



(DRAFT COPY - Not for submission)

# Renewal of License

File Number: | Submit Date: **05/28/2026** | Call Sign: **WABC-TV** | Facility ID: **1328** | FRN: **0030871354** | State: **New York** | City: **NEW YORK**  
Service: **DTV** | Purpose: **Renewal of License** | Status: **Saved** | Status Date: **05/05/2026** | Filing Status: **Active**

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## General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	Yes

## Fees, Waivers, and Exemptions

Section	Question	Response
Waivers	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	

**Applicant  
Information**

**Applicant Name, Type, and Contact Information**

Applicant	Address	Phone	Email	Applicant Type
<b>WABC Television (New York), LLC</b>	7 Hudson Square New York, NY 10013 United States	+1 (202) 222- 4747	eric.lieberman@disney. com	Limited Liability Company

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**Contact  
Representatives  
(4)**

Contact Name	Address	Phone	Email	Contact Type
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<b>Eric Lieberman</b> ABC, Inc.	1717 Desales Street NW Washington, DC 20036 United States	+1 (202) 222- 4747	eric.lieberman@disney.com	Legal Representative

**Renewal  
Certification**

Section	Question	Response
<b>Character Issues</b>	Licensee certifies that neither the licensee nor any party to the application has or has had any interest in, or connection with, any broadcast application in any proceeding where character issues were left unresolved, or were resolved adversely against the applicant or any party to the application;	Yes
	Licensee certifies that neither the licensee nor any party to the application has or has had any interest in, or connection with, any pending broadcast application in which character issues have been raised..	Yes
<b>Adverse Findings</b>	Licensee certifies that, with respect to the licensee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any laws related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	Yes
<b>FCC Violations during the Preceding License Term</b>	Licensee certifies that, with respect to the station(s) for which renewal is requested, there have been no violations by the licensee of the Communications Act of 1934, as amended, or the rules or regulations of the Commission during the preceding license term. If "No", the licensee must submit an explanatory exhibit providing complete descriptions of all violations.	Yes
<b>Ownership</b>	The licensee certifies that, with respect to the station(s) for which renewal is requested, it complied with 47 CFR Section 73.3555.	Yes
<b>Alien Ownership and Control</b>	Licensee certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	Yes
<b>Non-Discriminatory Advertising Sales Agreements</b>	Commercial licensee certifies that its advertising sales agreements do not discriminate on the basis of race or ethnicity and that all such agreements held by the licensee contain non-discrimination clauses. Noncommercial licensees should select "not applicable."	Yes

**DTV/Class A  
Certification**

<b>Section</b>	<b>Question</b>	<b>Response</b>
<b>Biennial Ownership Report</b>	Licensee certifies that the station's Biennial Ownership Report (FCC Form 323 or 323-E) has been filed with the Commission, as required by 47 CFR Section 73.3615.	Yes
<b>EEO Program</b>	The station's Broadcast EEO Program Report (Form 2100, Schedule 396), has been filed with the Commission as required by 47 CFR Section 73.2080(f)(1).	Yes <b>File Number:</b>
	The station has posted its most recent Broadcast EEO Public File Report on the station's website, as required by 47 CFR Section 73.2080(c)(6).	Yes
<b>Online Public Inspection File</b>	Licensee certifies that the documentation required by 47 CFR Sections 73.3526 or 73.3527, as applicable, has been uploaded to the station's public inspection file when required.	Yes
<b>Children's Programming Commercial Limitations</b>	For the period of time covered by this application, the licensee certifies that it has complied with the limits on commercial matter as set forth in 47 CFR Section 73.670 and the Commission's commercial limit policies related to host-selling and program-length commercials.	Yes
<b>Children's Television Programming Reports</b>	For the period of time covered by this application, the licensee certifies that it has filed with the Commission, and incorporates by reference, the Children's Television Programming Reports (FCC Form 2100, Schedule H) as described in 47 CFR Section 73.3526, containing all required information.	Yes
<b>Core Programming Processing Guidelines</b>	For the period of time covered by this application, the licensee certifies that the station has complied with the Core Programming criteria and Core Programming Processing Guidelines, as required by the Commission's rules that were in effect at the time the Core Program was aired.	Yes
<b>E/I Symbol</b>	The licensee certifies that, as required by 47 CFR Section 73.671(c)(5), it identifies each Core Program using the E/I symbol throughout the airing of each program.	Yes
<b>Notifying Publishers Of Program Guides</b>	The licensee certifies that it provides information identifying each Core Program aired on its station to publishers of program guides, as required by 47 CFR Section 73.673.	Yes
<b>Publicizing Children's Reports</b>	The licensee certifies that prior to January 21, 2020, it publicized the existence and location of the station's Children's Television Programming Reports (FCC Form 2100, Schedule H) as required by 47 CFR Section 73.3526 (e)(11)(iii).	Yes
<b>Continued Class A Eligibility</b>	Licensee certifies that its station does, and will continue to, broadcast: (a) a minimum of 18 hours per day; and (b) an average of at least 3 hours per week of programming each quarter produced within the market area served by the station, or by a group of commonly controlled low power or Class A stations whose predicted noise-limited contours are contiguous. See 47 CFR Section 73.6001.	
<b>Discontinued Operations</b>	Licensee certifies that during the preceding license term, the station has not been silent for any consecutive 12-month period.	Yes
<b>Silent Stations</b>	Licensee certifies that the station is currently on the air broadcasting programming intended to be received by the public.	Yes

<b>Environmental Effects</b>	Licensee certifies that the specified facility complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments.	Yes
<b>Adherence to Minimum Operating Schedule</b>	Licensee certifies that during the preceding license term the station has not been silent (or operating for less than its prescribed minimum operating hours) for any period of more than 30 days.	Yes
<b>Adherence to Operating Parameters</b>	Licensee certifies that during the preceding license term, the station has operated pursuant to authorized operating parameters, either pursuant to the terms of its license, special temporary authority, or as otherwise permitted under the Commission's rules.	Yes

**Other BroadCast  
Certifications**

Section	Question	Response
Other BroadCast Certifications	Does this application include one or more FM translator station(s) or TV translator station(s) or LPTV station(s), in addition to the station listed at the top of this section?	No

**FM Translator  
Certifications**

You have not selected any Other Broadcast Station.

**TV Translator/ LPTV Certifications**

You have not selected any Other Broadcast Certifications

**Certification**

Section	Question	Response
<p><b>General Certification Statements</b></p>	<p>The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).</p>	
	<p>The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002 (c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.</p>	
<p><b>Authorized Party to Sign</b></p>	<p><b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b></p> <p>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</p> <p>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</p>	
	<p>I certify that this application includes all required and relevant attachments.</p>	<p>Yes</p>
	<p>I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.</p>	<p><b>Eric Lieberman</b> Assistant Secretary</p>

**Attachments**

<b>File Name</b>	<b>Uploaded By</b>	<b>Attachment Type</b>	<b>Description</b>
<u>WABC-TV DTV Certification Exhibit.pdf</u>	Applicant	DTV/Class A Certifications	WABC-TV DTV Certification Exhibit
<u>WABC-TV Objection to Unlawful Early Renewal.pdf</u>	Applicant	All Purpose	WABC-TV Objection to Unlawful Early Renewal
<u>WABC-TV Public Interest Exhibit.pdf</u>	Applicant	All Purpose	WABC-TV Public Interest Exhibit

**Objection to Unlawful Early Renewal**

**I. INTRODUCTION**

WABC-TV (“WABC” or the “Station”) submits this license renewal application under protest in response to an unlawful, arbitrary, and unconstitutional Order issued on April 28, 2026, by the Media Bureau.<sup>1</sup> The Commission had not demanded early renewal in over five decades. And it has never before demanded simultaneous license renewal applications from a group of stations commonly owned with a network as it has here.<sup>2</sup> The Order has *no* legitimate purpose. There is no information that the application will reveal that the Commission could not obtain through other means. The Order is inconsistent with a legitimate exercise of investigative authority and is plainly incompatible with the First Amendment. Worse, the Order opens the door to an assault on the Station’s license, while the Commission searches for a legal pretext to achieve its desired goal. This effort to suppress speech under the guise of bureaucratic process must not prevail. WABC files this application without waiving any rights, and calls on the Commission to rescind the Order.

***The Order is procedurally and legally indefensible.*** The Order is not a measured or legitimate exercise of regulatory discretion. It is an unprecedented attack on a single company’s entire portfolio of broadcast licenses. The Commission has never attempted an action akin to the

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<sup>1</sup> *The Walt Disney Company, American Broadcasting Company et. al.*, Order, DA 26-416, ¶ 3 (MB rel. Apr. 28, 2026) (“Order”) (demanding the simultaneous filing of license renewal applications for all eight ABC owned television stations: KABC-TV, Los Angeles, California (Facility ID 282), KFSN-TV, Fresno, California (Facility ID 8620), KGO-TV, San Francisco, California (Facility ID 34470); KTRK-TV, Houston, Texas (Facility ID 35675), WABC-TV, New York, New York (Facility ID 1328), WLS-TV, Chicago, Illinois (Facility ID 73226), WPVI-TV, Philadelphia, Pennsylvania (Facility ID 8616), and WTVD, Durham, North Carolina (Facility ID 8617)).

<sup>2</sup> Under the Commission’s customary approach, television station license renewal applications are filed in regional groups spaced out every two months over nearly three years. 47 C.F.R. § 73.1020(a).

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

Order,<sup>3</sup> and it finds no cognizable support in the structure or purpose of the Communications Act of 1934, as amended (the “Act”).

The Commission has elsewhere committed to identifying and eliminating obsolete or unnecessary regulations.<sup>4</sup> Here, it does the opposite—excavating an arcane procedural relic, dormant for decades, to justify its actions. The “call-up” provision that it now invokes was designed for a regulatory world that no longer exists: an era of shorter license terms, comparative hearings weighing applicants’ merits, and exhaustive renewal showings on program content. That world is gone. The Commission once acknowledged as much, recognizing that it “has always been circumspect in its discretionary use of the callup procedure.”<sup>5</sup> The Bureau’s one-sentence justification for the Order suggests no such circumspection here—only a predetermined destination and a forgotten rule pressed into service to reach it.

That one-sentence justification stated in the Order is this: that accelerating renewal will aid the Commission in “investigating Disney’s ABC stations for possible violations of . . . the agency’s prohibition on unlawful discrimination.”<sup>6</sup> That rationale does not survive scrutiny. The path for investigating any such potential violations is obviously through the investigation of that very subject which the Commission began in June 2025 and has been ongoing since then.

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<sup>3</sup> The first early call-up in over fifty years was issued just 24 hours before the Order at issue here. *See Bridge News, LLC*, Order, DA-26-413 (MB rel. Apr. 27, 2026); *see also* Kelcee Griffis & Saijel Kishan, *ABC License Renewal Call Surprised FCC Staff and Shattered Norms*, Bloomberg (Apr. 29, 2026) (“Bloomberg April 29 article”), <https://news.bgov.com/bloomberg-government-news/abc-license-renewal-call-surprised-fcc-staff-and-shattered-norms> (“[The Bridge News] action . . . creates plausible deniability that the license renewals are only targeting Disney”). That action did not involve stations under common ownership with a broadcast network and involved clear and egregious misconduct by the licensee.

<sup>4</sup> *See In re: Delete, Delete, Delete*, Public Notice, DA 25-219 (rel. Mar. 12, 2025).

<sup>5</sup> *Robert E. Thomas & Ferris A. Maloof, D.B.A. Click Broad. Co., Blue Ridge, Ga.*, 17 F.C.C.2d 375, 380 (1969) (citing *William L. Ross*, FCC 63-366, 25 Rad. Reg. 360 (1963)).

<sup>6</sup> Order ¶ 1.

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

Before the Order issued, the Enforcement Bureau had already served a string of inquiries, and the Company has produced over 11,000 pages of responsive documents on a mutually agreed schedule. The Enforcement Bureau has never suggested its existing tools are insufficient for whatever it is investigating, and has elsewhere touted those same tools as providing “broad statutory authority to investigate any question that may arise under any of the provisions of the Act.”<sup>7</sup>

It is not credible to now declare the early renewal process “essential” to the same investigation,<sup>8</sup> particularly when after releasing the Order, the Enforcement Bureau issued yet another request for information to which the Company is required to respond less than 24 hours after the instant filing. The early renewal procedure is not an investigative tool and adds nothing to the Commission’s investigative capacity.

The Order purports to investigate “possible violations” of the “prohibition on unlawful discrimination,” but never identifies what violation it had in mind. The Commission has never articulated—let alone adopted through notice-and-comment rulemaking—any new compliance standard under its broadcast Equal Employment Opportunity (“EEO”) requirements, which focus on non-discrimination and providing access to opportunities for those from underrepresented groups.<sup>9</sup> It has never stated whether or when diversity, equity, and inclusion (“DEI”) practices violate a Commission rule or warrant ordinary punishment, much less the extraordinary

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<sup>7</sup> *Resp-Org.com*, Letter, 26 FCC 8498, 8498-99 (EB 2011) (cleaned up); *World Communications Satellite Systems, Inc.*, Notice of Apparent Liability for Forfeiture, 18 FCC Rcd 18545, 18547 ¶ 6 (EB 2003) (“Congress afforded us broad authority to investigate regulated entities.”).

<sup>8</sup> Order ¶ 2.

<sup>9</sup> 47 C.F.R. § 73.2080(c).

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

punishment of a demand for early license renewal. A licensee cannot comply with a standard that is announced nowhere, defined nowhere, and exists nowhere.

In truth, the Station has acted consistently with the Commission’s EEO requirements. Yet it is now being punished under an interpretation the Commission invented but has never promulgated or even fully articulated—one that turns the longstanding EEO rules on their head. A licensee cannot be held to a standard it was never given notice of—that is not enforcement, it is arbitrary, capricious, and a denial of due process. And even if the Commission were to eventually declare that the Station committed an EEO rule violation—a finding that the Station in no way concedes—jeopardizing the Station’s license would be grossly disproportionate to any such violation, especially one premised on an unarticulated standard.

***The Order violates the First Amendment.*** Its true purpose and inescapable effect are to suppress speech—to ramp up toward possible license revocation and cause the Station and others to think twice before they say something the government might dislike. “[T]he First Amendment prohibits government officials from relying on the ‘threat of invoking legal sanctions and other means of coercion . . . to achieve the suppression’ of disfavored speech.”<sup>10</sup> That is what is happening here.

“If a coercive campaign is carried out with enough sophistication,” its true purpose can be difficult to prove.<sup>11</sup> This one, however, leaves little to the imagination. The record of public statements by senior government officials targeting ABC and its parent company for their coverage and programming choices is extensive and explicit. The FCC Chairman himself has

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<sup>10</sup> *Nat’l Rifle Ass’n of Am. v. Vullo*, 602 U.S. 175, 189 (2024) (quoting *Bantam Books, Inc. v. Sullivan*, 372 U.S. 58, 67 (1963)).

<sup>11</sup> *Murthy v. Missouri*, 603 U.S. 43, 80 (2024) (Alito, J., dissenting).

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

threatened broadcasters that “[w]e can do this the easy way or the hard way,” and he has warned that stations could lose their licenses if they do not “correct course.”<sup>12</sup>

*The Order harms the public.* By threatening WABC, the Order threatens harm to the community the Station serves.<sup>13</sup> By the Commission’s own standards, the licensee is not only in good standing but exceptional standing, with not a single enforcement violation during the license term under review. Its record of compliance makes the Order’s threat to the Station’s license all the more striking and all the more revealing of its true purpose. For decades, the central mission of WABC has been to serve its viewers by providing daily news coverage, public affairs, and other programming of interest to the audience in the greater New York area, and other extensive community engagement to meet the needs and interests of its local community. The Station has invested deeply in its community through charitable partnerships, educational outreach, consumer advocacy, and the employment of hundreds of local community members. Although public interest showings are not submitted in license renewal applications in the normal course, WABC feels compelled to do so here, given the extraordinary nature of the Order—and because its viewers and the general public deserve to know what is at stake.

The harm to the Station’s community is particularly acute—but the chilling effect of the Order extends far beyond any particular market or broadcaster. The FCC Chairman has made his

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<sup>12</sup> Chris Megerian, *Kimmel’s suspension is the latest display of Trump’s growing power over the US media landscape*, Associated Press (Sept. 18, 2025), <https://apnews.com/article/trump-kimmel-abc-suspension-media-pressure-kirk-eb4f0fcd38499e37c94613fe8bd8e9c6> (quoting Brendan Carr, Chairman, FCC); Maria Paula Mijares Torres, *FCC’s Carr Threatens TV broadcast licenses over news coverage*, Fortune (Mar. 14, 2026), <https://fortune.com/2026/03/14/fcc-brendan-carr-tv-broadcast-licenses-news-coverage-us-war-iran-trump/> (discussing social media post); *see also* President Donald J. Trump (@realDonaldTrump), Truth Social post (Aug. 24, 2025), <https://truthsocial.com/@realDonaldTrump/posts/115087160158530143> (ABC should “lose their Licenses for their unfair coverage of Republicans and/or Conservatives.”).

<sup>13</sup> *See generally* WABC Public Interest Statement.

broader message explicit: “If you didn’t take us seriously, now you should.”<sup>14</sup> Simultaneously forcing every station in a media company’s portfolio to file premature license renewal applications is not a regulatory tool. It is an extraordinary demonstration of power and coercion directed at disfavored editorial voices, which sends a clear warning to every broadcaster in America.<sup>15</sup> This is a threat to the First Amendment that this Commission and this proceeding must not be permitted to normalize.

## **II. THE ORDER IS LEGALLY AND PROCEDURALLY INDEFENSIBLE.**

The Media Bureau has no legal basis for this Order. The Act dictates that the license renewal evaluation must occur at the end of the license term—not whenever the Commission decides that a broadcaster’s speech warrants scrutiny. The ostensible explanation the Order provides violates the Commission’s duty to provide fair notice and explain itself through lawful process. Strip away the procedural veneer and what remains is a governmental agency using the license process renewal to punish a broadcaster for its editorial choices.

### **A. The Act Does Not Authorize the Order.**

The Order violates the plain language and clear purpose of the Act. Section 309(k) of the Act mandates that the Commission evaluate a renewal application based on the licensee’s performance “*during the preceding term of its license.*”<sup>16</sup> The Commission renewed WABC’s

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<sup>14</sup> Anna Nicolaou, ‘*The US needed a shock to the system*’: Brendan Carr, US media watchdog, Financial Times (May 15, 2026), <https://www.ft.com/content/d62d3361-a337-4e2c-ab6b-afb791ba566f?syn-25a6b1a6=1>.

<sup>15</sup> *Illinois Citizens Comm. for Broad. v. FCC*, 515 F.2d 397, 407 (D.C. Cir. 1975) (Bazelon, C.J. statement on denial of rehearing en banc) (“The main threat is, of course, that the government can put a licensee out of business but I suppose that the more pervasive threat lies in the sub rosa bureaucratic hassling which the Commission can impose on the licensee, i.e. responding to FCC inquiries, forcing expensive consultation with counsel, immense record-keeping and the various attendant inconveniences.”). Both threats are present here.

<sup>16</sup> 47 U.S.C. § 309(k)(1) (emphasis added).

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

current license on August 28, 2024,<sup>17</sup> and that term extends until June 1, 2031—more than four years from now.<sup>18</sup> There is no complete term to review. There is no record ripe for adjudication. The Act’s structure—including the prohibition on granting a renewal more than thirty days before license expiration<sup>19</sup>—reflects a deliberate congressional design: The renewal process must operate at the end of a license term. By demanding a premature application, the Order exceeds the Commission’s authority by deviating from the renewal process Congress designed, and it deprives the Station of the opportunity to build the full record of service the Act commands.

Even if the call-up rule on which the Order relies was once lawful, this Order’s application of that rule has lost any tether to the Act. The Commission “literally has no power to act” absent a statutory delegation of authority.<sup>20</sup> Because Congress dictated that the Commission must evaluate renewal applications based on the full preceding term, the Order’s application of the rule is unlawful.

The Commission’s violations of the Act do not end there. Nearly seventy years ago, the Commission acknowledged that station’s license term “will in no way be affected” by an order calling for early filing of a renewal application.<sup>21</sup> But without any notice to the Station, the

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<sup>17</sup> See WABC, Renewal of License, LMS File No. 0000208980, (filed Feb. 1, 2023) (“WABC Renewal Application”).

<sup>18</sup> This renewal application covers the period since grant of the Station’s last license renewal application on August 28, 2024. See WABC Renewal Application. Section 503(b)(6) of the Act, 47 U.S.C. § 503(b)(6), provides that the “date of commencement of the current term of such license” means the date of commencement of the last term of license for which the licensee has been granted a license by the Commission. See, e.g., *Furniture City Broadcasting Corporation*, Memorandum Opinion and Order, 11 FCC Rcd 13678, 13680 ¶ 6 n.3 (1996); *Mapleton License of San Luis Obispo, LLC*, Forfeiture Order, 27 FCC Rcd 4099, 4101 n.15 (EB 2012).

<sup>19</sup> 47 U.S.C. § 307(d).

<sup>20</sup> *La. Pub. Serv. Comm’n v. FCC*, 476 U.S. 355, 374 (1986).

<sup>21</sup> *Application of Herbert P. Michels (WAUB), Auburn, N.Y.*, 44 F.C.C.2d, 1346, 1348 (1958).

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

Commission altered WABC’s license expiration date—and that of the other seven ABC owned stations—in its Licensing and Management System and Online Public Inspection File to May 28, 2026, the date the instant application is due. This unilateral action, if it were taken literally, would violate both Commission precedent and the underlying requirements of Section 316 of the Act.<sup>22</sup> The Media Bureau informed the Station that this was merely a technical maneuver to enable the Commission’s systems to process the early filing of the license renewal application, but of course the need for jerry-rigged database workarounds illustrates that the Order is inconsistent with the law as the Commission has long applied it.

**B. The Order is Arbitrary and Capricious.**

Independent of its statutory defects, the Order fails under the Administrative Procedure Act (“APA”). By tying the early call-up to the Commission’s so-called “unlawful discrimination” investigation, the Order implies that certain types of employment policies and programming—presumably different from the requisite EEO demonstration of “how the station achieved broad and inclusive outreach”<sup>23</sup>—will factor into the renewal adjudication. That would constitute a new interpretive standard for measuring public interest compliance, adopted without notice or an opportunity for comment.

The Commission has never said what this new standard is. The same standards have governed the renewal process for decades—WABC has operated under them without incident,

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<sup>22</sup> Section 316 provides that the Commission may not modify a station license without affording the licensee the process and procedural rights provided by the Act. 47 U.S.C. § 316. Moreover, modifying a station license to eliminate the balance of its license term would constitute a revocation of the license, which would be subject to the process and procedures provided in Section 312 of the Act. *Id.* § 312.

<sup>23</sup> See FCC, *Instructions – Form 2100, Schedule 396 – Broadcast Equal Employment Opportunity Program Report*, at 4 (Feb. 2019), <https://www.fcc.gov/sites/default/files/lms-396-eeo-instructions.pdf>; see also 47 C.F.R. § 73.2080(c); WABC EEO Narrative Statement.

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

and the Commission has never suggested they were insufficient or that something more was required. WABC has no fair notice of what conduct the Commission now expects, what prior conduct it deems deficient, or how the Commission will execute on its apparent plan to begin weighing DEI practices in the renewal process.<sup>24</sup> Punishing a licensee without fair notice of what the agency requires—under a standard that did not exist until the Commission decided to apply it—violates both the APA and the Due Process Clause of the Constitution.<sup>25</sup>

The retroactivity problem is equally serious. Neither the Act nor the Commission’s rules suggest that DEI practices are relevant to renewal evaluation, let alone that they could trigger an extraordinary, accelerated renewal proceeding years before the ordinary renewal cycle. The Station has no time machine to conform past conduct to standards the Commission still has failed to define. Any attempt to apply new and undefined standards to conduct predating their articulation—in a proceeding itself accelerated years ahead of the ordinary renewal schedule—is precisely the retroactive application of novel requirements the Supreme Court has repeatedly condemned.<sup>26</sup>

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<sup>24</sup> The current Commission has repeatedly extracted commitments concerning DEI practices from transaction applicants. *See, e.g.*, Letter from Stephanie Kyoko McKinnon, General Counsel and Co-President of Business Operations, Skydance Media, to Brendan Carr, Chairman, FCC, MB Docket No. 24-275 (July 22, 2025), <https://www.fcc.gov/ecfs/document/1072299913934/1>. These private commitments, made in the context of specific transactions, do not and cannot legally serve as sufficient notice to licensees of a change in the Commission’s EEO rules or its license renewal requirements.

<sup>25</sup> *See e.g., FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253-54 (2012) (“A conviction or punishment fails to comply with due process if the statute or regulation under which it is obtained ‘fails to provide a person of ordinary intelligence fair notice of what is prohibited, or is so standardless that it authorizes or encourages seriously discriminatory enforcement.’”) (quoting *United States v. Williams*, 553 U.S. 285, 306 (2008)); *see also Trinity Broad. of Fla., Inc. v. FCC*, 211 F.3d 618, 628 (D.C. Cir. 2000) (requiring “ascertainable certainty” as to “the standards with which the agency expects parties to conform”) (quoting *Gen. Elec. Co. v. EPA*, 53 F.3d 1324, 1329 (D.C. Cir. 1995)).

<sup>26</sup> *Bowen v. Georgetown Univ. Hosp.*, 488 U.S. 204, 208 (1988) (discussing longstanding Supreme Court precedent holding that “congressional enactments and administrative rules will not be construed to have retroactive effect unless their language requires this result”); *Landgraf v. USI Film Prods.*, 511 U.S. 244, 265 (1994) (finding that it is “deeply rooted” in the Supreme Court’s jurisprudence that “elementary

The APA further requires an agency to acknowledge and provide reasoned justification for departing from its prior policies and precedents.<sup>27</sup> The Order departs from decades of consistent practice without a single word of explanation for why this case is different. That silence is not a valid exercise of regulatory discretion. It is the hallmark of arbitrary and capricious agency action.<sup>28</sup>

**C. This Proceeding Does Not Accomplish Any Lawful Goal.**

Contrary to the Media Bureau’s conclusory assertion in the Order, this early license renewal application is not “essential” for the conduct of any Commission investigation.<sup>29</sup> That assertion is baseless as a legal matter, factually unsupported, and contradicted by the Commission’s own conduct in its DEI-related investigation. The Order specifically references the Commission’s ongoing investigation into the Company’s alleged “unlawful discrimination.”<sup>30</sup> As the Commission frequently emphasizes, however, it has ample tools to conduct an investigation, including enforcement authority for failure to fully comply with the legal obligations of a letter of inquiry.<sup>31</sup> Thus, the Commission can obtain the information it requires without the “aid” of early renewal applications, and it is doing so.

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considerations of fairness dictate that individuals should have an opportunity to know what the law is and to conform their conduct accordingly”).

<sup>27</sup> See *Motor Vehicle Manufacturers Ass’n of the United States, Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 41 (1983); 5 U.S.C. § 706(2)(A).

<sup>28</sup> *FCC v. Fox Television Stations*, 556 U.S. 502, 515 (2009) (“[T]he requirement that an agency provide reasoned explanation for its action would ordinarily demand that it display awareness that it is changing position.”); *SEC v. Chenery Corp.*, 332 U.S. 194, 196 (“If the administrative action is to be tested by the basis upon which it purports to rest, that basis must be set forth with such clarity as to be understandable.”).

<sup>29</sup> Order ¶ 2.

<sup>30</sup> *Id.* ¶ 1.

<sup>31</sup> See 47 U.S.C. § 503(b)(1)(B); see also *Aura Holdings of Wisconsin, Inc.*, Notice of Apparent Liability for Forfeiture, 33 FCC Rcd 3688, 3696 ¶ 21, 3697 ¶ 23 (2018), *forfeiture order issued*, 34 FCC Rcd 2540

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

In accordance with the Commission’s asserted authority and standard enforcement tools, the investigation has been ongoing for nearly a year, and the Company has been fully engaged and cooperative throughout. The Company received a Letter of Inquiry from the Enforcement Bureau on June 5, 2025, and promptly negotiated with that Bureau an agreed scope and timetable for its responses consistent with standard practice.<sup>32</sup> Between July and September 2025, the Company produced over 6,200 pages of documents in response following the schedule and scope agreed to by the Enforcement Bureau. The Company did not hear from the Commission until five months later when the Enforcement Bureau issued an expansive Supplemental LOI on February 20, 2026.<sup>33</sup> The Company timely responded to the Supplemental LOI on April 21, 2026, again pursuant to the Bureau’s agreed upon timetable, producing a 38-page narrative response to the Commission’s 78 additional written requests and an additional 4,839 pages of documents.

Yet only seven days later, on April 28, the Commission issued the Order. Chairman Carr publicly suggested that the April 21, 2026, submission was somehow deficient and that those purported deficiencies justified the extraordinary step of accelerating the Stations’ renewal applications.<sup>34</sup> Prior to the issuance of the Order, the Enforcement Bureau staff had not

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(2019) (imposing a \$19,693 penalty for failure to respond to a letter of inquiry); *Conexions, LLC d/b/a Conexion Wireless*, Notice of Apparent Liability for Forfeiture and Order, 28 FCC Rcd 15318, 15325-26 ¶ 22 (2013) (proposing a \$300,000 forfeiture for failure to provide timely and complete responses to a letter of inquiry); *SBC Communications, Inc.*, Forfeiture Order, 17 FCC Rcd 7589, 7600 ¶ 28 (2002) (imposing \$100,000 penalty for failing to submit a sworn written response).

<sup>32</sup> Letter from Patrick Webre, Acting Chief, Enforcement Bureau, FCC, to Mr. Robert A. Iger, Chief Executive Officer, The Walt Disney Company (June 5, 2025).

<sup>33</sup> Letter from Patrick Webre, Acting Chief, Enforcement Bureau, FCC, to Mr. Robert A. Iger, Chief Executive Officer, The Walt Disney Company (Feb. 20, 2026) (“Supplemental LOI”).

<sup>34</sup> Brian Flood, *FCC boss Brendan Carr maintains early ABC license renewal is about DEI probe, not Jimmy Kimmel controversy*, Fox News (Apr. 30, 2026), <https://www.foxnews.com/media/fcc-boss-brendan-carr-maintains-early-abc-license-renewal-about-dei-probe-not-jimmy-kimmel-controversy>.

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

communicated any such deficiencies to the Company or otherwise engaged with the submission in any discernible way. It was only on May 15, 2026, two weeks *after* the issuance of the Order (and after Commissioner Gomez and the press had suggested that the Commission’s citation to the DEI investigation was pretextual), that Enforcement Bureau staff sent an email to the Company with an 11-page addendum detailing alleged deficiencies in the Company’s April 21 submission. If the Bureau remained fully capable of obtaining the information it sought through ordinary investigative tools as it did on May 15, 2026, the Commission cannot explain why an extraordinary acceleration of license renewals was needed. That is because the asserted deficiencies did not necessitate the April 28 Order; they simply supplied a pretext for it.

Furthermore, information solicited by the license renewal application is not “essential to the proper conduct of” the ongoing investigation.<sup>35</sup> In fact, it is irrelevant to that investigation. A simple review of the license renewal application form underscores that fact. While a license renewal application includes certifications related to Commission ownership rules, children’s programming reports, public file compliance, and various other matters, the application does not even request information about employment issues, apart from confirming that the licensee has filed the standard EEO public file reports and EEO Program Report (FCC Form 2100, Schedule 396). Even these EEO Program Reports will provide the Commission with no new insights, as the information required by these reports, including confirmation of the Station’s “broad and inclusive outreach,” is either already publicly available or available to the Commission through the investigatory process. License renewal proceedings exist to evaluate local public interest service—not to adjudicate employment practices or content policies that have their own distinct

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<sup>35</sup> *Cf.* 47 C.F.R. § 73.3539(c).

statutory and regulatory frameworks.<sup>36</sup> Thus, far from being “essential” to the investigation, the license renewal application information is irrelevant. The Order’s conflation of the investigatory and renewal processes undermines the integrity of both.

### **III. THE COMMISSION IS PUNISHING THE STATION FOR THE CONTENT OF ITS SPEECH IN VIOLATION OF THE FIRST AMENDMENT.**

The only plausible reason to issue the Order is to punish the Station for speech the government does not like. Commissioner Gomez recognized in her May 11, 2026 letter what the record makes plain: The Commission’s actions against Disney and ABC constitute “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.”<sup>37</sup> This is not a partisan point. Senator Ted Cruz called one of Chairman Carr’s threats to broadcasters “dangerous as hell” and warned that “[g]overnment officials threatening adverse consequences for disfavored content is an unconstitutional coercion that chills protected speech.”<sup>38</sup>

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<sup>36</sup> *Lutheran Church-Missouri Synod v. FCC*, 141 F.3d 344, 354 (D.C. Cir. 1998) (“[T]he FCC is not the Equal Employment Opportunity Commission . . . and a license renewal proceeding is not a Title VII suit.”).

<sup>37</sup> Letter from Anna M. Gomez, Commissioner, FCC, to Josh D’Amaro, Chief Executive Officer, The Walt Disney Company, at 1 (May 11, 2026) (“Commissioner Gomez Letter”), <https://docs.fcc.gov/public/attachments/DOC-421580A1.pdf>. Commissioner Gomez also described the FCC’s concurrent revival of a previously closed “news distortion” complaint and the institution of an “equal opportunities” investigation into ABC’s *The View* as additional elements of the same coordinated campaign. See *id.* at 3; see also David Shepardson, *FCC reinstates complaints over ABC presidential debate, Harris TV appearances*, Reuters (Jan. 23, 2025), <https://www.reuters.com/business/media-telecom/fcc-reinstates-complaints-over-abc-presidential-debate-harris-tv-appearances-2025-01-22/>.

<sup>38</sup> John Hendel & Gabby Miller, *Cruz threatens to disarm FCC over Jimmy Kimmel’s suspension*, Politico (Dec. 17, 2025), <https://www.politico.com/news/2025/12/17/cruz-presses-trumpian-regulator-to-stand-down-after-kimmel-threats-00695379>.

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

The timing of the Order makes the retaliatory purpose unmistakable. The Order suddenly emerged the day after public calls for punitive action in response to comments made during ABC Network programming.<sup>39</sup> The Order’s pretextual investigatory motivation is belied by the facts. The Company had produced nearly 5,000 pages of responsive documents to the Enforcement Bureau just seven days earlier.<sup>40</sup> Bureau staff had been in routine, cooperative contact with the Company and gave no indication whatsoever of any deficiency. The intent to pressure the Company to alter or withhold its speech is clear from the scope of the Order. Simultaneously requiring *all* television stations owned by a single and specific network to file premature license renewal applications is an unprecedented and uniquely targeted action—one with a national focus, rather than the local one dictated by the Act for review of local broadcast station licenses.<sup>41</sup> Consequently, the instant license renewal proceeding, rather than being a routine review of the Station’s service to its community as required by the Act, is the product of unconstitutional retaliation and coercion.

The Order ultimately threatens speech in three concentric ways, growing in scope and impact at each step. First, it imposes a direct cost on the Station in terms of time and resources to submit an early renewal application. As Commissioner Gomez stated in her letter, “the process is the punishment.”<sup>42</sup> Second, it is the beginning of a process that threatens the Station’s license and therefore the local news, emergency information, and community journalism that

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<sup>39</sup> See, e.g., Bloomberg April 29 article.

<sup>40</sup> It is not at all clear how the Commission completed its review of nearly 5000 pages in just seven days, especially given that it apparently took five months to complete its review of the original 6000 page submission.

<sup>41</sup> See 47 U.S.C. § 309(k). The plain language of Section 309(k) provides that the FCC shall grant a licensee’s renewal application if it meets the mandated standard “with respect to that station.”

<sup>42</sup> Commissioner Gomez Letter at 2.

millions of New Yorkers depend upon every day from WABC. Third, it serves as a signal to broadcasters that chills protected speech across the entire broadcast industry and potentially for all Americans.<sup>43</sup>

Under the First Amendment, government regulation based on the content of speech is subject to strict scrutiny, meaning it must further a compelling interest and be narrowly tailored to achieve that interest.<sup>44</sup> The Commission has not even attempted to articulate a specific policy that the Order advances, and the Commission's path thus far is consistent with aiming for maximum chilling effect rather than narrow tailoring.<sup>45</sup> Thus, the Order violates the First Amendment.<sup>46</sup>

#### **IV. THE ORDER HARMS THE STATION AND THE PUBLIC.**

##### **A. The Accelerated Process Is Prejudicial.**

As a result of the Media Bureau's demand for a greatly accelerated license renewal application, as well as the wholly inadequate time frame provided for filing the application, the overall record of the Station's service set forth in this renewal application cannot be expected to be as robust as it would have been under a customary renewal schedule. This is highly

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<sup>43</sup> *Illinois Citizens Comm. for Broad.*, 515 F.2d at 407 (Bazelon, C.J. statement on denial of rehearing en banc) (“For better or worse, a licensee confronted with the choice between an economic disadvantage and pleasing the government through curtailment of a constitutional right will generally choose curtailment.”).

<sup>44</sup> *Reed v. Town of Gilbert*, 576 U.S. 155, 163, 169-70 (2015); *see also Action for Children's Television v. FCC*, 58 F.3d 654, 660 (D.C. Cir. 1995) (en banc) (applying “strict scrutiny to [content-based] regulations . . . regardless of the medium affected by them”).

<sup>45</sup> The chilling effect on all licensees who observe these proceedings is itself a constitutionally cognizable harm. *See Sec'y of State of Md. v. Joseph H. Munson Co.*, 467 U.S. 947, 956-57 (1984).

<sup>46</sup> *See generally* Petition of KTRK Television, Inc. & American Broadcasting Companies for Declaratory Ruling, MB Docket No. 26-124, at 5 (May 7, 2026), <https://www.fcc.gov/ecfs/document/10522087167981/1> (“While the Supreme Court may once have upheld the FCC's distinct ‘personal attack’ and ‘political editorial’ regulations, the fundamental factual predicates of that decision no longer exist.” (citing *Red Lion Broad. Co. v. FCC*, 395 U.S. 367 (1969))).

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

prejudicial to the Station. In the normal course of predictably-scheduled licensing proceedings, a license renewal period covers the complete arc of a licensee's service to its community. The public is entitled to that full record. The Order forecloses it. As a result, the Order denies WABC the procedural protections afforded to every other broadcaster for a half-century.

Moreover, under the Commission's longstanding processes, licensees are on notice for years that a renewal application deadline is approaching. Typically, licensees take several months or more to collect and vet the necessary information. In this case, however, the Station was given 30 days. The result is that the accompanying application, while demonstrating a record of exceptional public service, is less comprehensive than it would have been under any normal process because the time allowed for compiling, reviewing, and presenting that record was woefully insufficient.

Subjecting all of the stations to this arduous process at once further deviates from the typical process and amplifies the burden. Under the standard schedule, the Company would never file more than three applications on the same date. The Order's unique demand to simultaneously produce eight renewal applications within 30 days is highly burdensome and prejudicial to the assembly of a comprehensive record for the Commission's review.

For these reasons, the Station, while acknowledging that it fully intended to comply, requested a 60-day extension of time, until July 28, 2026, to help ensure a more orderly and thorough diligence process. The Media Bureau summarily denied the request without explanation. The extraordinary circumstances surrounding the application, the lack of adequate notice, and the explicit refusal of customary preparation time raise significant APA and due process problems.

**B. The Playing Field is Tilted Toward One Outcome.**

The practical consequences of the Order compound its legal defects. Section 307(d) of the Act prohibits the Commission from granting a renewal more than thirty days before license expiration.<sup>47</sup> Thus, with years remaining on the Station’s license, this proceeding cannot conclude in the grant of a license renewal at any time during the current Administration. Any proceeding concluded during this Administration can *only* end in adversity. The alternative of leaving the proceeding open is hardly better. That leaves the “Sword of Damocles” of a burdensome hearing or even license revocation constantly hanging over the Station. This unique, ever-present threat itself poses significant harm to the Station.<sup>48</sup> In sum, there is no procedural path for this proceeding to terminate favorably for the Station, which demonstrates the unlawful Order’s punitive intent and the harms flowing directly from it.

**C. Americans Bear the Cost of This Order.**

The ultimate injury here is not to the Station or its parent company. It is to the public. When a broadcaster must weigh regulatory retaliation before making editorial decisions, the public loses access to journalism that is free from government influence. The Order—both on its own terms and as a signal to other broadcasters—advances exactly that result. A press that edits itself to avoid government displeasure is not a free press. The Commission should not be the instrument of that outcome.

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<sup>47</sup> 47 U.S.C. § 307(d).

<sup>48</sup> *First Choice Women’s Res. Centers, Inc. v. Davenport*, 146 S.Ct. 1114, 1127 (2026) (“[T]he value of a sword of Damocles is that it hangs—not that it drops.”) (quoting *Arnett v. Kennedy*, 416 U.S. 134, 231 (1974) (Marshall J., dissenting)).

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC (WABC-TV)**

The Company and the Station reserve all rights and arguments, and this filing and all material accompanying it are without prejudice to those rights and arguments and to the Station's right to supplement the record as the law and circumstances may require.

**WABC-TV PUBLIC INTEREST STATEMENT**

For decades, the central mission of WABC-TV (“WABC” or “ABC7”) has been to serve its viewers by providing daily news coverage, public affairs, and other programming of interest to the audience in the Connecticut-New Jersey-New York Tri-State area, and other extensive community engagement to meet the needs and interests of its local community. ABC continues its sustained investment in on-the-ground reporting at each of the ABC Owned TV stations, including WABC, providing critical information—from emergency weather alerts to breaking news to traffic updates—to local communities. This dedication is evident across the country at all ABC Owned TV stations. Each ABC Owned TV station broadcasts multiple hours of live local news as well as regular, long-form, locally produced public affairs programming each week, in addition to airing public service announcements (“PSAs”) throughout the day.

Viewers in the Tri-State area trust WABC: WABC has been the leader in local news and entertainment programming in the New York City area for more than 60 years. Producing between 48 to 51 hours of live, local news and weather each week (depending on the season), Channel 7 “Eyewitness News” is the most watched local news in New York and the United States. WABC also produces “Live with Kelly and Mark,” weekdays at 9:00 a.m., which airs in more than 200 markets across the country. Quality news and programming, cutting-edge technology, and ongoing community outreach are the hallmarks of excellence that have consistently kept WABC New York’s number 1 station and the most-watched television station in the nation for over twenty years.

Not only reporting the news, but directly helping WABC’s viewers, Eyewitness News marquee “7 On Your Side” stories have resulted in viewers recovering a total of \$2.7 million just since August 2024. A recent story shared how “7 On Your Side” helped recover backpay for a

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC**

special needs teacher who kept up her appointments with her students for months without a paycheck.<sup>1</sup> “7 On Your Side’s” reputation for getting results is well known in the community. Its stories often originate with viewers advising their friends and neighbors who are experiencing consumer problems to contact the station.<sup>2</sup>

The National Edward R. Murrow Award-winning “7 On Your Side Investigates” also dives deeper into stories to the benefit of the community.<sup>3</sup> Last year, reporter Dan Krauth not only helped a local resident get back the home she inherited after squatters moved in one night, but the reporting led to a prosecution and, ultimately, a law change. At the courthouse during a follow-up story, Queens District Attorney Melinda Katz told WABC cameras: “I thank the media for all the attention that they have given to this story and for being here today because I do think it is an important message to send.”<sup>4</sup>

WABC serves its local community by being present in its local community. The Station operates 15,000 square feet of production facilities out of an approximately 112,000 square foot space in 7 Hudson Square, located in lower Manhattan. In addition, WABC operates four remote news bureaus—in Hempstead, New York, Long Island City, New York, White Plains, New York, and Rutherford, New Jersey—enabling the Station to provide targeted localized coverage throughout the Tri-State area. WABC broadcasts its signal from a primary transmitter positioned

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<sup>1</sup> Nina Pineda, *Special needs teacher gets backpay with help from 7 On Your Side*, ABC7 (Apr. 16, 2026), <https://abc7ny.com/post/special-needs-teacher-bronx-gets-backpay-help-7-side-paychecks-stopped/18900387>.

<sup>2</sup> *See id.* (“No longer able to keep working for free, and about to be evicted, Pankin’s friend, Tony, took her in, and more importantly, gave her some soothing advice: call 7 On Your Side.”).

<sup>3</sup> *Edward R. Murrow Awards 2025 National Winners*, RTDNA, <https://www.rtdna.org/2025-national-edward-r-murrow-award-winners> (last visited May 27, 2026) (“*Edward R. Murrow Awards 2025 National Winners*”); *Investigation Squatters*, ABC7, <https://app.frame.io/presentations/801dadd-3349-46d1-b586-a5ec1f095f2b> (last visited May 27, 2026) (“*Investigation Squatters*”).

<sup>4</sup> *Investigation Squatters* at 7:15-7:23.

**FCC FORM 2100, SCHEDULE 303-S**  
**WABC TELEVISION (NEW YORK), LLC**

atop the Empire State Building, with an auxiliary transmission facility located in West Orange, New Jersey. Both WABC's General Manager and News Director live in the area and work from the Station's facilities, and WABC employs over 220 members of the community.

WABC's community-focused news reporting has won numerous awards over the years. In just the last two years, WABC won 36 local Emmy awards, including for "News Excellence" and "Overall Excellence."<sup>5</sup> Among the Emmy recipients was veteran Eyewitness News Reporter Stacey Sager, who won a trophy for her very personal special, "3 Decades, 3 Cancers," and has undoubtedly saved lives by sharing her screening and cancer treatment stories over three decades at WABC.<sup>6</sup> In addition, "Literacy for Life: A Protect Our Children Special" won a local Creative Arts Emmy for Education/Schools Long Form Content in 2025.<sup>7</sup> WABC also won a national 2025 Edward R. Murrow Award for its investigative reporting, adding to its total over the years, which also included regional Edward R. Murrow Awards in 2024 and 2025.<sup>8</sup>

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<sup>5</sup> 68<sup>TH</sup> NY EMMY® AWARDS GALA RECIPIENTS, New York Emmys (2025), <https://www.nyemmys.org/media/files/files/9ca82c9f/68th-ny-emmy-awards-gala-recipients-10-11-2025.pdf> ("2025 NY Emmys"); Press Release, The National Academy of Television Arts & Sciences – New York Chapter, The National Academy Of Television Arts & Sciences, New York Chapter Announces Results Of The 67th Annual New York Emmy® Awards (Oct. 26, 2024), <https://www.nyemmys.org/files/1617>.

<sup>6</sup> 2025 NY Emmys; Stacey Sager et al., *3 Decades, 3 Cancers: Reporter Stacey Sager's story of perseverance, sacrifice and survival*, ABC7 (Feb. 15, 2024), <https://abc7ny.com/post/cancer-breast-ovarian-stacey-sager/14403644>. Ms. Sager was previously honored with the first annual "Stacey Sager Courage Award" at the Long Island "Making Strides against Breast Cancer" kickoff breakfast on August 8, 2024, organized by the American Cancer Society.

<sup>7</sup> 68<sup>TH</sup> NY EMMY® AWARDS CREATIVE ARTS RECIPIENTS (2025), <https://www.nyemmys.org/media/files/files/d4036364/68th-ny-emmy-awards-creative-arts-recipients-10-11-2025.pdf>.

<sup>8</sup> See *Edward R. Murrow Awards 2025 National Winners* (award in Investigative Reporting for "Squatter Standoff: Eyewitness to Change"); *Edward R. Murrow Awards 2025 Regional Winners*, RTDNA, <https://www.rtdna.org/2025-regional-edward-r-murrow-award-winners> (last visited May 27, 2026) (awards including Overall Excellence); Press Release, RTDNA, RTDNA Announces 2024 Region 11 Edward R. Murrow Award Winners (May 28, 2024), <https://www.rtdna.org/news/rtdna-announces-2024-region-11-edward-r-murrow-award-winners> (award in News Series for "Crisis in the Mideast").

Peabody, the Silurians Press Club, and others have also recognized WABC for outstanding news reporting.<sup>9</sup>

The range of the Station's longstanding commitment to its local community is vast and constantly evolving to meet the needs of its viewers. Below are representative examples of WABC's local service and, more broadly, of ABC's long-term commitment as a community partner and public interest trustee of its station licenses. WABC provides critical news coverage, emergency information, and coverage of local events to its local community every day. And WABC's service goes beyond the studio, sidewalk reporter, and newscoper: headlining charitable activities, fundraising for causes of importance to the community, providing station access to the journalists of tomorrow, and more.

**I. WABC BREAKS LOCAL NEWS AND AIRS VITAL EMERGENCY INFORMATION**

Breaking news is one of WABC's core pillars, and WABC's news operations are the foundation of its commitment to keep viewers informed in a timely and accurate manner. WABC uses a multi-layered approach to be the first to break local news with expert reporters and cutting-edge technology. WABC provides accurate, minute-by-minute weather forecasts with life-saving information during emergencies that leverage state-of-the-art weather cameras, live reporting on site, and bold presentations incorporating advanced technologies such as

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<sup>9</sup> See, e.g., *WABC-TV*, Peabody Awards, <https://peabodyawards.com/broadcasters/wabc-tv> (last visited May 27, 2026); *2024 Excellence in Journalism*, The Silurians Press Club, <https://www.silurians.org/Silurians-Press-Club-2024-Excellence-in-Journalism-Awards> (last visited May 27, 2026) (award for Television Breaking News); *2025 Award Recipients – Excellence in Broadcasting*, New York State Broadcasters Association, <https://www.nysbroadcasters.org/2025-award-recipients> (last visited May 27, 2026) (recognizing WABC for Outstanding Spot News (Protests at Columbia University), Outstanding Series/Documentary (Squatter Standoff), and Outstanding Sportscast (Covering New York Sports)); *Announcing the 2025 Best in News Folio Award Winners*, Fair Media Council (2025), <https://www.fairmediacouncil.org/blog/blog/2025/07/02/announcing-2025-best-in-news-folio-award-winners>.

augmented reality and virtual reality. Viewers also rely on WABC for traffic awareness and traffic forecasts, such as which roads are most likely to flood or be obstructed, the worst spots for backups, road conditions and infrastructure, changing traffic trends, and construction project timelines. WABC's station is staffed 24 hours a day, and regularly scheduled news programs are broadcast live so that viewers can have access to the most up-to-date information.

During emergencies, such as extreme weather, fires, power failures, or civil disorders, the Station takes on added importance as a reliable source of information about road and school closures, airport closures, changes in city services, and other bulletins that enable viewers to obtain assistance and maximize their safety. WABC has long served as a vital resource on major weather events, offering important preparatory information, contemporaneous coverage, and follow-up on how the community is affected.<sup>10</sup> For example, WABC provided live full-day coverage of the February 23, 2026 blizzard reporting from Belmar, New Jersey; Rockville Centre, Long Island; all five boroughs of New York City; Paramus, New Jersey; South Amboy, New Jersey; Nyack, New York; Freehold, New Jersey; and White Plains, New York. WABC also covered the blizzard clean up with live, full-day coverage reporting from cities and towns across New York City, Westchester County, Rockland County, and Northern New Jersey. Similarly, WABC broke into regular programming to cover the New Jersey Transit strike of 2025 and the Long Island Rail Road strike of 2026 with special coverage of vital news

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<sup>10</sup> See, e.g., *MTA service changes and system-wide preparations announced ahead of the blizzard*, ABC7, <https://abc7ny.com/post/blizzard-warning-nyc-mta-subway-bus-train-changes-system-wide-preparations-announced/18631317> (last visited May 27, 2026); *The Blizzard of 2026 in New York City, Tri-State area*, ABC7 (Feb. 25, 2026), <https://abc7ny.com/live-updates/how-snow-nyc-weekend-winter-coastal-storm-weather-forecast-nj-ny-ct-tri-state-area/18626210>; Phil Taitt, *Snow melting 'hot tubs' deployed on Staten Island and across all five boroughs*, ABC7 (Feb. 26, 2026), <https://abc7ny.com/post/2026-blizzard-snow-melting-hot-tubs-deployed-staten-island-5-boroughs/18652738>; *5 snow shoveling-related deaths on Long Island after blizzard, officials say*, ABC7 (Feb. 25, 2026), <https://abc7ny.com/post/blizzard-snow-shoveling-safety-5-deaths-long-island-appear-heart-attacks-clearing-away/18648975>.

conferences and major updates on the negotiations. In both instances, WABC started the local morning newscast coverage 30 minutes early to provide important travel information to viewers who were trying to plan their morning commute.

WABC leverages ABC Network resources to enhance the information it provides to viewers. For example, ABC, WABC, and more than 60 other affiliate stations across the country partnered on a special report on the opioid crisis, covering the epidemic's impact in their communities and nationally.<sup>11</sup> ABC News experts regularly join newscasts to provide their insight to local viewers. For example, ABC News' Dr. Darien Sutton shares medical headlines and answers questions on Eyewitness News.<sup>12</sup> National newscasts and programs such as "ABC World News Tonight" and "Good Morning America" regularly "throw" to WABC stations during weather and other events, and vice versa, to ensure viewers understand the international and national news happening in their backyard.

## **II. HOURS OF LOCALLY FOCUSED PROGRAMMING EACH WEEK KEEPS THE NEW YORK METROPOLITAN AREA INFORMED**

Each ABC Owned TV station airs video programming produced in and centered on their local community through a combination of daily news, weekly public affairs programming, longer-form reports and series, and PSAs. As an initial matter, WABC airs multiple hours of local news early in the morning, during the afternoon, and late into the evening that cover breaking local, national, and international news, sports, weather, consumer and medical reports,

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<sup>11</sup> Pierre Thomas et al., *One Nation, Overdosed: Snapshots of Americans struggling under the opioid crisis*, ABC News, <https://abcnews.go.com/Nightline/deepdive/american-life-under-opioid-crisis-49355808> (last visited May 27, 2026).

<sup>12</sup> See, e.g., *Things to know as tick season kicks off*, ABC7 (Apr. 29, 2026), <https://abc7ny.com/videoClip/18996595> (Dr. Sutton joined the Eyewitness News at the 10am desk to inform Tri-State viewers about the risks from ticks and tips to protect oneself and family from tick-borne illnesses); *Dr. Sutton discusses how to combat spring allergies*, ABC7 (May 2, 2025), <https://abc7ny.com/videoClip/16302767/> (a segment from Eyewitness News at 10am discussing methods to address seasonal allergies).

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**WABC TELEVISION (NEW YORK), LLC**

along with entertainment news. Specifically, WABC currently broadcasts over 50 hours of regularly scheduled local news programming per week (7 hours, 45 minutes each weekday; 5.5 hours on Saturdays; and 7 hours on Sundays).<sup>13</sup>

The local community tunes in to WABC not only to learn about breaking news and the upcoming weather and traffic, but to connect with and better understand their communities.<sup>14</sup>

For example, WABC produces distinctive long-form public affairs programs each week that cover local issues. During the license period under review, these programs included:

- *Eyewitness News Up Close* (Sundays, 11:00am-11:30am): Eyewitness News anchor Bill Ritter hosted a half hour discussion with newsmakers about topics of timely importance to the Greater New York area.
- *Tiempo* (Sundays, 11:30am-12:00pm): Eyewitness News This Weekend anchor Joe Torres hosted a weekly round-table discussion about topics affecting and relating to Hispanic citizens in the Greater New York area.<sup>15</sup>
- *Here and Now* (Sundays, 12:00pm-1:00pm): Eyewitness News weekend anchor Sandra Bookman hosted a locally produced program covering matters of significance to and the viewpoint of the African-American community in the Greater New York area.

WABC also broadcasts several locally produced and syndicated, long-form specials such as the *Here and Now: Queens Special*, which focused on the borough of Queens, the largest New York City borough by area.<sup>16</sup> The program paid tribute to Queens legends and featured the younger generation who are preparing to become future leaders in their Queens community.

*Operation 7: Save-A-Life* is an annual informative, entertaining show full of life-saving

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<sup>13</sup> The amount of daily live local news WABC airs can vary during the fall as a result of college football games.

<sup>14</sup> WABC incorporates by reference its Issues and Programs Reports filed quarterly with the FCC and found online at <https://publicfiles.fcc.gov/tv-profile/WABC-TV?id=1328>.

<sup>15</sup> On October 7, 2025, Joe Torres received an honor from the Essex County (New Jersey) Prosecutor's Office in recognition of his impactful work as a reporter and host of *Tiempo*.

<sup>16</sup> Sandra Bookman & Eyewitness News, *Here and Now Special: Legends and Future Leaders of Queens*, Eyewitness News (Dec. 14, 2025), <https://abc7ny.com/post/here-now-sandra-bookman-legends-future-leaders-queens-special/18247737>.

information on preparing for emergencies and learning tips that could save a life, now in its 28th year.<sup>17</sup> The 2026 edition looked inside the New York City Fire Department’s (“FDNY”) cutting-edge Robotics Unit; explained critical fire safety steps that could keep viewers and their pets safe; included a one-on-one interview with the new FDNY Commissioner, Lillian Bonsignore, on her decades of experience in EMS and her plans to modernize the FDNY; and featured a story of a man who had more than 100 blood transfusions in his cancer battle, and his quest to encourage others to donate blood to the American Red Cross.<sup>18</sup>

In 2025, New Jerseyans elected a new governor, and New York City elected a new mayor, along with other important elections. WABC helped viewers understand these important races and the candidates vying for their votes.<sup>19</sup> In addition to regular segments during local news broadcasts, an episode of “Up Close” closely examined the race for governor ahead of the June 2025 primary.<sup>20</sup> WABC also aired the second and final debate of the New Jersey gubernatorial race on October 8, 2025, which Eyewitness News anchor Bill Ritter co-moderated.<sup>21</sup> The year before, WABC produced “Vote 2024: Eyewitness News Election Guide,” a half-hour special that looked at the key races in the Tri-State area that would shape the U.S. House of Representatives and Senate as well as the national race for President.

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<sup>17</sup> *Operation 7: Save-A-Life*, ABC7, <https://abc7ny.com/operation7> (last visited May 27, 2026).

<sup>18</sup> *Operation 7 Save a Life 2026*, ABC7 (Feb. 9, 2026), <https://abc7ny.com/post/operation-7-save-life-bill-ritter-saturday-feb7-wabc-tv-channel-new-york-city/18500858>.

<sup>19</sup> *See generally Vote 2025*, ABC7, <https://abc7ny.com/tag/vote-2025> (last visited May 27, 2026).

<sup>20</sup> Bill Ritter & Eyewitness News, *Up Close 6/8/25: Closer look at the candidates in the race for governor of New Jersey | Vote 2025*, ABC7 (June 9, 2025), <https://abc7ny.com/post/close-bill-ritter-closer-look-democrat-republican-candidates-race-governor-new-jersey-vote-2025/16690950>.

<sup>21</sup> *Mikie Sherrill and Jack Ciattarelli clash in final New Jersey governor’s debate*, ABC7 (Oct. 8, 2025), <https://abc7ny.com/post/watch-live-nj-governors-debate-between-democrat-mikie-sherrill-republican-jack-ciattarelli-october-8-submit-questions/17951041>.

PSAs also air throughout the day and cover a wide range of subjects and interests, from health, education, public safety, and the environment to community involvement projects. These benefit local viewers by informing the community on vital issues, such as missing children, fire safety, and food banks. In just the first quarter of 2026, WABC aired over 1,400 PSAs on topics and organizations such as: the Food Bank of NYC, Drunk Driving, City Harvest, FDNY Fire Safety, Black History Month, Lithium Battery Safety, Children’s Hospital, Lunar New Year, New York Roadrunners Club, Women’s History Month, 7 In Your Community, Daylight Saving Spring Weekend, and the 5-Borough Race.<sup>22</sup> During the license period under review, WABC aired the Missing Kids Campaign PSA on a regular basis during all local newscasts.

WABC’s Channel 7.2 Localish Network features programs that tell stories about people engaging in and changing their communities for the better, showcasing the good in society, and connecting people across the country.<sup>23</sup> These programs focus on a variety of topics which include: good people, good food, good places to visit, and more, as well as an hour of educational and informational programming for kids.

### **III. WABC’S LOCAL REPORTING SERVES THE COMMUNITY**

WABC’s dedicated investigative, consumer, and political reporters not only shed light on issues and problems in the local community, they help solve them, too. For instance, “7 On Your Side,” WABC’s award winning consumer reporting unit, helps the community by informing viewers on ways to save and protect their money, reclaim what was lost to them, solve

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<sup>22</sup> WABC-TV regularly airs PSAs throughout the year and did so during the license period under review. For example, Q3 2024, WABC-TV aired 1,957 PSAs on various topics and organizations such as: E-Bike Safety, FDNY Fire Safety: Fire Tips, Motorcycle Safety, Celebrate Brooklyn, Skin Cancer, Red Cross Blood Drive, TEAL Walk, Asian Longhorn Beetle, Dominican Day Parade, New York Caribbean Carnival, New York Road Runners (“NYRR”) 5th Avenue Mile, African-American Day Parade, Hispanic & Latino-American Heritage Month, Voter Registration, NY Film Festival, and the St. Jude Walk.

<sup>23</sup> See, e.g., LOCALISH, ABC7, <https://abc7ny.com/localish> (last visited May 27, 2026).

problems, and navigate ongoing issues and concerns affecting their lives.<sup>24</sup> Through its sustained reporting, community engagement, and measurable results for viewers, WABC’s “7 On Your Side” consumer unit continues to demonstrate its role as an essential public service and a trusted advocate for Tri-State communities. Over the years, WABC has produced thousands of stories and helped recover millions of dollars for viewers.

For years, “7 On Your Side” has assisted consumers in resolving their issues with companies, such as a local family who was left homeless after a devastating fire and then had their insurance payment delayed.<sup>25</sup> “7 On Your Side” went directly to the insurance company, and by the time the station concluded its reporting, the family had temporary housing, living expenses, and a check for half a million dollars to begin repairs on their home.<sup>26</sup> “7 On Your Side” also helps viewers prevent problems before they occur, producing consumer alerts to identify vacation rental scams and phishing scams.<sup>27</sup> When food insecurity and aid were on many viewers’ minds last fall during the 2025 federal government shutdown, which threatened food assistance for millions of people in the Tri-State area and left many federal workers without a reliable paycheck, WABC’s coverage on local news and its weekly public affairs programming helped viewers understand the issue, where to help if they could, and where to get help if needed.<sup>28</sup>

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<sup>24</sup> See *7 ON YOUR SIDE*, ABC7, <https://abc7ny.com/7onyourside/> (last visited May 27, 2026).

<sup>25</sup> *7 On Your Side helps Queens family left homeless after fire*, ABC7 (May 4, 2026), <https://abc7ny.com/post/7-side-insurance-payout-family-left-homeless-fire/19034924>.

<sup>26</sup> *Id.*

<sup>27</sup> Nina Pineda, *7 On Your Side’s tips to identify vacation rental scams*, ABC7 (Apr. 22, 2026), <https://abc7ny.com/post/7-side-how-identify-vacation-rental-scams/18944900>; Nina Pineda, *7 On Your Side: What’s up with WhatsApp? New phishing scam going around*, ABC7 (Apr. 14, 2026), <https://abc7ny.com/post/7-side-whats-whatsapp-new-phishing-scam-going-around/18833786>.

<sup>28</sup> See, e.g., Darla Miles, *Food distribution event held for local federal workers at Newark Airport*, ABC7 (Oct. 27, 2025), <https://abc7ny.com/post/food-distribution-event-held-federal-workers-newark-airport-amid-government-shutdown/18077731>; Joe Torres, *Food giveaway for federal workers impacted by*

WABC is also home to one of the most decorated investigative reporting teams in the nation. Among other initiatives, “7 On Your Side Investigates” digs even deeper into stories, following up with reporting that has helped prompt legal reforms, such as the squatter law discussed above. Similarly, an in-depth investigation by the “7 On Your Side Investigates” team led to important protections for local farmers in Putnam County, which is part of the WABC community.<sup>29</sup> Last spring, the Federal Bureau of Investigation’s (“FBI”) Director Kash Patel encouraged the public to read ABC’s coverage of the violent 764 network of online predators that was preying on children on popular devices and apps and manipulating them into doing acts of violence and self-harm.<sup>30</sup> This investigative reporting was a collaboration between ABC News and some of ABC’s Owned stations. WABC again partnered with ABC News and ABC Owned Stations to follow-up on the FBI’s response to the 764 network a few months later, reporting that the FBI was tracking the network, including in New Jersey, where a young man

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*government shutdown in Brooklyn*, ABC7 (Nov. 12, 2026), <https://abc7ny.com/post/food-giveaway-bank-new-york-city-federal-workers-impacted-government-shutdown-brooklyn/18147834>; Joe Torres, *Tiempo: Nonprofit provides food aid to students and their families impacted by government shutdown*, ABC7 (Nov. 16, 2025), <https://abc7ny.com/post/tiempo-joe-torres-nonprofit-ny-edge-provides-food-aid-students-families-amid-government-shutdown/18155632>.

<sup>29</sup> Dan Krauth, *Farmers receive long awaited AG protections in New York*, ABC7 (May 8, 2025), <https://abc7ny.com/post/putnam-countys-ridge-ranch-farmers-receive-long-awaited-ag-protections-new-york-state/16350545> (providing a follow-up on a 7 On Your Side Investigate story from six-months prior and explaining how the WABC team “reached out to every county in the state” chasing the story and ultimately helping the Station’s farming viewers).

<sup>30</sup> FBI Director Kash Patel (@FBIDirectorKash), X, (May 6, 2025, 10:28 AM), <https://x.com/FBIDirectorKash/status/1919761211014406495?s=20>; see also Dan Krauth, *FBI: Online group “764” preying on children*, ABC7 (May 6, 2025), <https://abc7ny.com/post/fbi-online-group-764-preying-children/16339805>.

was arrested.<sup>31</sup> Following this and citing the work of ABC News, Republican leaders in Congress asked the Department of Justice and FBI for a briefing on these issues.<sup>32</sup>

More recently, “7 On Your Side Investigates” teamed up with ABC News to help viewers understand – and protect themselves from – criminals posing as attorneys, judges, and law enforcement officers to defraud vulnerable individuals and undermine the immigration system.<sup>33</sup> WABC collaborated with ABC News and more than 20 affiliated stations across the country to investigate the newest generation of criminal hackers, who authorities and cybersecurity experts warn are uniquely dangerous and shockingly young.<sup>34</sup> Another WABC, ABC News, and ABC Owned TV Stations joint investigation exposed how college tuition aid fraud is among the most pervasive, expensive, and dynamic schemes going into 2026 across the country.<sup>35</sup>

In addition to producing investigative consumer journalism, WABC also serves the local community by covering its rich history. As part of ABC7 Celebrates America: 250, WABC is

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<sup>31</sup> Dan Krauth, *FBI investigating more cases involving online extremist network 764, including in the Tri-State*, ABC7 (Nov. 18, 2025), <https://abc7ny.com/amp/post/online-extremist-network-764-fbi-investigating-more-cases-including-nj-tri-state-area/18170634>.

<sup>32</sup> Letter from James Comer, Chairman, Committee on Oversight and Government Reform, & Clay Higgins, Chairman, Subcommittee on Federal Law Enforcement, to Kash Patel, Director, FBI (Feb. 17, 2026), <https://oversight.house.gov/wp-content/uploads/2026/02/Letter-to-FBI-764-Group-.pdf>.

<sup>33</sup> Dan Krauth, *Group posed as fake attorneys and judges to scam vulnerable immigrants, prosecutors say*, ABC7 (May 5, 2026), <https://abc7ny.com/post/ny-group-posed-fake-attorneys-judges-scam-vulnerable-immigrants-prosecutors-say/19045111>; Laura Romero et al., *Fake courtrooms: Immigrants targeted by scams amid Trump administration’s deportation push*, ABC7 (May 5, 2026), <https://abc7ny.com/post/immigrants-targeted-fake-courtroom-scams-amid-trump-administrations-deportation-push/19043432>.

<sup>34</sup> See, e.g., Dan Krauth, *‘I was addicted’: More teens behind cybercrime*, ABC7 (Apr. 14, 2026), <https://abc7ny.com/post/was-addicted-more-teens-behind-cybercrime/18885287> (including insight from WABC-TV’s Dan Krauth with Nathan Oubre, the Special Agent in Charge of the New York Field Office) <https://abc7ny.com/post/immigrants-targeted-fake-courtroom-scams-amid-trump-administrations-deportation-push/19043432/>.

<sup>35</sup> See, e.g., Dan Krauth, *Fake ‘ghost students’ stealing identities and financial aid money*, ABC7 (Jan 28, 2026), <https://abc7ny.com/post/fake-ghost-students-stealing-identities-financial-aid-money-brookdale-community-college-nj/18493830> (featuring an interview with local reporter, Dan Krauth, and Dr. David Stout, President of Brookdale Community College in New Jersey, explaining how Brookdale has been harmed by the scheme).

showcasing local historical sites, such as the Thomas Edison National Historical Park in West Orange, New Jersey.<sup>36</sup> This initiative complements other efforts throughout ABC to celebrate America at 250. Last summer, for example, ABC’s “Good Morning America” launched, “50 States in 50 Weeks: America the Beautiful” in honor of its 50th anniversary and the upcoming 250th anniversary of the United States.<sup>37</sup> This year-long series is a partnership among ABC News, ABC Owned TV Stations, and affiliated stations that showcases each state’s unique culture, history, traditions, and landmarks with audiences nationwide.

WABC exponentially helps local non-profit groups and small businesses by showcasing them in its reporting.<sup>38</sup> For example, in December 2025, for the fourth year, WABC’s 7 Days of Giving campaign shone a spotlight on nonprofits throughout greater New York City.<sup>39</sup> Viewers were invited to make a difference – whether by donating or seeking support if needed. In January, National Blood Donor Month, local reporter Darla Miles covered the severe emergency blood shortage and explained how local viewers can give blood, including through the American

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<sup>36</sup> Anthony Johnson, *Inside Thomas Edison’s legendary lab in West Orange*, ABC7 (May 1, 2026), <https://abc7ny.com/post/thomas-edisons-west-orange-lab-where-american-innovation-became-industry/19014337>; Joe Torres, *Taste the Spirit of ’76 at America’s oldest restaurant*, ABC7 (May 7, 2026), <https://abc7ny.com/videoClip/19057694>; see also *Celebrate America*, ABC7, <https://abc7ny.com/tag/celebrate-america> (featuring numerous stories celebrating America) (last visited May 27, 2026).

<sup>37</sup> Jim Donnelly, *‘Good Morning America’ Announces ‘50 States in 50 Weeks: America the Beautiful’*, ABC (June 30, 2025), <https://abc.com/news/7310a834-3007-4a2f-baa4-e42ea5829491/category/1138628>.

<sup>38</sup> See generally *ABC7 In Your Community*, ABC7, <https://abc7ny.com/community> (last visited May 27, 2026).

<sup>39</sup> *7 Days of Giving to help local nonprofits in New York City and the Tri-State*, ABC7 (Dec. 10, 2025), <https://abc7ny.com/post/7-days-giving-help-local-nonprofits-new-york-city-tri-state-area/18181167>; see also Joelle Garguilo, *Heart of Gold gives magic of Christmas to moms, kids in NYC shelters*, ABC7 (Dec. 23, 2024), <https://abc7ny.com/post/heart-gold-gives-magic-christmas-moms-kids-new-york-city-shelters/15696486>.

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Red Cross.<sup>40</sup> Similarly, May is Mental Health Awareness Month, and earlier this month, WABC covered the third annual New York Road Runners Mindful 5K, which focuses on the connection between physical movement and mental well-being, and features therapy dogs from New York Therapy Animals and the “Zen Zone.”<sup>41</sup> An important local industry, ABC7 provided viewers with half-hour fall and spring previews of the Broadway season.<sup>42</sup> As part of “Celebrating Small Business,” WABC showcased several local small businesses from around its viewing area.<sup>43</sup>

ABC7 periodically hosts events and produces specials that cover topics of local interest. For example, WABC hosts a yearly back-to-school townhall with the New York City Department of Education Schools Chancellor and key deputies to answer parent questions and highlight new programs. A recent 30-minute back-to-school special highlighted the changing role of technology in school.<sup>44</sup> WABC also produces periodic 30-minute “Your Money, Your Savings” specials designed to help viewers stretch their budget. These included a back-to-school

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<sup>40</sup> *Red Cross calls on Americans to donate blood, declares severe emergency shortage*, ABC7 (Jan. 21, 2026), <https://abc7ny.com/post/red-cross-declares-severe-shortage-blood-supply-falls-35-past-month/18439131>.

<sup>41</sup> *New York Road Runners Mindful 5K focuses on mental health awareness*, ABC7 (May 2, 2026), <https://abc7ny.com/post/new-york-road-runners-mindful-5k-raises-awareness-mental-health-issues/19022481>. WABC-TV also partners with the New York Road Runners to cover the New York City Marathon, among other events throughout the year.

<sup>42</sup> *See, e.g., Watch ‘Broadway Backstage: Spring Preview’*, ABC7 (Mar. 21, 2026), <https://abc7ny.com/post/broadway-backstage-2026-spring-preview-michelle-charlesworth-deborah-cox-wabc-tv-abc7ny/18724806>; *Watch ‘Broadway Backstage: Fall Preview’*, ABC7 (Oct. 20, 2024), <https://abc7ny.com/post/broadway-backstage-fall-preview-join-darren-criss-michelle-charlesworth-look-hottest-new-shows-season/15404615>.

<sup>43</sup> *See, e.g., Joelle Garguilo, Nostalgia-filled toy store in the Bronx is like stepping into a time machine*, ABC7 (May 9, 2025), <https://abc7ny.com/post/dans-parents-house-toy-store-city-island-bronx-is-like-stepping-time-machine/16357740>.

<sup>44</sup> *Watch Eyewitness News special ‘Back to School: Phones, AI & Your Kids’*, ABC7 (Sept. 3, 2025), <https://abc7ny.com/post/watch-eyewitness-news-special-back-school-phones-ai-kids/17653323> (“As kids across the Tri-State head back to school, Eyewitness News has what parents need to know at the start of the school year during our special, ‘Back to School: Phones, AI & Your Kids.’”).

savings special in August 2026 and holiday savings special in November 2025, and supplement weekly news pieces built around ways for viewers to save, including special deals for families.<sup>45</sup>

#### **IV. WABC IS A GO-TO SOURCE FOR LOCAL SPORTS COVERAGE**

WABC ensures that fans of all of the New York area's many teams in the major sports leagues—Giants and Jets (NFL), Yankees and Mets (MLB), Knicks and Nets (NBA), Rangers and Islanders (NHL), Red Bulls and New York City FC (MLS), and Liberty (WNBA)—have dedicated coverage of the teams they care about in addition to providing coverage of local athletic events such as the New York City Marathon, and the NYRR RBC Brooklyn Half.<sup>46</sup> WABC is also providing coverage of the area's preparations to host games for this summer's World Cup.<sup>47</sup>

The Eyewitness News sports team also understands that sports fans can get their scores from a variety of sources, and thus sportscasts feature storytelling showcasing the area's people and communities, including professional teams' involvement in the local community and compelling stories spotlighting outstanding local athletes, coaches, and events. Recent stories have included profiling NY Metro Blind Hockey, a non-profit organization that has created special equipment to enable visually impaired kids to play ice hockey,<sup>48</sup> the inspirational comeback of a Queens teen who suffered a devastating ski accident that left her paralyzed from

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<sup>45</sup> See, e.g., *Eyewitness News Guide: Your Money, Your Savings*, ABC7 (Nov. 24, 2025), <https://abc7ny.com/post/eyewitness-news-guide-money-savings-watch-monday-530-pm-channel-7-stream-abc-ny/18185275>.

<sup>46</sup> See *SPORTS*, ABC7, <https://abc7ny.com/sports/> (last visited May 27, 2026).

<sup>47</sup> See, e.g., *New York City to offer 1,000 \$50 World Cup tickets via resident lottery*, ABC7 (May 21, 2026), <https://abc7ny.com/post/nyc-hold-lottery-1000-discounted-world-cup-tickets-free-bus-rides-residents/19143456/>.

<sup>48</sup> Sam Ryan, *NY Metro Blind Hockey helping make sport more accessible to the visually impaired community*, ABC7 (Dec. 11, 2025), <https://abc7ny.com/post/ny-metro-blind-hockey-helping-make-sport-more-accessible-adaptive-puck/18277455/>.

the waist down, but re-found her love for competition through tennis,<sup>49</sup> and the story of a 12-year-old Long Island boy—nicknamed “Super Jack” and born with a congenital heart defect—who is now playing hockey and selling custom apparel to help raise money for congenital heart defect awareness.<sup>50</sup> These stories represent just a small sample of WABC’s commitment to local sports-related storytelling.<sup>51</sup>

WABC also celebrates the successes of local teams. For example, WABC broadcast the WNBA champion New York Liberty’s ticker-tape parade in the Canyon of Heroes in downtown Manhattan in October 2024.<sup>52</sup> WABC has also showcased several local teams during ABC network broadcasts, including the Giants, Knicks, Liberty, Rangers, and Yankees.

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<sup>49</sup> Sam Ryan, *Queens teen paralyzed in ski accident finds motivation in tennis, set to play at Clemson*, ABC7 (July 7, 2025), <https://abc7ny.com/post/queens-teen-paralyzed-ski-accident-finds-motivation-tennis-set-play-clemson-university/17008917/>.

<sup>50</sup> Sam Ryan, *Long Island boy born with heart defect defies the odds to play hockey, starts clothing line*, ABC7 (Feb. 12, 2024), <https://abc7ny.com/post/jack-foley-hypoplastic-left-heart-syndrome-defect-new-york-islanders/14404423/>.

<sup>51</sup> See, e.g., Sam Ryan, *New Jersey teen’s miracle recovery brings her back to the volleyball court*, ABC7 (Mar. 4, 2026), <https://abc7ny.com/post/hillsborough-teen-makes-miracle-volleyball-comeback-devastating-crash/18676085/>; Sam Ryan, *Brothers with Muscular Dystrophy honored at Yankee Stadium for Hope Week*, ABC7 (June 19, 2025), <https://abc7ny.com/post/brothers-muscular-dystrophy-honored-yankee-stadium-hope-week/16792080/>; Sam Ryan, *NYRR’s Runner of the Year is NYU medical school student balancing athletic, academic success*, ABC7 (Feb. 12, 2026), <https://abc7ny.com/post/nyrrs-runner-year-is-nyu-medical-student-felicia-pasady-balances-athletic-academic-success/18591239/>; Eyewitness News ABC7NY, *Rutgers superfan gets surprised by Rutgers football team*, YouTube (Nov. 14, 2025), <https://www.youtube.com/watch?v=ILwxUA0AoSk>; Sam Ryan, *Record-setting student athlete from Long Island could be on brink of Olympic glory*, ABC7 (Feb. 15, 2025), <https://abc7ny.com/post/record-setting-student-athlete-long-island-could-brink-olympic-glory/15913971/>; Sam Ryan, *Young woman who overcame Hodgkin’s lymphoma to sign national anthem at Giants’ final home game*, ABC7 (Jan 4, 2024), <https://abc7ny.com/post/mya-rodriguez-new-york-giants-national-anthem-singer-metlife-stadium/14276013/>.

<sup>52</sup> *NYC honors WNBA champs with New York Liberty Parade of Champions*, ABC7 (Oct. 24, 2024), <https://abc7ny.com/post/ny-liberty-parade-champions-2024-nyc-ticker-tape-canyon-of-heroes-live-wnba/15458727/>.

**V. IN ADDITION TO AIRING IMPORTANT LOCAL PROGRAMMING,  
EMPLOYEES OF WABC SERVE IN THEIR COMMUNITY**

ABC Owned TV stations are mainstays of their local communities, serving as the broadcast partner of local parades, leading community fundraisers, and providing important emergency and public safety information. For example, WABC proudly broadcasts the biggest Veterans Day event in the United States, the annual New York City Veterans Day Parade.<sup>53</sup> Eyewitness News anchor Joe Torres and ABC News' Stephanie Ramos hosted the 2025 parade and Eyewitness News anchor David Novarro and Ramos hosted in 2024.<sup>54</sup> Among other widely attended and viewed events, WABC also airs the New York City Marathon.<sup>55</sup> And in 2025, employees of WABC and ABC ran the Marathon together.<sup>56</sup> Station personnel regularly speak to students and provide station tours to local high schools and organizations.<sup>57</sup> Recently, on February 2, 2026, reporter Marcus Solis sat down for a fireside chat with Supreme Court Justice Sonia Sotomayor and students at Cardinal Spellman High School, where they are both alumni.

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<sup>53</sup> *Patriotism on full display for 105th New York City Veterans Day Parade*, ABC7 (Nov. 11, 2024), <https://abc7ny.com/post/2024-nyc-veterans-day-parade-marching-bands-military-units-more-will-march-avenue-watch-live/15517534>; *Thousands of service members march in New York City Veterans Day Parade*, ABC7 (Nov. 11, 2025), <https://abc7ny.com/post/veterans-day-parade-2025-nyc-when-where-military/18120449>.

<sup>54</sup> *See id.*

<sup>55</sup> *Watch the Race*, New York Road Runners, <https://www.nyrr.org/tcsnyymarathon/race-day/watch-the-race> (last visited May 27, 2026) (noting that pre-race cover begins at 7:00am ET and continues through 1:00pm ET); Press Release, ESPN, ESPN and WABC Announce 2025 TCS New York City Marathon Broadcast Schedule for November 2 Race (Oct. 22, 2025), <https://espnpressroom.com/us/press-releases/2025/10/espn-and-wabc-announce-2025-tcs-new-york-city-marathon-broadcast-schedule-for-november-2-race>.

<sup>56</sup> Press Release, ABC News, *ABC NEWS Team Runs 2025 TCS New York City Marathon Ahead Of 'Good Morning America' 50TH Anniversary Show* (Sept. 24, 2025), <https://www.detroitpress.com/abcnews/pressrelease/abc-news-team-runs-2025-tcs-new-york-city-marathon-ahead-of-good-morning-america-50th-anniversary-show>.

<sup>57</sup> *See, e.g., Tour of Eyewitness News van at Hofstra H.S. Journalism Institute*, ABC7 (July 21, 2023), <https://abc7ny.com/videoClip/13530795>.

Reporter Chanteé Lans also hosted a six-week workshop for students at Baldwin High School on Long Island in Spring 2026.

WABC station personnel frequently host and attend events to promote charitable causes and raise money for nonprofit and educational organizations, such as the American Red Cross of Greater New York, enCourage Kids Foundation,<sup>58</sup> Friends of Karen,<sup>59</sup> Good Samaritan University Hospital, the CaringKind's annual Alzheimer's Walk in Central Park, Breakthrough T1D (Type 1 Diabetes) Walk in Foley Square, Medgar Evers College, the YWCA of Union County (New Jersey), the North Shore Child & Family Guidance Center (Long Island), the Center for Hearing and Communication, the Metropolitan College of New York at Manhattan, The Family Center, Coney Island Prep, City University of New York School of Public Health Foundation, and the Special Olympics. As just one example, several members of the WABC team served over 150 meals at the Food Bank for New York City's Community Kitchen.<sup>60</sup>

WABC also participates in company-wide community initiatives, such as Disney's Week of Wishes, a weeklong campaign to celebrate Disney's 45-year relationship with Make-A-Wish and bringing happiness and joy to children facing critical illnesses, when it is needed

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<sup>58</sup> EnCourage Kids is an organization that provides healthcare programs and funding for children with illnesses.

<sup>59</sup> Friends of Karen is an organization that supports families caring for children with cancer or other life-threatening diseases.

<sup>60</sup> *WABC-TV helps serve hot meals at Food Bank for NYC's Community Kitchen in Harlem*, ABC7 (Nov. 17, 2025), <https://abc7ny.com/post/wabc-tv-volunteers-food-bank-nycs-community-kitchen-harlem-serving-hot-meals/18167724>.

most.<sup>61</sup> Disney is the world’s largest wish-granter for Make-A-Wish, and WABC participated when the company hosted a second Week of Wishes in 2026.<sup>62</sup>

## **VI. CONCLUSION**

There can be no doubt WABC has and will continue to meet its public interest obligations. The Station’s long-standing position as the number one news provider and number one station overall confirms the value Tri-State residents place on WABC’s service to the area. Every day, WABC brings market-leading local programming to its viewers, matched only by its local service to the community.

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<sup>61</sup> Press Release, The Walt Disney Company, Inaugural ‘Disney Week of Wishes’ Creates Happiness & Celebrates Make-A-Wish (May 6, 2025), <https://thewaltdisneycompany.com/news/week-of-wishes-2025> (“ABC Owned Television Stations in California, Illinois, Texas, New York, and Pennsylvania spotlighted inspiring wish stories near wish kids’ hometowns across the country, which include Chicago, IL, Harrisburg, PA, Hemet, CA, Chester, NY, Cass, MI, Benton, IA, and more.”).

<sup>62</sup> *Disney makes kids’ dreams come true with Disney Week of Wishes*, ABC News (Apr. 30, 2026), <https://abcnews.com/GMA/Living/disney-makes-kids-dreams-true-disney-week-wishes/story?id=132402776>

**DTV CERTIFICATION EXHIBIT**

This application is being submitted pursuant to the Media Bureau’s April 28, 2026 Order (“Order”) to file the license renewal application for WABC-TV (“WABC” or “Station”) and the other seven ABC owned television stations by May 28, 2026, and covers the period since grant of the Station’s last license renewal application on August 28, 2024 (“Renewal Period”).<sup>1</sup>

**Biennial Ownership Reports**

No biennial ownership reports were required to have been filed with the Commission since grant of the Station’s last license renewal application on August 28, 2024.<sup>2</sup>

**Online Public Inspection File**

During the 30-day accelerated due diligence period following receipt of the Order, Licensee undertook a burdensome and comprehensive review of the Station’s online public inspection file (“OPIF”) to address this certification.<sup>3</sup> Licensee confirmed that it timely uploaded the required quarterly and annual filings during the Renewal Period. In addition, during the same period and as shown in the OPIF, Licensee diligently uploaded nearly 2,000 political file documents, including for the 2024 midterm election and other busy and intense election cycles.<sup>4</sup> Licensee is currently unaware of any such documents that may have been uploaded late. However, given the volume of OPIF documents (including political file documents) required to have been uploaded

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<sup>1</sup> See WABC Television (New York), LLC, Renewal of License, Exhibit: Objection to Unlawful Early Renewal (filed May 28, 2026) (“Objection Exhibit”) (filed concurrently with renewal application); WABC Television (New York), LLC, Renewal of License, LMS File No. 0000208980 (granted Aug. 28, 2024). The information in this DTV Certification Exhibit (“Exhibit”) has been arranged in separately titled sections corresponding to questions in the “DTV/Class A Certification” section of the license renewal application. Any information set forth in a particular section of this Exhibit is deemed to be disclosed for purposes of any other section of the license renewal application to which the information may be relevant (e.g., certain of the Children’s Television certifications reference Section 73.3526 and thus overlap with the Online Public Inspection File certifications).

<sup>2</sup> See *Media Bureau Waives Requirement for Broadcasters to File Biennial Ownership Reports for 18 Months*, Public Notice, DA 25-671 (rel. July 29, 2025) (waiving the requirement to file the biennial ownership reports that otherwise would have been due December 1, 2025 until the earlier of June 1, 2027 or further notice of the Media Bureau).

<sup>3</sup> See Objection Exhibit at Section IV.A. Licensee notes that, for purposes of this certification, documents uploaded pursuant to an FCC extension and/or following a federal holiday or period when the OPIF was unavailable are considered timely consistent with FCC policy and industry practice. See, e.g., 47 C.F.R. § 1.4; *Great Plains Television Network, LLC*, Forfeiture Order, 30 FCC Rcd 9969, 9970 n.14 (MB 2015); *Life of Victory TV, Inc.*, Order and Consent Decree, 31 FCC Rcd 11628, 11628, 11631 n.7 (MB 2016); *Impact of Potential Lapse in Funding on Commission Operations*, Public Notice, DA 25-922 (rel. Sept. 30, 2025); *Revisions to Deadlines Following Resumption of Normal Operations*, Public Notice, DA 25-943 (rel. Nov. 17, 2025); *Media Bureau Announces Deadline for Uploading Political Programming Records to Online Public Inspection Files*, Public Notice, DA 25-948 (rel. Nov. 17, 2025).

<sup>4</sup> See 47 C.F.R. § 73.1943(d) (specifying retention of OPIF political file documents for a period of two years).

during the Renewal Period, and the expedited timeline within which Licensee had to respond to this certification, Licensee reserves the right to supplement this response.<sup>5</sup>

### **Children's Television**

*Programming Reports.* During the 30-day accelerated due diligence period following receipt of the Order, Licensee confirmed that it timely uploaded all required Children's Television Programming Reports (FCC Form 2100, Schedule H).<sup>6</sup>

*Publicizing Children's Reports.* As of January 21, 2020, the requirement for television stations to publicize the existence and location of the station's Children's Television Programming Reports (FCC Form 2100, Schedule H) was eliminated.<sup>7</sup> Thus, this certification is not applicable to the instant license renewal application, which covers the period since grant of the Station's last license renewal application on August 28, 2024.

### **Engineering/Operational**

*Environmental Effects.* Attached to this Exhibit is an Environmental Effects Statement prepared by the Carl T. Jones Corporation in support of this certification.

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<sup>5</sup> Out of an abundance of caution, Licensee notes that, based on its review of the OPIF to date, it appears that the Section 73.3613 documents listed in its most recent Biennial Ownership Report may not be current in all respects. Given the truncated diligence period for preparing this application, Licensee is still evaluating this matter and will update the instant application to the extent necessary.

<sup>6</sup> See *supra* note 3.

<sup>7</sup> See *Children's Television Programming Rules*, Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 5822, 5863 ¶ 69 (2019); *Children's Television Programming Rules*, 84 Fed. Reg. 70037 (Dec. 20, 2019).

## Environmental Effects - Statement for Renewal of License

WABC-TV, New York, NY (Facility ID 1328)

Main Facility FCC License File No. 0000227428

I, Carl T. Jones, Jr, am a Consulting Engineer, president in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission (FCC). I am a Registered Professional Engineer in the Commonwealth of Virginia, Registration No. 013391.

The licensed WABC-TV main broadcast antenna referenced above is located on the Empire State Building. The broadcast stations which operate from Empire State Building are listed in the attached Table. As a multi-use transmitter site, the Empire State Building RF environment is ever changing. Any material changes in the RF environment are closely regulated and managed to ensure compliance with all applicable safety guidelines.

There has been no material change in the station's RF environment since the August 28, 2024, grant of the last WABC-TV *Application for Renewal of License*, FCC File No. 0000208980.

- For completeness, a current statement regarding the station's RF environment follows.

Based on worst-case calculations and considering a very conservative vertical relative field factor of 0.3 pursuant to OET Bulletin 65, the WABC-TV television facility is predicted to produce a maximum power density of only  $0.636 \mu\text{W}/\text{cm}^2$  at two meters above ground level. This represents only 0.32% of the FCC Guideline value of  $200.0 \mu\text{W}/\text{cm}^2$  for uncontrolled RFR environments. Pursuant to Section 1.1307(b)(3) of the FCC Rules, because the WABC-TV facility does not exceed 5% of the uncontrolled limit and controlled exposure limit, the WABC-TV power density contribution is insignificant.

Access to the Empire State Building transmission facilities, antenna support structures and any areas within the building that may exceed exposure limits is strictly controlled by the building owner. The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines.

Further, WABC-TV is party to the Empire State Building RF exposure safety program along with the other broadcasters and FCC licensees that use the shared transmission site. The RF exposure safety procedures are amended as necessary to stay current, based on calculations or actual RF measurements. At locations where high RF levels may be

present, sufficient marking and restricted access protocols are in place. The licensee will continue to cooperate and coordinate with other site users to reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel.

Dated: May 7, 2026



Broadcast station authorizations in the vicinity of the WABC-TV transmitter site

WABC-TV Last Renewal Application Granted August 28, 2024

May, 2026

Call	City	State	FacID	Service	RF Channel	Class	Status	FCC File No.	After 08/28/24	ERP (kW)	HAAT (m)	ASR	Licensee/Applicant
WINS-FM	NEW YORK	NY	58579	FM	222	B	LIC	BLH-19940204KF		6	415	-	AUDACY LICENSE, LLC
WINS-FM	NEW YORK	NY	58579	FS	222	B	LIC	BXLH-20171010ACE		7.1	387	1007048	AUDACY LICENSE, LLC
WPAT-FM	PATERSON	NJ	51663	FM	226	B	LIC	213080		4.8	415	1007048	WPAT LICENSING, INC.
WNYC-FM	NEW YORK	NY	73355	FM	230	B	LIC	BLH-20110815ADD		5.2	415	1007048	NEW YORK PUBLIC RADIO
WNYC-FM	NEW YORK	NY	73355	FS	230	B	LIC	BXLH-20171011AAS		6.2	387	1007048	NEW YORK PUBLIC RADIO
WPLJ	NEW YORK	NY	73887	FM	238	B	LIC	BMLED-20190222AAE		6.7	408	1007048	K-LOVE, INC.
WPLJ	NEW YORK	NY	73887	FS	238	B	LIC	BMLH-19851224KA		7.2	396	1007048	K-LOVE, INC.
WPLJ	NEW YORK	NY	73887	FS	238	B	LIC	BLH-19870729KA		6.6	410	-	K-LOVE, INC.
WPLJ	NEW YORK	NY	73887	FS	238	B	LIC	BXLH-20171010ADE		7.6	387	1007048	K-LOVE, INC.
WXNY-FM	NEW YORK	NY	29022	FM	242	B	LIC	BLH-19940204KG		6	415	-	UNIVISION RADIO STATIONS GRO
WXNY-FM	NEW YORK	NY	29022	FS	242	B	LIC	BXLH-20171030AEM		7.1	387	1007048	UNIVISION RADIO STATIONS GRO
WQHT	NEW YORK	NY	19615	FM	246	B	LIC	BMLH-20050215AAH		6.7	408	1007048	MEDIACO WQHT LICENSE LLC
WQHT	NEW YORK	NY	19615	FS	246	B	LIC	BXLH-20171011AAH		7.6	387	1007048	MEDIACO WQHT LICENSE LLC
WSKQ-FM	NEW YORK	NY	61641	FM	250	B	LIC	BLH-19940204KA		6	415	-	WSKQ LICENSING, INC.
WEPN-FM	NEW YORK	NY	63781	FM	254	B	LIC	BMLH-20100414AAI		6	415	1007048	EMMIS NEW YORK RADIO LICENSE
WEPN-FM	NEW YORK	NY	63781	FS	254	B	LIC	BXLH-20060914AAT		0.39	396	1007048	EMMIS NEW YORK RADIO LICENSE
WEPN-FM	NEW YORK	NY	63781	FS	254	B	LIC	BMLH-19950725KD		4.6	373	-	EMMIS NEW YORK RADIO LICENSE
WEPN-FM	NEW YORK	NY	63781	FS	254	B	LIC	BXLH-20171011AAP		7.1	387	1007048	EMMIS NEW YORK RADIO LICENSE
WBAI	NEW YORK	NY	51249	FS	258	B	LIC	BMLH-19950802KA		3.3	373	1007048	PACIFICA FOUNDATION, INC.
WHTZ	NEWARK	NJ	59953	FM	262	B	LIC	BLH-19940204KD		6	415	-	IHM LICENSES, LLC
WHTZ	NEWARK	NJ	59953	FS	262	B	LIC	BXLH-20171013AAU		7.1	387	1007048	IHM LICENSES, LLC
WCBS-FM	NEW YORK	NY	9611	FM	266	B	LIC	BLH-20060301ABK		6.7	408	1007048	AUDACY LICENSE, LLC
WCBS-FM	NEW YORK	NY	9611	FS	266	B	LIC	BXLH-20171010ACD		7.6	387	1007048	AUDACY LICENSE, LLC
WCBS-FM	NEW YORK	NY	9611	FS	266	B	LIC	BXLH-20070410AAC		7.2	397	1007048	AUDACY LICENSE, LLC
WFAN-FM	NEW YORK	NY	67846	FM	270	B	LIC	BMLH-20170328AAC		6	415	1007048	AUDACY LICENSE, LLC
WFAN-FM	NEW YORK	NY	67846	FS	270	B	LIC	BLH-19950905KC		4.6	373	-	AUDACY LICENSE, LLC
WFAN-FM	NEW YORK	NY	67846	FS	270	B	LIC	BXLH-20060914AAU		0.39	396	1007048	AUDACY LICENSE, LLC
WFAN-FM	NEW YORK	NY	67846	FS	270	B	LIC	BXLH-20171012AAA		7.1	387	1007048	AUDACY LICENSE, LLC
WNEW-FM	NEW YORK	NY	25442	FM	274	B	LIC	BLH-19940204KH		6	415	-	AUDACY LICENSE, LLC
WNEW-FM	NEW YORK	NY	25442	FS	274	B	LIC	BXLH-20171012AAB		7.1	387	1007048	AUDACY LICENSE, LLC
WNEW-FM	NEW YORK	NY	25442	FS	274	B	LIC	BMLH-19950407KC		4.6	373	-	AUDACY LICENSE, LLC
WKTU	LAKE SUCCESS	NY	6595	FM	278	B	LIC	BLH-20030604ACH		6	415	1007048	IHM LICENSES, LLC
WKTU	LAKE SUCCESS	NY	6595	FS	278	B	LIC	BXLH-20171013AAT		7.1	387	1007048	IHM LICENSES, LLC
WAXQ	NEW YORK	NY	23004	FM	282	B	LIC	BLH-19960426KA		6	415	-	IHM LICENSES, LLC
WAXQ	NEW YORK	NY	23004	FS	282	B	LIC	BXLH-20171013AAW		7.1	387	1007048	IHM LICENSES, LLC
WWPR-FM	NEW YORK	NY	6373	FM	286	B	LIC	BLH-19940204KB		6	415	-	IHM LICENSES, LLC
WWPR-FM	NEW YORK	NY	6373	FS	286	B	LIC	BXLH-20171013ABB		7.1	387	1007048	IHM LICENSES, LLC
WQXR-FM	NEWARK	NJ	46978	FM	290	B1	LIC	BMLH-20091009AAI		0.61	416	1007048	NEW YORK PUBLIC RADIO
WQXR-FM	NEWARK	NJ	46978	FS	290	B1	LIC	BXLH-20171011AAT		0.71	387	1007048	NEW YORK PUBLIC RADIO
WLTW	NEW YORK	NY	56571	FM	294	B	LIC	BLH-19940203KA		6	415	-	IHM LICENSES, LLC
WLTW	NEW YORK	NY	56571	FS	294	B	LIC	BMLH-19950118KD		4.7	373	-	IHM LICENSES, LLC
WLTW	NEW YORK	NY	56571	FS	294	B	LIC	BXLH-20171013AAS		7.1	387	1007048	IHM LICENSES, LLC
WBLS	NEW YORK	NY	28203	FM	298	B	LIC	BLH-19940204KN		4.2	415	-	MEDIACO WBLS LICENSE LLC
WBLS	NEW YORK	NY	28203	FS	298	B	LIC	BMLH-19950807KC		3.3	373	-	MEDIACO WBLS LICENSE LLC
WBLS	NEW YORK	NY	28203	FS	298	B	LIC	BXLH-20171011AAQ		5	387	1007048	MEDIACO WBLS LICENSE LLC
WABC-TV	NEW YORK	NY	1328	DTV	7	DTV	LIC	227428		34	405	1007048	WABC TELEVISION (NEW YORK), LLC
WPIX	NEW YORK	NY	73881	DTV	11	DTV	LIC	227437		26	405	1007048	MISSION BROADCASTING, INC.
WZME	BRIDGEPORT	CT	70493	DTS	21	DTS	LIC	212909		210	428	1007048	WZME-TV LLC
WEDW	STAMFORD	CT	13594	DTS	21	DTS	LIC	212720		210	428	1007048	CONNECTICUT PUBLIC BROADCASTING, INC.
WDVB-CD	EDISON	NJ	168834	DCA	22	DCA	LIC	211588		15	0	1007048	TRINITY BROADCASTING OF TEXAS, INC.
WTBY-TV	JERSEY CITY	NJ	67993	DTV	23	DTV	LIC	211626		15	0	1007048	TRINITY BROADCASTING OF NEW YORK, INC.
WXNY-LD	NEW YORK	NY	29231	LPD	23	LPD	LIC	182227		3.25	0	1007048	WORD OF GOD FELLOWSHIP, INC.
WFUT-DT	NEWARK	NJ	60555	DTV	26	DTV	LIC	177210		275	397	1007048	UNIVISION NEW YORK LLC
WXTV-DT	PATERSON	NJ	74215	DTV	26	DTV	LIC	226224		275	397	1007048	WXTV LICENSE PARTNERSHIP, G.P.
WDYA-LD	NEW YORK	NY	130470	LPD	33	LPD	LIC	259636	1/7/2025*	15	0	1007048	MAJOR MARKET BROADCASTING OF NEW YORK INC.
WDYJ-LD	NEW YORK	NY	60554	LPD	33	LPD	LIC	262257	1/7/2025*	15	0	1007048	MAJOR MARKET BROADCASTING OF NEW YORK INC.

\* Channel Sharing Modification - no change in RF environment