf.

Further, Kimmel’s campaign statement against Pratt was not presented as a traditional newscast, news interview, documentary, or on-the-spot coverage of a bona fide news event. **Instead, he**

² *Id.*; see also 47 CFR § 73.1943(c).

³ *Id.*; 47 USC 312(a)(7).

⁴ FCC Media Bureau Public Notice DA 26-530 (May 2026).

⁵ For example, “Reality TV — that’s a good thing. Lots of jobs in reality TV. But being the star of a reality TV show is very different than running the nation’s second-largest city, and one does not qualify you for the other.” *Variety*. <https://variety.com/2026/tv/news/karen-bass-mayor-reality-tv-spencer-pratt-1236759996/>.



devoted approximately six minutes on the eve of an active mayoral election and expressly urged viewers not to support a particular candidate, acknowledging the proximity in time with the election on the following Tuesday.

Accordingly, Spencer Pratt for Mayor requests a similar six-minute block of time, syndicated to all ABC-affiliated stations serving viewers within the City of Los Angeles, with a similar audience segment and ratings pull as the episode of *Jimmy Kimmel Live!* referenced above.

Please call me, as the legal counsel of Spencer Pratt for Mayor, at 202-417-3529, or reply to my underlying email, to discuss how to facilitate this request in the limited time before Election Day on June 2. Given the proximity of the election, we respectfully request a prompt response regarding the station's position on Section 315 and our client's request for comparable time and placement.

Sincerely,

/s/ Steve Roberts

Jessica Furst Johnson

Steve Roberts

Counsel, Pratt for Mayor 2026



Kristi Thompson

From: Kornick, Lindsay <Lindsay.Kornick@FOX.COM>
Sent: Thursday, May 28, 2026 6:31 PM
To: MediaRelations; Brendan Carr
Subject: [EXTERNAL]: FOX NEWS REQUEST: Disney/ABC response

You don't often get email from lindsay.kornick@fox.com. [Learn why this is important](#)

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Hi, my name is Lindsay Kornick. I am an associate editor at Fox News Digital. We are looking into Disney and ABC's response to the FCC's investigation and early license renewal review involving allegations that the process is being used to "suppress speech." <https://deadline.com/2026/05/abc-fcc-license-renewal-trump-1236929113/>

Does the FCC have a response to this statement against it?

Please respond by 8:30 PM ET.

Lindsay Kornick
Fox News Associate Editor
Work cell: (b) (6)
Lindsay.Kornick@FOX.com



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Kristi Thompson

From: Shepardson, David (Reuters) <David.Shepardson@thomsonreuters.com>
Sent: Thursday, May 7, 2026 2:40 PM
To: Brendan Carr
Subject: [EXTERNAL]: FW: Markey, Schumer, Cantwell, Luján Demand FCC Stop First Amendment Attacks on Disney, ABC

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Do you want to respond to this?

David Shepardson
Correspondent
Reuters

Phone: +1 202 898 8324
Mobile: (b) (6)
david.shepardson@thomsonreuters.com
www.reuters.com
twitter.com/davidshepardson

1333 H Street NW
Suite 700 Washington, DC 20005

From: Press, Markey (Markey) <Markey_Press@markey.senate.gov>
Sent: Thursday, May 7, 2026 2:14 PM
To: Press, Markey (Markey) <Markey_Press@markey.senate.gov>
Subject: Markey, Schumer, Cantwell, Luján Demand FCC Stop First Amendment Attacks on Disney, ABC

FOR IMMEDIATE RELEASE

Contact: markey_press@markey.senate.gov, 202-224-2742

Markey, Schumer, Cantwell, Luján Demand FCC Stop First Amendment Attacks on Disney, ABC

Call for FCC's order for early license renewals to Disney be rescinded

[Letter Text \(PDF\)](#)

Washington (May 7, 2026) - Senator Edward J. Markey (D-Mass.), member of the Commerce, Science, and Transportation Committee, along with Democratic Leader Chuck Schumer (D-N.Y.), Commerce Committee Ranking Member Maria Cantwell (D-Wash.), and Senator Ben Ray Luján (D-N.M.) today led their colleagues

in writing to Federal Communications Commission (FCC) Chairman Brendan Carr urging it to rescind last week's order requiring Disney to file early license renewals for its eight ABC broadcast stations. The FCC order, at Chairman Carr's directive, came just one day after President Donald Trump publicly demanded ABC fire late-night host Jimmy Kimmel and is the latest effort by Trump and Carr to weaponize the FCC's authorities to target broadcasters. Senators John Hickenlooper (D-Colo.), Mazie Hirono (D-Hawaii), Jacky Rosen (D-Nev.), Bernie Sanders (I-Vt.), Brian Schatz (D-Hawaii), Adam Schiff (D-Calif.), Chris Van Hollen (D-Md.) and Elizabeth Warren (D-Mass.) also signed the letter.

In the letter, the Senators wrote, "The campaign against Disney and its editorial decision-making, culminating in last week's early-renewal order, is an egregious abuse of power and a clear violation of the First Amendment. Although the FCC has the authority to ensure broadcasters operate in the public interest, it cannot serve as President Trump's roving censor, threatening to revoke licenses against broadcasters whose editorial content — including a comedian's jokes — displeases the President. In fact, before serving as chairman, you frequently recognized the importance of the First Amendment and the freedom of speech, including for comedians. As you previously explained: 'From Internet memes to late-night comedians, from cartoons to the plays and poems as old as organized government itself - Political Satire circumvents traditional gatekeepers & helps hold those in power accountable. Not surprising that it's long been targeted for censorship.' Now, you are doing exactly that — targeting political satire for censorship."

The Senators request answers by May 21, 2026, to questions including:

- What internal legal review, including by the Office of General Counsel, was conducted before the order was issued?
- Did you consider, but reject, any less aggressive enforcement steps prior to issuing the order?
- The Commission issued a procedurally similar early-renewal order against Bridge News, LLC on April 27, 2026 — one day before the Disney order. Did you intentionally time the orders so that the Bridge News order would precede the Disney order in the public record?
- What is the status update on each open FCC investigation into Disney or its ABC stations?
- What is the FCC's justification for issuing the early-renewal order amidst these ongoing investigations?
- Between April 22, 2026, and April 28, 2026, did you, your staff, or any other FCC personnel communicate with the White House, any other component of the Executive Office of the President, or any individual acting on their behalf regarding Disney, ABC, Jimmy Kimmel, or the early-renewal order?
- What are the prior instances in which the Commission has invoked 47 CFR § 73.3539(c) to call in the licenses of a broadcaster for early renewal, including a summary of the grounds for each instance?

###

Kristi Thompson

From: Shepardson, David (Reuters) <David.Shepardson@thomsonreuters.com>
Sent: Monday, May 11, 2026 11:30 AM
To: Brendan Carr
Subject: [EXTERNAL]: Fw: NEWS: Gomez Calls on Disney to Fight FCC Censorship

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Do you want to comment?

David Shepardson
Correspondent
Reuters

Phone: +1 202 898 8324
Mobile: (b) (6)
david.shepardson@thomsonreuters.com
www.reuters.com
twitter.com/davidshepardson

1333 H Street NW
Suite 700 Washington, DC 20005

From: Gomez.Press <Gomez.Press@fcc.gov>
Sent: Monday, May 11, 2026 10:59 AM
To: Jonathan Uriarte <Jonathan.Uriarte@fcc.gov>
Subject: NEWS: Gomez Calls on Disney to Fight FCC Censorship



Media Contact:
Gomez.Press@fcc.gov

For Immediate Release
May 11, 2026

GOMEZ CALLS ON DISNEY TO FIGHT CENSORSHIP, EXPOSES DOUBLE STANDARD IN FCC TARGETING

*In First Communication to Disney's New CEO, FCC Commissioner Describes What
Appears to Be Entrapment While Encouraging the Company to Stand Firm*

WASHINGTON — FCC Commissioner Anna M. Gomez today sent a letter to Walt Disney Company CEO Josh D'Amaro documenting the record of this Administration's campaign of censorship and control against Disney, calling out the FCC's double standard in its selective enforcement against the company, and encouraging Disney to continue fighting. The letter marks the first formal communication to Disney's leadership from a federal regulator since D'Amaro assumed the role of Chief Executive Officer.

“What Disney and ABC are facing is not a series of coincidental regulatory actions but a sustained, coordinated campaign of censorship and control, carried out through the weaponization of the FCC's authority as a federal regulator and aimed at pressuring a free and independent press and all media into submission,” **Commissioner Gomez wrote.**

The letter traces the censorship campaign from its origins in the settlement of a baseless defamation lawsuit brought against ABC, through a series of investigations into ABC's debate moderation, diversity programs, and *The View*, and culminating in an unprecedented early license renewal order against all eight ABC-owned stations, which Commissioner Gomez has called the most egregious First Amendment assault this FCC has taken to date.

“That settlement did not buy you peace. It only bought you time. Disney's experience since then has made one thing undeniable for any company facing the same pressure. You cannot buy this Administration's favor. For the right price, you can only borrow it. And the price always goes up,” **Gomez wrote.**

The letter calls out a stark double standard at the heart of the FCC's enforcement posture. While the agency has trained its enforcement apparatus on ABC, other broadcasters operating under the exact same rules, in the same markets, aired interviews with political candidates without filing required notices and received no inquiry, no letter, and no investigation whatsoever. Invoking a recent Supreme Court opinion, **Commissioner Gomez wrote:** “The threat is the point. As Justice Gorsuch reminded us by invoking Justice Thurgood Marshall, 'the value of a sword of Damocles is that it hangs, not that it drops.’”

The letter also raises serious questions about the FCC's conduct in its investigation into *The View*. Based on Disney's own filing, Commissioner Gomez describes what appears to be a form of entrapment where the Commission selectively used the threat of enforcement actions to pressure ABC affiliates into filing paperwork on a candidate appearance and then used the existence of those filings as evidence against Disney's ABC station. “If true, that is a government agency abusing its authority to punish speech it dislikes while protecting speech it favors,” **Gomez wrote.**

Commissioner Gomez also raises serious concerns about the FCC's investigation into Disney's diversity, equity, and inclusion programs, noting that the agency's own rules on this topic are limited to recruitment outreach and say nothing about internal corporate policies. Despite that overreach, Disney produced over 11,000 pages of documents in response to the inquiry. “The FCC's attempt to usurp control over internal corporate decision-making through its limited authority requires reaching for legal power that the statute, agency rules, and the applicable case law simply do not provide,” **Gomez wrote.**

Commissioner Gomez closed the letter by encouraging Disney to continue fighting, noting the company's previous successful resistance to government overreach in Florida.

“I am encouraged to see that Disney is choosing courage over capitulation. The fight ahead may not be easy, but the law, the facts, and the public are on your side. This is a fight worth having, and one that I am confident you will win.”

The full letter is available [here](#).

###

Office of Commissioner Anna M. Gomez: (202) 418-2100

ASL Videophone: (844) 432-2275

www.fcc.gov/leadership/anna-gomez

This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action. See MCI v. FCC, 515 F.2d 385 (D.C. Cir. 1974).

Kristi Thompson

From: David Folkenflik <DFolkenflik@npr.org>
Sent: Friday, May 22, 2026 11:01 AM
To: Brendan Carr
Cc: Greg Watson
Subject: [EXTERNAL]: Re: ABC/Disney filing

Some people who received this message don't often get email from dfolkenflik@npr.org. [Learn why this is important](#)

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Brendan:

Hope you're well.

Given Colbert's last show, I had two questions:

Did the president, the administration or the FCC have any role in advising, encouraging or advocating the cessation of Colbert's show ahead of regulators' decision on whether to approve the sale of Paramount by Shari Redstone et al to Skydance/Ellisons?

Second, what role has the presence of Jimmy Kimmel played in the decision to accelerate the renewal process for ABC stations?

I'll be taping a segment at 2pm so would appreciate a chance to chat or any insights ahead of that.

Thank you-
Dave

David Folkenflik
Media Correspondent
NPR NEWS
mobile) (b) (6)
e) dfolkenflik@npr.org
Twitter: @davidfolkenflik
Signal: @davidfolkenflik.01

From: David Folkenflik
Sent: Friday, May 8, 2026 8:32 PM
To: Brendan Carr <brendan.carr@fcc.gov>
Cc: gregory.watson@fcc.gov <gregory.watson@fcc.gov>
Subject: ABC/Disney filing

Chairman Carr:

Wanted to get your reaction to the filing by Paul Clement & co on behalf of Disney/ABC. What do you make of it?

I'll be on the air tomorrow morning and would value your input.

Best

Dave

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Kristi Thompson

From: John Kennedy (b) (6)
Sent: Thursday, April 30, 2026 10:55 AM
To: Brendan Carr
Subject: [EXTERNAL]: Re: Jimmy Kimmel

You don't often get email from (b) (6). [Learn why this is important](#)

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You are at it again! Unbelievable. I find it confounding that you have no understanding of the 1st Amendment. Your continued intimidation of the news media now reflected by FCC's attempt to censor free speech by reviewing ABC's broadcasting licenses has not gone unnoticed. I look forward to the 1st Amendment lawsuit against the FCC and you in your individual capacity. You are a disgrace to this country.

On Monday, March 16, 2026 at 08:50:44 AM PDT, John Kennedy (b) (6) wrote:

Here you go again! How dare you try to intimidate the news media with threats to revoke their FCC licenses in violation of their First Amendment rights. You are a disgrace to this country.

On Sep 22, 2025, at 7:09 PM, John Kennedy (b) (6) wrote:

Mr. Carr-

I was so looking forward to the 1st Amendment lawsuit against the FCC and you in your individual capacity. You better be careful moving forward. We'll be watching you. Closely.

On Sep 18, 2025, at 7:31 AM, John Kennedy (b) (6) wrote:

Mr. Carr-

You are a disgrace to this country by using your authority as FCC Chairman to suppress free speech under the First Amendment. Your political views and positions do not dictate what protected political speech this country is entitled to hear. You will pay a political and public price for what you have done and this country will not let you get away with imposing your political views on the rest of us. Charlie Kirk is not a hero and not someone this country should celebrate. He was a right-wing zealot who fomented hate.

Kristi Thompson

From: Joseph Flint <joe.flint@wsj.com>
Sent: Monday, May 11, 2026 9:42 AM
To: FCC Office of Media Relations
Cc: Brendan Carr
Subject: [EXTERNAL]: send any comment re: Gomez letter to Disney CEO Josh D'Amaro

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https://www.wsj.com/business/media/fcc-commissioner-tells-disney-that-agency-is-on-campaign-to-censor-it-f4b78182?st=9mLaPU&reflink=desktopwebshare_permalink

Thanks!

--

Joe Flint
STAFF REPORTER



M: (b) (6)
E: Joe.Flint@WSJ.com
T: @JBFlint
A: 5900 Wilshire Blvd., Los Angeles, CA 90036



Kristi Thompson

From: Barry Bragg (b) (6)
Sent: Friday, May 22, 2026 8:00 PM
To: Brendan Carr
Subject: [EXTERNAL]: The View, Jimmy Kimmel and ABC

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Brendan Carr
Chairman
Federal Communications Commission
Washington, D.C.

Chairman Carr,

I am writing out of deep concern regarding the FCC's recent posture toward ABC and its broadcast license. ABC's daytime program The View is, in fact, a news program for the first half of every weekday show. They discuss current events, policy developments, and national issues — often with spirited debate. Their perspective leans liberal, just as Fox News, Newsmax, and One America News lean openly and consistently conservative. CNN and the major networks tend to fall closer to the center. This diversity of viewpoints is not a flaw in our media landscape; it is the essence of a free press.

Yet ABC is now being pushed into a rushed license renewal process. The timing and tone strongly suggest that the real target is not the network, but one individual — Jimmy Kimmel — among a vast and varied slate of ABC programming. That is not how broadcast regulation is supposed to work. The FCC's mandate is to ensure the public interest, not to police political criticism or protect any president from unfavorable commentary.

Donald Trump's presidency has been marked by unprecedented ethical, legal, and constitutional controversies. Many Americans, historians, and public-integrity experts already regard him as one of the most corrupt presidents in our history. Your actions as FCC Chairman will be judged in that same historical context. If the Commission is seen as enabling political retaliation or suppressing dissenting viewpoints, that legacy will follow you long after this administration ends.

Your duty — and the FCC's duty — is to uphold the First Amendment, safeguard the free exchange of ideas, and protect the independence of American journalism. Anything less is a failure of the office you hold.

I urge you to consider how this moment will be remembered, and to choose the path that strengthens, rather than weakens, the constitutional freedoms you are entrusted to defend.

Sincerely,

Barry Bragg

Kristi Thompson

From: Chris Williamson (b) (6)
Sent: Monday, April 27, 2026 8:35 PM
To: Brendan Carr
Subject: [EXTERNAL]: To the Leadership of the FCC and The Walt Disney Company,

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Dear Mr. Carr,

What continues to be allowed on ABC under the guise of “comedy” is completely unacceptable.

Jimmy Kimmel’s recent comments referencing violence toward public figures, including Charlie Kirk and First Lady Melania Trump, are not jokes—they are reckless, inflammatory, and disgraceful. This is not satire. This is not entertainment. It is a platform being used to push hostile, divisive rhetoric that lowers the standard of public discourse.

There is a clear and growing pattern here, and it raises serious concerns about ABC’s judgment and accountability. Allowing this behavior to continue unchecked sends the message that promoting or trivializing violence is acceptable so long as it aligns with a certain viewpoint.

Let me be clear: it is not.

I will not support a network that enables this kind of conduct. I am prepared to completely boycott ABC programming—including content I would otherwise value—until decisive action is taken. That action should include removing Jimmy Kimmel from the air.

His words do not exist in a vacuum. They contribute to an already volatile environment and risk further deepening division in this country. At a minimum, this is irresponsible. At worst, it is dangerous.

If ABC chooses to stand by him, then it shares responsibility for the consequences of amplifying this rhetoric.

This is a moment for leadership, not silence.

**Sincerely,
Chris Williamson**

(b) (6) mobile

Kristi Thompson

From: ABC News Events <abc.news.events@disney.com>
Sent: Monday, April 20, 2026 11:56 AM
To: Brendan Carr
Subject: [EXTERNAL]: White House Correspondents' Association Pre-Dinner Reception

You don't often get email from abc.news.events@disney.com. [Learn why this is important](#)

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Kristi Thompson

From: Brendan Carr (Internal)
Sent: Friday, May 29, 2026 3:53 PM
To: Allison Howell
Cc: Greg Watson; Courtney Cowper
Subject: BRIDGE NEWS Re: Accepted for Filing PNs
Attachments: 5.28 Early Renewal Pleading Bridge PN Draft OCH CLEAN-BC.docx

I'm signed off on attached version of Bridge pleading cycle doc. I changed one thing to bold for consistency in opening and made one or two spacing edits.

From: Allison Howell <Allison.Howell@fcc.gov>
Sent: Friday, May 29, 2026 3:43 PM
To: Brendan Carr (Internal) (b) (6) >
Cc: Greg Watson <Gregory.Watson@fcc.gov>; Courtney Cowper <Courtney.Cowper@fcc.gov>
Subject: Accepted for Filing PNs

Chairman,

Attached are the Bridge and Disney PN's. Please let me know if you have any additional edits.

Thanks,

Allison Howell

Legal Advisor

Office of FCC Chairman Brendan Carr

allison.howell@fcc.gov



PUBLIC NOTICE

Federal Communications Commission
45 L Street NE
Washington, DC 20554

News Media Information 202-418-0500
Internet: www.fcc.gov

DA 26-XXX

Released: May 29, 2026

FCC'S MEDIA BUREAU ESTABLISHES PLEADING CYCLE AND EX PARTE PROCEDURES FOR THE EARLY RENEWAL APPLICATIONS OF BRIDGE NEWS LLC'S LICENSES

MB Docket No. 26-XXX

Petition to Deny Date: June 29, 2026

Opposition Date: July 29, 2026

Reply Date: August 5, 2026

On April 27, 2026, the Video Division of the Media Bureau issued an Order directing Bridge News, LLC (Bridge) to file license renewals for all of its licensed TV stations.¹ On May 27, 2026, Bridge filed renewal applications for its 83 television licenses.² By this Public Notice, we accept Bridge's renewal applications for filing and announce procedures related to their consideration.³

The FCC licenses that the agency grants to broadcast TV stations like those granted to Bridge authorize them to operate for 8 years.⁴ Generally speaking, upon expiration of their 8-year license term, broadcast TV stations are allowed to continue operating while the FCC determines whether or not to renew their license for another term of years.⁵ While none of Bridge's licenses would ordinarily be due for renewal until 2028, at the earliest,⁶ the FCC is permitted under section 73.3539 of its rules to call for the early renewal of licenses when the agency determines that doing so is essential to the proper conduct of an investigation.⁷ As stated in the *Early Renewal Order*, "the FCC has been investigating Bridge News, LLC, for possible violations of the FCC's prohibition on unauthorized transfers of control of the station licenses"⁸ In the course of conducting that investigation, the FCC determined that calling in Bridge's licenses for early renewal was necessary to the proper conduct of that ongoing investigation.⁹ Calling the licenses in now for early renewal also provides the FCC the opportunity to determine whether

¹ *Bridge News, LLC*, Order, DA 26-413 (MB Apr. 27, 2026) (*Early Renewal Order*).

² A list of the applications is included in the Attachment.

³ The license renewal applications referred to in this Public Notice have been accepted for filing upon initial review. The Commission reserves the right to return any application if, upon further examination, it is determined to be defective and not in conformance with the Commission's rules or policies.

⁴ 47 U.S.C. § 307(c)(1).

⁵ 47 U.S.C. § 307(c)(3).

⁶ The Commission staggers license expiration dates based on the state where the station is licensed. 47 CFR § 73.1020 (Station license period).

⁷ 47 CFR § 73.3539.

⁸ *Early Renewal Order* at para. 1.

⁹ *Id.* at para 2.

Bridge has been operating in the public interest, as required by its FCC licenses.¹⁰ As trustees of the nation's airwaves,¹¹ broadcasters must operate in the public interest and, among other requirements, must maintain the character to hold a broadcast license.¹²

Standard of Review. Pursuant to section 309(k)(1) of the Act, the Commission shall grant an application for license renewal if it finds, "with respect to that station, during the preceding license term of its license,"¹³ the following:

- (A) the station has served the public interest, convenience, and necessity;
- (B) there have been no serious violations by the licensee of the Communications Act or the rules and regulations of the Commission; and
- (C) there have been no other violations by the licensee of the Communications Act or the rules and regulations of the Commission which, taken together, would constitute a pattern of abuse.¹⁴

If a broadcaster fails to meet these requirements, the FCC may move to either deny the application after notice and opportunity for hearing or grant it "on terms and conditions as are appropriate, a term less than the maximum otherwise permitted."¹⁵

If, after notice and the opportunity for hearing, the FCC determines that a licensee has failed to meet the standard for renewal under section 309(k)(1) of the Act and that no mitigating factors justify the imposition of lesser sanctions, the FCC will issue an order denying a license renewal application and make the former licensee's channel available to other interested parties.¹⁶ If the FCC determines, after a hearing, that a licensee has met the standard for renewal, the FCC will issue an order renewing the license.

PROCEDURAL MATTERS

Ex Parte Status. In order to assure FCC staff's ability to discuss and obtain information needed to resolve the issues presented in this proceeding and pursuant to section 1.1200(a) of the Rules,¹⁷ we establish **MB Docket No. 26-####** for this proceeding. The proceeding announced in this Public Notice

¹⁰ See, e.g., 47 U.S.C. §§ 303, 307(a), & 309(a); *FCC v. National Citizens Committee for Broadcasting*, 436 U.S. 775, 795 (1978) (stating that "the physical scarcity of broadcast frequencies, as well as problems of interference between broadcast signals, led Congress to delegate broad authority to the Commission to allocate broadcast licenses in the 'public interest'"); *FCC Reminds Broadcasters of Their Public Interest Obligations*, Public Notice, DA 26-520 (MB May 28, 2026).

¹¹ See *Office of Communication of United Church of Christ v. FCC*, 707 F.2d 1413, 1427 (D.C. Cir. 1983) ("The clear intent of the Act was that the award of a broadcasting license should be a 'public trust.'").

¹² 47 U.S.C. § 308(b) (referencing character in the context of "[a]ll applications for station licenses, or modifications, or renewals thereof"); *Policy Regarding Character Qualifications In Broadcast Licensing Amendment of Rules of Broadcast Practice and Procedure Relating to Written Responses to Commission Inquiries and Making of Misrepresentations to the Commission by Permittees and Licensees*, Report, Order, and Policy Statement, 102 F.C.C.2d 1179 (1986 *Character Policy Statement*), recon. dismissed/denied, 1 FCC Rcd 421 (1986); *Policy Regarding Character Qualifications in Broadcast Licensing*, Policy Statement and Order, 5 FCC Rcd 3252 (1990) (1990 *Character Policy Statement*), modified, Memorandum Opinion and Order, 6 FCC Rcd 3448 (1991), further modified, Memorandum Opinion and Order, 7 FCC Rcd 6564 (1992).

¹³ 47 USC § 309(k)(1).

¹⁴ *Id.*

¹⁵ 47 U.S.C. § 309(k)(2). See also 47 U.S.C. § 307(c)(1) (Terms of Licenses – Initial and Renewal Licenses).

¹⁶ See 47 U.S.C. § 309(k)(3)(A)-(B). Pending the outcome of the proceeding the licenses continue to remain in effect. 47 U.S.C. § 307(c)(3).

¹⁷ 47 CFR § 1.1200(a).

shall be treated as a “permit-but-disclose” proceeding¹⁸ in accordance with the Commission’s *ex parte* rules.¹⁹ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation.²⁰ Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation.²¹ If the presentation consisted in whole or in part of data or arguments already reflected in the presenter’s written comments, memoranda, or other filings in the proceeding, then the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum.²² Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with section 1.1206(b) of the Rules.²³ Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.²⁴ We strongly urge parties to use the Electronic Comment Filing System (ECFS) to file *ex parte* submissions.²⁵ All *ex parte* filings must be clearly labeled as such and must reference **MB Docket No. 26-XXX**.

Petitions to Deny. Interested persons must file petitions to deny no later than June 29, 2026.²⁶ Oppositions to petitions to deny must be filed no later than July 29, 2026. Replies must be filed no later than August 5, 2026.²⁷ To the extent the reply deadline specified here provides for a shorter time period than provided as a general matter in the FCC’s rules, we hereby waive that rule for good cause.²⁸ Specifically, the FCC has determined that, in the context of this proceeding, replies, if any, can be prepared and filed within the timeframe specified here and the FCC’s interest in moving efficiently in this matter to provide the licensees and stakeholders with certainty about the pleading cycle outweighs the interest in applying the general provision here. Persons and entities that properly file petitions to deny become parties to the proceeding and must be served in accordance with FCC rules.²⁹ To allow the

¹⁸ 47 CFR § 1.1206.

¹⁹ 47 CFR § 1.1200 *et seq.*

²⁰ 47 CFR § 1.1206(b)(2)(iii).

²¹ 47 CFR § 1.1206(b)(1).

²² *Id.*

²³ 47 CFR § 1.1206(b).

²⁴ 47 CFR § 1.1200 *et seq.*

²⁵ See 47 CFR § 1.1200(b)(2)(i).

²⁶ For purposes of filing a Petition to Deny against a license renewal application, the Commission’s rules only establish a deadline in reference to “timely filed” and “not timely filed” applications. 47 CFR § 73.3516(e); *Media Bureau Announces June 18, 2026 Effective Date for Amendment of Parts 1, 73, 74, and 76 of the Commission’s Rules to Update Rules Applicable to Broadcast Stations*, MB Docket No. 24-626 & GN Docket No. 25-133, DA 26-500 (MB May 19, 2026) (redesignating 47 CFR § 73.3516(e) as § 73.3584(f) effective June 18, 2026). In the absence of a specific rule governing the deadline for filing a petition to deny for an early license renewal, we rely on the requirements of the Act, which requires that interested parties be provided no less than thirty days to file and restricts grant of a license renewal application to no early than 30 days following the public notice announcing the application’s acceptance of filing. 47 U.S.C. §§ 309(b) & (d). See 47 CFR § 1.939 (setting forth requirements for a petition to deny).

²⁷ 47 CFR § 73.3584(b) (establishing filing deadlines for oppositions and replies). See 47 CFR § 1.939 (setting forth filing requirements for oppositions and replies).

²⁸ 47 C.F.R. § 1.3.

²⁹ 47 CFR § 1.47.

Commission to consider fully all substantive issues regarding the applications in as timely and efficient a manner as possible, petitioners and objectors should raise all issues in their initial filings. Replies may only address matters raised in oppositions.³⁰

Filing Procedures. All filings concerning matters referenced in this Public Notice should refer to MB Docket No. 26-XXXX, as well as the specific file numbers of the individual applications or other matters to which the filings pertain. Submissions in this proceeding must be filed electronically (i.e., through ECFS) or by filing paper copies.

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. Filings can be sent by commercial overnight courier, first-class or overnight U.S. Postal Service mail, or by hand delivery. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission and reference MB Docket No. 26-XXX.
 - Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
 - U.S. Postal Service first-class, Express, and Priority mail must be addressed to 45 L Street NE, Washington, DC 20554.
 - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.

Availability of Documents. Applications in this proceeding are available electronically through the Commission's Licensing and Management System (LMS) at the file numbers in the Attachment. All other documents (e.g., *ex parte* submissions, petitions to deny, oppositions, and replies) will be publicly available online through ECFS.

People with Disabilities. To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (TTY).

For further information, contact David Brown at (202) 418-1645 or Chris Robbins at (202) 418-0685. For press inquiries, contact Nancy Murphy at (202) 418-1043.

This action is taken by the Chief, Video Division, Media Bureau, pursuant to authority delegated by sections 0.61 and 0.283 of the Commission's Rules.³¹

- FCC -

³⁰ 47 CFR § 1.45(c).

³¹ 47 CFR §§ 0.61 & 0.283.

Kristi Thompson

From: Allison Howell
Sent: Wednesday, May 20, 2026 9:11 AM
To: Brendan Carr (Internal); Greg Watson
Subject: Bridge Petition for Recon
Attachments: Petition for Reconsideration.pdf

In the Matter of)
)
Bridge News LLC)

PETITION FOR RECONSIDERATION

The Video Division of the Media Bureau has issued an *Order* against Bridge News LLC, the licensee of various LPTV, Class A, and full-service broadcast stations, directing it to file early renewal applications for all of its stations pursuant to Section 73.3579(c) of the Commission’s Rules. The directive is unprecedented, and contrary to past Commission practice and policy. The only issue for which Bridge News LLC is being “investigated” involves a factually-settled matter concerning an ownership-reporting matter, for which only a forfeiture would be warranted. For the Media Bureau to take the draconian step of requiring the filing of early renewal applications for all of Bridge News LLC’s stations goes far beyond Commission precedent; and is beyond the delegated authority of the Media Bureau. Consequently, the Media Bureau’s Order is arbitrary and capricious, and should immediately be rescinded.

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In the Matter of)
)
Bridge News LLC)

PETITION FOR RECONSIDERATION

Background

The ownership of Bridge News did not change during the period encompassing the years 2022-23. Additional licenses were applied for by Bridge News in 2023 for seven Class A stations (WBYD-CD, WJGN-CD, KSVN-CD, W36EX-D, WJYL-CD, KRET-CD, and WTNG-CD), and four full-service stations (KKAI, KUPU, KTNL-TV, and KDMD). The ownership of Bridge News was misstated, however, in the applications for acquisition of Stations KKAI (File No.

0000222030, filed on October 4, 2023), KUPU (File No. 0000222037, filed on October 4, 2023), KDMD (File No. 0000232208, filed on December 11, 2023), KTNL-TV (File No. 0000232209, filed on December 11, 2023), WJYL-CD (File No. 0000226236, filed on November 14, 2023), KRET-CD (File No. 0000219810, filed on August 24, 2023), W36EX-D (File No. 0000216835, filed on June 16, 2023), WJGN-CD (File No. 0000212618, filed on March 16, 2023), WBYP-CD (File No. 0000211405, filed on February 24, 2023), WTNG-CD (File No. 0000220916, filed on September 12, 2023) and KSVN-CD (File No. 0000210975, filed on February 17, 2023), and the subsequent Bridge News 2023 Biennial Ownership Report (File No. 0000227857, filed on February 7, 2024), to incorrectly state that the sole owner and Manager and possessor of 100% voting rights and equity of Bridge News LLC was “Vincent Bodiford.”

That was in error. The correct statement of the owners and other attributable officers and managers of Bridge News LLC should have been listed as follows:

MBX Wyoming, Inc.	100% voting Member	100% equity
-------------------	--------------------	-------------

(the 100% owner of MBX Wyoming is
Manoj Bhargava, who is a United State citizen.
The officers of MBX Wyoming, Inc. are as follows:
Manoj Bhargava is the President, Treasurer, and Secretary
as well as the CEO of MBX Wyoming, Inc. Chris Fowler is the
Vice President of Finance of MBX Wyoming, Inc.)

Manoj Bhargava: Manager

Vincent Bodiford: Chief Executive Office and Manager

It was discovered in March 2024 that although Bridge News accurately had stated its correct ownership structure in the prior-filed applications filed for Stations WXII-LD and WMNN-LD (File Nos. 0000180466 and File No. 0000180467, consummated March 24, 2022), and that Bridge News ownership did not ever change in a substantial manner between March 24, 2022 and 2024, Bridge News inadvertently incorrectly stated its overall ownership in the

subsequently filed Class A and full-service assignment applications (as well as in a subsequent Ownership Report) filed in 2023 and 2024, resulting in a technical violation of Section 310(d) of the Commission's Rules. 47 C.F.R. §310(d). Bridge News' counsel learned of the error on March 7, 2024, and applications for transfer of control (Lead Application File Nos. 0000240949, 0000240957, and 0000240961) were promptly filed with the FCC by Bridge News on March 15, 2024. As already has been explained in response to a Letter of Inquiry issued by the Video Division:

Bridge News President of OTA Operations Scott Centers and counsel Dan J. Alpert were first to become aware that Bridge News' previously filed applications and ownership reports were likely incorrect when information was being prepared in conjunction with another application being prepared on behalf of Manoj Bhargava for the acquisition of an interest in Audacy License LLC, Lead File No. 0000241074, and it was brought to their attention by counsel for Audacy that MBX Wyoming owns 100% of Bridge News and Manoj Bhargava owns 100% of MBX Wyoming. In conjunction with that application, FCC counsel for Audacy contacted FCC counsel for Bridge News on or about March 7, 2024, concerning the preparation of an exhibit to that application that was being prepared which reflected that MBX Wyoming (100% owned by Manoj Bhargava) was 100% owner of Bridge News. ... That information conflicted with information filed with the FCC previously by Bridge News. Upon further inquiry with Vincent Bodiford and corporate counsel for Bridge News, it was determined by Bodiford, Centers, and Alpert that (i) the information obtained by counsel for Audacy was in fact correct, (ii) the information filed with the FCC by Bridge News for various applications and licenses was in fact incorrect; and (iii) transfer of control applications needed to be filed by Bridge News immediately in order to correct the ownership information on file with the FCC. Preparation of transfer of control applications began immediately, and were filed with the FCC on March 15, 2024.

Response to Letter of Inquiry at 3. In other words, the error was *discovered* by Bridge News, voluntarily and quickly *reported to the FCC* by Bridge News, and was quickly *attempted to be fixed* by Bridge News, over two years ago. Importantly, Vincent Bodiford (the party previously reported erroneously to have been owner and in "control" of Bridge News) is no longer even employed by Bridge News, and is in fact, deceased.

This ownership matter is the only matter raised by the Video Division in its *Order*. In the past, where allegations have been made of parties being in control of a Commission licensee without prior FCC approval, the matter has routinely been handled at the Bureau level simply

through the issuance of notices of inquiry, followed by consent decrees or the imposition of forfeitures under Section 1.80 of the Commission rules. See, e.g., Capstar TX LLC, 27 FCC Rcd 3919 (Enf. Bur. 2012); Tama Broadcasting, Inc., 24 FCC Rcd 1612 (Enf. Bur. 2009); Hughes Communications, Inc., 24 FCC Rcd 3694 (Enf. Bur. 2009) (consent decree permitted where licensee where licensee discovered an unauthorized transfer of control and disclosed the matter one week later); KCCS, LLC, 39 FCC Rcd 10850 (MB 2024) (forfeiture issued for undisclosed transfer of control); Birach Broadcasting Corp., 25 FCC Rcd 2643 (Enf. Bur. 2010).

Despite repeated efforts to resolve the matter with the FCC, the three transfer of control applications have now been pending for over two years. After it was believed that the matter was about to be resolved by Consent Decree, the Video Division's *Order* unexpectedly was released, which now requires the filing of early renewal applications. The *Order* stated:

1. The FCC has been investigating Bridge News, LLC, for compliance with its obligations as a licensed broadcaster. Specifically, the FCC has been investigating Bridge News, LLC for possible violations of the FCC's prohibition on unauthorized transfers of control of the station licenses. While Bridge News, LLC has purported to respond to two FCC Letters of Inquiry (LOIs), the FCC has determined that additional actions are appropriate at this time.
2. Specifically, FCC rules provide that whenever the FCC regards an application for a renewal of a license as essential to the proper conduct of an investigation, the FCC has the authority to call the broadcaster's licenses in for early renewal. Doing so both allows the FCC to conduct its ongoing investigation and enables the FCC to ensure that the broadcaster has been meeting its public interest obligations more broadly.
3. The FCC determines that calling in Bridge News, LLC's licenses early for renewal, at this time, under the FCC's Communications Act's public interest standard is essential within the meaning of agency regulations. Therefore, Bridge News, LLC is hereby directed to file license renewal applications for all of their licensed stations within 30 days--in other words, by May 27, 2026.

Order, DA 26-412 (MB, April 27, 2026) (footnotes omitted).

A listing of the outstanding Bridge News station licenses affected by the *Order*, together with their previous license expiration dates, is attached hereto as Attachment A. Copies of the most recent grants for renewal of licenses are attached hereto as Attachment B. The applications

for renewal of license or else for initial licenses were granted on the dates shown in Attachment B. As seen therein, under the previously granted Applications for renewal or for license, the currently outstanding licenses for Bridge News were not due to expire until **December 1, 2028** (for Station W25FQ-D); **February 1, 2029** (for Stations WWRJ-LD, W29FX-D, W16CA-D, WDGT-LD, WEWF-LD, WOFT-LD, WOFT-LD, WQFT-LD, WGCT-LD, WGCT-LD, W19EX-D, WBMN-LD, K06PT-D, W19EX-D, WBMN-LD, and WZVC-LD); **April 1, 2029** (for Stations WRDP-LD, WZVC-LD, W33ER-D, W25FX-D, and WRDP-LD); **June 1, 2029** (for Stations KTVV-LD, KKAF-LD, and KHEF-LD); **August 1, 2029** (for Stations WJYL-LD and WIIW-LD); **October 1, 2029** (for Stations WHNE-LD, WMNN-LD, and WXII-LD); **December 1, 2029** (for Stations W17EH-D, WCHU-LD and W36EX-D); **February 1, 2030** (for Stations KUKC-LD and K06PT-D); **April 1, 2030** (for Stations K26PF-D, K06QJ-D and WUMN-LD); **August 1, 2030** (for Stations KADF-LD, KMBA-LD, KVVV-LD, KVHC-LD, KULC-LD, K34MX-D and K03IJ-D); **October 1, 2030** (for Stations K34QY-D, K08QN-D, KGLR-LD, KKIC-LD, WXCX-LD, KDNU-LD, KVPA-LD, KSVN-LD, KCVB-LD, and K15NV-D); **December 1, 2030** (for Stations KFLA-LD, K27PE-D, KBNK-LD, KSAO-LD, KBNI-LD, KWSM-LD, KRET-CD, KSDX-LD, KILA-LD, and KJOU-LD); **February 1, 2031** (for Stations KTNL-TV, KDMD, KLDY-LD, K06QP-D, K25QK-D, KKAI, KUPU, KBLT-LD) and K21LB-D; **April 1, 2031** (for Station WRDP-LD); **June 1, 2031** (for Stations WBXZ-LD, WHTV-LD, WVBG-LD, and W24EU-D); and **August 1, 2031** (for Stations W24EU-D and WBYD-LD).

ARGUMENT

I. **The Grant of Bridge News' Prior Renewal and License Applications Are Final Orders.**

An action of a Bureau of the Federal Communications Commission (FCC) is considered final and no longer subject to appeal or reconsideration when the following conditions are met:

- **Exhaustion of Administrative Remedies:** Under 47 U.S.C. § 155, the filing of an application for review by the full Commission is a condition precedent to judicial review of any order issued by a subordinate unit of the FCC, such as a Bureau. If no application for review is filed, the Bureau's order becomes final and subject to judicial review. However, if an application for review is filed, the Bureau's order is rendered non-final until the full Commission acts on the application. *Ga. Power Co. v. Teleport Communs. Atlanta, Inc.*, 346 F.3d 1047 (2003).
- **Expiration of Time for Filing Appeals or Reconsideration:** The time for filing a petition for reconsideration or an application for review is generally 30 days from the date of public notice of the Bureau's action, as prescribed by 47 U.S.C. § 405, and . § 1.106 (Petitions for reconsideration in non-rulemaking proceedings). If no petition or application is filed within this period, the Bureau's action becomes final. 47 U.S.C. § 405, 47 C.F.R. § 1.106 (Petitions for reconsideration in non-rulemaking proceedings).
- **Resolution of Pending Applications or Petitions:** If a petition for reconsideration or an application for review is filed, the Bureau's action remains non-final until the FCC disposes of the petition or application. For example, if the full Commission denies an application for review, the Bureau's action becomes final upon the issuance of the Commission's decision . *Ga. Power Co. v. Teleport Communs. Atlanta, Inc.*, 346 F.3d 1047 (2003).
- **No Further Review or Stay:** An action is final when it has not been reversed, stayed, enjoined, or otherwise set aside, and no timely request for administrative or judicial review, reconsideration, or stay is pending. Additionally, the time for the FCC to set aside the action on its own motion must have expired. For instance, under , § 1.102 Effective dates of actions taken pursuant to delegated authority.. the effect of a Bureau's action may be stayed if a petition for reconsideration or application for review is filed, but once the FCC completes its review and issues a final decision, the action becomes final . § 1.102 Effective dates of actions taken pursuant to delegated authority, *Bridge Capital Investors v. Susquehanna Radio Corp.*, 458 F.3d 1212 (2006).
- **Judicial Review Considerations:** Judicial review is only available for final agency actions. If a party files a petition for reconsideration or an application for review, the underlying Bureau action is rendered non-final and unreviewable by the courts until the FCC issues a final decision. This principle is supported by case law, which holds that ongoing agency review renders an order non-final for judicial review purposes, and any petition for review filed before the agency's final decision is "incurably premature." *Ga.*

Power Co. v. Teleport Communs. Atlanta, Inc., 346 F.3d 1047 (2003), *Small Bus. in Telecomms. v. FCC*, 251 F.3d 1015 (2001).

Once an FCC action becomes administratively final, it is generally not subject to further review or modification. This principle is rooted in the public interest in ensuring certainty, convenience, and order in administrative proceedings. Under federal law, administrative finality is a dominant principle, as reflected in *Greater Boston Television Corp. v. FCC*, 463 F.2d 268 (1971). Once an FCC order becomes final -- either because it was not appealed within the statutory timeframe or because it was affirmed on judicial review—the FCC is generally bound by that finality. As the Commission has stated:

Staff action taken pursuant to delegated authority generally becomes final and not subject to administrative review forty days after the release of public notice announcing the action,²⁵ unless a petition for reconsideration or an application for review has been filed.²⁶ The Commission has made exceptions to the administrative doctrine of finality when ministerial errors have occurred in processing an application²⁷ or when manifestly unconscionable consequences would result from a failure to revisit a case.²⁸ Otherwise, the Commission will honor the public interest in ensuring certainty, convenience, and order by freezing the administrative record at a predetermined point in time.²⁹

²⁵ See *id.* § 1.117(a).

²⁶ See *id.* §§ 1.106, 1.115.

²⁷ *In re VSS Enterprises, LLC*, Memorandum Order and Opinion, 18 FCC Rcd 6225, 6227 (2003).

²⁸ See *In re Radio Para La Raza*, Memorandum Order and Opinion, 40 FCC 2d 1102 (1973).

²⁹ See *Golden State Broadcasting*, 102 FCC 2d at 797.

Riverside Ministries and Christian Voice of Central Ohio, Inc., 23 FCC Rcd 10360, 10363 ¶ 7 (MB 2008). Accord, *Frontier Broadcasting Co. v. FCC*, 296 F.2d 443, 445 (1961) (the holder of a construction permit awarded by a final order -- *e.g.*, an order that is never appealed -- has a "high degree of protection" under the Communications Act).

None of those situations apply in this case. Thus, the FCC's grants of the Bridge News' renewal and license to cover applications (granting each station in this case either a renewal license term for a full eight-year term or an initial license term applicable to the license period for stations in each stations' state) are currently administratively final, and it was improper and

legally impermissible for the Video Division retroactively, on its own volition, to retract the finality of those actions and to shorten the current license term to “May 27, 2026.”

II. The Video Division’s Application of Section 73.3539(c) of the Commission’s Rules is Unprecedented, and Contrary to Commission Precedent Restricting Application of the Rule.

The FCC has the authority to require the filing of an early application for the renewal of a license, but that right is limited. Under Section 73.3539(c) of the Commission’s Rules, the FCC may direct a licensee to file an early renewal application when it deems such action essential to the proper conduct of a hearing or investigation. 47 C.F.R. § 73.3539(c). In such cases, the FCC specifies a particular deadline for the filing of the renewal application. Additionally, under 47 U.S.C. § 308(a) of the Communications Act, the FCC also may grant or require early renewal applications in cases of emergency. These emergencies may involve danger to life or property, damage to equipment, or situations arising during a national emergency proclaimed by the President or Congress. In such cases, the FCC may bypass normal licensing procedures and require or grant renewals under terms and conditions it prescribes. However, any authorization granted under these emergency provisions does not extend beyond the duration of the emergency. 47 U.S.C. § 308. These provisions illustrate the FCC’s discretion to mandate early renewal applications in situations where public interest, safety, or administrative necessity justifies such action.

The FCC has never previously required an FCC broadcast licensee to file an application for early renewal. Section 73.3539 states:

(c) Whenever the FCC regards an application for a renewal of license as essential to the proper conduct of a hearing or investigation, and specifically directs that it be filed by a date certain, such application shall be filed within the time thus specified. If the licensee fails to file such application within the prescribed time, the hearing or investigation shall proceed as if such renewal application had been received.

47 C.F.R. § 73.3539(c). In this case, although the *Order* states: “the FCC has been investigating Bridge News, LLC for possible violations of the FCC’s prohibition on unauthorized transfers of control of the station licenses,” that matter is not even a subject of debate – Bridge News *already* has *admitted* that inadvertently the ownership structure that was presented to and approved by the Commission was not accurate with respect to Stations WBYD-CD, WJGN-CD, KSVN-CD, W36EX-D, WJYL-CD, KRET-CD, WTNG-CD, KKAI, KUPU, KTNL-TV, and KDMD, and has been willing to accept a forfeiture regarding that error. Long-form applications for approval of the corrected ownership structure (which is ownership which already was approved by the Commission for two of Bridge News’ stations WXII-LD and WMNN-LD (File Nos. 0000180466 and 0000180467)) currently are on file with the FCC. Lead Application File Nos. 0000240949, 0000240957, and 0000240961.

Moreover, the FCC *already* has been conducting an investigation concerning this matter in conjunction with the already-filed transfer of control applications. The Video Division *already* has issued two Inquiry Letters in conjunction with those applications, and is free to *continue* its investigation in connection to those already-pending applications. In this circumstance, the requirement to filing *additional* applications cannot be validly considered to be “essential to the proper conduct of an investigation” where applications *already* have been filed and are pending before the FCC, and the conduct *already* is being investigated. Cf. *Walt Disney Company and American Broadcasting Company*, FCC 26-416 (MB April 28, 2026), where no applications are already under scrutiny, and no investigation with respect to any such pending applications already is pending with regard to pending applications.

FCC precedent establishes a clear standard: “the Commission...will adhere to its practice of not requiring the filing of early renewal applications absent some compelling reason.” *In re Stangland*, 9 F.C.C.2d 683, 684 (1967).

Similarly, in *Knox Broadcasting*, 29 F.C.C.2d 47 (1971), a party sought to have a licensee's authorization revoked or subject to an application for renewal of license in advance of the date specified in the Commission's rules. The Commission denied that effort, stating:

Our review of the submissions of the parties does not disclose the existence of any question of fact, law or policy which is incapable of resolution outside the hearing process and which would, therefore, justify the exercise of our discretion under Section 312 of the Communications Act (See: *Anthony Martin-Trigona*, 18 RR 2d 581 (1970); *Salem Broadcasting Company*, 1 FCC 2d 655, 6 RR 2d 160 (1965)) to direct the licensee of KKDA to show cause why its license for that station should not be revoked. Neither have we been able to find any compelling reason for demanding the submission of an application for renewal of license in advance of the date specified in Section 1.539(c) of the Commission's rules. (See: *Sioux Empire Broadcasting Company*, 9 FCC 2d 683, 10 RR 2d 1031 (1967); *National Antivivisection Society v. F.C.C.*, 3 RR 2d 2027 (1964)). It follows that KNOK's subject Petition must be denied.

Id. at 50.

In even the seminal case of *RKO General, Inc.*, 1 FCC Rcd 1081 (1986), the Commission declined to set stations' licenses for early renewal:

Section 73.3539(c) of the Commission's Rules provides that the Commission may call for the early filing of a renewal application where it "regards an application for a renewal of license as essential to the proper conduct of a hearing or investigation" Mainstream requests that we call for the early filing of WOR-TV's renewal application, pursuant to the rule. We have stated, however, that we would not call for the early filing of a renewal application "absent some compelling reason." *Sioux Empire Broadcasting Co.*, 9 F.C.C.2d 683, 684 (1967). The matters alleged by Mainstream, as described above, concern unresolved issues as to RKO's activities after the issuance of station WOR-TV's license in March, 1983. We do not consider such unresolved issues to be "compelling circumstances."

Similarly, in *Greater Portland Broadcasting Corp.*, 3 FCC Rcd 1953 (1988), a licensee was accused of anticompetitive conduct aimed at keeping a competitor off the air. The Commission stated:

the Commission has never specifically set out pleading requirements for persons requesting the early filing of renewal applications, except to state that it would grant such a request only for "serious" or "compelling reasons." See, e.g., *Sioux Empire Broadcasting Co.*, 9 FCC2d 683, 684 (1967).

Id. at 1954; *Accord, RKO General*, 6 FCC Rcd 6569, ¶ 21 (1991); *Sandab Communications Limited Partnership II*, 13 FCC Rcd 14413 ¶ 65 (1998) (Commission denies requiring the filing on an early renewal application, after finding no “compelling reasons”):

Upon review of the information now before us, we find that the allegations in Portland's pleadings fail to raise[] any substantial and material questions regarding Columbia's conduct. Accordingly, we see no reasons to invoke our discretionary authority under Section 73.3539(c) of the rules.

Greater Portland Broadcasting Corp., 3 FCC Rcd 1953, 1955 (1988).

As far back as 1963, the Commission noted that the Commission has always been circumspect in its discretionary use of the callup procedure. *William L. Ross*, 25 R.R. 360, 364 ¶ 11(1963). As the Commission stated in *Robert E. Thomas and Ferris A. Maloof*, 17 F.C.C.2d 375 (1969):

The Commission, as a matter of policy, will not advance the filing date of the renewal application of an existing station...

We followed this in *Bigbee Broadcasting Co.*, F.C.C. 63-260, 25 R.R. 88 (1963), and also in *William L. Ross*, F.C.C. 63-366, 25 R.R. 360 (1963), pointing out there that the Commission has always been circumspect in its discretionary use of the callup procedure. Accordingly, the applicant's request in this regard will be denied.

Id. at ¶ 16. There has been no reported instance where a change in this policy has been announced.

In short, there has not been even one reported case in which the Commission has ever previously invoked Section 73.3539(c) (or its predecessor, Section 1.539(c)) to require the early “callup” of a Commission license. In light of the investigations that already have been conducted and can still be conducted by virtue of the pending transfer of control applications; and in light of prevailing Commission precedent, the Video Division’s action was arbitrary and capricious, beyond its delegated authority, and contrary to Commission precedent.

III. The Video Division's Action Was Beyond the Authority Delegated to the Media Bureau Under Section 0.61 of the Commission's Rules.

Due to the unprecedented nature of the Video Division's action targeting licenses for early renewal, the Video Division's action was beyond the Media Bureau's delegated authority. The Video Division *Order* was an action of the Media Bureau, and not the Commission itself. The Media Bureau operates under delegated authority as outlined in § 0.61 of the Commission's Rules and Section § 0.283 of the Commission's Rules. Under these rules, certain matters must be referred to the FCC *en banc* for resolution. These include issues presenting novel questions of law, fact, or policy that cannot be resolved under existing precedents, as well as matters involving significant penalties or rulemaking proceedings requiring public notice and comment. 47 C.F.R. § 0.61 and 47 C.F.R. § 0.283. Thus, the Media Bureau cannot unilaterally initiate an early renewal if it involves such matters.

In short, the Media Bureau is restricted from acting on matters that involve novel or unusual issues without referring them to the FCC. This limitation ensures that significant policy decisions or deviations from established procedures are addressed at the Commission level. 47 C.F.R. § 0.283. Quite simply, it has *never* been Commission policy in the past to require the filing of early renewal applications simply to resolve ownership issues and errors in Commission filings, as are presented in this case.

CONCLUSION

Throughout its brief history of owning stations before the FCC, Bridge News has provided quality programming to the public and has served the public interest. Other than one ownership error, which was voluntarily disclosed and has attempted to be rectified, Bridge News has a spotless record of compliance with all FCC rules and regulations.

Legitimate questions have been raised about the motivation underlying the Commission's *Order* against Bridge News. Bloomberg News reports that the Video Division's action "surprised some agency employees" and was issued to "function as a blueprint for future license investigations...and it also creates plausible deniability that license renewals are only targeting Disney."¹ This belief is consistent with concerns being expressed by the United States Senate. In a Letter dated May 7, 2026, Chairman Carr has been requested to respond to a letter from members of the United States Senate stating:

The Commission issued a ... renewal order against Bridge News, LLC on April 27, 2026 – one day before the Disney order. Did you intentionally time the orders so that the Bridge News order would precede the Disney order in the public record?

Attachment C at 3.

As the National Association of Broadcasters has stated:

The FCC's broadcast license renewal process must be grounded in predictability, fairness and transparency, principles reflected in the license terms Congress established and later extended. The Media Bureau's nearly unprecedented request for one company to quickly reapply for all of its licenses – rather than utilize its traditional enforcement process – runs contrary to these principles and creates significant uncertainty for all broadcasters.

Broadcast stations already face intense challenges as they work to deliver trusted journalism, lifesaving emergency services, community programming and election coverage. The FCC must be careful to avoid actions that create further instability for the local stations viewers and listeners depend on."

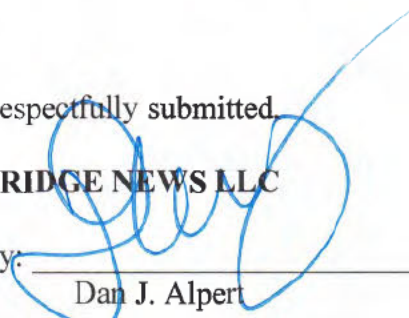
Attachment D. Shortening Bridge News' license terms in these circumstances, and requiring an unprecedented requirement of the filing of early renewal applications, is unnecessary, arbitrary and capricious, and contrary to Commission precedent.

¹ <https://www.msn.com/en-us/money/companies/abc-license-renewal-call-surprised-fcc-staff-and-shattered-norms/ar-AA221DnA?ocid=finance-verthp-feeds>

WHEREFORE, for all of these reasons, it is respectfully requested that this Petition be granted, and that the Video Division's *Order* against Bridge News LLC be reconsidered, rescinded, and withdrawn.

Respectfully submitted

BRIDGE NEWS LLC

By: 

Dan J. Alpert

Its Attorney

The Law Office of Dan J. Alpert
2120 21st Rd. N
Arlington, VA 22201
703-980-2419

May 19, 2026

Attachment A

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Fac ID	Call Sign	City	State
182186	K15NG-D	MESQUITE	NV
28566	KFLA-LD	LOS ANGELES	CA
186672	K27PE-D	GUSTINE	CA
20559	KBNK-LD	FRESNO	CA
34578	KSAO-LD	SACRAMENTO	CA
41123	KBNI-LD	SANTA MARIA	CA
31355	KWSM-LD	SANTA MARIA	CA
10536	KRET-CD	PALM SPRINGS	CA
168576	KSDX-LD	SAN DIEGO	CA
60519	KTNL-TV	SITKA	AK
25221	KDMD	ANCHORAGE	AK
25219	KLDY-LD	ANCHORAGE	AK
183022	K06QP-D	JUNEAU	AK
25222	K25QK-D	ANCHORAGE	AK
83180	KKAI	KAILUA	HI
89714	KUPU	WAIMANALO	HI
182846	KBLT-LD	ANCHORAGE	AK
185411	K21LB-D	LINCOLN CITY	OR
186686	WVCC-LD	WESTMORELAND	NH
14317	WBXZ-LD	BUFFALO	NY
127812	WHTV-LD	NEW YORK	NY
74018	WVBG-LD	GREENWICH	NY
129632	W24EU-D	ERIE	PA
68395	WBYD-CD	PITTSBURGH	PA
50144	WIVX-LD	CLEVELAND	OH
168787	KBNY-LD	MONTEREY	CA
50148	W27DG-D	MILLERSBURG	OH
129642	KILA-LD	CHERRY VALLEY	CA
130272	KJOU-LD	BAKERSFIELD	CA
181856	WRDP-LD	COLUMBUS	GA
182020	W25FQ-D	FLORENCE	SC
182301	W19EX-D	GAINESVILLE	FL
182322	WBMN-LD	OCALA	FL
183492	K06PT-D	COLUMBIA	MO
183588	WZVC-LD	ATHENS	GA
184641	K26PF-D	SAINT CLOUD	MN
185711	W33ER-D	AUGUSTA	GA
185777	W25FW-D	COLUMBUS	GA
186640	K34QY-D	GOLDEN VALLEY	AZ
186641	K08QN-D	GOLDEN VALLEY	AZ
186719	K19NF-D	SOCORRO	NM
187860	K06QJ-D	SIOUX FALLS	SD
188768	W17EH-D	QUINCY	IL

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Attachment B

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000189822, was granted on 11/18/2022 for a term expiring on 08/01/2030.

This is your License Renewal Authorization for station K03IJ-D

Facility ID: 183495

Location: COLLEGE STATION,TX

Innovative Media Technologies, Inc.

5174 McGinnis Ferry Road Suite 133

Alpharetta, GA 30005



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington, MI, 48331

Call Sign File Number

K06PT-D 0000254122

Facility ID: 183492**NTSC TSID:** 10910**Digital TSID:** 10911**This License Covers Construction
Permit No.**

0000184981

Grant Date 10/02/2024		Expiration Date 02/01/2030
Hours of Operation Unlimited		
Station Location City COLUMBIA State MO	Frequency (MHz) 82.0 - 88.0	Station Channel 6

Antenna Structure Registration Number 1027181	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 39-0-52.1 N Longitude 92-16-32.7 W	Antenna Type Directional
Description of Antenna Make SCA Model TVO-4	Major Lobe Directions 70.0 250.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 3 kW 4.77 DBK	
Height of Radiated Center Above Ground (Meters) 151	Height of Radiated Center Above Mean Sea Level (Meters) 405.5
Out-Of-Channel Emission Mask Simple	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington, MI, 48331

Call Sign File Number

K06QJ-D 0000254649

Facility ID: 187860**NTSC TSID:** 10922**Digital TSID:** 10923**This License Covers Construction
Permit No.**

0000184985

Grant Date 10/02/2024		Expiration Date 04/01/2030
Hours of Operation Unlimited		
Station Location City SIOUX FALLS State SD	Frequency (MHz) 82.0 - 88.0	Station Channel 6

Antenna Structure Registration Number 1042104	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 43-30-18.0 N Longitude 96-33-23.0 W	Antenna Type Directional
Description of Antenna Make JAM Model JA/LS-OM-8	Major Lobe Directions 0.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 3 kW 4.77 DBK	
Height of Radiated Center Above Ground (Meters) 170	Height of Radiated Center Above Mean Sea Level (Meters) 604.9
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196960, was granted on 01/26/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station K06QP-D

Facility ID: 183022

KETCHIKAN TV, LLC

Location: JUNEAU,AK

PO Box 1471

Evergreen, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign File Number

K08QN-D 0000193003

Facility ID: 186641**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000190287

Grant Date 06/10/2022	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City GOLDEN VALLEY State AZ	Frequency (MHz) 180.0 - 186.0 Station Channel 8

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 35-20-6 N Longitude 114-12-56 W	Antenna Type Directional
Description of Antenna Make SAM Model SAM-160	Major Lobe Directions 180.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 1 kW 0.00 DBK	
Height of Radiated Center Above Ground (Meters) 7	Height of Radiated Center Above Mean Sea Level (Meters) 1040.3
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) 7.6

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
W17EH-D	0000240011

Facility ID: 188768

NTSC TSID:

Digital TSID:

**This License Covers Construction
Permit No.**

0000215088

Grant Date 03/01/2024		Expiration Date 12/01/2029
Hours of Operation Unlimited		
Station Location City QUINCY State IL	Frequency (MHz) 488.0 - 494.0	Station Channel 17

Antenna Structure Registration Number 1011390	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 39-57-4.0 N Longitude 91-19-54.0 W	Antenna Type Non-Directional
Description of Antenna Make Alive Model ATC-BCE212M-V2-17	Major Lobe Directions N/A
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 139	Height of Radiated Center Above Mean Sea Level (Meters) 370.6
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000203370, was granted on 04/20/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station K21LB-D

Facility ID: 185411

Location: LINCOLN CITY,OR

Innovative Media Technologies

5174 McGinnis Ferry Road Suite 133

Alpharetta, GA 30005



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000196961, was
granted on 01/26/2023 for a term expiring on
02/01/2031.

This is your License Renewal Authorization for station K25QK-D

Facility ID: 25222

Location: ANCHORAGE,AK

KETCHIKAN TV, LLC

PO BOX 1471

EVERGREEN, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington, MI, 48331

Call Sign File Number

K26PF-D 0000256325

Facility ID: 184641**NTSC TSID:** 10924**Digital TSID:** 10925**This License Covers Construction
Permit No.**

0000226660

Grant Date 10/31/2024	Expiration Date 04/01/2030
Hours of Operation Unlimited	
Station Location City SAINT CLOUD State MN	Frequency (MHz) 542.0 - 548.0 Station Channel 26

Antenna Structure Registration Number 1210568	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 45-34-20.5 N Longitude 94-21-2.3 W	Antenna Type Directional
Description of Antenna Make Alive Telecom Model ATC-BCE28CW-V2-26	Major Lobe Directions 50.0
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 89.9	Height of Radiated Center Above Mean Sea Level (Meters) 456.3
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195810, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station K27PE-D

Facility ID: 186672

Location: GUSTINE,CA

Lowcountry 34 Media, LLC

14 Tuxedo Drive

Beaufort, SC 29907



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000188912, was granted on 01/04/2023 for a term expiring on 08/01/2030.

This is your License Renewal Authorization for station K34MX-D

Facility ID: 125712

Location: ODESSA,TX

Lowcountry 34 Media, LLC

14 Tuxedo Drive

Beaufort, SC 29907



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign File Number

K34QY-D 0000193005

Facility ID: 186640**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000190286

Grant Date 06/08/2022	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City GOLDEN VALLEY State AZ	Frequency (MHz) 590.0 - 596.0 Station Channel 34

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 35-20-6 N Longitude 114-12-56 W	Antenna Type Directional
Description of Antenna Make ELTI Model ELTI UHF Panel	Major Lobe Directions 90.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 3 kW 4.77 DBK	
Height of Radiated Center Above Ground (Meters) 6	Height of Radiated Center Above Mean Sea Level (Meters) 1039.3
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) 7.6

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000185932, was
granted on 08/02/2022 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station KADF-LD

Facility ID: 32281

Location: AUSTIN,TX

Joseph W. Shaffer

P.O. BOX 10310

PRESCOTT, AZ 86304



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000203343, was granted on 02/04/2026 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KBLT-LD

Facility ID: 182846

Location: ANCHORAGE,AK

Bridge News LLC

38955 Hills Tech Dr.

Farmington Hills, MI 48331



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195885, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KKDJ-LD

Facility ID: 41123

Location: SANTA MARIA,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195882, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KJE0-LD

Facility ID: 20559

Location: FRESNO,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000192733, was
granted on 01/10/2023 for a term expiring on
10/01/2030.

This is your License Renewal Authorization for station KCVB-LD

Facility ID: 69693

Location: LOGAN,UT

CACHE VALLEY BROADCASTING, LLC

P.O. BOX 3942

LOGAN, UT 84323



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196955, was granted on 01/17/2024 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KDMD

Facility ID: 25221

Location: ANCHORAGE,AK

KETCHIKAN TV, LLC

29793 Ruby Ranch Road PO Box 1471
Evergreen, CO 80439

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195228, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KFLA-LD

Facility ID: 28566

Location: LOS ANGELES,CA

Roy William
Mayhugh

1872 NE Brown Dr.
Madras, OR 97741



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000189935, was granted on 09/29/2022 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KGLR-LD

Facility ID: 182107

Location: SPARKS,NV

New Line Media Communications LLC

3495 Lakeside Drive # 1228

Reno, NV 89509



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000135003, was granted on 06/09/2021 for a term expiring on 06/01/2029.

This is your License Renewal Authorization for station KHMf-LD

Facility ID: 58284

Location: FORT SMITH,AR

KTV MEDIA, LLC

17200 CHENAL PARKWAY SUITE 300 - 267
LITTLE ROCK, AR 72223



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195314, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KILA-LD

Facility ID: 129642

Location: CHERRY VALLEY,CA

Roy William

Mayhugh

1872 NE Brown Dr.

Madras, OR 97741



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195881, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KJOU-LD

Facility ID: 130272

Location: BAKERSFIELD,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000135001, was granted on 06/09/2021 for a term expiring on 06/01/2029.

This is your License Renewal Authorization for station KKAF-LD

Facility ID: 48534

Location: FAYETTEVILLE,AR

KTV MEDIA, LLC

17200 CHENAL PARKWAY SUITE 300 - 267
LITTLE ROCK, AR 72223



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000190754, was
granted on 01/19/2023 for a term expiring on
10/01/2030.

This is your License Renewal Authorization for station KKIC-LD

Facility ID: 74409

Location: BOISE,ID

COCOLA BROADCASTING COMPANIES LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196959, was granted on 01/26/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KLDY-LD

Facility ID: 25219

Location: ANCHORAGE,AK

KETCHIKAN TV, LLC

PO BOX 1471

EVERGREEN, CO 80437



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000185938, was
granted on 08/02/2022 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station K34FM-D

Facility ID: 67880

Location: AUSTIN,TX

Joseph W. Shaffer

P.O. BOX 10310

PRESCOTT, AZ 86304



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195889, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KMBY-LD

Facility ID: 168787

Location: Monterey, CA

COCOLA BROADCASTING COMPANIES, LLC

706 WEST HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196044, was granted on 07/19/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KRET-CD

Facility ID: 10536

Location: PALM SPRINGS,CA

PO Box 5377 41625 ECLECTIC SUITE J1
PALM DESERT, CA 92260

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195883, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KSA0-LD

Facility ID: 34578

Location: SACRAMENTO,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196486, was granted on 11/30/2022 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KSDX-LD

Facility ID: 168576

Location: SAN DIEGO,CA

Estrella Television License LLC

1845 Empire Avenue

Burbank, CA 91504



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000192709, was granted on 01/04/2023 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KSVN-CD

Facility ID: 168239

Location: OGDEN,UT

Azteca Broadcasting Corporation

4215 West 4000 South

West Haven, UT 84401

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000196953, was granted on 02/22/2024 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KTNL-TV

Facility ID: 60519

Ketchikan TV, LLC

Location: SITKA,AK

P.O. Box 1471 29833 Ruby Ranch Road
Evergreen, CO 80437

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000134930, was granted on 06/09/2021 for a term expiring on 06/01/2029.

This is your License Renewal Authorization for station KTVV-LD

Facility ID: 57547

Location: HOT SPRINGS,AR

PINNACLE MEDIA, LLC

PO Box 23808

LITTLE ROCK, AR 72221



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000160875, was granted on 01/21/2022 for a term expiring on 02/01/2030.

This is your License Renewal Authorization for station KUKC-LD

Facility ID: 191352

Location: KANSAS CITY,MO

MEDIA VISTA KANSAS CITY, LLC

1110 Pine Ridge Road Suite 301

Naples, FL 34108



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000188321, was
granted on 01/04/2023 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station KULC-LD

Facility ID: 182050

Location: PORT ARTHUR,TX

Lowcountry 34 Media, LLC

14 Tuxedo Drive

Beaufort, SC 29907



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000201873, was granted on 01/19/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KUPU

Facility ID: 89714

Location: WAIMANALO,HI

Hawaii Catholic TV, Inc.

PO Box 15

Honolulu, HI 96810

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000187964, was
granted on 02/15/2023 for a term expiring on
08/01/2030.

This is your License Renewal Authorization for station KVHC-LD

Facility ID: 125586

Location: KERRVILLE,TX

5GTV, LLC

500 Summer Street #502
Stamford, CT 06901



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000192522, was granted on 09/30/2022 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KVPA-LD

Facility ID: 33773

Location: PHOENIX,AZ

Estrella Television License LLC

1845 EMPIRE AVENUE

Burbank, CA 81504



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000186977, was granted on 08/02/2022 for a term expiring on 08/01/2030.

This is your License Renewal Authorization for station KVVV-LD

Facility ID: 6690

Location: HOUSTON,TX

Sovryn Holdings, Inc.

450 Park Avenue 30th
Floor

New York, NY 10022



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195892, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KWSM-LD

Facility ID: 31355

Location: SANTA MARIA,CA

COCOLA BROADCASTING COMPANIES, LLC

706 W. HERNDON AVENUE

FRESNO, CA 93650



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000191478, was granted on 10/13/2022 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KXCY-LD

Facility ID: 186316

Location: CHEYENNE,WY

Roseland Broadcasting, Inc.

888C 8th Avenue #733

New York, NY 10019



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122149, was granted on 10/13/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station W16CA-D

Facility ID: 126708

Location: HOMESTEAD,FL

CAYO HUESO NETWORKS, LLC

PO Box 471

EVERGREEN, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

W19EX-D 0000266946

Facility ID: 182301**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000213178

Grant Date 02/27/2025	Expiration Date 02/01/2029
Hours of Operation Unlimited	
Station Location City GAINESVILLE State FL	Frequency (MHz) 500.0 - 506.0 Station Channel 19

Antenna Structure Registration Number 1035360	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 29-32-12.0 N Longitude 82-23-59.0 W	Antenna Type Directional
Description of Antenna Make Dielectric Model TLP-8F/VP OS	Major Lobe Directions 290.0
Antenna Beam Tilt (Degrees Electrical) 1.0	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 207.3	Height of Radiated Center Above Mean Sea Level (Meters) 226.8
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000212462, was granted on 07/12/2023 for a term expiring on 08/01/2031.

This is your License Renewal Authorization for station W24EU-D

Facility ID: 129632

Lowcountry 34 Media, LLC

Location: ERIE,PA

14 Tuxedo Drive

Beaufort, SC 29907



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign File Number

W25FQ-D 0000215753

Facility ID: 182020**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000214692

Grant Date 06/01/2023	Expiration Date 12/01/2028
Hours of Operation Unlimited	
Station Location City FLORENCE State SC	Frequency (MHz) 536.0 - 542.0 Station Channel 25

Antenna Structure Registration Number 1048802	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 34-16-18.0 N Longitude 79-43-33.0 W	Antenna Type Directional
Description of Antenna Make ELTI Model ELTI UHF Panel	Major Lobe Directions 60.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 1 kW 0.00 DBK	
Height of Radiated Center Above Ground (Meters) 11	Height of Radiated Center Above Mean Sea Level (Meters) 48.2
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Lowcountry 34 Media, LLC
14 Tuxedo Drive
Beaufort, SC, 29907

Call Sign	File Number
W25FW-D	0000221308

Facility ID: 185777**NTSC TSID:** 10354**Digital TSID:** 10355**This License Covers Construction
Permit No.**

0000218613

Grant Date 09/28/2023		Expiration Date 04/01/2029
Hours of Operation Unlimited		
Station Location City COLUMBUS State GA	Frequency (MHz) 536.0 - 542.0	Station Channel 25

Antenna Structure Registration Number 1219605	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 32-35-55.4 N Longitude 85-12-19.7 W	Antenna Type Directional
Description of Antenna Make Dielectric Model DLP-12M (BA)	Major Lobe Directions 270.0 290.0 310.0 330.0 350.0
Antenna Beam Tilt (Degrees Electrical) 1	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 82	Height of Radiated Center Above Mean Sea Level (Meters) 278.9
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000144279, was granted on 09/08/2021 for a term expiring on 10/01/2029.

This is your License Renewal Authorization for station W27DG-D

Facility ID: 50148

Location: MILLERSBURG, OH

IMAGE VIDEO TELEPRODUCTIONS, INC.

6755 FREEDOM AVE., N.W.

NORTH CANTON, OH 44720



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122148, was granted on 10/13/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WKIZ-LD

Facility ID: 4323

Location: KEY WEST,FL

CAYO HUESO NETWORKS, LLC

PO Box 471

EVERGREEN, CO 80437



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
W33ER-D	0000218372

Facility ID: 185711**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000217785

Grant Date 08/01/2023	Expiration Date 04/01/2029
Hours of Operation Unlimited	
Station Location City AUGUSTA State GA	Frequency (MHz) 584.0 - 590.0 Station Channel 33

Antenna Structure Registration Number 1059412	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 33-30-21.0 N Longitude 81-57-43.0 W	Antenna Type Directional
Description of Antenna Make Dielectric Model DLP-12M/VP (AER)	Major Lobe Directions 190.0 210.0 230.0 250.0 270.0
Antenna Beam Tilt (Degrees Electrical) 1	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 125.4	Height of Radiated Center Above Mean Sea Level (Meters) 269.0
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000158106, was granted on 09/12/2023 for a term expiring on 12/01/2029.

This is your License Renewal Authorization for station W36EX-D

Facility ID: 37238

Location: ALTON,IL

Liberty Communications, Inc.

PO Box 1044 3401 Fosterburg Road

Alton, IL 62002

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
WBMN-LD	0000266947

Facility ID: 182322**NTSC TSID:** 10912**Digital TSID:** 10913**This License Covers Construction
Permit No.**

0000213176

Grant Date 02/27/2025		Expiration Date 02/01/2029
Hours of Operation Unlimited		
Station Location City OCALA State FL	Frequency (MHz) 488.0 - 494.0	Station Channel 17

Antenna Structure Registration Number 1035360	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 29-32-12.0 N Longitude 82-23-59.0 W	Antenna Type Directional
Description of Antenna Make Dielectric Model TLP-120/VP	Major Lobe Directions 205.0
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 182.9	Height of Radiated Center Above Mean Sea Level (Meters) 202.4
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000207783, was
granted on 05/10/2023 for a term expiring on
06/01/2031.

This is your License Renewal Authorization for station WBXZ-LD

Facility ID: 14317

Location: BUFFALO,NY

Steven D. Ritchie

7729 AKRON ROAD

LOCKPORT, NY 14094



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000213456, was granted on 04/11/2024 for a term expiring on 08/01/2031.

This is your License Renewal Authorization for station WBYD-CD

Facility ID: 68395

Location: PITTSBURGH,PA

Bridge News LLC

38955 Hills Tech Dr.

Farmington Hills, MI 48331

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000155276, was granted on 11/12/2021 for a term expiring on 12/01/2029.

This is your License Renewal Authorization for station WCHU-LD

Facility ID: 129745

Location: Oakwood hills,IL

Venture Technologies Group, LLC

5670 Wilshire Blvd., Suite 1620

Los Angeles, CA 90036



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122150, was granted on 10/13/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WDGT-LD

Facility ID: 6046

Location: MIAMI,FL

CAYO HUESO NETWORKS, LLC

PO Box 471

EVERGREEN, CO 80437



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122936, was granted on 03/19/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station W05DH-D

Facility ID: 183761

New Hola TV LLC

Location: Jupiter,FL

6115 Lake Avenue

West Palm Beach, FL 33405



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000119812, was granted on 12/17/2021 for a term expiring on 12/01/2028.

This is your License Renewal Authorization for station WFDY-LD

Facility ID: 182003

Location: MYRTLE BEACH,SC

MARQUEE BROADCASTING INC.

4400 Brookeville Rd

Brookeville, MD 20833



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000123217, was granted on 03/04/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WGCT-LD

Facility ID: 128357

Location: Tampa,FL

Robert W Carr

23114 NE 69TH AVENUE
MELROSE, FL 32666



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000118816, was
granted on _____ for a term expiring on
12/01/2028.

This is your License Renewal Authorization for station WTNG-CD

Facility ID: 167158

Location: LUMBERTON-PEMBROKE,NC

Mercy's Bridge Media, LLC

PO Box 526 P.O. BOX 526

Cordova, NC 28330

This Authorization must be uploaded to its online public inspection file with the station's
License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000208588, was
granted on 08/23/2023 for a term expiring on
06/01/2031.

This is your License Renewal Authorization for station WHTV-LD

Facility ID: 127812

Location: New York,NY

Venture Technologies Group, LLC

150 S Arroyo Pkwy #103

Pasadena, CA 91105



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000144280, was
granted on 09/08/2021 for a term expiring on
10/01/2029.

This is your License Renewal Authorization for station WIVX-LD

Facility ID: 50144

Location: AKRON,OH

IMAGE VIDEO TELEPRODUCTIONS, INC.

6755 FREEDOM AVE., N.W.

NORTH CANTON, OH 44720



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000115088, was granted on 10/13/2020 for a term expiring on 10/01/2028.

This is your License Renewal Authorization for station WJGN-CD

Facility ID: 66549

Location: CHESAPEAKE,VA

THE UNION MISSION

3000 NORTH LANDING ROAD

VIRGINIA BEACH, VA 23456

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000141430, was granted on 10/13/2021 for a term expiring on 08/01/2029.

This is your License Renewal Authorization for station WJYL-CD

Facility ID: 6837

Location: JEFFERSONVILLE,IN

WJYL, LLC

P.O. Box 2605

Clarksville, IN 47131

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000145924, was granted on 09/08/2021 for a term expiring on 10/01/2029.

This is your License Renewal Authorization for station WMNN-LD

Facility ID: 184267

Location: LAKE CITY,MI

FREELANCER TELEVISION BROADCASTING, INC.

320 W. 13TH STREET

CADILLAC, MI 49601



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000122948, was granted on 03/19/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WOFT-LD

Facility ID: 128367

Location: Ocala, FL

BUDD BROADCASTING CO., INC.

4190 NW 93RD AVENUE

GAINSVILLE, FL 32653



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
WRDP-LD	0000264874

Facility ID: 181856

NTSC TSID: 10926

Digital TSID: 10927

**This License Covers Construction
Permit No.**

0000233576

Grant Date 02/14/2025		Expiration Date 04/01/2029
Hours of Operation Unlimited		
Station Location City COLUMBUS State GA	Frequency (MHz) 482.0 - 488.0	Station Channel 16

Antenna Structure Registration Number 1032658	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 32-27-29.0 N Longitude 84-53-8.0 W	Antenna Type Directional
Description of Antenna Make Alive Telecom Model ATC-BCE410BR-VB-16	Major Lobe Directions 5.0 235.0
Antenna Beam Tilt (Degrees Electrical) 1.0	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 150	Height of Radiated Center Above Mean Sea Level (Meters) 267.3
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000119280, was granted on 02/11/2021 for a term expiring on 12/01/2028.

This is your License Renewal Authorization for station WSCG-LD

Facility ID: 69449

Location: BEAUFORT, ETC.,SC

MARQUEE BROADCASTING INC.

4400 BROOKEVILLE RD

BROOKEVILLE, MD 20833



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000118816, was
granted on _____ for a term expiring on
12/01/2028.

This is your License Renewal Authorization for station WTNG-CD

Facility ID: 167158

Location: LUMBERTON-PEMBROKE,NC

Mercy's Bridge Media, LLC

PO Box 526 P.O. BOX 526

Cordova, NC 28330

This Authorization must be uploaded to its online public inspection file with the station's
License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000172285, was granted on 03/29/2022 for a term expiring on 04/01/2030.

This is your License Renewal Authorization for station WUMN-LD

Facility ID: 191416

Location: MINNEAPOLIS,MN

MEDIA VISTA MINNEAPOLIS, LLC

1110 Pine Ridge Rd Suite 301

Naples, FL 34108



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000208877, was
granted on 05/10/2023 for a term expiring on
06/01/2031.

This is your License Renewal Authorization for station WVBG-LD

Facility ID: 74018

Location: GREENWICH,NY

WIRELESS ACCESS, LLC

PO Box 260 50 SWART STREET
MARGARETVILLE, NY 12455



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000204335, was granted on 03/15/2023 for a term expiring on 04/01/2031.

This is your License Renewal Authorization for station WCC-LD

Facility ID: 186686

Location: WESTMORELAND,NH

Milachi Media, LLC

482 Harbor Drive North

Indian Rocks Beach, FL 33785



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000121757, was granted on 02/18/2021 for a term expiring on 02/01/2029.

This is your License Renewal Authorization for station WWRJ-LP

Facility ID: 39420

Location: JACKSONVILLE,FL

U.S. TELEVISION, L.L.C.

P.O. BOX 3041

JENA, LA 71342



Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000145962, was
granted on 10/13/2021 for a term expiring on
10/01/2029.

This is your License Renewal Authorization for station WXII-LP

Facility ID: 16651

Location: CEDAR,MI

FREELANCER TELEVISION BROADCASTING, INC.

320 W. 13TH ST.

CADILLAC, MI 49601



Federal Communications Commission

TELEVISION TRANSLATOR BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

K15NG-D 0000189026

Facility ID: 182186**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

BNPDTL-20090825APE

Grant Date 04/13/2022	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City MESQUITE State NV	Frequency (MHz) 476.0 - 482.0 Station Channel 15
This authorization reissued to TINY TORTOISE INVESTMENTS, LLC on 03/05/2026. Call Sign Compliance	

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 36-49-55.4 N Longitude 114-3-34.2 W	Antenna Type Directional
Description of Antenna Make SCA Model 4DR-16-2HW	Major Lobe Directions 172.0 225.0 278.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 0.5 kW -3.01 DBK	
Height of Radiated Center Above Ground (Meters) 17	Height of Radiated Center Above Mean Sea Level (Meters) 587
Out-Of-Channel Emission Mask Simple	Overall Height of Antenna Structure Above Ground (Meters) 18

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000201851, was granted on 09/20/2023 for a term expiring on 02/01/2031.

This is your License Renewal Authorization for station KKAI

Facility ID: 83180

Kailua Television, LLC

Location: KAILUA,HI

PO Box 8969 P.O. Box 8969

Honolulu, HI 96810

This Authorization must be uploaded to its online public inspection file with the station's License Certificate and any subsequent modifications.



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000195889, was granted on 02/15/2023 for a term expiring on 12/01/2030.

This is your License Renewal Authorization for station KMBY-LD

Facility ID: 168787

Location: Monterey,CA

COCOLA BROADCASTING COMPANIES, LLC

706 WEST HERNDON AVENUE

FRESNO, CA 93650



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign	File Number
WZVC-LD	0000253901

Facility ID: 183588**NTSC TSID:** 10902**Digital TSID:** 10903**This License Covers Construction
Permit No.**

0000226647

Grant Date 09/13/2024	Expiration Date 04/01/2029
Hours of Operation Unlimited	
Station Location City ATHENS State GA	Frequency (MHz) 524.0 - 530.0 Station Channel 23

Antenna Structure Registration Number 1020944	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 34-5-1.1 N Longitude 83-19-19.3 W	Antenna Type Directional
Description of Antenna Make Alive Telecom Model ATC-BCE210MR-V2-23	Major Lobe Directions 70.0
Antenna Beam Tilt (Degrees Electrical) 0.5	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 106.7	Height of Radiated Center Above Mean Sea Level (Meters) 372.6
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

K19NF-D 0000234030

Facility ID: 186719**NTSC TSID:****Digital TSID:****This License Covers Construction
Permit No.**

0000220945

Grant Date 01/08/2024	Expiration Date 10/01/2030
Hours of Operation Unlimited	
Station Location City SOCORRO State NM	Frequency (MHz) 500.0 - 506.0 Station Channel 19

Antenna Structure Registration Number 1055979	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 34-25-0.5 N Longitude 106-50-40.1 W	Antenna Type Non-Directional
Description of Antenna Make Dielectric Model DLP-12B	Major Lobe Directions N/A
Antenna Beam Tilt (Degrees Electrical) 1	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 30	Height of Radiated Center Above Mean Sea Level (Meters) 1479.3
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Innovative Media Technologies Inc.
7742 Spalding Dr
Suite 465
Norcross, GA, 30092

Call Sign	File Number
W17EH-D	0000169061

Facility ID: 188768

NTSC TSID:

Digital TSID:

**This License Covers Construction
Permit No.**

0000154571

Grant Date 11/26/2021		Expiration Date 12/03/2029
Hours of Operation Unlimited		
Station Location City QUINCY State IL	Frequency (MHz) 488.0 - 494.0	Station Channel 17

Antenna Structure Registration Number	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 39-57-46.8 N Longitude 91-23-36.3 W	Antenna Type Directional
Description of Antenna Make SCA Model CL-1469	Major Lobe Directions 180.0
Antenna Beam Tilt (Degrees Electrical) Not Applicable	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) .005 kW -23.01 DBK	
Height of Radiated Center Above Ground (Meters) 5.8	Height of Radiated Center Above Mean Sea Level (Meters) 188.8
Out-Of-Channel Emission Mask Stringent	Overall Height of Antenna Structure Above Ground (Meters) 6

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000128576, was granted on 04/02/2021 for a term expiring on 04/01/2029.

This is your License Renewal Authorization for station WGCB-LD

Facility ID: 69450

Location: HINESVILLE-RICHMOND,GA

MARQUEE BROADCASTING INC.

4400 BROOKEVILLE RD

BROOKEVILLE, MD 20833



Federal Communications Commission

LOW POWER TELEVISION BROADCAST STATION LICENSE

Licensee/Permittee

Bridge News LLC
38955 Hills Tech Dr.
Farmington Hills, MI, 48331

Call Sign File Number

WIIW-LD 0000232650

Facility ID: 168068

NTSC TSID:

Digital TSID:

**This License Covers Construction
Permit No.**

0000213351

Grant Date 02/01/2024		Expiration Date 08/01/2029
Hours of Operation Unlimited		
Station Location City NASHVILLE State TN	Frequency (MHz) 470.0 - 476.0	Station Channel 14

Antenna Structure Registration Number 1050735	
Transmitter Type Accepted. See Sections 74.750 of the Commission's Rules.	Transmitter Output Power(kW) As required to achieve authorized ERP.
Antenna Coordinates Latitude 36-8-27.0 N Longitude 86-51-56.0 W	Antenna Type Directional
Description of Antenna Make Alive Model ATC-BCE312UA-V1-14	Major Lobe Directions 20.0 90.0 160.0
Antenna Beam Tilt (Degrees Electrical) 0.75	Antenna Beam Tilt (Degrees Mechanical @ Degrees Azimuth) Not Applicable

Maximum Effective Radiated Power (Average) 15 kW 11.76 DBK	
Height of Radiated Center Above Ground (Meters) 211.2	Height of Radiated Center Above Mean Sea Level (Meters) 416.9
Out-Of-Channel Emission Mask Full Service	Overall Height of Antenna Structure Above Ground (Meters) See the registration for this antenna structure.

Waivers/Special Conditions

- Grant of this license application is conditioned on continuous operations of the licensed facility for the twelve-month period following grant. The failure to so operate will result in the rescission of this grant, dismissal of the license application and the forfeiture of the associated construction permit pursuant to 47 C.F.R. § 73.3598(e) unless the licensee rebuts the presumption that the authorized facilities were temporarily constructed.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Renewal of License Authorization

This is to notify you that your Application
for Renewal of License 0000144818, was
granted on 09/08/2021 for a term expiring on
10/01/2029.

This is your License Renewal Authorization for station WHNE-LD

Facility ID: 168737

Location: DETROIT,MI

TAIT BROADCASTING, LLC

27251 STATE ROAD 54 SUITE B14-124

WESLEY CHAPEL, FL 33544



Renewal of License Authorization

This is to notify you that your Application for Renewal of License 0000191734, was granted on 09/30/2022 for a term expiring on 10/01/2030.

This is your License Renewal Authorization for station KDNV-LD

Facility ID: 67876

Location: LAS VEGAS,NV

LVNV Broadcasting Company LLC

3111 Bel Air Dr. Unit 25D

Las Vegas, NV 89109



Attachment C

United States Senate

May 7, 2026

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Dear Chairman Carr,

The Federal Communications Commission's (FCC) order, sent at your directive, to The Walt Disney Company to file early license renewals for its eight ABC broadcast stations — coming just one day after President Donald Trump publicly demanded ABC fire late-night host Jimmy Kimmel — is an extraordinary abuse of power. This order is the latest and most extreme step in your use of the FCC's licensing authority as a cudgel against broadcasters whose editorial choices displease the President. You have effectively converted the FCC's authority over the public airwaves into an instrument of presidential retribution against constitutionally protected speech. The FCC must immediately rescind this order and explain its conduct.

The FCC order, sent under your leadership, appears to be a blatant effort to punish Disney for its editorial decision-making, notably its refusal to fire Kimmel over a recent joke. On Monday last week, both President Trump¹ and First Lady Melania Trump² demanded that Disney fire Kimmel over his joke — speech clearly protected under the First Amendment. One day later, you directed the FCC to send the early-renewal order³ to Disney — reportedly surprising FCC career staff.⁴ Although the three-paragraph order did not mention Kimmel's joke or Trump's comments, the timing speaks volumes. This action appears to penalize Disney for refusing to capitulate to Trump's demands to fire Kimmel and to send a message to other broadcasters: Modify your speech to favor Trump or face the FCC's wrath. Moreover, with the exception of a different order on Monday of last week⁵ — possibly timed to give you cover for the Disney order that would come the next day — the FCC appears not to have used its authority⁶ to call in licenses for early renewal in over half a century, and it has never invoked that authority to target

¹ Donald J. Trump (@realDonaldTrump), Truth Social (Apr. 27, 2026 1:26 PM), <https://truthsocial.com/@realDonaldTrump/posts/116477838570626860>.

² Melania Trump (@FLOTUS), X (Apr. 27, 2026 10:19 AM), <https://x.com/FLOTUS/status/2048769128513585618>.

³ Federal Communications Commission Order DA 26-416, In the Matter of The Walt Disney Company et al. (Apr. 28, 2026), <https://docs.fcc.gov/public/attachments/DA-26-416A1.pdf>.

⁴ Kelcee Griffis & Saijel Kishan, *ABC License Renewal Call Surprised FCC Staff and Shattered Norms*, Bloomberg (Apr. 29, 2026), <https://www.bloomberg.com/news/articles/2026-04-29/abc-license-renewal-call-surprised-fcc-staff-and-shattered-norms>.

⁵ FCC Order DA 26-413, In the Matter of Bridge News, LLC (Apr. 27, 2026), <https://docs.fcc.gov/public/attachments/DA-26-413A1.pdf>.

⁶ 47 CFR § 73.3539(c).

constitutionally protected speech or satisfy a president's personal vendetta against a company.⁷ The Disney early-renewal order is thus an unprecedented and unconstitutional abuse of the Commission's powers.

The Trump administration's sustained, public campaign against Disney also lays bare the pretextual and politically motivated nature of this order. Over the past 18 months, President Trump and you have repeatedly threatened Disney, ABC, and its stations for engaging in constitutionally protected speech. In January 2025, just a few days after you became FCC chairman, the FCC reinstated a frivolous complaint against ABC based on its moderation of a 2024 presidential debate.⁸ Over the following months, President Trump repeatedly called on the FCC to revoke licenses from broadcasters because of their news coverage, including licenses of ABC stations.⁹ And then in September 2025, you told a podcast host — following a different joke from Kimmel that angered Trump and his allies — that Disney and ABC could “do this the easy way or the hard way,” and said that “there's going to be additional work for the FCC ahead” unless ABC affiliates “find ways to change conduct and take action, frankly, on Kimmel[.]”¹⁰ This mafia boss threat provoked a bipartisan backlash but your message was clear: the FCC, with you as chairman, was ready to serve as Trump's speech police.

The campaign against Disney and its editorial decision-making, culminating in last week's early-renewal order, is an egregious abuse of power and a clear violation of the First Amendment. Although the FCC has the authority to ensure broadcasters operate in the public interest, it cannot serve as President Trump's roving censor, threatening to revoke licenses against broadcasters whose editorial content — including a comedian's jokes — displeases the President. In fact, before serving as chairman, you frequently recognized the importance of the First Amendment and the freedom of speech, including for comedians. As you previously explained: “From Internet memes to late-night comedians, from cartoons to the plays and poems as old as organized government itself - Political Satire circumvents traditional gatekeepers & helps hold those in power accountable. Not surprising that it's long been targeted for censorship.”¹¹ Now, you are doing exactly that — targeting political satire for censorship.

⁷ Although the FCC does not have a public list of early-renewal orders, a petition to the Commission in 2018 indicated that the agency last called in licenses for early renewal in 1972. *See* Petition to Require Filing of Early Renewal Applications, American Cable Association (Nov. 26, 2018) 4 n.9 (identifying just three early-renewal orders in the past 75 years, the last coming in 1972). This letter seeks to confirm that early-renewal record.

⁸ *See, e.g.*, David Shephardson, *FCC reinstates complaints against ABC, CBS and NBC for 2024 election coverage*, Reuters (Jan. 23, 2025), <https://www.reuters.com/business/media-telecom/fcc-reinstates-complaints-over-abc-presidential-debate-harris-tv-appearances-2025-01-22/>.

⁹ *See, e.g.*, Donald J. Trump (@realDonaldTrump), Truth Social (Aug. 24, 2025, 9:59 PM), <https://truthsocial.com/@realDonaldTrump/posts/115086929873163909>.

¹⁰ *See, e.g.*, Gene Maddaus, *FCC Chairman Threatens ABC Over Jimmy Kimmel's Remarks About Charlie Kirk's Killer*, Variety (Sept. 17, 2025), <https://variety.com/2025/tv/news/brendan-carr-abc-fcc-jimmy-kimmel-charlie-kirk-1236522406/>.

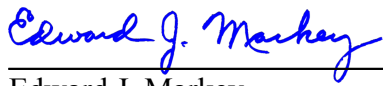
¹¹ Brendan Carr (@BrendanCarrFCC), X (Feb. 20, 2020, 10:18 PM), <https://x.com/BrendanCarrFCC/status/1230693195828400129>.

You should direct the FCC to immediately rescind the order calling in Disney's ABC station licenses for early renewal. To help the public understand your basis for this action, please respond in writing to the following questions by May 21, 2026:

1. Please describe the timing and process by which you determined that the Commission should issue the early-renewal order.
 - a. When did you first direct Commission staff to begin drafting the Disney order, and on what date was the final text approved for release?
 - b. What internal legal review, including by the Office of General Counsel, was conducted before the order was issued?
 - c. Did you consider, but reject, any less aggressive enforcement steps prior to issuing the order? If so, please identify them.
 - d. The Commission issued a procedurally similar early-renewal order against Bridge News, LLC on April 27, 2026 — one day before the Disney order. Did you intentionally time the orders so that the Bridge News order would precede the Disney order in the public record?
2. Please provide a status update on each open FCC investigation into Disney or its ABC stations.
 - a. When was Disney's last response to each of these inquiries, and how many pages of documents has Disney produced as part of these investigations?
 - b. Has Disney been unresponsive to these investigations?
 - c. Please describe the justification for issuing the early-renewal order amidst these ongoing investigations.
3. Between April 22, 2026, and April 28, 2026, did you, your staff, or any other FCC personnel communicate with the White House, any other component of the Executive Office of the President, or any individual acting on their behalf regarding Disney, ABC, Jimmy Kimmel, or the early-renewal order? If so, please describe each communication, including the participants and substance.
4. Please identify each prior instance in which the Commission has invoked 47 CFR § 73.3539(c) to call in the licenses of a broadcaster for early renewal, including a summary of the grounds for each instance.

Thank you for your attention to this important issue.

Sincerely,



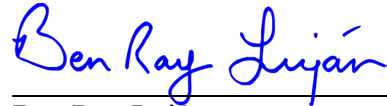
Edward J. Markey
United States Senator



Charles E. Schumer
United States Senator



Maria Cantwell
United States Senator



Ben Ray Lujan
United States Senator



John Hickenlooper
United States Senator



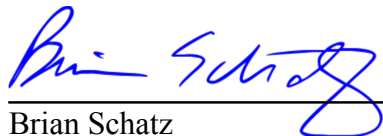
Mazie K. Hirono
United States Senator



Jacky Rosen
United States Senator



Bernard Sanders
United States Senator



Brian Schatz
United States Senator



Adam B. Schiff
United States Senator



Chris Van Hollen
United States Senator



Elizabeth Warren
United States Senator

cc.

Chairman Carr

May 7, 2026

Page 5

The Honorable Anna M. Gomez

Commissioner

Federal Communications Commission

45 L Street, N.E.

Washington, DC 20554

The Honorable Olivia Trusty

Commissioner

Federal Communications Commission

45 L Street, N.E.

Washington, DC 20554

Attachment D

FOR IMMEDIATE RELEASE
April 29, 2026

CONTACT
Carrie Healey

☎ (202) 429-5350
✉ chealey@nab.org

✖ Post

NAB Statement on FCC Calling in Broadcast Licenses for Early Renewal

The following statement can be attributed to NAB President and CEO Curtis LeGeyt:

"The FCC's broadcast license renewal process must be grounded in predictability, fairness and transparency, principles reflected in the license terms Congress established and later extended. The Media Bureau's nearly unprecedented request for one company to quickly reapply for all of its licenses – rather than utilize its traditional enforcement process – runs contrary to these principles and creates significant uncertainty for all broadcasters.

Broadcast stations already face intense challenges as they work to deliver trusted journalism, lifesaving emergency services, community programming and election coverage. The FCC must be careful to avoid actions that create further instability for the local stations viewers and listeners depend on."

About NAB

The National Association of Broadcasters is the premier advocacy association for America's broadcasters. NAB advances radio and television interests in legislative, regulatory and public affairs. Through advocacy, education and innovation, NAB enables broadcasters to best serve their communities, strengthen their businesses and seize new opportunities in the digital age. Learn more at nab.org.

###

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that true and correct copies of the forgoing Petition for Reconsideration are being sent electronically, via email, to the following:

The Hon. Brenden Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

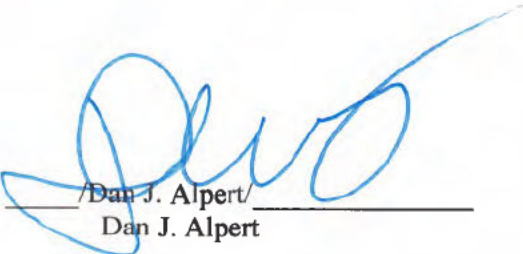
The Hon. Anna M. Gomez
Commissioner
Federal Communications Commission
45 L Street NE
Washington, DC 20554

The Hon. Olivia Trusty
Commissioner
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Alexander Sanjenis
Acting Bureau Chief
Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Evan Morris
Deputy Chief
Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

David Brown
Chief, Video Division
Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554



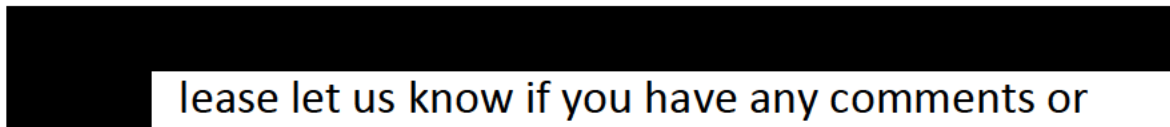
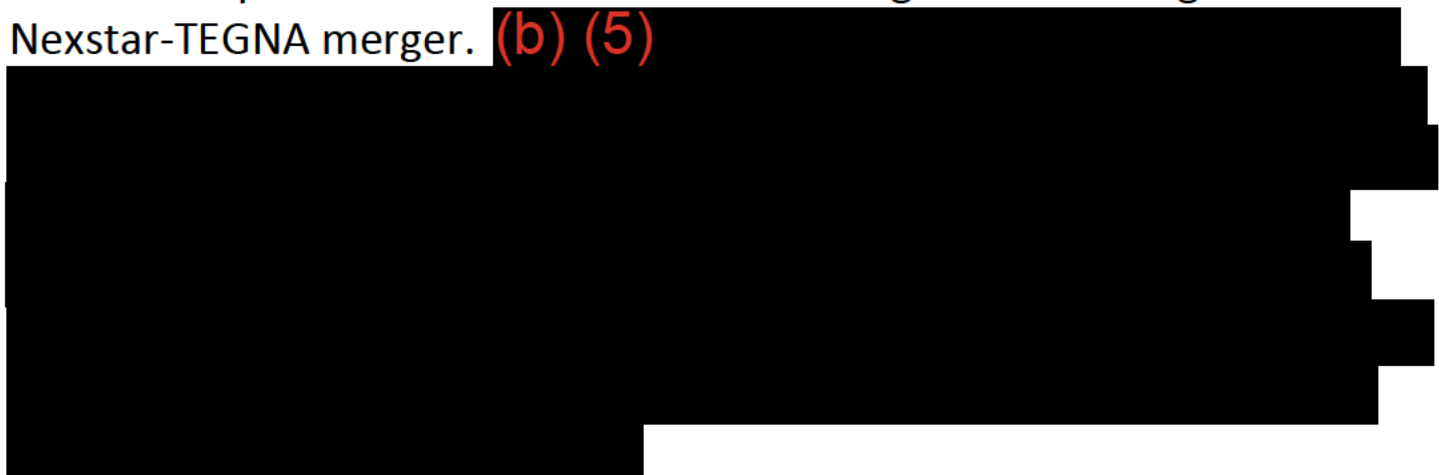
Dan J. Alpert
Dan J. Alpert

Kristi Thompson

From: Adam Candeub
Sent: Monday, May 11, 2026 10:52 AM
To: Brendan Carr (Internal); Allison Howell
Subject: Broadband Communications Ass'n v. FCC, D.C. Cir. No. 26-1062 -- FCC Opposition to Mandamus Petitions
Attachments: Response to Mandamus Petitions 050526.docx; Order 042826.pdf

Mr. Chairman:

Please find attached a draft of the Commission's opposition to the mandamus petitions filed in the DC Circuit litigation involving the Nexstar-TEGNA merger. (b) (5)



lease let us know if you have any comments or suggestions. Thanks.

Adam

(b) (5)

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Kristi Thompson

From: Jim Balaguer
Sent: Friday, May 1, 2026 5:51 AM
To: Brendan Carr; Greg Watson; Allison Howell
Subject: Correspondence to Chairman Carr from House Committee on Energy and Commerce Ranking Members
Attachments: 2026.04.30 Letter to Chairman Carr re FCC Weaponization.pdf

FYI – Letter from E&C Ranking Member Pallone, O&I Ranking Member Clarke and CT Ranking Matsui posing questions on the FCC Media Bureau's order regarding Disney TV licenses renewal proceeding.

The letter includes the following series of questions and document requests, no later than May 14, and includes a previous letter from March 31.

1. Explain and provide all documents related to your decision to order the early license renewal of Disney ABC stations. Include in your explanation and production of documents how this proceeding would “ensure that the broadcaster has been meeting its public interest obligations” and what, if any, issues you purportedly identified in your ongoing investigation of Disney that are somehow relevant to upholding the “public interest” or any other FCC authority.
2. Explain and provide all documents related to your decision to reverse long-standing FCC policy and subject daytime and late-night talk shows to the equal time rule. Include in your explanation and production of documents the rationale behind issuing this change without formal rulemaking, which is open to public comment.
3. Specifically describe and provide documentation of any complaints raised about the interview on “The View” with James Talarico that led to your investigation of potential violation of the equal time rule. Also provide all other documentation related to your investigation to date. Include in your response which other eligible candidates, if any, requested and were refused equal time by the broadcaster. To the extent that there were no candidates that were refused equal time, describe the basis of your investigation and what authority you believe the FCC has to conduct this investigation.
4. Provide any communications with CBS or its affiliates regarding the interview of James Talarico on “The Late Show with Stephen Colbert.”
5. Explain your interpretation of the “public interest standard” you frequently cite and the FCC’s authority to enforce your interpretation of such standard.²⁹ Provide all documentation regarding your interpretation and purported authority, including memoranda and communications.
6. Explain what criteria you purport to use to determine whether a program is “motivated by a partisan purpose” and provide all documentation regarding these criteria including related memoranda and communications
7. Provide all records related to travel to Trump’s personal residence in Florida including itineraries for that travel, participants in meetings held at Trump’s personal residence, detailed receipts of all associated costs paid or reimbursed by the FCC, and any formal or informal ethics advice that was provided related to such travel.

Finally, preserve all documents and records potentially responsive to the issues and requests raised in this letter and in our letter of March 31, 2025, including text messages, emails, and digital and physical documents. This preservation request applies to existing and future materials that are responsive to these requests, including those that would otherwise be automatically deleted.

From: McAuliffe, Will <Will.McAuliffe@mail.house.gov>

Sent: Thursday, April 30, 2026 2:29 PM

To: Jim Balaguer <Jim.Balaguer@fcc.gov>

Cc: Desai, Parul <Parul.Desai@mail.house.gov>; O'Connor, Constance <Constance.OConnor@mail.house.gov>; Alethea Lewis <Alethea.Lewis@fcc.gov>

Subject: Correspondence to Chairman Carr from House Committee on Energy and Commerce Ranking Members

You don't often get email from will.mcauliffe@mail.house.gov. [Learn why this is important](#)

Mr. Balaguer,

Please find attached correspondence to Chairman Carr from House Committee on Energy and Commerce Ranking Member Pallone, Subcommittee on Oversight and Investigations Ranking Member Clarke, and Subcommittee on Communications and Technology Ranking Member Matsui.

Please confirm receipt at your earliest convenience and let us know if you have any questions.

Best,
Will

Will McAuliffe

Chief Counsel

Subcommittee on Oversight and Investigations

House Committee on Energy and Commerce Democrats

Mobile/Signal: (b) (6)

[E&C Democrats Whistleblower Tipline](#)

ONE HUNDRED NINETEENTH CONGRESS
Congress of the United States
House of Representatives
COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-6115

Majority (202) 225-3641
Minority (202) 225-2927

April 30, 2026

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

Dear Chairman Carr:

We write to express our concern over your blatant efforts to chill speech and intentionally favor friends and allies of President Trump. Your selective interpretation and threatened weaponization of Federal Communications Commission (FCC) rules and regulations to curry favor with President Trump undermines the independence of your agency and erodes the public trust that is essential to a free press and our democratic system.

As your most recent abuse of power, you ordered an early review of Disney's ABC licenses in obvious retaliation for a joke made by Jimmy Kimmel on "Jimmy Kimmel Live!" on April 23.¹ Instead of carrying out the work of the FCC as an independent agency, you have again decided to use the FCC as a weapon to punish protected speech at the behest of the President and, this time, the First Lady.² On April 28, claiming that the FCC is seeking to ensure that "the broadcaster has been meeting its public interest obligations," the FCC issued an order to Disney and its eight broadcast stations requiring that Disney file to renew its licenses within 30 days.³ This is a flagrant political move on your part, given that the earliest license renewal is not due until 2028, and some not even due until 2031.⁴ As FCC Commissioner Gomez put it, "This is the most egregious action this FCC has taken in violation of the First Amendment to date."⁵ Any effort on your part to revoke Disney's licenses on the basis of protected speech will fail, which you well know. Instead, this is a blatant attempt to hold your investigation and license

¹ *F.C.C. Orders a Review of ABC's Broadcast Licenses*, The New York Times (Apr. 28, 2026).

² First Lady Melania Trump (@FLOTUS), X (Apr. 27, 2026, 10:19 AM) (<https://x.com/FLOTUS/status/2048769128513585618>).

³ Federal Communications Commission, *Order* (Apr. 28, 2026) (DA 26-416).

⁴ See note 1.

⁵ Federal Communications Commission, *Gomez: FCC Assault on 1st Amendment Will Fail* (Apr. 29, 2026) (press release).

renewal proceedings over the heads of Disney executives in an effort to chill future speech on news and entertainment programs at Disney and across the entire industry. And while you do so, you not only violate the FCC's prohibition on censorship, but you also waste taxpayer dollars that fund this crusade and the time and expertise of the FCC career staff tasked with carrying it out.

Your partisan attacks on media figures and companies that Trump does not like was also apparent at the recent Conservative Political Action Conference, where you stated, "PBS, defunded. NPR, defunded. Joy Reid, gone from MSNBC. Sleepy-eyes Chuck Todd, gone. Jim Acosta, gone. John Dickerson, gone... Stephen Colbert is leaving. CBS is under new ownership. And soon enough, CNN is going to have new ownership as well... President Trump is winning."⁶ Since laying out this disturbing manifesto, however, a federal court overturned Trump's Executive Order defunding NPR and PBS, stating that the President "may not... use his governmental power" to cut funding "in retaliation for saying things that he does not like."⁷ Trump and you will only see more losses in court and losses to your credibility, including in Congress, if you continue to issue threats and take official actions in a partisan and legally indefensible manner.

Several other incidents have demonstrated the partisan and hypocritical nature of your decisions as Chairman of the FCC. On the morning of Saturday, March 7, 2026, Trump and other government officials attended the dignified transfer ceremony at Dover Air Force Base for six soldiers killed in Kuwait due to the war in Iran.⁸ At the ceremony, Trump wore a white baseball hat with "USA" emblazoned in gold lettering with "45-47" embroidered on one side and an American flag on the other.⁹ This display, which was captured on tape by countless media outlets present, drew bipartisan criticism for being an inappropriate and irreverent choice of attire. Even several high-profile Republicans called the choice "shameful" and a reflection of Trump having "no sense of dignity or appreciation for the moment."¹⁰

⁶ *WATCH LIVE: FCC Chair Brendan Carr speaks at CPAC*, PBS NewsHour (Mar. 27, 2026).

⁷ *National Pub. Radio, Inc. v. Donald J. Trump*, No. 25-1674, 53 (D.D.C. 2026).

⁸ *Trump Attends Dignified Transfer of 6 Fallen Service Members Killed in Kuwait Amid Iran war*, ABC News (Mar. 7, 2026).

⁹ Trump Store, *USA 45-47 Hat* (<https://www.trumpstore.com/headwear/usa-45-47-hat>) (accessed Apr. 29, 2026).

¹⁰ *Trump's Wearing of Baseball Cap during Dignified Transfer Draws Criticism*, The Washington Post (Mar. 9, 2026).



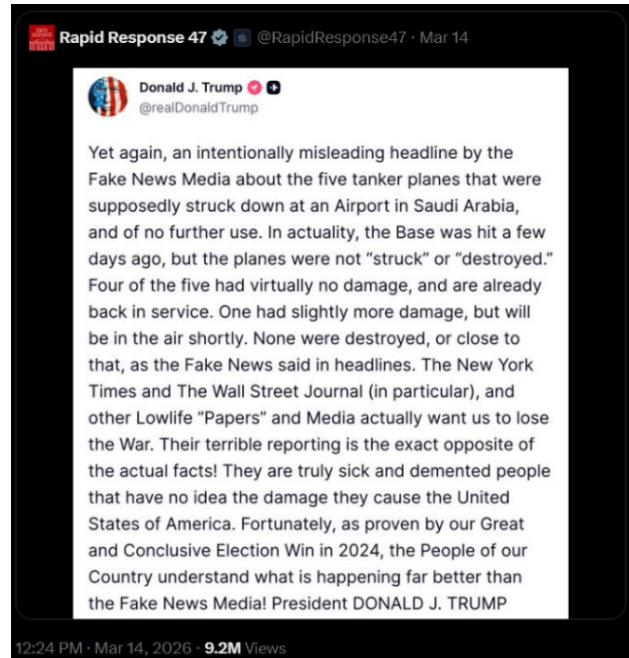
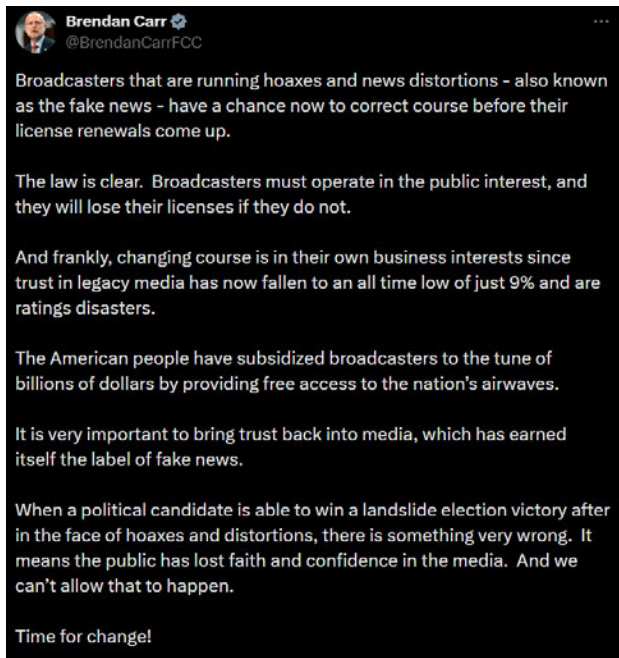
March 7, 2026, Dover Air Force Base, Dover, Delaware. Anna Moneymaker/Getty Images

Notwithstanding the President’s lack of decorum and respect, reflected by wearing a hat, Fox News chose not to air accurate video footage from that morning. Instead, Fox News chose to repeatedly air an old video from a dignified transfer ceremony in December where Trump was dressed appropriately.¹¹ Fox News’ viewers, including Fox News Sunday viewers on the Fox television network, were shown inaccurate coverage of the dignified transfer ceremony, preventing them from seeing the white baseball hat. Although Fox News Sunday airs on hundreds of local broadcast stations across the country, you were uncharacteristically quiet about its misleading coverage—a stark contrast to your threats against broadcasters for coverage that President Trump finds unfavorable.

In fact, on March 14, 2026, you responded to a post from Trump criticizing news reports of damage to American military equipment by threatening broadcasters’ licensees for running “hoaxes and news distortions.”¹²

¹¹ *Fox’s Donald Trump Dignified Transfer ‘Mistake’ Under Fire: ‘Would be a Huge Scandal’*, Penn Live (Mar. 9, 2026).

¹² Brendan Carr (@BrendanCarrFCC), X (Mar. 14, 2026, 12:24 PM) (<https://x.com/BrendanCarrFCC/status/2032855414233047172>).



Your manipulation of the news distortion policy is apparent in your selective threats and investigations of news distortion complaints as you reopened three of the four previously closed news distortion complaints (against ABC, NBC, and CBS), while notably leaving the closed case against Fox untouched.¹³ Earlier, you also reinstated a lawfully denied complaint against CBS for alleged news distortion for engaging in routine editing of an interview with former Vice President Kamala Harris.¹⁴ Following that reinstatement, you launched a formal investigation of CBS all while Skydance's merger with Paramount was under federal review. After a \$16 million settlement was made to President Trump for alleged "damages" arising from the same allegations, the merger was approved and the FCC investigation was effectively dropped.

Since assuming the role of Chairman, you have weaponized the agency against news outlets by not only questioning the speech and expressive conduct of targeted entities but also by abusing your power to formally accuse these speakers of wrongdoing.¹⁵ As we said in prior

¹³ *FCC Chair Brendan Carr Threatens to Revoke Broadcasters' Licenses over Iran Coverage*, BBC (Mar. 15, 2026); *Carr FCC sets aside Rosenworcel Closure of "News Distortion" Complaints against CBS, ABC and NBC, but not Fox*, REC Networks Substack (Jan. 22, 2025).

¹⁴ Letter from Peter S. Hyun, Acting Enforcement Bureau Chief, Federal Communications Commission, to Daniel R. Suhr, President, Center for American Rights (Jan. 16, 2025).

¹⁵ *How an AM Radio Station in California Weathered the Trump administration's Assault on Media*, AP News (Dec. 15, 2025); *FCC Chairman Threatens ABC Over Jimmy Kimmel's Remarks About Charlie Kirk's Killer*, Variety (Sept. 17, 2025); *FCC Reinstates Complaints over ABC Presidential Debate, Harris TV Appearances*, Reuters (Jan. 23, 2025); *Brendan Carr Plans to Keep Going After the Media*, The New York Times (Sept. 24, 2025); *Federal Regulators Take New Aim at Late-Night TV*, The New York Times (Jan. 21, 2026).

correspondence, these actions assault the freedom of the press and violate the FCC's statutory prohibition against censorship.¹⁶ As explained on the FCC's website, "[t]he First Amendment and the Communications Act expressly prohibit[s] the Commission from censoring broadcast matter."¹⁷ Prior to your position as Chairman, you appeared to accept this as true, saying "[s]hould the government censor speech it doesn't like? Of course not. The FCC does not have a roving mandate to police speech in the name of the 'public interest.'"¹⁸

In your attempts to justify your partisan actions, you have posted entirely inapplicable quotes from case law while ignoring the central principle that "government censorship of a particular program contrary to... the official government view" is never permitted.¹⁹ This Administration's repeated attempts to threaten news outlets and rewrite the facts is egregious, blatant, and, as FCC Commissioner Gomez said, "grounded in neither reality nor law and would not survive judicial scrutiny."²⁰

Beyond your biased threats regarding news distortion and serving the public interest, your selective interpretation and inconsistent enforcement threats regarding the equal time rule further demonstrate your clear bias in favor of Trump. In January, you reversed the decades-old policy regarding the bona fide news exception to the equal time rule and issued a notice that the exception would no longer apply to daytime talk shows and late-night programs.²¹ These thinly disguised acts all appear to support the same goal: chill speech that Trump doesn't like.

This tactic's inevitable and intended outcome is already materializing. In February, reports indicated that the FCC was investigating "The View" for hosting a segment featuring Texas Senate candidate James Talarico apparently based on their new interpretation that a

¹⁶ Letter from Rep. Frank Pallone, Jr., Ranking Member, House Committee on Energy and Commerce, Rep. Doris Matsui, Ranking Member, Subcommittee on Communications and Technology, House Committee on Energy and Commerce, and Rep. Yvette D. Clarke, Ranking Member, Subcommittee on Oversight and Investigations, House Committee on Energy and Commerce, to Brendan Carr, Chairman, Federal Communications Commission (Mar. 31, 2025).

¹⁷ Federal Communications Commission, *The Public and Broadcasting* (Sept. 2021) (<https://www.fcc.gov/media/radio/public-and-broadcasting#FCC>); Donald J. Trump (@realDonaldTrump), Truth Social (Mar. 15, 2026, 7:48 PM) (<https://truthsocial.com/@realDonaldTrump/posts/116235861005528220>); 47 U.S.C. § 326.

¹⁸ Brendan Carr (@BrendanCarrFCC), X (Feb. 14, 2019, 10:05 AM) (<https://x.com/BrendanCarrFCC/status/1096062915201953795?s=20>).

¹⁹ Brendan Carr (@BrendanCarrFCC), X (Mar. 14, 2026, 4:00 PM) (<https://x.com/BrendanCarrFCC/status/2032909862305235397>); *Democrats Blast FCC Chair Carr's Broadcast License Threats as Anti-First Amendment, 'Totalitarian'*, CNBC (Mar. 16, 2026).

²⁰ Federal Communications Commission, *Gomez: Stop Falling for FCC Intimidation Tactics* (Mar. 16, 2026) (press release); *FCC Chair Threatens TV Networks Amid Iran War Coverage — but his Warning Rings Hollow*, CNN (Mar. 15, 2026).

²¹ Federal Communications Commission, *FCC's Media Bureau Provides Guidance on Political Equal Opportunities Requirement for Broadcast Television Stations* (Jan. 21, 2026) (press release).

daytime talk show no longer qualified for the bona fide news exception.²² Commissioner Gomez called out the transparent maneuver, saying “Let’s be clear on what this is. This is government intimidation, not a legitimate investigation.”²³ Similarly, less than two weeks later, network lawyers advised Stephen Colbert that hosting James Talarico on “The Late Show with Stephen Colbert” could expose the network to consequences from the FCC unless opposing candidates were offered equal opportunities.²⁴ These concerns were enough to force Colbert to interview Talarico on YouTube to avoid any chance of retribution from the Trump FCC, even though the equal time rule places the burden on the opposing candidate, not the broadcast licensee, to request equal time.²⁵ If an opposing candidate fails to request equal time within the designated period, the licensee has no obligation and no ability to force them to participate.

The chilling effect here is therefore doubly troubling, as it is being achieved not by a legitimate interpretation or enforcement of the law, but by exploiting broadcasters’ fear of a hostile FCC. Further, the new interpretations are not being enforced against daytime and late-night talk shows equally. Instead, the FCC has announced it will assess whether a show has a “partisan purpose” when determining whether the equal time rule is implicated.²⁶ Given your FCC’s track record of favoritism towards Trump, this level of subjectivity is alarming. If the FCC’s investigation into “The View” and CBS’s decision to move the Talarico interview to YouTube portends a broader trend, Americans may see and hear from fewer candidates this election year, which is not in the public interest.²⁷

These recent actions uniformly and improperly wield the regulatory power of your agency to erode the First Amendment rights of your and Trump’s targets. They have provoked widespread concern across the political spectrum and demand both continued oversight by Congress and answers from you. Even the appearance of partisan action by the FCC is inappropriate and raises questions about whether the FCC is acting within its statutory obligations and limitations.

Because you failed to adequately respond to our prior correspondence, we renew those requests which are attached to this letter. Additionally, please provide written responses to the following new requests by May 14, 2026.

1. Explain and provide all documents related to your decision to order the early license renewal of Disney ABC stations. Include in your explanation and production of

²² *Trump FCC Investigates The View, reportedly says “Fake News” will be Punished*, Ars Technica (Feb. 9, 2026).

²³ Federal Communications Commission, *Gomez on Sham “Investigation” of The View* (Feb. 6, 2026) (press release).

²⁴ *Stephen Colbert Slams CBS, says Lawyers told him James Talarico Interview could not Air on “The Late Show”*, CBS News (Feb. 18, 2026).

²⁵ 47 C.F.R. § 73.1941.

²⁶ See note 20.

²⁷ *Brendan Carr’s ‘Equal Time’ Curveball Crashes the Midterms*, POLITICO (Mar. 17, 2026).

documents how this proceeding would “ensure that the broadcaster has been meeting its public interest obligations” and what, if any, issues you purportedly identified in your ongoing investigation of Disney that are somehow relevant to upholding the “public interest” or any other FCC authority.²⁸

2. Explain and provide all documents related to your decision to reverse long-standing FCC policy and subject daytime and late-night talk shows to the equal time rule. Include in your explanation and production of documents the rationale behind issuing this change without formal rulemaking, which is open to public comment.
3. Specifically describe and provide documentation of any complaints raised about the interview on “The View” with James Talarico that led to your investigation of potential violation of the equal time rule. Also provide all other documentation related to your investigation to date. Include in your response which other eligible candidates, if any, requested and were refused equal time by the broadcaster. To the extent that there were no candidates that were refused equal time, describe the basis of your investigation and what authority you believe the FCC has to conduct this investigation.
4. Provide any communications with CBS or its affiliates regarding the interview of James Talarico on “The Late Show with Stephen Colbert.”
5. Explain your interpretation of the “public interest standard” you frequently cite and the FCC’s authority to enforce your interpretation of such standard.²⁹ Provide all documentation regarding your interpretation and purported authority, including memoranda and communications.
6. Explain what criteria you purport to use to determine whether a program is “motivated by a partisan purpose” and provide all documentation regarding these criteria including related memoranda and communications.³⁰
7. Provide all records related to travel to Trump’s personal residence in Florida including itineraries for that travel, participants in meetings held at Trump’s personal residence, detailed receipts of all associated costs paid or reimbursed by the FCC, and any formal or informal ethics advice that was provided related to such travel.

²⁸ See note 3.

²⁹ *Trump’s CBS Lawsuit Ties Media Freedom to FCC’s Regulatory Power*, The Brookings Institution (Feb. 19, 2025); *Will the FCC’s ‘Public Interest’ Standard Limit Broadcast Free Speech?*, DC Journal (Dec. 3, 2024); *FCC Chief Brendan Carr Wants to ‘Re-Empower’ Local TV Stations and Consider Tighter Regulation of Social Media Giants*, Variety (Feb. 27, 2025).

³⁰ *Trump FCC’s Equal-Time Crackdown Doesn’t Apply Equally—or at all—to Talk Radio*, Ars Technica (Mar. 2, 2026).

Finally, preserve all documents and records potentially responsive to the issues and requests raised in this letter and in our letter of March 31, 2025, including text messages, emails, and digital and physical documents. This preservation request applies to existing and future materials that are responsive to these requests, including those that would otherwise be automatically deleted. If you have any questions about this request, please contact the Committee Democratic staff at (202) 225-2927.

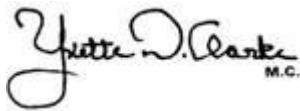
Sincerely,



Frank Pallone, Jr.
Ranking Member



Doris Matsui
Ranking Member
Subcommittee on Communications
and Technology



Yvette D. Clarke
Ranking Member
Subcommittee on Oversight
and Investigations

cc: The Honorable Brett Guthrie
Chairman

The Honorable Richard Hudson
Chairman
Subcommittee on Communications and Technology

The Honorable John Joyce
Chairman
Subcommittee on Oversight and Investigations

ONE HUNDRED NINETEENTH CONGRESS
Congress of the United States
House of Representatives
COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-6115

Majority (202) 225-3641
Minority (202) 225-2927

March 31, 2025

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairman Carr:

We write to express deep concern over your actions to target and intimidate news organizations and broadcasters in violation of the First Amendment.¹ These troubling actions assault the Constitutionally protected freedom of the press and violate the Federal Communications Commission's (FCC) statutory prohibition against engaging in censorship.² Moreover, directing FCC staff to devote time and resources to bogus investigations constitutes a violation of the law, gross mismanagement, extreme waste of funds, and an abuse of authority. Therefore, we are also sharing a copy of this letter with the FCC's Office of Inspector General and are recommending that it open an investigation.³

Since assuming the role of Chairman on January 20, 2025, you have weaponized the agency against news outlets by not only questioning the speech and expressive conduct of targeted entities but also by abusing your power to formally accuse these speakers of wrongdoing. These actions are in flagrant disregard of the statutory jurisdiction of the Commission, lack any evidence of actual violations, and are conducted with apparent willful ignorance of FCC practice and legal precedent.

As you know, the FCC is an independent government agency, overseen by Congress, with authority to regulate interstate and international communications and related technologies. Your partisan goals are transparent and inappropriate, particularly given your previous experience as FCC General Counsel. You have launched sham investigations into entities disfavored by President Trump, Elon Musk, and the Republican Party to censor journalists and news coverage. In the absence of actual agency authority and any real evidence of wrongdoing, your pursuit of

¹ U.S. Const. amend. I.

² 47 U.S.C. § 326.

³ *Id.*

these actions is clearly intended to punish and burden broadcasters and other media companies by inflicting incalculable reputational harm and excessive costs to defend themselves.

Additionally, and alarmingly, some of your actions are aligned with a private lawsuit in which President Trump in his personal capacity is seeking extensive monetary damage from the same entities you are targeting. This is an obvious effort to create additional leverage in Trump's settlement negotiations and encourage payment in a sham lawsuit in exchange for favorable regulatory outcomes. Furthermore, your frequent travel with the President to his property in Florida is inappropriate of the Chairman of an independent agency. It calls into doubt your understanding of the agency's purpose and raises questions about whether you are inappropriately receiving direction from the President.^{4,5}

Perhaps your most concerning action to date is your harassment of CBS. You recently reinstated a lawfully denied complaint against CBS for alleged news distortion for engaging in routine editing of an interview with former Vice President Kamala Harris.⁶ Following this reinstatement, you launched a formal investigation of the broadcaster by sending a letter of inquiry demanding videos and transcripts. You also opened an unnecessary comment period—advertised with a banner on the FCC website's consumer complaints page—even after receiving and publishing unedited videos and transcripts that clearly show no deception.^{7,8} You have taken these actions while the Commission is reviewing a merger proposed by CBS's parent company, Paramount Global, and President Trump is suing the company in his personal capacity for damages based on the same allegations. As others have noted, undertaking these official actions to pressure the regulated entity to settle its lawsuit with President Trump for monetary damages could give the appearance that you are facilitating a bribe to the President to drop these

⁴ Broadband Breakfast, *Exclusive Q&A with Chairman Brendan Carr* (Feb. 25, 2025) (<https://broadbandbreakfast.com/exclusive-q-a-with-chairman-brendan-carr/>).

⁵ Axios, *Tech: Agencies Go MAGA* (Mar. 18, 2025) (https://www.axios.com/pro/tech-policy/newsletters/2025/03/18/tech-agencies-go-maga?utm_source=axios&utm_medium=email&utm_campaign=pro_policy_daily_03-20-2025&utm_content=Final&utm_term=pro_policy_preview_tech).

⁶ Letter from Peter S. Hyun, Acting Bureau Chief, Enforcement Bureau, Federal Communications Commission, to Daniel R. Suhr, Center for American Rights (Jan. 16, 2025).

⁷ Federal Communications Commission, *Consumer Inquiries and Complaints Center* (<https://consumercomplaints.fcc.gov/hc/en-us>) (accessed Mar. 21, 2025).

⁸ Federal Communications Commission, *In the Matter of News Distortion Complaint Involving CBS Broadcasting Inc. re: Preserving the First Amendment (GN Docket No. 25-11)* (<https://docs.fcc.gov/public/attachments/DA-25-85A1.pdf>) (Jan. 22, 2025).

investigations and approve the transaction.⁹ Broadcasters, public interest organizations, and free speech advocates have been uniformly critical of your pursuit of this matter.^{10,11,12}

Additionally, in your few weeks as Chairman of the FCC, you have:

- Reinstated a lawfully denied complaint against ABC for alleged news distortion for conducting an otherwise unremarkable presidential debate.^{13,14}
- Reinstated a lawfully denied complaint against NBC for violations of the FCC's equal time rule stemming from former Vice President Kamala Harris's appearance on Saturday Night Live, despite numerous clear deficiencies in the complaint including the uncontested fact that NBC's stations satisfied the Commission's regulations by appropriately filing public notice of the appearance and promptly acceding to equal time requests made by other legally qualified candidates.¹⁵
- Selectively reinstated the aforementioned complaints against ABC, CBS, and NBC while conspicuously not reinstating a petition filed against FOX that was contemporaneously denied.¹⁶
- Launched a formal investigation of KCBS-AM in San Jose, an entity owned by Audacy, for simply reporting on publicly available information about Immigration and Customs Enforcement (ICE) activity in a local neighborhood.¹⁷ This is after you had previously highlighted Audacy's connection with a fund owned by George Soros and threatened to delay Audacy's business before the Commission.¹⁸

⁹ *Paramount Executives Ask: Could They Be Sued for Settling Trump's \$20 Billion CBS Lawsuit?*, Wall Street Journal (Feb. 14, 2025).

¹⁰ Federal Communications Commission, *Comments of the National Association of Broadcasters* (Mar. 2025) (MB Docket No. 25-73).

¹¹ Federal Communications Commission, *Comments of Free Press* (Mar. 2025) (MB Docket No. 25-73).

¹² Federal Communications Commission, *Comments of the Foundation for Individual Rights and Expression* (Mar. 2025) (MB Docket No. 25-73).

¹³ See note 7.

¹⁴ See note 9.

¹⁵ Federal Communications Commission, *In the Matter of Equal Opportunities Complaint Involving NBC Telemundo License. re: Preserving the First Amendment* (GN Docket No. 25-11) (<https://docs.fcc.gov/public/attachments/DA-25-56A1.pdf>) (Jan. 16, 2025).

¹⁶ MSN, *The FCC's MAGA Standard: Target Trump's Enemies, Let Fox News off the Hook* (<https://www.msn.com/en-us/news/us/the-fcc-s-maga-standard-target-trump-s-enemies-let-fox-news-off-the-hook/ar-AA1ArnOc?ocid=BingNewsSerp>) (accessed Mar. 21, 2025).

¹⁷ *FCC Investigates Calif. Radio Station that Shared ICE Agents' Location*, Los Angeles Times (Feb. 6, 2025).

¹⁸ RadioInk, *Carr's FCC To 'Take A Very Hard Look' at Audacy's Soros Plan* (Nov. 26, 2024) (<https://radioink.com/2024/11/26/carrs-fcc-to-take-a-very-hard-look-at-audacy-plan-with-soros/>).

- Directed the FCC's Enforcement Bureau to launch an investigation into NPR and PBS based on false allegations of violations of the Commission's underwriting and advertisement rules, without offering any specific evidence indicating such violations.¹⁹ This was despite the fact that NPR and PBS do not hold broadcast licenses and are not subject to those rules. Shortly thereafter, you followed up that threat with letters to 13 public radio stations, demanding information about on-air sponsorship announcements.²⁰
- Baselessly accused YouTubeTV of religious discrimination based on business decisions about what channels to carry on its service.²¹
- Threatened, using dubious legal authority, to reinterpret Section 230 of the Communications Act to require private social media entities to carry speech that they disagree with or that violates their terms of service and community guidelines.²²

These recent actions uniformly and improperly wield the regulatory power of your agency to abridge the First Amendment rights of the entities you target. Many of these actions also impermissibly attempt to stretch the bounds of the FCC's authority or engross statutory requirements in ways that are inappropriate, particularly in light of recent court decisions (that you had celebrated) which seek to narrow agency discretion.^{23,24} In addition to weaponizing the FCC's Enforcement Bureau, you have also politicized the Media Bureau's licensing regime, echoing persistent calls from President Trump to revoke the broadcast licenses of news outlets that were deemed critical of him.

These recent actions have provoked widespread concern among stakeholders across the political spectrum. A bipartisan group of former Chairs of the FCC each recently criticized this overreach arguing that it threatens fundamental constitutional rights and undermines the

¹⁹ Letter from Brendan Carr, Chairman, Federal Communications Commission, to Katherine Maher, President and Chief Executive Officer, National Public Radio, and Paula A. Kerger, President and Chief Executive Officer, PBS (Jan. 29, 2025).

²⁰ MSN, *FCC Asks Public Radio Stations for Details on Sponsorships* (<https://www.msn.com/en-us/news/us/fcc-asks-public-radio-stations-for-details-on-sponsorships/ar-AA1AphqZ?ocid=BingNewsSerp>) (accessed Mar. 21, 2025).

²¹ Brendan Carr (@BrendanCarrFCC), X (Mar. 7, 2025 at 2:07 PM) (<https://x.com/BrendanCarrFCC/status/1898088195675283501>).

²² *Brendan Carr Has Big Ideas About the FCC and Critics Across the Spectrum*, The Washington Post (Mar. 11, 2025).

²³ Broadband Breakfast, *FCC's Carr: Loper Bright 'Directionally a Really Good Thing'* (Jul. 17, 2024) (<https://broadbandbreakfast.com/fccs-carr-loper-bright-directionally-a-really-good-thing/>).

²⁴ See, e.g., *Loper Bright Enterprises v. Raimondo*, 603 U.S. __ (2024).

independence of the Commission.^{25,26,27,28,29} Other experts have raised similar concerns related to the lack of FCC jurisdiction to conduct some of these investigations and obvious attempts to attack and punish speech that you, or the President and his supporters, don't like.^{30,31}

Further, your current agenda for the FCC stands in sharp contrast to some of your own prior statements condemning actions you considered government censorship. During the prior administration, you were critical of, in your words, "selectively target[ing] a handful of news media outlets for their coverage of political events" and lamented that "regulated entities will pay a price if the targeted newsrooms do not conform to [a President's] preferred political narratives."^{32,33} What happened to your concern about "concerted effort[s] . . . to drive political dissent from the public square"?³⁴ Your own words and previously held beliefs about freedom of speech are crystal clear, and we call on you to end this misconduct and join us "in publicly denouncing [attempts] to stifle political speech and independent news judgment."³⁵

The following questions are intended to help us understand how your recent actions and decisions comply with federal law and reflect the FCC's mission and statutory obligations. For each question, please provide any and all responsive information from January 20, 2025, to the present and provide written responses by April 14, 2025.

- 1) Provide all documents related to the following investigations of media entities, including letters of inquiry, subpoenas, and similar official requests for information as well as all responses to these requests:

²⁵ Brookings Institute, *Not 'Deregulation' but Heavy-handed Regulation at the Trump FCC* (Feb. 25, 2025) (<https://www.brookings.edu/articles/not-deregulation-but-heavy-handed-regulation-at-the-trump-fcc/>).

²⁶ The Talbot Spy, *Trump Versus Free Speech by Al Sikes* (Feb. 5, 2025) (<https://talbotspy.org/trump-versus-free-speech-by-al-sikes/>).

²⁷ *Trump, CBS, and 'News Distortion'*, The Wall Street Journal (Feb. 9, 2025).

²⁸ The Federalist Society, *Expression over Radio Waves Is Not Exempt from the First Amendment* (Feb. 11, 2025) (<https://fedsoc.org/commentary/fedsoc-blog/expression-over-radio-waves-is-not-exempt-from-the-first-amendment>).

²⁹ Broadband Breakfast, *3 Former FCC Chairmen Condemn Brendan Carr's Threats Targeting Media Outlets* (Feb. 20, 2025) (<https://broadbandbreakfast.com/3-former-fcc-chairmen-condemn-brendan-carrs-threats-targeting-media-outlets/>).

³⁰ Columbia Journalism Review, *A Plea for Institutional Modesty* (Feb. 6, 2025) (<https://www.cjr.org/politics/a-plea-for-institutional-modesty-fcc-corn-revere-brendan-carr-inconsistent-hypocrisy.php>).

³¹ See note 28.

³² Federal Communications Commission, *FCC Commissioner Carr Responds to Democrats' Efforts to Censor Newsrooms* (Feb. 22, 2021) (press release).

³³ *Id.*

³⁴ *Id.*

³⁵ *Id.*

- the FCC investigation of CBS related to the editing of a 60 Minutes episode featuring Vice President Kamala Harris;
 - the FCC investigation of ABC related to a 2024 presidential debate;
 - the FCC investigation of NBC related to Vice President Harris' appearance on Saturday Night Live and the equal time rule;
 - the decision not to reinstate the FCC investigation of FOX related to its coverage of the 2020 election;
 - the FCC investigation of KCBS-AM in San Jose, CA related to coverage of ICE activity;
 - the FCC investigations of NPR and PBS purportedly related to underwriting and advertisement rules;
 - the FCC inquiry of YouTubeTV related to faith-based programming; and
 - the FCC inquiry of social media companies related to Section 230.
- 2) Provide all communications between you and current White House officials and between you and other Trump Administration officials that relate to investigations of these or other media entities.
- 3) Provide all communications between you and third parties related to investigations of these or other media entities.
- 4) Explain and provide all supporting documents related to your decision to reinstate the complaints against ABC, CBS, and NBC but not a similar complaint against FOX, including but not limited to any advice provided by the Office of General Counsel.
- 5) Specifically describe your interpretation of the "public interest standard" you frequently cite and specifically describe the FCC's plan and authority to enforce your interpretation of such standard.^{36,37,38}

³⁶ Brookings Institute, *Trump's CBS Lawsuit Ties Media Freedom to FCC's Regulatory Power* (Feb. 19, 2025) (<https://www.brookings.edu/articles/trumps-cbs-lawsuit-ties-media-freedom-to-fccs-regulatory-power/>).

³⁷ Inside Sources, *Will the FCC's 'Public Interest' Standard Limit Broadcast Free Speech?* (Dec. 3, 2024) (<https://dcjournal.com/will-the-fccs-public-interest-standard-limit-broadcast-free-speech/>).

³⁸ Variety, *FCC Chief Brendan Carr Wants to 'Re-Empower' Local TV Stations and Consider Tighter Regulation of Social Media Giants* (Feb. 27, 2025) (<https://variety.com/2025/tv/news/fcc-brendan-carr-re-empower-tv-stations-1236323044/>).

- 6) Specifically describe and provide all documents related to your interpretation of the FCC's authority over national broadcast networks.
- 7) Specifically describe and provide all documents related to your interpretation of the FCC's authority over online video streaming.
- 8) Specifically describe and provide all documents related to your interpretation of the FCC's authority to interpret Section 230 of the Communications Act.³⁹
- 9) Please provide an accounting of the staff time you have directed toward the investigations identified in this letter and an estimate of the cost associated with that time.
- 10) Please explain your previous statements adopting the President's agenda and describe any discussions you have had with the President or other executive branch officials during your multiple visits to the President's personal residence in Florida.
- 11) Please provide all records related to travel with the President on government aircraft and travel to the President's personal residence in Florida for meetings with the President or other White House officials, including detailed receipts of all associated costs borne by the FCC and any ethics advice that was provided related to such travel.

³⁹ 47 U.S.C. § 230.

The Honorable Brendan Carr

March 31, 2025

Page 8

If you have any questions about this request, please contact the Committee Democratic staff at (202) 225-2927.

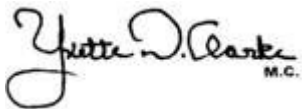
Sincerely,



Frank Pallone, Jr.
Ranking Member



Doris Matsui
Ranking Member
Subcommittee on Communications
and Technology



Yvette D. Clarke
Ranking Member
Subcommittee on Oversight
and Investigations

cc: The Honorable Brett Guthrie
Chairman

The Honorable Richard Hudson
Chairman
Subcommittee on Communications and Technology

The Honorable Gary Palmer
Chairman
Subcommittee on Oversight and Investigations

Kristi Thompson

From: Brendan Carr (Internal)
Sent: Tuesday, May 26, 2026 1:59 PM
To: Connor Glisson
Cc: Greg Watson; Courtney Cowper
Subject: Current Hill Letter response
Attachments: +AH Pallone Letter Response 5.12.26-BC2.docx

Here's a version of the Hill letter with edits from me. There are a few places for citations to be added to prior letters. (b) (5)



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Kristi Thompson

From: Brendan Carr (Internal)
Sent: Friday, May 29, 2026 3:54 PM
To: Allison Howell
Cc: Greg Watson; Courtney Cowper
Subject: Disney Accepted for Filing PNs

No edits from me on the Disney one.

From: Allison Howell <Allison.Howell@fcc.gov>
Sent: Friday, May 29, 2026 3:43 PM
To: Brendan Carr (Internal) (b) (6) v>
Cc: Greg Watson <Gregory.Watson@fcc.gov>; Courtney Cowper <Courtney.Cowper@fcc.gov>
Subject: Accepted for Filing PNs

Chairman,

Attached are the Bridge and Disney PN's. Please let me know if you have any additional edits.

Thanks,
Allison Howell
Legal Advisor
Office of FCC Chairman Brendan Carr
allison.howell@fcc.gov

Kristi Thompson

From: Allison Howell
Sent: Thursday, May 28, 2026 4:05 PM
To: Brendan Carr (Internal); Greg Watson
Subject: Disney has filed

<https://enterpriseefiling.fcc.gov/dataentry/public/tv/draftCopy.html?displayType=html&appKey=25076f919df5a492019df87d8b5c00ce&id=25076f919df5a492019df87d8b5c00ce&goBack=N>

Allison Howell
Legal Advisor
Office of FCC Chairman Brendan Carr
allison.howell@fcc.gov

Kristi Thompson

From: Brendan Carr
Sent: Thursday, May 21, 2026 11:04 AM
To: Allison Howell
Subject: Disney PN latest draft
Attachments: ABC Petition for Declaratory Ruling Draft PN.5.20-BC.docx

Made some more suggested edits to the PN. (b) (5)

[REDACTED]

Let's plan on locking the document down today and then we get just get it out tomorrow morning.

(b) (5)

(b) (5)

(b) (5)

(b) (5)

Kristi Thompson

From: Allison Howell
Sent: Tuesday, April 21, 2026 4:42 PM
To: Brendan Carr (Internal)
Cc: Greg Watson; Courtney Cowper
Subject: Disney v. Sling Summary
Attachments: ESPN Enterprises Inc. et al v DISH Network - Background.docx; ESPN v. DISH Network (SDNY) Docs.zip

Chairman,

(b) (5)

Please let me know if you would like anything

else.

Thanks,

Allison Howell

Attorney Advisor

Office of FCC Chairman Brendan Carr

allison.howell@fcc.gov

(b) (5)

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ESPN ENTERPRISES, INC., a Delaware corporation; ESPN, INC., a Delaware corporation; ABC CABLE NETWORKS GROUP, a California corporation; AMERICAN BROADCASTING COMPANIES, INC., a Delaware corporation; FX NETWORKS, LLC, a Delaware limited liability company; INTERNATIONAL FAMILY ENTERTAINMENT, INC., a Delaware corporation; NGC NETWORK US, LLC, a Delaware limited liability company; SOAPnet, L.L.C., a Delaware limited liability company; WABC TELEVISION (NEW YORK), LLC, a Delaware limited liability company; WPVI TELEVISION (PHILADELPHIA), LLC, a Delaware limited liability company; KABC TELEVISION, LLC, a Delaware limited liability company; KFSN TELEVISION, LLC, a Delaware limited liability company; KGO TELEVISION, INC., a Delaware corporation; KTRK TELEVISION, INC., a Michigan corporation; WLS TELEVISION, INC., a Delaware corporation; WTVD TELEVISION LLC, a Delaware limited liability company,

Plaintiffs,

v.

DISH NETWORK LLC, a Colorado limited liability company,

Defendant.

Civil Action No. 1:25-cv-7169

**AMENDED COMPLAINT FOR
BREACH OF CONTRACT,
DAMAGES, AND INJUNCTIVE
RELIEF**

JURY TRIAL DEMANDED

Plaintiffs ESPN Enterprises, Inc., ABC Cable Networks Group, American Broadcasting Companies, Inc., FX Networks, LLC, International Family Entertainment, Inc., NGC Network US, LLC, and SOAPnet, L.L.C. (“OTT Licensor”); ESPN, Inc., ESPN Enterprises, Inc., American Broadcasting Companies, Inc., ABC Cable Networks Group, FX Networks, LLC, International Family Entertainment, Inc., NGC Network US, LLC, and SOAPnet, L.L.C. (“DBS

Licensor”); and WABC Television (New York), LLC, WPVI Television (Philadelphia), LLC, KABC Television, LLC, KFSN Television, LLC, KGO Television, Inc., KTRK Television, Inc., WLS Television, Inc., and WTVD Television, LLC (“RCA Licensor,” and together with OTT Licensor and DBS Licensor, “Licensor”) for their complaint against Defendant DISH Network LLC (“DISH”), allege as follows:

NATURE OF THE ACTION

1. OTT Licensor brings this action to enjoin DISH’s unauthorized transmittal, distribution, and sale of some of the most in-demand and valuable television programming in the country, including the ESPN Network and Disney Channel (the “Subscription Networks”) and recoup damages for the harm DISH’s conduct has caused. By offering one-time, non-renewing “Day Passes” to the Subscription Networks via its Sling Orange service—an action taken without notice to OTT Licensor and without its consent—DISH is distributing the Subscription Networks to customers for a profit on a non-subscription basis, without paying contractually required license fees to OTT Licensor. In fact, DISH is not paying OTT Licensor *anything* for [REDACTED] of Day Pass users. DISH’s conduct violates the terms of its contract, breaches the implied covenant of good faith and fair dealing, and is damaging OTT Licensor.

2. DISH has a limited over-the-top digital license (“OTT License”) to distribute the Subscription Networks as part of its streaming Sling TV service, which aggregates linear television networks and accompanying on-demand content and delivers it over the Internet to subscribers who sign up for monthly subscriptions.¹ Under this OTT License as well as previous

¹ “Over-the-top” or “OTT” refers to a service that distributes programming digitally over the Internet, distinct from broadcast, cable, and satellite distribution. OTT services include virtual multichannel video programming distributors (virtual MVPDs or vMPVDs), such as Sling TV and YouTube TV, and subscription-based film and television content (SVOD), like Netflix or Amazon Prime.

licenses between the parties, and consistent with the rest of the industry, OTT Licensor licenses its programming for DISH’s Sling TV service on a monthly subscription basis: DISH is required to count the applicable subscribers to the Subscription Networks on a monthly basis, pay OTT Licensor monthly fees, and provide reports of monthly subscribers. A copy of the OTT License is attached to this Complaint as **Exhibit A**.

3. On August 12, 2025, DISH—without consulting OTT Licensor—decided to offer OTT Licensor’s ESPN networks and other Subscription Networks on a transactional basis as part of a new service, which it calls Day Pass, Weekend Pass, and Week Pass (collectively, “Day Pass”). DISH concedes that prior to that date, Sling had only ever offered “a minimum subscription period of one month’s time.”² In what it heralded as an “industry-first” product,³ DISH advertised that users could watch the ESPN Network “*with no subscription*” at all using the Day Pass service, for as little as one day.⁴ DISH acted unilaterally, without even informing OTT Licensor of its intention or seeking comment, and timed its ambush to capitalize on the opening of the college football and NFL seasons, and specifically telecasts of marquee games on the ESPN Network and ESPN2.⁵

² Decl. of Andrew LeCuyer ¶ 8 (Dkts. 46, 55).

³ *Sling TV Launches Industry-First \$4.99 Day Pass Redefining How Viewers Watch Live TV*, DISH Newsroom (Aug. 15, 2025), <https://about.dish.com/2025-08-12-Sling-TV-Launches-Industry-First-4-99-Day-Pass-Redefining-How-Viewers-Watch-Live-TV> (Ex. D at 3).

⁴ *Day Pass by Sling TV*, Sling, <https://www.sling.com/service/day-pass> (emphasis added) (Ex. E at 3).

⁵ See Ex. D at 3, *supra* n. 3 (“Now [DISH is] breaking the mold again, just in time for football season . . . ‘With college football just around the corner, our new Day Pass offering is all consumers need to win on game day, for just \$4.99.’”).

4. Rather than a subscription—which DISH admits has always been the fundamental bedrock of the industry⁶—Day Pass provides users, for a “[o]ne-time charge,”⁷ access to live sporting events like headlining football games and other OTT Licensor programming for a single day, weekend, or week, with no renewal or commitment of any kind. As reflected by the OTT License and its agreements with other distributors, OTT Licensor’s business model—its ability to finance, acquire, develop, produce, and program content—is based and dependent on monthly subscriptions to 24/7 network programming that includes hundreds of different programs.

5. [REDACTED]

[REDACTED] Indeed, DISH admits that Day Pass is “the first time that a linear streaming service has offered short-term access to its platform on a non-renewing basis.”⁸

[REDACTED]
[REDACTED]
[REDACTED]

6. Yet DISH is now offering access to OTT Licensor’s most valuable programming without any subscription at all, permitting users to pick and choose content for as little as one day at a time. The OTT License nowhere states that DISH is permitted to offer such access to the Subscription Networks. Nor can such authority—[REDACTED]
[REDACTED]—be implied. The OTT License provides no mechanism for reporting on or paying OTT Licensor for Day Pass. And in fact, DISH is not paying OTT Licensor *anything* for [REDACTED] of those users, something

⁶ See Decl. of Kurt Simon ¶ 4 (Dkts. 48, 57).

⁷ See *Plan Comparison*, Sling, <https://www.sling.com/service/compare-plans> (describing the Monthly plan as a “[m]onthly subscription,” compared to the “Day Pass,” “Weekend Pass,” and “Week Pass,” which are available for a “[o]ne-time charge”) (Ex. F at 3).

⁸ Decl. of Kurt Simon ¶ 4 (Dkts. 48, 57).

no rational contracting party would ever have agreed to and which denies OTT Licensor the fundamental benefit of the bargain struck in the OTT License. There is no evidence that the parties ever intended to produce such a commercially unreasonable result and no reason why OTT Licensor would have so agreed. Day Pass is fundamentally inconsistent with and wholly unauthorized by the OTT License and constitutes a material and ongoing breach of that license.

7. Licensor's networks are central to DISH's Day Pass offering and essential to its value proposition. DISH's Day Pass announcement boasted that the service includes "popular sports channels like ESPN, ESPN2, and ESPN3."⁹ Today, DISH continues to promote Day Pass specifically as a cheap way to watch sports on the Subscription Networks, including "[t]op college football rivalry games," "Monday Night Football," the NBA, NHL, Formula 1, and college basketball—all of which it is selling for *\$1 per day*:¹⁰



⁹ *Day Pass by Sling Gives Sports & TV Fans Unparalleled Flexibility Starting at \$4.99*, Sling (Aug. 12, 2025), <https://www.sling.com/whatson/announcements/sling-day-week-weekend-passes?msocid=200eacf672d36c901ccfbacf73336daf> (Ex. G at 3). Unrelated to this dispute, Licensor discontinued ESPN3 for all distributors in December 2025.

¹⁰ *For a Limited Time, Sling TV Offers Fans a \$1 Day Pass to Catch Their Favorite Sports and Entertainment*, Sling, <https://www.sling.com/whatson/announcements/sling-day-pass-one-dollar-deal> (Nov. 19, 2025) (Ex. H at 3–4).

8. According to DISH, it is on a “mission to redefine television” using Day Pass to provide “pay-as-you-want, instant access to top live channels.”¹¹ But those networks are controlled and licensed by OTT Licensor. DISH can distribute them only as authorized. The OTT License is not a contract to “redefine television”; it is a standard license to distribute Plaintiffs’ networks consistent with other linear distributors in the market. OTT Licensor would not grant DISH some unique right to blow up the basic premise of that entire contractual structure or the right to fundamentally undermine the business model on which these networks are based.

9. DISH’s unauthorized conduct is irreparably harming OTT Licensor and causing OTT Licensor to incur significant damages. It violates the OTT License and the implied covenant of good faith by manipulating and purposefully evading the OTT License’s payment requirements, which require DISH to pay monthly fees for *all* subscribers who are not expressly excluded. OTT Licensor did not agree to allow DISH to evade paying anything at all for [REDACTED] of Day Pass customers, as DISH is currently doing.

10. Day Pass jeopardizes OTT Licensor’s business model, which is structured around, depends on, and uniformly requires monthly subscriptions. The OTT License was intended to maintain that structure, as demonstrated by its monthly fees, monthly reports, and foundational limitation that it only granted to DISH the right to distribute the networks on a subscription basis. Day Pass also threatens to severely disrupt OTT Licensor’s longstanding contractual and business relationships with its distribution partners by offering unauthorized access to OTT Licensor’s valuable programming in a manner unavailable anywhere else in the

¹¹ *Sling TV Celebrates Court Win With \$1 Day Pass Offer, Vows To Continue Fight For Consumer Choice*, Sling (Nov. 19, 2025), <https://news.sling.com/2025-11-19-Sling-TV-Celebrates-Court-Win-With-1-Day-Pass-Offer,-Vows-to-Continue-Fight-for-Consumer-Choice> (Ex. I at 3).

market. Certainly there is no reason OTT Licensor would have given DISH that singular advantage. And it devalues OTT Licensor's networks and harms its goodwill with consumers—as social media comments collected by DISH confirm.¹²

11. When OTT Licensor learned—through the media—of DISH's Day Pass offering, OTT Licensor asked DISH to cease and desist, but DISH refused, forcing OTT Licensor to seek relief from this Court. OTT Licensor accordingly seeks an injunction to stop this illegal distribution and exploitation of the Subscription Networks and damages for the harm DISH has caused.

12. In addition, DISH has breached the OTT License, the license for its direct broadcast satellite service, attached hereto as **Exhibit B** (the "DBS License"), and the Retransmission Consent Agreement, attached hereto as **Exhibit C** (the "RCA License"), by failing to timely pay License Fees. The OTT License, DBS License, and RCA License contain the same payment structure: DISH must pay Licensor within 30 days after the end of a Reporting Period, and accrued interest becomes due after 45 days. OTT License ¶¶ 8(d), 8(f); DBS License ¶¶ 8(h), 8(j); RCA License ¶¶ 7(g), 7(i). Since January 2023, DISH has *not once* paid Licensor the License Fees it owes in accordance with the applicable contractual terms, nor has it paid Licensor the interest associated with late payments. DISH now owes Licensor more than [REDACTED] as a result of these breaches.

PARTIES

13. Plaintiffs are a group of parties that granted DISH a limited license to transmit various of Plaintiffs' linear television networks and the content displayed thereon to paid

¹² Decl. of Kurt Simon ¶ 12 (Dkts. 48, 57) (identifying social media comments where customers said they'd "rather pay a weekend pass than to pay an extra \$10 for a full month of ESPN if money is tight," and lauded being able to "pay for a day to get every network for ball").

subscribers in exchange for certain consideration, including the payment of monthly License Fees.

14. The OTT Licensor Plaintiffs granted DISH a limited license to distribute certain linear television networks and the content displayed thereon over the Internet via DISH's Sling TV service. DISH offers some of those networks and content on the Day Pass service.¹³ The OTT Licensor Plaintiffs are:

- a. ESPN Enterprises, Inc., a Delaware corporation with its principal place of business in Connecticut;
- b. ABC Cable Networks Group, a California corporation with its principal place of business in California;
- c. American Broadcasting Companies, Inc., a Delaware corporation with its principal place of business in New York;
- d. FX Networks, LLC, a Delaware limited liability company with its principal place of business in California;
- e. International Family Entertainment, Inc., a Delaware corporation with its principal place of business in California;
- f. NGC Network US, LLC, a Delaware limited liability company with its principal place of business in the District of Columbia; and
- g. SOAPnet, L.L.C., a Delaware limited liability company with its principal place of business in California.

¹³ Networks associated with OTT Licensor Plaintiffs ESPN Enterprises, Inc., ABC Cable Network Group, International Family Entertainment, Inc., and SOAPnet, L.L.C. are available on DISH's Sling Orange service, and are thus accessible via Day Pass. Networks associated with the remaining OTT Licensor Plaintiffs are available via DISH's Sling Blue service, and are thus not accessible via Day Pass.

15. The DBS Licensor Plaintiffs granted DISH a limited license to distribute certain linear television networks and the content displayed thereon via direct broadcast satellite on DISH's satellite service. The DBS Licensor Plaintiffs are:

- a. ESPN, Inc., a Delaware corporation with its principal place of business in Connecticut;
- b. ESPN Enterprises, Inc., a Delaware corporation with its principal place of business in Connecticut;
- c. ABC Cable Networks Group, a California corporation with its principal place of business in California;
- d. American Broadcasting Companies, Inc., a Delaware corporation with its principal place of business in New York;
- e. FX Networks, LLC, a Delaware limited liability company with its principal place of business in California;
- f. International Family Entertainment, Inc., a Delaware corporation with its principal place of business in California;
- g. NGC Network US, LLC, a Delaware limited liability company with its principal place of business in the District of Columbia; and
- h. SOAPnet, L.L.C., a Delaware limited liability company with its principal place of business in California.

16. The RCA Licensor Plaintiffs granted DISH the right to distribute certain ABC stations via its direct broadcast satellite service. The RCA Licensor Plaintiffs are:

- a. WABC Television (New York), LLC, a Delaware limited liability company with its principal place of business in New York;

- b. WPVI Television (Philadelphia), LLC, a Delaware limited liability company with its principal place of business in New York;
- c. KABC Television, LLC, a Delaware limited liability company with its principal place of business in California;
- d. KFSN Television, LLC, a Delaware limited liability company with its principal place of business in California;
- e. KGO Television, Inc., a Delaware corporation with its principal place of business in California;
- f. KTRK Television, Inc., a Michigan corporation with its principal place of business in Texas;
- g. WLS Television, Inc., a Delaware corporation with its principal place of business in Illinois; and
- h. WTVD Television, LLC, a Delaware limited liability company with its principal place of business in North Carolina.

17. Defendant DISH Network LLC is a Colorado limited liability company with its principal place of business in Colorado. Its sole member is DISH DBS Corporation, which is incorporated in Colorado, with a principal place of business in Colorado. DISH is the counterparty to each of the OTT License, which provides limited rights to distribute Licensor's networks via its virtual multichannel video programming distribution (vMVPD) service, Sling TV; the DBS License, which provides similar rights to distribute Licensor's networks via its direct broadcast satellite service; and the Retransmission Consent Agreement, which provides similar rights to distribute WABC, WPVI, KABC, KFSN, KGO, KTRK, WLS, and WTVD via DISH's direct broadcast satellite service.

JURISDICTION AND VENUE

18. This Court has jurisdiction pursuant to 28 U.S.C. § 1332(a) because there is complete diversity of citizenship between the parties. Upon information and belief, DISH is a citizen of Colorado. As set forth in Paragraphs 13–16 above, each Plaintiff entity is incorporated in a state other than Colorado and has its principal place of business in a state other than Colorado. Therefore, none of the Plaintiffs is a citizen of Colorado and each Plaintiff is diverse from DISH.

19. DISH’s conduct has caused and will cause Licensor irreparable harm and an injury that exceeds \$75,000.

20. This Court has personal jurisdiction over DISH by consent pursuant to Paragraph 14(a) of the OTT License, which provides that any dispute related to the agreement “will be litigated exclusively in the United States District Court for the Southern District of New York” or, if the Court lacks subject matter jurisdiction, in New York state court, and that “[e]ach Party waives any objection to venue in such courts” and “consents to the in personam jurisdiction of such courts for such purposes.” OTT License ¶ 14(a); DBS License ¶ 14(a); RCA License ¶ 13(a).

21. Venue is proper in this Court pursuant to Paragraph 14(a) of the OTT License, Paragraph 14(a) of the DBS License, and Paragraph 13(a) of the RCA License, as set forth above, and 28 U.S.C. § 1391(b)(3).

**LICENSOR’S VALUABLE TELEVISION PROGRAMMING AND DISTRIBUTION
LICENSES**

22. Licensor owns extremely valuable programming, including sports network ESPN and Disney Channel. Licensor authorizes distribution of these and other linear television networks in the United States by multichannel video programming distributors (MVPDs) like

DISH's DBS service and vMVPDs like Sling TV, which provide paying subscribers with linear content on live television networks and accompanying video-on-demand streaming content. Licensor authorizes unaffiliated distributors like DISH to provide customers access to these networks solely through contractual licenses.

23. Licensor's linear networks provide an array of content, including a variety of live sports events and original programming, on a 24/7 basis. The ESPN networks, for instance, telecast both college and professional sports, including games for various NCAA conferences, the NFL, the NBA, the WNBA; original in-studio programming, such as Pardon the Interruption, SportsCenter, and NFL Primetime; and news and documentaries, such as 30 for 30. Licensor's networks include hundreds of different programs that appeal to a wide variety of audiences.

24. Programming and content-acquisition decisions for the networks covered by the OTT License, including the ESPN networks, depend on a monthly subscription model. For instance, the ESPN networks invest heavily to acquire the exclusive rights to telecast marquee live sports events like Monday Night Football, the NBA playoffs, and the College Football Playoff.

25. What makes those enormous, long-term investments possible is Licensor's ability to monetize that content on a monthly basis for a specific monthly, per-subscriber fee across multiple distribution agreements and to reliably forecast the revenue those fees will generate years down the line. The economics of the business model do not account for, and are incompatible with, a transactional service like Day Pass.

26. Licensor retains monthly subscribers over the long term by offering an array of valuable content that appeals to different portions of the market. For example, many ESPN Network subscribers may subscribe to an MVPD or vMVPD service like Sling TV to gain access

to specific sports categories or events. Those subscriber volumes support ESPN's longer-term investments in other programming, which in turn have contributed to massive growth in certain sport categories (*e.g.*, women's basketball), benefiting athletes and audience members alike.

Licensors' content-acquisition strategies and costs reflect this reality.

27. Licensors' network decisions also depend on the monthly subscription model. One salient example is America's national tennis championship, the U.S. Open. Licensors acquire rights to the U.S. Open based on a packaged multi-week event; it cannot pick and choose particular matches, even though many viewers will only watch a handful of the total number of matches. Licensors justify its investment based on the fact that subscribers will pay for at least full month of access to Licensors' networks that carry the U.S. Open and makes related programming decisions accordingly. Offering one-time access on a transactional basis to key U.S. Open matches via a Day Pass would be a very different economic and strategic prospect.

28. Licensors' agreements with DISH go back decades. Consistent with Licensors' overall business, these agreements have never provided or even contemplated granting DISH the right to distribute the Subscription Networks on anything less than a monthly subscription basis.

29. Licensors and DISH negotiated the OTT License in 2022. At no point during those negotiations did DISH ever request any right to offer subscriptions to the Subscription Networks on less than a monthly basis or to offer the Subscription Networks on a non-subscription basis. If it had, the parties would have documented that request.

30. Rather, DISH's Senior Vice President, Product and Operations, Seth Van Sickle, stated in a declaration to this Court that DISH has only been [REDACTED]

[REDACTED]

[REDACTED] and did not begin “moving toward making Sling Passes a reality” until spring of 2025.¹⁴

31. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ESPN’s own direct-to-consumer streaming service, which provides access to the ESPN linear networks, on demand replays, studio shows, and original programming, is also available only on a monthly or annual basis, as is the Disney+ streaming video-on-demand service.

DISH ANNOUNCES UNAUTHORIZED “DAY PASS” OFFERING

32. On or about August 12, 2025, DISH publicly announced the Day Pass service via press release.¹⁵ The press release described Day Pass as “flipping the script on traditional streaming bundles” with a “first of its kind” service. DISH told the public it was “breaking the mold again, just in time for football season” with “the latest move in Sling’s mission to challenge industry norms by creating flexible, fan-first streaming solutions at a time when customers are demanding more control and less cost. This industry-first product gives viewers instant, 24-hour access to live TV, sports and entertainment without a long-term commitment.” The press release repeatedly stated that Day Pass could be used to watch college football and professional sports, advertising “24 hours of football for \$4.99” and access to Subscription Networks ESPN, ESPN2, ESPN3, Disney Channel, and more. Sling Orange’s monthly subscription starts at \$45.99.

33. DISH’s website also published an announcement, dated August 12, advertising that consumers did not need a subscription to access the Day Pass service: “Best of all, you don’t

¹⁴ Decl. of Seth Van Sickel ¶ 5 (Dkts. 49, 58).

¹⁵ Ex. G at 3, *supra* n. 9.

have to worry about remembering to cancel” because “Day Pass is not a recurring charge.”¹⁶ Again, DISH emphasized that Day Pass “include[s] popular sports channels like ESPN, ESPN2, and ESPN3 (which simulcasts select sports programming on ABC),” and “children’s programming on Disney Channel.”

34. DISH’s OTT License grants it the right solely to distribute the Subscription Networks via specified services. OTT License ¶ 2. Sling Orange has historically qualified as a PSS Service, “as part of which subscribers then-currently entitled to receive applicable programming networks . . . may access . . . content at any time on a paid subscription basis[.]” *Id.* ¶¶ 1, 2(a). The contract specifies that “neither offering video content as part of a limited free trial or free preview, nor permitting subscribers to access more than one stream of Premium Network Content at a time, will disqualify a video programming service” from inclusion in the grant of rights. *Id.* ¶ 1. But Day Pass customers are not receiving OTT Licensor’s networks on a subscription basis, paid or otherwise. Rather, when it launched Day Pass, DISH prominently advertised “24 hours of access to ESPN, TNT & more *with no subscription*”:¹⁷



¹⁶ Ex. G at 3, *supra* n. 9.

¹⁷ Ex. E at 3, *supra* n. 4.

Accordingly, at least when it comes to Day Pass consumers, Sling Orange does not qualify as a PSS Service under the OTT License.

35. DISH similarly admitted in its Frequently Asked Questions that Day Pass is not a subscription, stating that “[w]hen the time expires, you will not be charged again until the next time you order another Sling Day Pass or subscribe to the service.”¹⁸ DISH contrasted “[m]onthly subscribers” with those who buy “short term viewing options,” *i.e.*, Day Pass.¹⁹ And on its Plan Comparison page, DISH compared its “Monthly” service, which it describes as a “Monthly subscription” with “24/7 access,” with its Day Pass service, available for a “[o]ne-time charge.”²⁰

36. DISH is delivering and providing customers with access to the following Subscription Networks via the Day Pass service: ESPN, ESPN2, ESPNU, ESPNEWS, ACC Network, SEC Network, SEC Network+, Freeform, Disney Channel, Disney Jr., and Disney XD, either as part of the base offerings or as available add-ons.

37. DISH did not consult with OTT Licensor before announcing and offering Day Pass. Rather, OTT Licensor learned of DISH’s actions through articles in the trade press, such as *Deadline*.²¹ *Deadline* reported that, according to Sling TV’s Senior Vice President of Product and Operations, “programming partners were briefed about the company’s plans for the short-term subscriptions.”²² But that representation was false. Even though all but two of the networks prominently displayed in DISH’s ads for Day Pass belong to OTT Licensor (with

¹⁸ *Id.* at 5. (Sling Day Pass FAQ: Is this really a one-time charge?).

¹⁹ *Sling Orange—Service Details, Channels, & Information*, Sling, <https://www.sling.com/service/sling-orange> (FAQ: What if I want to cancel?) (Ex. J at 6).

²⁰ Ex. F at 3, *supra* n. 7.

²¹ Dade Hayes, *Sling TV Slices up the Bundle, Launching Subscriptions for Day, Weekend and Full Week Starting at \$4.99*, *Deadline* (Aug. 12, 2025), <https://deadline.com/2025/08/sling-tv-slices-up-the-bundle-subscriptions-dish-streaming-1236483566/> (Ex. K).

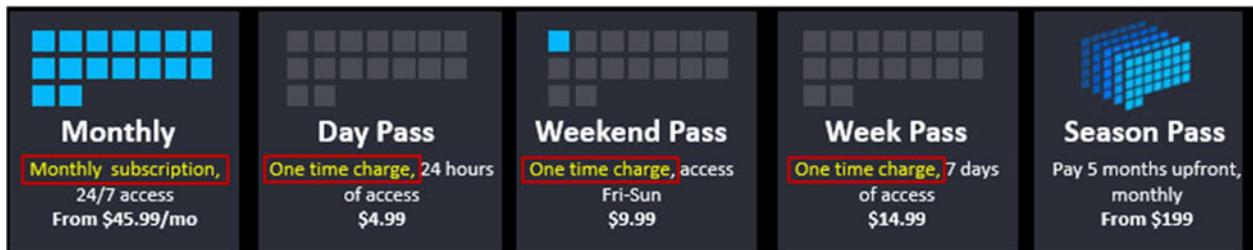
²² *Id.* at 3.

another eight available as Day Pass “Extras”), DISH never consulted with OTT Licensor about the Day Pass service.

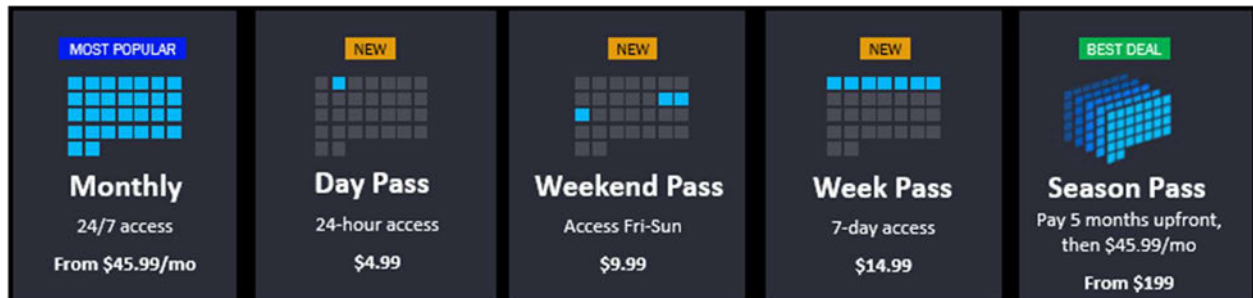
38. On the contrary, once it learned about Day Pass, OTT Licensor swiftly contacted DISH to object to the Day Pass on the grounds that it is inconsistent with, and constitutes a breach of, the OTT License, and demanded that DISH cease and desist offering it. DISH has refused.

39. After DISH received these communications from OTT Licensor, it began removing references to Day Pass’s “one-time access” from its website in an attempt to obscure that its Day Pass offering is unauthorized by the parties’ agreement. For instance, on DISH’s main Sling webpage as well as its Plan Comparison page, DISH removed the comparison between a “Monthly subscription” versus the Day Pass “One-time charge”:

Original Description²³:



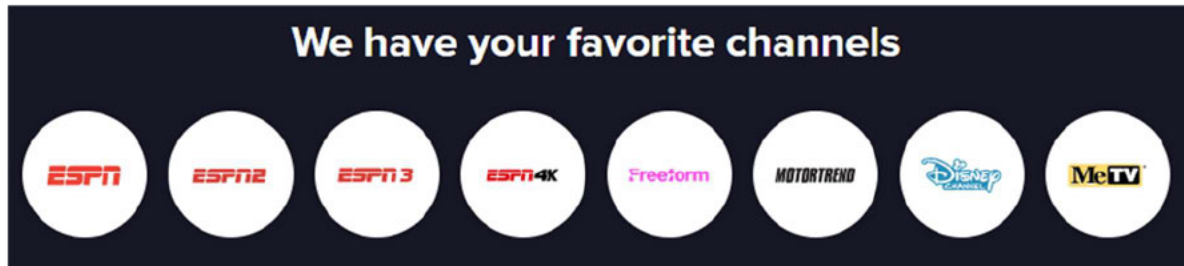
Modified Description:



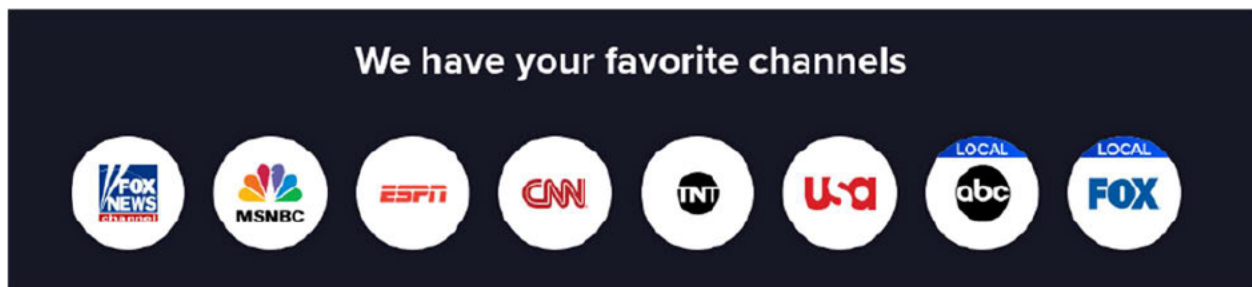
²³ Highlighting and red boxes added for emphasis; *compare* Sling TV, SLING, www.sling.com (Ex. Q) at 4–5 with Ex. Q at 10.

40. DISH also changed its list of highlighted channels on its main Sling TV webpage in an attempt to downplay its reliance on the Subscription Networks:

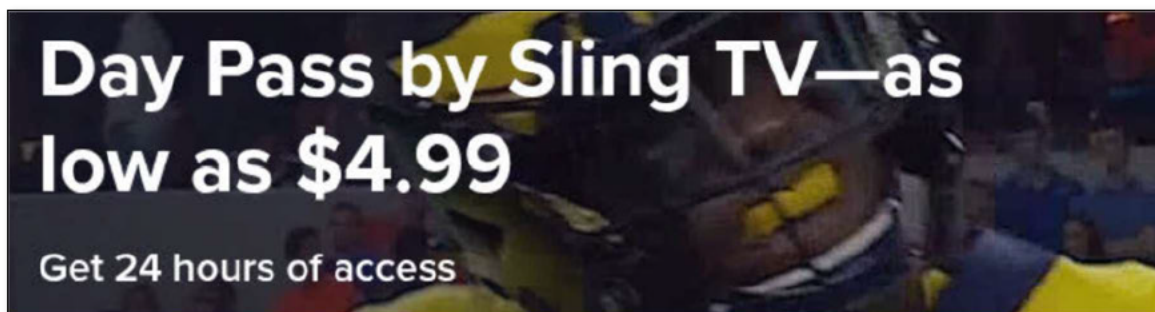
Original Graphic²⁴:



Modified Graphic:



41. On or about August 26, 2025, OTT Licensor filed its original Complaint in this Court, along with a request that the Complaint be filed under seal. That Complaint identified the “no subscription” advertising noted *supra* paragraph 34. DISH then purged that admission from its website as well, removing the reference to ESPN and the phrase “no subscription.”²⁵



²⁴ Compare Ex. Q at 4 with Ex. Q at 10.

²⁵ Compare Ex. E at 3 with Ex. E at 8.

42. After OTT Licensor filed the original Complaint, DISH also replaced its FAQs, replacing “you will not be charged again until the next time you order another Sling Pass *or subscribe* to the service,” with “you won’t be charged again until the next time you order a Sling pass or service.”²⁶

43. DISH also edited its Terms of Use to shoehorn Day Pass into the definition of “Subscription Services” as follows: “~~Regardless of the period for which you purchased any Subscription Services,~~ Except for certain short-term non-renewing Subscription Services (e.g., Passes), following the completion of such subscription period, your Subscription Services will automatically renew on a month-to-month basis at the then-current standard rates for monthly access to the same Subscription Services, unless and until they are cancelled or changed by you or Sling TV in accordance with these Terms of Use.”²⁷ At the time OTT Licensor and DISH entered into the OTT License—and at the time DISH launched Day Pass—DISH’s own definition of its Subscription Services in its Terms of Use reflected that Subscription Services—unlike Day Pass—“automatically renewed on a month-to-month basis.”²⁸

44. DISH personnel have never denied purging its website of admissions that Day Pass is not a subscription. Rather, DISH’s Vice President of Brand Marketing, Kurt Simon, called the phrase “inartful” but admitted that DISH sought to “differentiate the Sling Passes offering from the standard monthly streaming subscriptions that are familiar to consumers,” which “requires pre-payment on a monthly basis and auto-renews from month-to-month.”²⁹

²⁶ Compare Ex. E at 5 with Ex. M at 11 (emphasis added).

²⁷ Compare Ex. P at 6 with Ex. P at 24.

²⁸ See Ex. P at 6.

²⁹ Decl. of Kurt Simon ¶¶ 3, 6, 11 (Dkts. 48, 57).

**DISH CONTINUES TO CAPITALIZE ON DAY PASS'S UNAUTHORIZED AND
UNIQUE MARKET ADVANTAGE**

45. In the ensuing months, DISH leveraged Day Pass—its unique market advantage, [REDACTED]—in an attempt to attract additional customers.

46. On October 30, 2025, a carriage agreement between Licensor and YouTube TV expired, leaving YouTube TV subscribers without access to many of Licensor's networks, including the ESPN networks. DISH immediately launched a campaign to push its Day Pass offerings to those affected by the carriage dispute, often in tandem with advertisements for scheduled games appearing on Licensor's networks. Given the timing of Disney's carriage dispute with YouTube TV, which lasted from October 30, 2025 to November 14, 2025, DISH did not pay License Fees to OTT Licensor for *any* Day Pass customers it attracted during the dispute.

47. On October 31, 2025, on the platform X, Dish reposted a previous advertisement for college football games appearing on Licensor's networks.



48. Beginning on November 1, 2025, DISH began frequently reposting X posts from users praising the Day Pass offering, particularly given the carriage dispute between Disney and YouTube TV. Some of those posts specifically referenced Monday Night Football, which is exclusively available on Licensor's networks:



49. DISH has continued posting many similar advertisements on its social media channels. On November 6, it used X to encourage potential customers to purchase Day Pass to

access Licensor’s networks to watch college football games airing that day. It also reposted several posts from other X accounts lauding Day Pass as an option to watch college football.

50. Two days later, on November 8, DISH did the same thing for Monday Night Football, reposting comments including: “\$9.99 weekend pass for both pro and college football has been awesome this season 🍌🍌🍌 100 100.”

51. DISH will not pay OTT Licensor any License Fees for Day Pass users who accessed Licensor’s networks on the days DISH promoted in these advertisements, while OTT Licensor’s networks were unavailable on YouTube TV because of the carriage dispute.

52. After this Court’s ruling on OTT Licensor’s motion for a preliminary injunction, on November 19, 2025, DISH “celebrat[ed] [its] recent court victory” by launching a limited-time offering for customers to purchase Day Pass for only \$1 “with no long-term contracts or commitments,” touting its “mission . . . to redefine television.”³⁰ In the press release, DISH also advertised that customers can use Day Pass to access Licensor’s “popular networks . . . like ESPN, ESPN2, ESPN3, . . . [and] Disney Channel.”³¹ In addition to the press release, DISH updated the advertising on its website to highlight its \$1 Day Pass offering, often in tandem with Licensor’s networks and marks:³²

³⁰ Ex. I at 3, *supra* n. 11 (“The limited-time offer celebrates Sling’s recent court victory after a federal court denied Disney’s request for a preliminary injunction, allowing Sling to continue offering customers the flexibility and control they deserve in how and when they watch TV with Sling TV Day, Weekend and Week Pass subscriptions.”).

³¹ *Id.* at 4.

³² *See, e.g.*, Sling TV, SLING, www.sling.com (Ex. L at 3); Customizable TV Packages, Services, and Pricing Information, SLING, www.sling.com/service (Ex. M at 3).

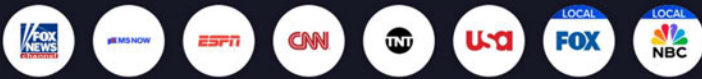
Limited time offer!
Orange Day Pass for just \$1 ~~\$4.99~~

[See channels](#)

[Get Day Pass](#) [See All Plans](#) [Offer details](#)

sling
DAY PASS

We have your favorite channels



[See all channels](#)

Orange

[DAY](#) [WEEK](#) [WEEKEND](#) [MONTHLY](#) [PREPAY](#)



SPECIAL OFFER ~~\$4.99/day~~ **\$1/day**

A combination of sports and entertainment—great for football fans and the whole family.

[Shop Orange](#)

DAY PASS BREACHES DISH'S LIMITED LICENSE TO DISTRIBUTE OTT SUBSCRIPTION NETWORKS ON A MONTHLY SUBSCRIPTION BASIS

I. Sling Orange Does Not Qualify as a “PSS Service” for Day Pass Users.

53. OTT Licensor and DISH entered into an agreement on [REDACTED] granting DISH a limited license to distribute the Subscription Networks to subscribers through OTT services offered by DISH’s Sling TV platform. The foundation of the OTT License is the standard monthly subscription model. It uses the word “subscription” and its variants more than 1,000 times and the networks covered by the OTT License are referred to as “Subscription Networks.”³³ The OTT License expires on [REDACTED]

54. DISH’s distribution rights are confined to what the OTT License explicitly authorizes it to do; the agreement reserves to OTT Licensor “all of Licensor’s rights not expressly granted to DISH.” OTT License ¶ 14(i)(i). The only rights OTT Licensor granted to DISH were to distribute the Subscription Networks on a monthly, paid subscription basis.

55. Specifically, the OTT License grants DISH a limited and carefully circumscribed set of non-exclusive distribution rights to the Subscription Networks, which are set forth in Section 2(a)(i) of the agreement.

56. Subject to certain limitations, that section—the Grant of Rights—grants DISH a license only to distribute the Subscription Networks “via the Sling Platform on a Streamed basis, as part of” specific listed services. *Id.* ¶ 2(a)(i). Those services include the “DISH PSS English Service,” which has historically included Sling Orange. *Id.* To fall within the Grant of Rights, a PSS Service must be “a video programming service comprised of linear programming networks . . . a part of which subscribers then-currently entitled to receive applicable programming

³³ Capitalized terms not otherwise defined herein are defined in the OTT License.

networks . . . may access. . . content at any time *on a paid subscription basis*[.]” *Id.* ¶¶ 1 (“PSS Service”), 2(a) (emphasis added).

57. DISH may then distribute, “as part of each” such service, the Subscription Networks’ signal to “Network Subscribers” to each network. *Id.* ¶ 2(a)(i)(A). “Network Subscribers” are “Subscriber[s] intentionally authorized by DISH to receive the Subscription Network via the Sling Platform.” *Id.* ¶ 1 (“Network Subscriber”). “Subscriber” is defined as “a person intentionally authorized by DISH to receive any level of video programming service or package of programming networks via the Sling Platform.” *Id.* (“Subscriber”). Under only certain, specified circumstances will a user who does not purchase a subscription be deemed a “Subscriber.” *Id.* (“For purposes of this Agreement, a person who accesses programming content via the DISH Free Service will be deemed to be a Subscriber, regardless of whether such person subscribes to a programming service, is charged a fee or has a subscription account.”). As described in more detail below, DISH then pays License Fees for all Network Subscribers for each network, except Gratis Subscribers and Network Subscribers “receiving such Subscription Network pursuant to a Free Preview.” *Id.* ¶ 8(a)-(c).

58. Thus, the first step in assessing whether an offering falls within the Grant of Rights is determining whether the offering qualifies as an authorized service—as relevant here, a PSS Service. If it does—and only then—the second step is that DISH may distribute each of the Subscription Networks to Network Subscribers, as defined. The Network Subscriber definition thus ensures that DISH only has to pay fees for subscribers to a qualifying PSS Service who are “intentionally authorized” to receive service—that is, people who are not pirating DISH’s services. And it ensures that no matter how DISH packages the networks it distributes or what tiers it creates, all Network Subscribers—except Gratis Subscribers and those receiving Free

Previews, who are explicitly excluded—will be counted and appropriate License Fees paid for each of them. But the Network Subscriber definition does not operate to expand the definition of “PSS Service” or remove the basic subscription requirement. Because DISH is not distributing the Subscription Networks to Day Pass customers “on a paid subscription basis,” it fails at the first step of the Grant of Rights analysis, before reaching the second step.

II. The OTT License Includes No Payment Mechanism for Day Pass.

59. Under the terms of the OTT License and reflecting OTT Licensor’s business model, DISH must pay OTT Licensor a “monthly” License Fee for each Network Subscriber to each network “with respect to each Reporting Period,” which runs from the 22nd of one month to the 21st of the following month. *Id.* ¶ 8(a); *see id.* Ex. A. The License Fee is calculated by multiplying the number of Network Subscribers by the contractual rates for each applicable network. *Id.* To determine the amount of the License Fee, DISH must take “the sum of the number of Network Subscribers [for each network] as of the last day of the (A) Reporting Period in question and (B) immediately preceding Reporting Period, and then divid[e] that sum by two[.]” *Id.* ¶ 8(b)(i).

60. The formula is based on monthly subscriptions under which each customer DISH has authorized to access Subscription Networks is deemed a Network Subscriber, whose use is fully and accurately captured. The OTT License provides no mechanism to pay OTT Licensor for access to the Subscription Networks on anything other than a monthly basis.

61. Exhibit A lays out the specific monthly license fees for each Subscription Network, which increase over time and can change in certain circumstances. *See, e.g., id.* Ex. A-5, ¶ 9 (monthly fees for ESPN). DISH can prorate these monthly fees if DISH launches a new Licensor network, an annual rate increase occurs during a Reporting Period, or if OTT Licensor

discontinues a network mid-month. But, in each case where a network continues, the basis for payment remains monthly, and full fees resume the month following the change. Nothing in the OTT License authorizes DISH to offer one-time access to any Subscription Network.

62. This structure confirms that DISH has the right to distribute the Subscription Networks on a monthly, paid subscription basis only. Subscribers sign up for a recurring monthly subscription to DISH's vMVPD service, and DISH pays Licensor a corresponding monthly, per-subscriber license fee for each Subscription Network. The OTT License is designed to implement and reflects that shared understanding. It does not give DISH the right to provide access to OTT Licensor's content through one-time transactions such as Day Pass, which according to DISH's own advertising requires "no subscription."³⁴

63. Moreover, the arrangement by which DISH pays OTT Licensor a monthly, per-subscriber license fee for each Network Subscriber is premised wholly on a monthly subscription model. The monthly License Fee that DISH must pay OTT Licensor for each Network Subscriber to a Subscription Network is calculated based on the number of subscribers who are subscribed to that network on the last day of two consecutive monthly reporting periods. *Id.* ¶ 8(b)(1). This structure makes sense only if the Subscription Networks are offered through a monthly subscription—DISH admits that the vast majority of new Day Pass customers who purchase access for shorter periods of time will not be captured in the calculation. The fact that there is no mechanism for paying OTT Licensor for these transactions demonstrates that they are not anticipated or permitted by the OTT License.

64. The fact that DISH is paying OTT Licensor for a small fraction of Day Pass users represents a breach of the implied covenant of good faith and fair dealing because it effectively

³⁴ Ex. E at 3, *supra* n. 4.

denies OTT Licensor the benefit of the bargain the parties struck. Under that bargain, OTT Licensor allows DISH to sell members of the public access to the Subscription Networks in exchange for monthly License Fees. Yet, in nearly all cases, OTT Licensor receives no payment (and thus no benefit) whatsoever for Day Pass users. Thus, the design of Day Pass itself breaches the implied covenant.

65. DISH has also manipulated the timing of its Weekend Pass to avoid paying OTT Licensor the contractually required License Fees. Although DISH counts Network Subscribers for License Fee payment at 3 a.m. MT on the 21st of the month, DISH chose to initiate its Weekend Passes at 4 a.m. MT Friday and to terminate them at 1 a.m. MT Monday, avoiding any reporting date falling on either a Friday or Monday. It was not until the Court suggested it address the issue that DISH altered the time parameters for Weekend Pass to begin at 1 a.m. MT on Friday and terminate at 1 a.m. MT on Monday. *See* Dkt. 79.

66. DISH's rights with respect to the Subscription Networks are limited to those granted to it by the OTT License. Those rights do not include DISH's new Day Pass offering. DISH is in material breach of the OTT License.

III. The OTT License's Reporting and Audit Provisions Confirm Day Pass Is Unauthorized.

67. Other provisions of the OTT License further confirm that Day Pass is inconsistent with DISH's limited contractual rights.

68. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

69. [REDACTED]

[REDACTED]

70. At least as interpreted by DISH, the mechanism for counting Network Subscribers captures only the miniscule fraction of Day Pass users who are active at 3 a.m. on the 21st day of each month. [REDACTED]

[REDACTED]

[REDACTED] This further illustrates that the OTT License does not contemplate Day Pass.

71. DISH disclosed some Day Pass sales data to OTT Licensor in connection with its opposition to OTT Licensor's motion for a preliminary injunction. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]³⁶

72. [REDACTED]

[REDACTED]

[REDACTED]

³⁵ See 12/1/25 Letter from D. Petrocelli to E. Echtman (Ex. N).

³⁶ *Id.*

³⁷ See 12/3/25 Letter from E. Echtman to D. Petrocelli (Ex. O).

IV. OTT Licensor Did Not Authorize DISH to Use Licensor Marks in Its Day Pass Materials.

73. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

74. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

75. [REDACTED]

[REDACTED] In its press releases, *e.g.*, Ex. D, and on its website, *e.g.*, Exs. E, F, H, DISH used and continues to use the [REDACTED] to entice customers to purchase the Day Pass product.

76. [REDACTED]

[REDACTED] DISH

itself boasts that Day Pass is a “first of its kind” and “industry-first product.” Ex. D. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

77. [REDACTED]

[REDACTED]

[REDACTED], which required DISH to “cease the disapproved use as soon as reasonably practicable[.]” OTT License ¶ 7(e)(ii). DISH has not complied with that requirement and has thereby breached the OTT License.

DISH IS IN BREACH OF THE OTT LICENSE, DBS LICENSE, AND RCA LICENSE BECAUSE [REDACTED]

78. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

79. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

80. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

81. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

82. [REDACTED]

[REDACTED]

[REDACTED]

83. [REDACTED]

[REDACTED], DISH has breached the OTT

License, the DBS License, and the RCA License.

**DISH’S UNLICENSED DISTRIBUTION OF THE SUBSCRIPTION NETWORKS IS
CAUSING NUMEROUS FORMS OF HARM**

84. DISH’s unauthorized distribution of the Subscription Networks is causing, and will continue to cause, irreparable harm to OTT Licensor unless and until DISH stops offering Day Pass. DISH’s Day Pass is unprecedented in the industry. DISH itself recognized this, advertising Day Pass as a “first of its kind” and “industry-first product.”³⁸ DISH’s unprecedented move threatens OTT Licensor’s overall business model in several ways that cannot be remedied by damages, and such harms continue to worsen each day that Day Pass is permitted to continue.

³⁸ Ex. D at 3, *supra* n. 3.

85. OTT Licensor's business is the development and distribution of linear television networks, such as the ESPN networks. The fundamental mechanics of that business model, from the cost of licensing content to the networks' programming decisions, are based on monthly subscriptions. Allowing distributors to slice and dice these 24/7 linear networks on a day-by-day basis subverts the basic economics underlying that business model, including Licensor's programming acquisition costs and the viability of various programming, injects volatility into subscriber counts and revenue streams, and destabilizes planning and investment modeling.

86. OTT Licensor's brand is built on offering linear television networks, not transactional access to its most popular programs. OTT Licensor has intentionally and strategically chosen to develop flagship brands like ESPN as 24/7 linear networks that offer a multitude of sports and related original content, not available through one-time transactions. Day Pass represents a serious and imminent threat to the value of these established brands by suggesting that they can be sold in one-time chunks for DISH's \$4.99 base price—and now, its \$1 per day special.

87. DISH's conduct is harming OTT Licensor's goodwill and relationships in the marketplace with other distributors, deteriorating its negotiating power with those distributors, and causing market confusion about the availability of the Subscription Networks. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Yet OTT Licensor faces the very real risk that Day Pass starts a domino effect of claims to the contrary.

88. DISH's unauthorized distribution of the Subscription Networks is also causing, and will continue to cause, OTT Licensor and DBS Licensor to incur significant monetary damages in an amount to be proven at trial.

89. By offering Day Pass in violation of the OTT License, advertising Day Pass using Licensor Marks, and encouraging the public to purchase Day Pass instead of monthly subscriptions to view Subscription Networks, DISH has caused OTT Licensor to lose revenue. But for Day Pass, consumers would have to purchase monthly subscriptions to view Subscription Networks' valuable programming, including college and professional sports. OTT Licensor would have earned monthly license fees for each such subscriber. A number of consumers who would have purchased monthly subscriptions, however, have instead purchased Day Pass, for which OTT Licensor, in [REDACTED] of circumstances, is paid nothing.

90. DISH's Day Pass offering harms OTT Licensor's ability to acquire valuable content by siphoning off License Fees to which OTT Licensor is entitled. Predictable License Fees from monthly subscriptions are foundational to OTT Licensor's purchasing and offering a wide range of content to viewers.

91. Day Pass also harms Licensor's advertising sales revenues and relationships with advertisers because it creates lack of consistency and predictability in subscribership and viewership at any given time.

92. [REDACTED]
[REDACTED], reducing its potential market share and causing loss of subscription fees. DISH admits that ESPN Unlimited's launch "played a role in our decision-making around Sling Passes."³⁹

³⁹ Decl. of Seth Van Sickel ¶ 10 (Dkts. 49, 58).

93. Finally, OTT Licensor and DBS Licensor have incurred damages in excess of [REDACTED] in unpaid interest due to DISH's failure to timely pay License Fees.

COUNT I: BREACH OF CONTRACT

Brought By Plaintiffs ESPN Enterprises, Inc., ABC Cable Network Group, International Family Entertainment, Inc., and SOAPnet, L.L.C. Against DISH

94. Plaintiffs ESPN Enterprises, Inc., ABC Cable Network Group, International Family Entertainment, Inc., and SOAPnet, L.L.C. incorporate herein by this reference each and every allegation contained in paragraphs 1 through 93 above. All references to "Plaintiffs" in this Count refer to these specified Plaintiffs.

95. Plaintiffs and DISH are parties to the OTT License, which is a binding contract.

96. Plaintiffs have performed all material obligations imposed by the OTT License.

97. DISH's Day Pass, Weekend Pass, and Weekly Pass services, collectively referred to herein as "Day Pass," constitute a material breach of the OTT License which provides the sole terms by which DISH is authorized to distribute the Subscription Networks via an OTT service.

98. As a result of DISH's breach of the OTT License, Plaintiffs have sustained and will continue to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at law. Plaintiffs are informed and believe, and on that basis aver, that unless enjoined by this Court, DISH will continue to breach the OTT License by advertising, distributing, and selling the Subscription Networks inconsistent with the terms of the OTT License, and are entitled to injunctive relief to restrain and enjoin DISH's conduct.

99. DISH has also breached the OTT License through its unauthorized use of [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

100. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

101. As a direct and proximate result of DISH's breaches, Plaintiffs have suffered monetary damages in an amount to be proven at trial, but which greatly exceed \$75,000, including but not limited to Plaintiffs' lost revenue associated with consumers selecting to purchase a Day Pass (for which Plaintiffs receive no compensation whatsoever [REDACTED] of the time, according to the most recent available data) instead of traditional monthly subscriptions (for which Plaintiffs would be paid).

COUNT II: BREACH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING

Brought By Plaintiffs ESPN Enterprises, Inc., ABC Cable Network Group, International Family Entertainment, Inc., and SOAPnet, L.L.C. Against DISH

102. Plaintiffs ESPN Enterprises, Inc., ABC Cable Network Group, International Family Entertainment, Inc., and SOAPnet, L.L.C. incorporate herein by this reference each and

every allegation contained in paragraphs 1 through 101 above. All references to “Plaintiffs” in this Count refer to these specified Plaintiffs.

103. Plaintiffs and DISH are parties to the OTT License, which is a binding contract.

104. Plaintiffs have performed all material obligations imposed by the OTT License.

105. DISH’s conduct with respect to (i) structuring Day Pass to distribute the Licensor Networks to paying customers while avoiding paying fees to the Plaintiffs, thereby directly subverting the purpose and economic framework of the OTT License; (ii) pricing Day Pass at prices contrary to market standards and in an arbitrary and irrational manner; and (iii) intentionally interfering with and undermining Plaintiffs’ businesses and relationships with other network providers breaches the implied covenant of good faith and fair dealing contained in the OTT License.

106. To the extent the OTT License affords DISH discretion to set subscription rates for Network Subscriptions, DISH was required to exercise any such discretion honestly, in good faith, and consistent with the parties’ reasonable expectations at the time of contracting. DISH violated the implied covenant by unreasonably and arbitrarily exercising the rate-setting discretion it possessed to undercut and frustrate Plaintiffs’ reasonable expectations, including by adopting subscription rates for Day Pass that were not commensurate with historical or market-based pricing and that were designed to extract value for DISH at Plaintiffs’ expense. DISH is only able to set such artificially low pricing because it is not paying License Fees for most Day Pass customers.

107. DISH breached the implied covenant by structuring Day Pass in a manner that results in DISH paying Plaintiffs nothing for the vast majority of Day Pass users—[REDACTED] according to the limited data available—thereby depriving Plaintiffs of the expected economic

benefits of the OTT License. With Day Pass, Plaintiffs' compensation depends on the vagaries of the calendar—whether the 21st of the month happens to fall on a day where there is relatively high or relatively low demand from Day Pass customers.⁴⁰ That is not how the parties intended the OTT License to work.

108. As DISH's retained expert Andrew Yeater acknowledged to this Court, "[REDACTED]

”⁴¹

[REDACTED] See Ex. O. That refusal further denies Plaintiffs the benefit of the bargain because they cannot, outside the context of litigation, obtain the information necessary to evaluate DISH's compliance with the OTT License or the extent of the losses Day Pass is causing.

109. DISH also breached the implied covenant by knowingly profiting from Subscription Networks while avoiding payment to Plaintiffs, despite Plaintiffs' clear and repeated objections and notice that such conduct contravened the parties' agreement and reasonable expectations.

110. As a direct and proximate result of DISH's breaches, Plaintiffs have suffered monetary damages in an amount to be proven at trial, but which greatly exceeds \$75,000.

⁴⁰ See Decl. of Andrew Yeater ¶ 21 (Dkts. 52, 60) (DISH expert: [REDACTED]

”).

⁴¹ *Id.* ¶ 19.

COUNT III: BREACH OF CONTRACT (FAILURE TO PAY)

Brought By All Plaintiffs Against DISH

111. Plaintiffs herein by this reference each and every allegation contained in paragraphs 1 through 110 above.

112. OTT Licenser and DISH are parties to the OTT License, which is a binding contract. DBS Licenser and DISH are parties to the DBS License, which is a binding contract. RCA Licenser and DISH are parties to the RCA License, which is a binding contract.

113. OTT Licenser has performed all material obligations imposed by the OTT License. DBS Licenser has performed all material obligations imposed by the DBS License. RCA Licenser has performed all material obligations imposed by the RCA License.

114. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

115. [REDACTED]

[REDACTED]

[REDACTED]

116. As a direct and proximate result of DISH's breach, Plaintiffs have suffered monetary damages in an amount to be proven at trial, but which greatly exceeds \$75,000, including but not limited to damages associated with more than [REDACTED] in unpaid interest, damages that are continuing to accrue.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for a judgment in its favor and against DISH as follows:

- A. That DISH is in breach of the express terms of the OTT License, the DBS License, and the RCA License;
- B. That DISH is in breach of the implied covenant of good faith and fair dealing implied in the OTT License's terms;
- C. An injunction permanently enjoining DISH, its employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and assigns, and all of those in active concert and participation with any of the foregoing, from:
 - i. Distributing, marketing, advertising, promoting, displaying, performing, selling, transmitting, or authorizing any third party to distribute, market, advertise, promote, display, perform, sell, or transmit the Subscription Networks in any manner other than as a monthly subscription in accordance with the OTT License, specifically including via DISH's Day Pass, Weekend Pass, and Week Pass services; and
 - ii. Aiding, assisting, or abetting any other individual or entity in doing any such act.
- D. Damages in an amount to be proven at trial, but which greatly exceeds \$75,000.
- E. Any other and further relief as the Court deems just and proper.

JURY TRIAL DEMAND

Plaintiffs demand a trial by jury of all issues so triable in this case.

Dated: December 19, 2025

Respectfully Submitted,

O'MELVENY & MYERS LLP

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EXHIBIT A

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EXHIBIT B

Filed Under Seal

Confidential

EXHIBIT C

Filed Under Seal

Confidential

EXHIBIT D

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Sling TV Launches Industry-First \$4.99 Day Pass Redefining How Viewers Watch Live TV

- *New Sling TV passes offer instant, contract-free access to live sports, tv and entertainment for a day, weekend or week*

ENGLEWOOD, Colo., Aug. 12, 2025 /PRNewswire/ -- Sling TV, the most flexible live streaming service, is flipping the script on traditional streaming bundles with the launch of the first of its kind, new \$4.99 Day Pass, \$9.99 Weekend Pass and \$14.99 Week Pass. Sling TV shook up how we watch TV in 2015. Now it's breaking the mold again, just in time for football season with fresh, flexible ways to tune in, giving customers even more control over how they watch television.

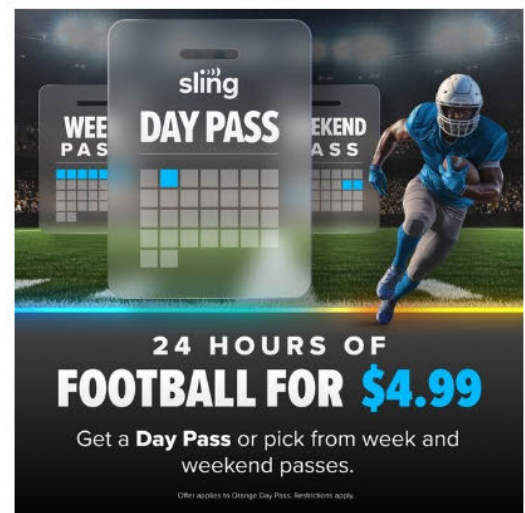
Passes are the latest move in Sling's mission to challenge industry norms by creating flexible, fan-first streaming solutions at a time when consumers are demanding more control and less cost. This industry-first product gives viewers instant, 24-hour access to live TV, sports and entertainment without a long-term commitment.

"This launch is about putting control back in the hands of the fans, whether it's tuning in for college football, professional sports, award shows, or a spontaneous movie night, all without having to sign a long-term, binding contract," said Seth Van Sickle, Senior Vice President, Product and Operations, Sling TV. "With college football just around the corner, our new Day Pass offering is all consumers need to win on game day, for just \$4.99."

New Offerings: Built for Real-Life Moments

To give football fans the ultimate flexibility, Sling TV has launched its new passes, short-term streaming options built for real-life viewing habits. Whether you're catching a single Saturday or Sunday showdown, settling in for a weekend of back-to-back games, or need a full week of access during playoffs or a school break, these passes make it easy. Get instant access to live football, entertainment, family friendly shows and news—no contracts, no long-term bills, just the action you want, when you want it.

- **Day Pass (\$4.99):** Instant 24-hour access. Perfect for a big game, an awards show, or an impromptu movie night.
- **Weekend Pass (\$9.99):** Access from Friday to Sunday. Ideal for a weekend of games, a movie marathon, or catching up on a show.
- **Week Pass (\$14.99):** 7-day access. Great for a week-long tournament, watching a new series, or keeping the family entertained on break.



Along with the launch of Day Pass, subscribers can also add Sling Extras, add-on channel packages. These add-ons offer a way to customize your channel lineup by category. Current Sling Extra packages include, Sports Extra, News Extra, Entertainment Extra, Hollywood Extra, Lifestyle Extra, Heartland Extra and Kids Extra. Fans can add Sling Extras to their passes for \$1 for Day Pass, \$2 for Weekend Pass and \$3 for Week Pass.

Day Pass, Weekend Pass and Week Pass include live and on-demand access to popular networks on Sling Orange like ESPN, ESPN2, ESPN3, TNT, A&E, TBS, Disney Channel, Comedy Central, History Channel, CNN and more.

"Built for the way people actually watch TV today, our new passes put viewers in control," said Van Sickle. "For just \$4.99, fans can dive into live sports, trending shows, or special events with no strings attached. It's instant access, ultimate flexibility and an unbeatable value."

For more information about Sling TV and the new passes, visit [Sling.com](https://www.sling.com).

About Sling TV

Sling TV is an Emmy® Award-winning live streaming TV service that provides more than 700 channels from today's most popular networks across its general market, Latino and international services. It is available on all major streaming devices, smart televisions, tablets, game consoles, computers and smartphones. Sling TV offers two general market streaming services, Sling Orange and Sling Blue, that collectively feature content from Disney/ESPN, FOX, NBC, AMC, A&E, AXS, Discovery, Scripps, Turner, Viacom, NBA TV, NFL Network, NHL Network, GSN, Hallmark, SHOWTIME, STARZ and MGM+. Sling TV offers customers access to free content via Sling Freestream, à la carte channels and services, plus Pay-Per-View events and movies on-demand. Sling TV provides a suite of stand-alone and add-on Spanish-language services and packages tailored to English-dominant, bilingual and Spanish-dominant U.S. households. Sling TV is the leading U.S. provider of foreign-language programming, with more than 400 channels in 27 languages. Visit [sling.com](https://www.sling.com) for more information. Sling TV L.L.C. is an indirect wholly-owned subsidiary of EchoStar Corporation (NASDAQ: SATS).

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New Offerings. Built for Real-Life Moments

To give football fans the ultimate flexibility, Sling TV has launched its new passes, short-term streaming options built for real-life viewing habits. Whether you're catching a single Saturday or Sunday showdown, settling in for a weekend of back-to-back games, or need a full week of access during playoffs or a school break, these passes make it easy. Get instant access to live football, entertainment, family friendly shows and news—no contracts, no long-term bills, just the action you want, when you want it.

- Day Pass (\$4.99): Instant 24-hour access. Perfect for a big game, an awards show, or an impromptu movie night.
- Weekend Pass (\$9.99): Access from Friday to Sunday. Ideal for a weekend of games, a movie marathon, or catching up on a show.
- Week Pass (\$14.99): 7-day access. Great for a week-long tournament, watching a new series, or keeping the family entertained on break.



Along with the launch of Day Pass, subscribers can also add Sling Extras, add-on channel packages. These add-ons offer a way to customize your channel lineup by category. Current Sling Extra packages include, Sports Extra, News Extra, Entertainment Extra, Hollywood Extra, Lifestyle Extra, Heartland Extra and Kids Extra. Fans can add Sling Extras to their passes for \$1 for Day Pass, \$2 for Weekend Pass and \$3 for Week Pass.

Day Pass, Weekend Pass and Week Pass include live and on-demand access to popular networks on Sling Orange like ESPN, ESPN2, ESPN3, TNT, A&E, TBS, Disney Channel, Comedy Central, History Channel, CNN and more.

"Built for the way people actually watch TV today, our new passes put viewers in control," said Van Sickle. "For just \$4.99, fans can dive into live sports, trending shows, or special events with no strings attached. It's instant access, ultimate flexibility and an unbeatable value."

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EXHIBIT E

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Day Pass by Sling TV—as low as \$4.99

Get 24 hours of access to ESPN, TNT & more with no subscription

[See all plans](#)

Get Day Pass

What is the Day Pass by Sling?

Day Pass grants you instant, 24-hour access to 34 popular channels, including ESPN, TNT, CNN, AMC, and more. At the end of your 24-hour pass, you can continue watching hundreds of channels included with Sling Freestream, or add another Day, Week, or Weekend Pass.

We have your favorite channels

[See all channels](#)

Watch today with your Day Pass

[See all games](#)

Today • 9:38 PM EDT



Today • 9:40 PM EDT



Today • 2:10 PM EDT



Today • 2:20 PM EDT



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Cincinnati Reds



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San Francisco Giants



San Diego Padres

Today • 2:10 PM EDT



Texas Rangers



Kansas City Royals

Today • 2:20 PM EDT



Milwaukee Brewers



Chicago Cubs

[Get your Day Pass](#)

Benefits of Sling



Watch on the Go

With Sling, you can watch on your favorite device so you'll never miss a moment of the action.



Sports Scores

Sports Scores allows you to track other live football games and easily switch between channels so you never miss a big play!



Watch & Win

With Sling Rewards, you could win up to \$10,000 in cash and prizes. With giveaways every single month, there's always a chance to win!



DVR

You get 50 hours of free cloud DVR, and if you upgrade to our Unlimited DVR, you can get added benefits like unlimited storage and Auto Record.

Trending



Sports



News



Entertainment



Premium



International



Deals

Watch on 20+ top devices

Apple TV

Apple iOS

Roku

Amazon Fire TV

Android TV

LG

SAMSUNG

VIZIO

See all our [supported devices](#)

See all our [supported devices](#)

Sling Day Pass Frequently Asked Questions

We're here to help! Visit our [Help Center](#) if you have more questions.

▲ Is this really a one-time charge?

Yes! After you complete your order for the Day Pass, you will be billed a one-time charge of \$4.99 and your 24-hour access begins. When the time expires, you will not be charged again until the next time you order another Sling Day Pass or subscribe to the service.

▲ What happens after 24 hours?

Your access to the channels available in the Day Pass will end, but you can still access over 600 channels on Sling Freestream.

▲ Where can I use Sling Day Pass?

Sling works on streaming devices, smart TVs, mobile phones, computers, tablets, and more! You'll need a reliable internet connection of at least 3 Mbps.

▲ Is there a Sling free trial?

Although there's no free trial for Sling, a Day Pass is a great way to try out a Sling Orange subscription and decide if it's a good fit. Anyone can watch Sling Freestream for free, and access doesn't end after a few days like a free trial!

▲ When does my Day Pass access start?

Day Pass and Week Pass access begins as soon as you complete your purchase. Weekend Passes can be purchased during the previous week, and access will begin on Friday at 4am ET.

▲ Can I add extras with a pass?

Yes! If you buy a Day, Week, or Weekend Pass, you can add extras for the duration of your pass.

▲ How do I cancel my Day Pass?

Unfortunately, due to the limited duration of the Day Pass offer, there is no cancellation and all sales are final.

▲ Who can get a Day Pass?

Anyone with a Sling account can order a Day, Week, or Weekend Pass! However, if you are an active Sling Blue subscriber, you can't use a short-term pass at the same time. Try upgrading to [Sling Orange & Blue](#) instead!