

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

In the Matter of:

The Walt Disney Company,

American Broadcasting Company,

KFSN Television, LLC,
File No. 0000298350

KABC Television, LLC,
File No. 0000298356

MB Docket No. 26-131

KGO Television, Inc.,
File No. 0000298344

WLS Television, Inc.,
File No. 0000298337

WABC Television (New York), LLC,
File No. 0000298318

WTVD Television, LLC,
File No. 0000298327

WPVI Television (Philadelphia), LLC,
File No. 0000298324

KTRK Television, Inc.
File No. 0000298353

OPPOSITION TO PETITIONS TO DENY RENEWALS OF LICENSES

July 29, 2026

SUMMARY

For the first time in history, the Federal Communications Commission has ordered an entire group of local television stations commonly owned with a broadcast network to undergo simultaneous license renewal proceedings well before their current licenses expire. That makes these proceedings extraordinary and unprecedented. There is no question why the Commission is singling out these eight stations: Each is owned by ABC, and the Administration has openly and repeatedly called for the revocation of ABC's licenses, because it dislikes the content and viewpoints expressed on ABC network programs.¹

These eight ABC Owned Stations have held their broadcast licenses without interruption for decades, starting with WABC's first local television broadcast in New York City in 1948. These Stations have established deep connections with their local communities—New York City, Los Angeles, Chicago, Philadelphia, Houston, San Francisco, Raleigh-Durham, and Fresno—and serve millions of viewers with award-winning original journalism, life-saving coverage during emergencies, local news stories, and locally tailored programming. The Stations have won 63 Edward R. Murrow Awards since 2020 alone, among many other local and national awards and recognition. Seven of the eight Stations rank first in viewership in their local markets for local news, and WABC has consistently been the most-watched local television station in the country.

The outpouring of support for the Stations has been unprecedented for a license renewal proceeding. Over 140,000 comments have been received from the Stations' local communities—from individual viewers to local police and firefighters, charities, businesses, and schools—and over 95% support the Stations. These supporters span the ideological spectrum but share a fundamental commitment to free speech and press freedom. This record demonstrates that the

¹ See, e.g., Donald J. Trump (@realDonaldTrump), Truth Social (Aug. 24, 2025, at 10:58 PM ET), <https://truthsocial.com/@realDonaldTrump/posts/115087160158530143> (stating that ABC and NBC “should lose their Licenses for their unfair coverage of Republicans and/or Conservatives”).

Stations serve the public interest with distinction.

The FCC has spent the last 18 months searching for some pretext for revoking the Stations' licenses. The Commission has found none, because the Stations easily meet the standard for license renewal—which under the law means that the Commission cannot revoke their licenses or order a hearing on their renewal applications. The Commission has nonetheless pursued ABC on multiple fronts—which a bipartisan group of former FCC Commissioners has condemned as “an assault on free speech disguised as regulatory process.”² Indeed, the few petitions submitted in opposition to the Stations' applications come not from their local communities, but from interest groups with a mission to persuade the FCC to exert editorial control over the programming of networks like ABC.

The history of these proceedings makes plain their purpose. The Commission first opened an investigation of ABC for purported equal employment opportunity (“EEO”) violations. While ABC has sought to comply, that has led only to increasingly intrusive discovery demands. The challenged practices do not suggest that any Station has violated any EEO rules; far from it, those practices are consistent with those that the FCC *encouraged* for many years. But to this Commission, all that is beside the point; the mere investigation and the threat of finding a violation are sufficient: “the value of a sword of Damocles is that it hangs—not that it drops.”³

Next, the Commission took aim at the popular ABC network daytime talk show, *The View*. The Commission now appears poised to find that *The View* must provide equal opportunities to all legally qualified political candidates if it interviews one candidate on the show, which would represent a reversal of decades of agency precedent. Not only would such a finding backtrack on the Commission's own ruling expressly exempting *The View* from this “equal opportunities”

² See *infra* note 56.

³ *Arnett v. Kennedy*, 416 U.S. 134, 231 (1974) (Marshall, J., dissenting).

requirement, but it poses grave First Amendment problems. Yet again, the Commission seeks to dictate what ABC can and cannot say.

The Commission has also resorted to intimidation. In response to on-air comments by ABC's late night host Jimmy Kimmel, the FCC Chairman issued an ultimatum to ABC:

We can do this the easy way or the hard way. These companies can find ways to take action on Kimmel, or there is going to be additional work for the FCC ahead.⁴

That message has not gone unnoticed. Last month, in a concurring opinion warning of the dangers of unchecked executive power, Justice Neil Gorsuch cited this very episode as a cautionary tale of what might be done to “[a] business out of favor with the party in control of the White House.”⁵ As Senator Ted Cruz put it more bluntly, the Commission's attempted censorship of ABC is “dangerous as hell.”⁶ The danger became real when the FCC Chairman acted on his threat. Just one day after the President objected to another Kimmel comment, the agency ordered the accelerated review of the Stations' licenses.

Nor was the message meant for ABC alone. The retaliation against ABC is a signal to every media company in the country: accommodate the Administration's view of what news coverage should look like or pay the price. Across the government, regulatory and contracting carrots and sticks have been trained on other disfavored speakers.⁷ The tools vary; the objective does not: a media industry too fearful of official reprisal to report the news freely.

These unprecedented proceedings must be understood against this backdrop. Until the day before the Commission took this step, it had not called for license renewal applications ahead of schedule for more than fifty years. Nor has it ever demanded simultaneous renewal applications

⁴ See *infra* note 37.

⁵ *Trump v. Slaughter*, No. 25-332, slip op. at 8–9, 11 (June 29, 2026) (Gorsuch, J., concurring).

⁶ See Koch, *infra* note 54.

⁷ See *infra* note 250.

from a group of stations commonly owned with a single broadcast network, much less ones with undisputed, distinguished records of serving the public interest. The Commission’s departure from those norms lays bare what is really going on: the Administration is retaliating against ABC for the exercise of its First Amendment rights.

That alone should stop these proceedings in their tracks. The First Amendment forbids the government from taking adverse action against a speaker because of the content of their speech. This is as clearcut an example of retaliation as one could imagine. Because this whole proceeding rests on an unconstitutional premise, the Stations should never have been asked to justify license renewal years early.

Congress anticipated this danger when creating the Commission. Section 326 of the Communications Act of 1934 categorically withholds from the agency “the power of censorship,” and forbids any “regulation or condition . . . which shall interfere with the right of free speech.”⁸ For nearly a century, that provision has stood as a statutory firewall between the government’s licensing power and broadcasters’ editorial freedom. What the Commission is attempting here—wielding the renewal process to punish and reshape a broadcaster’s speech—is not merely constitutionally suspect; it is the precise abuse Congress forbade in the agency’s founding charter.

Even indulging Petitioners’ theories, the Commission’s response is unwarranted and disproportionate. Calling up the license of a single Station—let alone all eight at once—while the Commission’s DEI investigation has found no violation is unnecessary, premature, and punitive. Even if any violation were ever substantiated, the Commission has a graduated set of well-established remedies far short of the corporate death penalty of license non-renewal. That the agency reached first for the most extreme sanction in its arsenal, before making any finding at all, reveals its true objective: to chill not only ABC, but every broadcaster watching.

⁸ 47 U.S.C. § 326.

In any event, the Petitions only reinforce ABC’s case.

First, various Petitioners allege “bias” in ABC’s network programming. But the Commission has no authority to regulate the content of television programming, absent narrow circumstances not present here. For decades, the Commission itself understood those limits were necessary to protect First Amendment rights. Those limits remain robust and doom any attempt by the FCC to condition licensing on speech.

Second, some Petitioners claim that ABC has violated EEO regulations. But the employment practices they challenge have long been *encouraged*, not forbidden, by the FCC—indeed, to a degree that would raise serious due process concerns were the Commission to try to sanction ABC for doing what the FCC was telling companies to do less than two years ago.

Third, Petitioners fail to grapple with the relevant statutory requirements, which the Stations clearly satisfy and which thus preclude the FCC from taking any adverse action with respect to their licenses. There is overwhelming and unrefuted evidence of the Stations’ essential contributions to their local communities, showing that they have “served the public interest, convenience, and necessity” as the Communications Act expects.⁹ And no Petitioner has established any “violations” of Commission rules or regulations, let alone the “serious” ones or the “pattern of abuse” required to warrant denying renewal.¹⁰

Finally, several Petitioners lack standing to participate as parties-in-interest, and their Petitions contain fatal procedural deficiencies. These errors further warrant dismissal.

The Petitioners’ contentions have no basis in the facts, in the law, or in the Constitution. The Stations meet all the requirements for renewal, and no Petitioner has offered any allegations sufficient to contradict that showing. The Commission thus must dismiss the Petitions to Deny.

⁹ 47 U.S.C. § 309(k)(1).

¹⁰ *Id.*

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BACKGROUND

ABC’s eight owned stations—WABC-TV, New York, NY; KABC-TV, Los Angeles, CA; WLS-TV, Chicago, IL; WPVI-TV, Philadelphia, PA; KTRK-TV, Houston, TX; KGO-TV, San Francisco, CA; WTVD, Durham, NC; and KFSN-TV, Fresno, CA—are now subject to an extraordinary and unprecedented early license renewal process. Broadcast licenses ordinarily run for eight-year terms, which are staggered geographically by state.¹¹ Under that schedule, the Stations’ licenses will not come up for renewal for several years—the earliest expiration is not until 2028 (WTVD), and the latest are not until 2031 (both WABC and WPVI).¹² Indeed, under the Communications Act, the Commission lacks authority to grant license renewals more than thirty days prior to expiration, meaning that this proceeding cannot result in the grant of a renewal for any of the Stations for several years.¹³ While FCC regulations permit the Commission to call for license applications ahead of schedule,¹⁴ it had not done so in more than half a century, and it has *never* demanded simultaneous renewal applications from a group of stations commonly owned with a single broadcast network.¹⁵

The record is undisputed that the Stations have served the public interest in their local communities with distinction. The Stations serve millions of viewers with award-winning original

¹¹ See 47 C.F.R. § 73.1020(a).

¹² See FCC, *Broadcast Television License Renewals by STATE*, <https://www.fcc.gov/media/television/broadcast-television-license-renewal-dates-by-state> (last visited July 27, 2026).

¹³ See 47 U.S.C. § 307(d).

¹⁴ See 47 C.F.R. § 73.3539(c).

¹⁵ The day before the FCC issued its order mandating early license renewals for ABC, the FCC entered a similar order to Bridge News, LLC. See *Bridge News, LLC*, Order, DA 26-413 (MB rel. Apr. 27, 2026), <https://docs.fcc.gov/public/attachments/DA-26-413A1.pdf>. The timing led “many to suggest that this action the day before may have been taken to deprive ABC of the argument that calling for accelerated license renewal applications is unprecedented at the FCC.” Scott R. Flick & Betsy Craig, FCC Enforcement Monitor, Pillsbury Law (May 28, 2026), <https://www.pillsburylaw.com/en/news-and-insights/fcc-enforcement-monitor-may-2026.html>.

journalism, life-saving coverage during emergencies, local news stories, and locally tailored programming. In a testament to the quality of their programming, the Stations’ local news broadcasts consistently earn market-best ratings.¹⁶ WABC’s Channel 7 Eyewitness News is the most watched local news in the country, and has been the most-watched television station in the nation for over twenty years.¹⁷ Industry awards further reflect the Stations’ exemplary service to their communities: during the Stations’ current license terms, national, regional, and local organizations awarded or honored the Stations’ reporting and staff over 200 times.¹⁸

The FCC’s decision to call up the Stations’ licenses for early renewal is nothing more than the latest in the Commission’s ongoing retaliation campaign against ABC and ABC’s parent

¹⁶ See Renewal of License Application, KABC-TV, File Number 0000298356, KABC-TV Public Interest Exhibit, at 2 (submitted May 28, 2026) (“KABC PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076ff39e706cbc019e70db9b6b007f>; Renewal of License Application, KFSN-TV, File Number 0000298350, KFSN-TV Public Interest Exhibit, at 2 (submitted May 28, 2026) (“KFSN PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e706df1019e70b9d52a0082>; Renewal of License Application, KGO-TV, File Number 0000298344, KGO-TV Public Interest Exhibit, at 2 (submitted May 28, 2026) (“KGO PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e706df1019e70a83d3a0075>; Renewal of License Application, KTRK-TV, File Number 0000298353, KTRK-TV Public Interest Exhibit, at 1 (submitted May 28, 2026) (“KTRK PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076ff39e706cbc019e70cc042e0073>; Renewal of License Application, WABC-TV, File Number 0000298318, WABC-TV Public Interest Exhibit, at 3 (submitted May 28, 2026) (“WABC PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076ff39edb9ec4019f0073b8cb1a58>; Renewal of License Application, WLS-TV, File Number 0000298337, WLS-TV Public Interest Exhibit, at 2 (submitted May 28, 2026) (“WLS PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e706df1019e709ba78e0066>; Renewal of License Application, WPVI-TV, File Number 0000298324, WPVI-TV Public Interest Exhibit, at 1 (submitted May 28, 2026) (“WPVI PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e6a1784019e702d712106ef>; Renewal of License Application, WTVD, File Number 0000298327, WTVD Public Interest Exhibit, at 2 (submitted May 28, 2026) (“WTVD PIS”), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e6a1784019e70615fb2071f>.

¹⁷ WABC PIS at 1.

¹⁸ See KABC PIS at 2–3; KFSN PIS at 2–3; KGO PIS at 3–4; KTRK PIS at 1–2; WABC PIS at 3–4; WLS PIS at 2–3; WPVI PIS at 2; WTVD PIS at 2–3.

company, Disney. From its earliest days, this Administration has made clear its intent to punish ABC for its news coverage and to create a chilling effect on ABC and others. Targeting the Stations' licenses serves as the most powerful vehicle for achieving that goal.

ABC News' 2024 Presidential Debate. President Trump's threats to the Stations' licenses trace back to the 2024 election. ABC News hosted the sole debate between then-candidate Trump and then-Vice President Kamala Harris. The day after the debate, Trump asserted that ABC's moderators fact-checked his statements more strenuously than Harris's: "It was three to one. It was a rigged deal, as I assumed it would be."¹⁹ Trump claimed that ABC was "corrupt" and argued that the FCC "ought to take away their license."²⁰ Trump subsequently repeated this threat during a campaign rally, stating that: "ABC should lose its license . . . because of what they've done."²¹

Two weeks later, the Center for American Rights ("CAR") filed an FCC complaint against ABC Owned Station WPVI, alleging that the station had engaged in "news distortion," and echoing Trump's criticisms.²² CAR's complaint accused ABC News of "broadcaster favoritism" toward Harris and requested a formal reprimand.²³ While CAR's complaint was pending, then-Commissioner Carr publicly wrote to Disney, accusing the company of contributing to the "erosion in public trust" in mass media.²⁴

¹⁹ Brett Samuels, *Trump Bashes ABC, Says He's 'Less Inclined' To Another Debate*, The Hill (Sept. 11, 2024, 8:02 AM ET), <https://thehill.com/homenews/campaign/4873681-donald-trump-kamala-harris-debate-abc-news>.

²⁰ *Id.*

²¹ Jeremy Barr, *Trump Once Again Steps Up Attacks On TV Networks As He Threatens To Revoke Licenses*, Guardian (Nov. 26, 2025), <https://www.theguardian.com/us-news/2025/nov/26/trump-revoke-tv-licenses-threats-media-attacks>.

²² See Center for American Rights, Complaint Against WPVI-TV, at 7, GN Docket No. 25-11 (Sept. 24, 2024), https://drive.google.com/file/d/1hjHOBYh_CVwRcpZLGc1aHrozUbpBcBhT/view.

²³ *Id.* at 2, 17.

²⁴ See Letter from Brendan Carr, Commissioner, FCC, to Robert A. Iger, Chief Executive Officer, The Walt Disney Company (Dec. 21, 2024), <https://www.fcc.gov/sites/default/files/Carr-Letter-to-Disney-12212024.pdf>.

On January 16, 2025, the FCC’s Enforcement Bureau squarely rejected CAR’s complaint against WPVI. As the Enforcement Bureau explained, CAR’s request for a reprimand of the station was “contrary” to the mandates of the First Amendment.²⁵ Moreover, CAR’s “editorial” allegations and “conclusory statements” failed to meet the “very high bar for the Commission to commence an enforcement action,” particularly given the agency’s unwillingness to “act as a self-appointed, freerooving arbiter of truth in journalism.”²⁶

On January 20, 2025, Inauguration Day, President Trump named Commissioner Carr the new FCC Chairman. One of Chairman Carr’s first acts was to set aside the Enforcement Bureau’s ruling and reinstate the just-dismissed CAR complaint against WPVI, asserting that its previous dismissal “was issued prematurely based on an insufficient investigatory record.”²⁷ That complaint remains pending: as FCC Commissioner Gomez explained “there will be no end in sight for that investigation because the process is the punishment and keeping it open serves that goal.”²⁸

The Commission Targets Disney/ABC Employment Practices. On March 27, 2025, Chairman Carr again wrote to Disney, this time to say that he had asked the Enforcement Bureau

²⁵ Letter from Peter S. Hyun, Acting Bureau Chief, Enforcement Bureau, FCC, to Daniel R. Suhr, Center for American Rights, DA 25-11, at 1–2 (Jan. 16, 2025), <https://docs.fcc.gov/public/attachments/DOC-408880A1.pdf>.

²⁶ *Id.* at 2–3.

²⁷ *News Distortion Complaint Involving WPVI Television (Philadelphia), LLC, licensee of WPVI-TV, Philadelphia*, Order, DA 25-84, ¶ 1 (EB rel. Jan. 22, 2025). Notably, Chairman Carr did not set aside the Media Bureau’s ruling from the same day, dismissing a Petition to Deny the license of WTXF-TV Philadelphia, a Fox Owned station, that also alleged “news distortion” but in connection with the 2020 Presidential Election. *Preserving the First Amendment, Application of Fox Television Stations, LLC For Renewal of License of WTXF-TV, Philadelphia, PA*, Memorandum Opinion and Order, DA 25-57, ¶ 10 (MB rel. Jan. 16, 2025) (“*Fox Television Stations MO&O*”). The Commission’s willingness to leave the Fox Owned Station ruling undisturbed while exhuming a complaint alleging similar conduct against the ABC Owned Station in the same market is further evidence of the Commission’s adversarial posture towards ABC.

²⁸ Letter from Anna M. Gomez, Commissioner, FCC, to Josh D’Amaro, Chief Executive Officer, The Walt Disney Company, at 2 (May 11, 2026) (“Commissioner Gomez Letter”), <https://docs.fcc.gov/public/attachments/DOC-421580A1.pdf>.

to open an investigation to “ensure that Disney and ABC have not been violating FCC equal employment opportunity regulations by promoting invidious forms of DEI discrimination.”²⁹ His letter cited news articles about Disney’s workplace diversity efforts and promised that the FCC would “follow up” with additional details.³⁰

That follow-up occurred in June 2025, when the Enforcement Bureau issued a first Letter of Inquiry (“LOI”) confirming that the FCC was initiating an investigation into Disney, ABC, and the Stations for potential violations of the Communications Act of 1934 and FCC rules prohibiting discrimination in employment.³¹ The LOI ordered ABC to produce information and documents concerning its hiring and employment practices over the previous eight years.³² Those demands concerned employment practices not only at the Stations subject to FCC regulation but also at the Disney parent company and its entire family of companies—including those which have nothing to do with broadcasting. ABC nonetheless promptly and thoroughly complied, providing written responses and producing more than 6,200 pages of documents between July and September 2025 that were properly limited to the Stations’ employment practices and Disney policies that impacted the Stations’ practices.

In response, the Enforcement Bureau issued another LOI in February 2026, with more than 80 additional requests for documents and information—many duplicative of the Bureau’s prior

²⁹ Letter from Brendan Carr, Chairman, FCC, to Robert A. Iger, Chief Executive Officer, The Walt Disney Company, at 1 (Mar. 27, 2025), <https://www.fcc.gov/sites/default/files/Carr-Letter-to-Disney-DEI-03272025.pdf>.

³⁰ *See id.* at 2–3.

³¹ Letter from Patrick Webre, Acting Bureau Chief, Enforcement Bureau, FCC, to Robert A. Iger, Chief Executive Officer, The Walt Disney Company, at 1, File No. EB-IHD-25-00038333 (June 5, 2025) (citing 47 U.S.C. §§ 554(b), 334; 47 C.F.R. §§ 25.601, 90.168, 73.2080(a), 76.73).

³² *Id.* at 4–5.

requests. ABC completed its response in April 2026, producing more than 4,000 pages of additional documents.

ABC's cooperation simply begat further, more aggressive demands. The Bureau sent follow-up email requests with aggressive deadlines and issued extensive new LOIs while ABC was still preparing its response to a previous LOI—requests with a volume and sweeping scope unheard-of in modern FCC practice. Although ABC objected to the scope and burden of the FCC's sweeping demands, Disney continued to comply with the FCC's investigation and has to date responded to over 600 separate requests and produced more than 12,000 pages of documents.

President Trump Again Threatens ABC's Licenses. Even as ABC strove to cooperate with the FCC, President Trump repeatedly threatened ABC's licenses and did not try to obscure the reason for that threat. In an August 2025 Truth Social post, he claimed that ABC is “the absolute worst” and “most biased network anywhere in the World” and that ABC “should lose their Licenses for their unfair coverage of Republicans and/or Conservatives.”³³ The next month, he posted again: “This is just one of many reasons the Federal Communications Commission should look into the license of . . . ABC Fake News . . . 97 percent negative to Republicans!”³⁴ The month after that, responding to an ABC reporter at a press conference, President Trump stated: “I think the license [should be] taken away from ABC because your news is so fake and is so wrong, and we have a great [FCC] Chairman who should look at that.”³⁵ Meanwhile, the White

³³ See Donald J. Trump (@realDonaldTrump), Truth Social (Aug. 24, 2025, at 10:58 PM ET), <https://truthsocial.com/@realDonaldTrump/posts/115087160158530143> (last visited July 27, 2026).

³⁴ See Donald J. Trump (@realDonaldTrump), Truth Social (Oct. 5, 2025, at 7:19 PM ET), <https://truthsocial.com/@realDonaldTrump/posts/115324116995053528> (last visited July 27, 2026).

³⁵ Irie Sentner, *Trump Again Threatens ABC's Broadcast License, This Time Over Epstein Questions*, Politico (Nov. 18, 2025), <https://www.politico.com/news/2025/11/18/trump-again-threatens-abcs-broadcast-license-this-time-over-epstein-questions-00657264>.

House began cataloguing the perceived “offenses” of various ABC reporters on a public webpage titled “Media Offenders.”³⁶

Chairman Carr Issues An Ultimatum. Following on-air comments made by ABC network late night host Jimmy Kimmel on September 15, 2025, Chairman Carr issued an ultimatum to ABC: “We can do this the easy way or the hard way. These companies can find ways to take action on Kimmel, or there is going to be additional work for the FCC ahead.”³⁷

The Commission Targets “The View.” Chief among the Administration’s alleged “Media Offenders” are the female co-hosts of ABC network’s popular daytime talk show, *The View*.³⁸ *The View*’s supposed “offenses” include criticism of government officials for “visiting the Alligator Alcatraz ICE detention facility in Florida” and “claiming President Trump was overstepping his authority by constructing a White House ballroom.”³⁹

On February 11, 2026, the Media Bureau sent an LOI to KTRK, the ABC Owned Station in Houston, alleging violation of the FCC’s “equal opportunities” rule and Section 315 of the Communications Act in connection with the appearance of Texas U.S. senatorial candidate, James Talarico, on *The View*.⁴⁰ That rule requires broadcast stations to provide, upon request, equal opportunity to all legally qualified candidates for an office if they permit any one candidate for the same office to use their facilities,⁴¹ and to include a record of the time used by that candidate in the station’s political file.⁴² But Congress has exempted “bona fide news interview” programs

³⁶ *Media Offender: ABC News*, The White House, <https://www.whitehouse.gov/media-bias-publication/abc-news> (accessed July 27, 2026).

³⁷ Benny Johnson, *Kash Patel Testifying LIVE Now on Charlie Kirk Assassin*, The Benny Show, at 1:29:28–29:40 (Sept. 17, 2025), <https://podcasts.apple.com/us/podcast/kash-patel-testifying-live-now-on-charlie-kirk-assassin/id1584730781?i=1000727236632>.

³⁸ *See supra* note 36.

³⁹ *Id.*

⁴⁰ KTRK responded to the LOI accordingly.

⁴¹ *See* 47 U.S.C. § 315.

⁴² 47 C.F.R. § 73.1943.

from these requirements,⁴³ and the FCC declared in 2002 that *The View* qualifies for that exemption.⁴⁴ Only one month before sending its LOI to *The View*, the Media Bureau had issued new guidance that called into question decades of precedent regarding the application of that exemption to “late night and daytime talk shows.”⁴⁵

On March 26, 2026, the Commission issued a second LOI to KTRK,⁴⁶ which concluded with an unprecedented order directing ABC to file a petition for declaratory ruling on *The View*’s exempt status. The Commission had never before required a licensee to initiate such a proceeding, and the directive contradicted prior statements that licensees “need not seek formal declaration from the Commission” to claim a bona fide news exemption.⁴⁷

The Commission Targets The ABC Owned Local Television Licenses. On April 28, 2026—one day after President Trump objected to additional on-air comments made by Jimmy Kimmel⁴⁸—the Commission abruptly ordered the company to file broadcast license renewal applications for all eight of ABC’s owned television stations, asserting that early renewal was

⁴³ 47 U.S.C. § 315(a)(2).

⁴⁴ See Letter from Robert Baker, Chief, Office of Political Programming, Policy and Rules Division, Mass Media Bureau, FCC, to ABC, Inc. (Mar. 1, 2002) (“The View Declaratory Ruling”).

⁴⁵ See *FCC’s Media Bureau Provides Guidance On Political Equal Opportunities Requirement For Broadcast Television Stations*, Public Notice, DA 26-68 (MB rel. Jan. 21, 2026), <https://docs.fcc.gov/public/attachments/DA-26-68A1.pdf>.

⁴⁶ The Commission based its March 26, 2026 inquiry in part on a claim that *The View*’s qualification for the bona fide news interview exemption was “not a position uniformly held by broadcasters that air the program” as 19 ABC affiliates had filed notice of Mr. Talarico’s appearance. Critically omitted was the detail that those affiliates’ filings were made more than two weeks after the appearance, and apparently at the request of the FCC, which reportedly promised to eschew enforcement for the late filing.

⁴⁷ See *Infinity Broadcasting Operations Inc.*, Declaratory Ruling, 18 FCC Rcd 18603, 18604 (MB 2003).

⁴⁸ Donald J. Trump (@realDonaldTrump), Truth Social (Apr. 27, 2026, at 1:26 PM ET), <https://truthsocial.com/@realDonaldTrump/posts/116477838570626860> (last visited July 27, 2026).

“essential” to the ongoing DEI investigations.⁴⁹ The Stations filed the renewal applications under protest, arguing (among other things) that the order violated the First Amendment.⁵⁰

The day after the ABC Owned Stations filed their early renewal applications, Chairman Carr wrote to Congress that the Commission had “formally notified Disney that responses to the agency’s lawful [EEO-related] inquiries have been deficient, nonresponsive, and disingenuous.”⁵¹ The Commission simultaneously issued yet another LOI concerning Disney’s employment and hiring practices.

To date, the Commission has received more than 140,000 submissions in the renewal applications docket, over 95% of which are supportive of the Stations,⁵² from elected officials, law enforcement and public safety authorities, organizations in the Stations’ local communities, and thousands of the Stations’ viewers emphasizing the importance and value each of the Stations has in their local communities and urging the FCC not to disrupt the Stations’ service.⁵³ Only a handful of entities—most of which are not local to any of the Stations—petitioned the Commission to deny the renewal applications, largely based on objections to the content and viewpoints expressed on ABC network programming or Disney corporate employment practices.

⁴⁹ *The Walt Disney Company, American Broadcasting Company et al.*, Order, MB Docket No. 26-416, ¶ 2 (MB Apr. 28, 2026), <https://docs.fcc.gov/public/attachments/DA-26-416A1.pdf>.

⁵⁰ See, e.g., Renewal of License Application, WABC-TV, File Number 0000298318, WABC-TV Objection to Unlawful Early Renewal (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e6a1784019e6ff4fe2c066b>.

⁵¹ See Letter from Brendan Carr, Chairman, FCC, to Yvette Clarke, Ranking Member, House Subcomm. on Oversight and Investigations, at 4 (May 29, 2026), <https://docs.fcc.gov/public/attachments/DOC-422341A2.pdf>.

⁵² See Appendix B. These numbers are based on the comments publicly filed as of midnight UTC on July 27, 2026.

⁵³ See generally FCC Electronic Comment Filing System, MB Docket No. 26-131, [https://www.fcc.gov/ecfs/search/search-filings/results?q=\(proceedings.name:\(%2226-131%22\)\)](https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2226-131%22))) (last visited July 29, 2026).

The Commission’s attempted censorship of ABC has attracted condemnation across the political aisle. In addition to Justice Gorsuch and Senator Cruz’s warnings,⁵⁴ a coalition of conservative and free-market organizations has warned against the “politicization” of the license renewal process and urged the FCC to “preserve the well-established, routine, predictable, and presumptive nature of broadcast license renewal.”⁵⁵ And in an Opposition to the Petitions to Deny of CAR and the Media Research Center (“MRC”), a bipartisan group of former FCC Chairs, Commissioners, Chiefs of Staff, General Counsels, and Bureau Chiefs implored the Commission to “terminate these early renewal proceedings,” “lift the pall of state censorship” the proceedings have “cast over American broadcasting,” and “reaffirm [the FCC’s] foundational and long-held commitment to free speech.”⁵⁶

⁵⁴ See *Slaughter*, slip op. at 8–9, 11 (Gorsuch, J., concurring); Alexandra Koch, *Cruz Warns Conservatives ‘Will Regret’ FCC Censorship Push Against ABC, Other Media Outlets*, Fox News (Sept. 19, 2025), <https://www.foxnews.com/politics/cruz-warns-conservatives-will-regret-fcc-censorship-push-against-abc-other-media-outlets>.

⁵⁵ Letter from Conservative and Free-Market Organizations to Brendan Carr, Chairman, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110043114/1>; see also, e.g., Ben Shapiro (@BenShapiro), YouTube Shorts, *Is The FCC Coming After Free Speech?* (Sept. 21, 2025), <https://www.youtube.com/shorts/f3y1kYXSbmQ> (“The FCC should not be threatening various broadcasters and hosts with governmental consequences for speech.”); Anthony Fuoti, Express Comment, MB Docket No. 26-131 (July 5, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26109986493> (“As a registered Republican, I am deeply upset and disturbed by what is happening in this docket. . . . Using a government agency to force early license reviews and scrutinize private business practices looks less like oversight and more like the weaponization of federal power. This sets a dangerous precedent that threatens the First Amendment rights of all broadcasters, regardless of their political leanings.”); Robert Osborn, Express Comment, MB Docket No. 26-131 (June 23, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26109894910> (“I am a registered Republican. Southeastern Pennsylvania deserves to keep its trusted news station 6 abc. This is a severe overreach and intrusion into first amendment free speech rights in this country.”); Michael Frenzer, Express Comment, MB Docket No. 26-131 (July 11, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26110010780> (“Although I am from Illinois I am a registered Republican . . . so consider that registered Republicans can think that the FCC would be going too far if they revoke broadcast licenses of stations like these.”).

⁵⁶ Opposition of Former FCC Chairs, Comm’rs, Chiefs of Staff, Gen. Counsels, and Bureau Chiefs to Petitions to Deny of CAR and MRC, MB Docket No. 26-131, at 2 (July 28, 2026), <https://www.fcc.gov/ecfs/document/26110060005/1>.

After the Stations’ early renewal applications were submitted, President Trump yet again called for ABC’s licenses to be revoked—this time for choosing not to air his July 16, 2026 primetime address over broadcast (and instead to stream the address live and free to the public and then provide breaking news special report broadcast coverage).⁵⁷ During that address, President Trump stated, “NBC and ABC fake news have both said that they would not cover this speech Fraud like this should mean a revocation of their licenses.”⁵⁸ The following week, Chairman Carr commented at a public press conference that the President’s speech was “something that broadcasters should be carrying,” and suggested that the network’s decision not to broadcast the President’s speech would be raised and considered by the Commission during these license renewal proceedings.⁵⁹

ARGUMENT

Section 309(k)(1) of the Communications Act declares that the Commission “shall grant the application [for renewal] if it finds, with respect to that station, during the preceding term of its license” that

(A) the station has served the public interest, convenience, and necessity;

(B) there have been no serious violations by the licensee of this chapter or the rules and regulations of the Commission; and

⁵⁷ Brian Stelter, *Here’s How The TV Networks Handled Trump’s Highly Unusual Prime-Time Address*, CNN (July 16, 2026), <https://www.cnn.com/2026/07/16/media/trump-election-address-cbs-abc-nbc-fox-networks>.

⁵⁸ Aaron Pellish, *Trump Calls For Revocation Of ABC, NBC Licenses Over Speech Snub*, Politico (July 16, 2026), <https://www.politico.com/news/2026/07/16/trump-calls-for-revocation-of-abc-nbc-licenses-over-speech-snob-01002580>; see also *id.* (noting numerous prior instances of different networks declining to broadcast presidential speeches).

⁵⁹ Todd Spangler, *FCC Chair Says ABC’s Decision to Not Broadcast Trump Speech Live Will Be Part of Agency’s Review of Station Licenses*, Variety (July 22, 2026, 11:24 AM PT), <https://variety.com/2026/tv/news/fcc-abc-trump-speech-review-station-licenses-1236818342>; see also Letter from Daniel R. Suhr, Director, Center for American Rights, to Brendan Carr, Chairman, FCC, (July 17, 2026), <https://www.fcc.gov/ecfs/document/26110026680/1>.

(C) there have been no other violations by the licensee of this chapter or the rules and regulations of the Commission which, taken together, would constitute a pattern of abuse.⁶⁰

The statute “expressly limit[s] the scope of the license renewal inquiry to matters occurring *at the particular station* for which license renewal is sought.”⁶¹

Where a petitioner asks the Commission to hold a hearing on a license renewal application, the petitioner bears a heavy burden to raise factual issues that are “substantial and material.”⁶² If the Commission finds that the record presents no substantial and material questions of fact and that the licensee has met the statutory standard, the Commission must grant the application.⁶³

By any ordinary measure, the eight Stations easily satisfy these requirements. The record overwhelmingly demonstrates the Stations’ essential contributions to the public interest and their local communities. And Petitioners identify no violation of the Communications Act or FCC rules of any kind, let alone one that could justify the extraordinary remedy of a designation for hearing or denial of a license renewal. That the Commission nonetheless demanded early review of all of the ABC Owned Stations’ licenses at once lays bare the true purpose of these proceedings: to punish ABC for the content of its speech and to chill future speech that the Administration dislikes.

The Commission therefore must deny the Petitions to Deny, or alternatively, dismiss these early renewal proceedings as untimely and unwarranted.

⁶⁰ 47 U.S.C. § 309(k)(1). Notably, by ordering the Stations to file early renewals, the Commission has denied the Stations the procedural protections it has afforded every other broadcaster for decades, including an evaluation of the *complete* preceding license term.

⁶¹ *Sagittarius Broadcasting Corp. Application for Renewal of License WXRK(FM), New York, New York Facility ID #58579*, 18 FCC Rcd 22551, 22555 (2003) (emphasis added); *accord Fox Television Stations MO&O* ¶ 11.

⁶² *Ca. Pub. Broad. Forum v. FCC*, 752 F.2d 670, 674 (D.C. Cir. 1985). *See also Gencor, Inc. v. FCC*, 832 F.2d 171, 180–181 (D.C. Cir. 1987) (“In 1960, Congress amended section 309(d) of the Act to significantly heighten the burden a petitioner must satisfy in order to obtain an evidentiary hearing.”).

⁶³ *See Astroline Commc’ns v. FCC*, 857 F.2d. 1556, 1561 (D.C. Cir. 1988).

I. The ABC Owned Stations Serve The Public Interest, Convenience, And Necessity

As an initial matter, the record is undisputed that the Stations have served the “public interest” in their local communities with distinction.⁶⁴ The Petitioners fail to contest the litany of evidence—contained both in the Stations’ Public Interest Statements filed as part of their renewal applications and in the thousands of comments submitted by community officials, organizations, and viewers—that demonstrates the depth of the Stations’ service to their communities.

Collectively, the Stations produce over 390 hours per week of regularly scheduled local news, an average of almost 49 hours per station.⁶⁵ That local news coverage airs throughout the day—beginning early in the morning, continuing during the afternoon, and concluding in the late evening—offering in-depth coverage of local news stories, investigative and consumer reporting, weather, and sports. In a testament to the quality of this programming—and its service to the public interest—the Stations’ local news broadcasts consistently earn market-best ratings.⁶⁶ Several of the Stations have been market leaders for many years or even decades, with some local news broadcasts outperforming the competition by 75% or more.⁶⁷ And WABC’s Channel 7

⁶⁴ 47 U.S.C. § 309(k)(1)(A).

⁶⁵ These totals do not include the numerous instances in which a Station breaks into regularly scheduled programming to provide local news coverage.

⁶⁶ In seven out of the eight markets, the Station’s local news broadcasts are ranked number one for viewership in every single daypart, and the eighth station is ranked first for morning news and second in all other dayparts. *See* KABC PIS at 1; KFSN PIS at 1; KGO PIS at 1; KTRK PIS at 1; WABC PIS at 1; WLS PIS at 1; WPVI PIS at 1; WTVD PIS at 1.

⁶⁷ WABC PIS at 1 (“WABC has been the leader in local news and entertainment programming in the New York City area for more than 60 years.”); WPVI PIS at 1 (describing “the station’s over 40-year run as the market’s local news leader”); *id.* at 6 (“From May 2025 through April 2026, [WPVI] was not just the number one newscast, it more than *doubled* the audience of its closest competitor in almost all dayparts.”); WLS PIS at 11 (“[T]he station leads its closest competitor in news ratings by over 75% . . . and the station’s 4pm, 5pm, and 6pm newscasts have retained their number one ranking for over 30 years.”); KGO PIS at 1 (“[KGO] has been the most watched 4:00 p.m., 5:00 p.m., and 6:00 p.m. local news in market the since 2018, and number one from sign-on to sign-off since 2020.”).

Eyewitness News is the most watched local news in the country, and has been the most-watched television station in the nation for over twenty years.⁶⁸

Numerous industry awards further reflect the Stations' exemplary service to their communities. During the Stations' current license terms, national, regional, and local organizations awarded or honored the Stations' reporting and staff over 200 times,⁶⁹ including with over 85 local Emmy Awards.⁷⁰ Since 2020, the Stations have collectively received 63 Edward R. Murrow Awards, including 37 in the past three years, with KABC, KGO, and WABC all taking national honors.⁷¹

The Stations also provide the following critical services for their communities:

Broadcasting lifesaving breaking news coverage. The Stations provide real-time, live coverage of emergencies in their communities—interrupting regularly-scheduled programming when necessary to do so—including severe weather, natural and manmade disasters, strikes, and situations involving law enforcement, ensuring that viewers have the knowledge necessary to avoid harm.⁷² For instance, KABC's Peabody award-winning coverage of the 2025 Southern

⁶⁸ WABC PIS at 1.

⁶⁹ See KABC PIS at 2–3; KFSN PIS at 2–3; KGO PIS at 3–4; KTRK PIS at 1–2; WABC PIS at 3–4; WLS PIS at 2–3; WPVI PIS at 2; WTVD PIS at 2–3.

⁷⁰ See KABC PIS at 3; KFSN PIS at 3; KGO PIS at 3; KTRK PIS at 1; WABC PIS at 3; WLS PIS at 2–3.

⁷¹ See KABC PIS at 2; KGO PIS at 3; WABC PIS at 3; WTVD PIS at 2; WLS PIS at 2.

⁷² See, e.g., KTRK PIS at 3–5; WLS PIS at 2, 5–8; WTVD PIS at 2, 4–5, 15; WPVI PIS at 2–7, 15; WABC PIS at 5, 7–8; KFSN PIS at 4, 6–7; KABC at 7–8, 10, 12; KGO PIS at 3 n.1, 6. See also, e.g., Letter from Jay Obernolte, Member of Congress, U.S. House of Representatives, 23rd District, California, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 2 (July 8, 2026) at 1, <https://www.fcc.gov/ecfs/document/26110044884/1> (“KGO has repeatedly been the first to deliver critical updates during natural disasters, such as coverage of the potential impacts of a series of high-magnitude earthquakes hit Northern California in December 2024 which triggered a tsunami warning along the California coast within KGO's viewing area.”); Letter from Daniel T. Blue, Senator, North Carolina General Assembly, 14th District, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110041393/1> (“When news breaks—a mass shooting in a Raleigh neighborhood, a shooting on the UNC campus, or a tragedy at the Raleigh Christmas

California wildfires included 35 hours of live broadcasts without commercial interruption, followed by 11 days of continuous coverage with only brief breaks during overnight hours, and was lauded in the record by local law enforcement for its role in keeping the community safe.⁷³

Keeping viewers informed on issues facing their local communities. The Stations’ journalists provide in-depth coverage of local governments, political races/elections, school systems, transit authorities, and judicial systems, providing insights national outlets may ignore.⁷⁴ Many Stations also offer dedicated public affairs programs that regularly host and interview policymakers, local opinion leaders, and other community luminaries.⁷⁵

Exposing wrongdoing and effecting meaningful change. Station investigative and consumer reporting teams have helped local viewers recover millions of dollars from companies and local governments while also inspiring new laws, government reforms, law enforcement

Parade—WTVD interrupts regular programming to deliver the timely, accurate information our residents need.”).

⁷³ KABC PIS at 3–5; Letter from Robert G. Luna, Sheriff, Office of the Sheriff County of Los Angeles to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131 (June 29, 2026), <https://www.fcc.gov/ecfs/document/26110016998/1>.

⁷⁴ See, e.g., KABC PIS at 10–11; KTRK PIS at 8, 14–15; WLS PIS at 9, 18; WTVD PIS at 15–19; WABC PIS at 8, 14; WPVI PIS at 4; KFSN PIS at 12–15. See also, e.g., Letter from Rania Mankarious, CEO, Crime Stoppers of Houston, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 1, 2026), <https://www.fcc.gov/ecfs/document/26109963978/1> (“[KTRK’s] reporting has helped amplify critical safety messages, encouraged crime reporting, connected victims with resources, and increased awareness of issues that affect families across Southeast Texas.”); Letter from Robert T. Reives, II, Democratic Leader, North Carolina House of Representatives, 54th District, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110056459/1> (“Few stations anywhere cover schools, students, and teachers with the depth and consistency that WTVD brings to central and eastern North Carolina.”).

⁷⁵ See, e.g., KABC PIS at 12; WPVI PIS at 6, 7; WABC PIS at 7; KTRK PIS at 9–11; KFSN PIS at 9. See also, e.g., Letter from Michael Giannaris, Deputy Leader, New York State Senate, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (June 21, 2026), <https://www.fcc.gov/ecfs/document/26110037991/1> (lauding WABC’s public affairs programming as “provid[ing] in-depth discussions with community leaders and policymakers, helping residents better understand issues ranging from public policy to education and community development.”).

investigations, civil lawsuits, criminal prosecutions, settlements, and restitution payments.⁷⁶

Comments reflecting gratitude for this work abound.⁷⁷

Showcasing community events, cultural institutions, businesses, sports teams, and charities. Each Station produces original programming to highlight unique local events and cultural institutions.⁷⁸ The Stations focus on local sports, providing live coverage of local games, special programming for post-season runs, and recurring segments on local teams and athletes.⁷⁹ The Stations boost local businesses through weekly programs and recurring news segments.⁸⁰ And

⁷⁶ See, e.g., WTVD PIS at 11–14; KABC PIS at 15–16; KTRK PIS at 13–15; WLS PIS at 14–16; WABC PIS at 2, 11–12; WPVI PIS at 9–11, 15; KGO PIS at 4, 9–10.

⁷⁷ See, e.g., Letter from Joseph Cantara, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131 (June 18, 2026), <https://www.fcc.gov/ecfs/document/26109834976/1> (describing how after contacting WABC, “[t]he very next day . . . the \$10,000.00 that we were attempting to get back for months at this point from Citibank, was deposited in our account because of [Nina Pineda’s] efforts and advocating on our behalf!”); Letter from Joseph P. Ciresi, Member, Pennsylvania House of Representatives, 146th District, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110044887/1> (“WPVI’s investigative and consumer reporting teams regularly uncover issues that directly affect Pennsylvanians and help deliver meaningful results. Recent efforts have led to substantial financial recoveries for consumers, exposed public safety concerns, and prompted corrective actions by businesses and institutions, demonstrating the real-world impact of the station’s reporting.”).

⁷⁸ See, e.g., KABC PIS at 19–20; KFSN PIS at 17; KGO PIS at 15–16; KTRK PIS at 11, 16–17; WABC PIS at 13–15, 16; WLS PIS at 11–12; WPVI PIS at 7–9, 14–15; WTVD PIS at 8–9. See also, e.g., Letter from Cristina Castro, Senator, Illinois State Senate, 22nd District, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 10, 2026), <https://www.fcc.gov/ecfs/document/26110045132/1> (“Beyond breaking news, WLS provides programming that highlights Chicago’s communities and civic life. Initiatives such as Our Chicago and Windy City Weekend showcase neighborhood stories, local businesses, and community leaders. These programs also facilitate discussions on issues affecting residents across the region.”).

⁷⁹ KABC PIS at 18–19; KFSN PIS at 17; KTRK PIS at 15–16; WPVI PIS at 14; WLS PIS at 20–21; KGO PIS at 13–14; WTVD PIS at 20–21; WABC PIS at 15–16.

⁸⁰ WPVI PIS at 7, 8–9, 12; WLS PIS at 11–12, 14; WTVD PIS at 8–9; WABC PIS at 13–14; KFSN PIS at 11, 13; KABC PIS at 13–14; KGO PIS at 13; KTRK PIS at 17. See also, e.g., Letter from Lisa A. Smittcamp, District Attorney, Fresno County District Attorney’s Office, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 2 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26110008444/1> (“Throughout the years, KFSN has distinguished itself not only through its journalism, but through its genuine investment in highlighting the people, organizations, and stories that define our community”).

the Stations air hundreds of public service announcements (PSAs) per month on locally relevant issues like health, education, public safety, and community initiatives.⁸¹

Honoring the military and American history. The Stations broadcast news stories and other local programming that profile U.S. service members, military veterans, and veteran-owned businesses and causes.⁸² Furthermore, in addition to producing patriotic programming associated

⁸¹ KABC PIS at 14; KFSN PIS at 11; KGO PIS at 12–13; KTRK PIS at 11–12; WABC PIS at 8–9; WLS PIS at 14; WPVI PIS at 8; WTVD PIS at 10. *See also* Letter from Ken Toren, Chapter Executive, Alzheimer’s Association Northern California Chapter, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (June 30, 2026), <https://www.fcc.gov/ecfs/document/26109960942/1> (discussing how KGO’s PSAs on upcoming events, news stories, and on-air talent hosts “helped us make an impact on thousands of community members”).

⁸² KABC PIS at 13; KFSN PIS at 20; KTRK PIS at 10–11; WTVD PIS at 16. *See also, e.g.*, Letter from Mark Otto, President & Executive Director, United War Veterans Council, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 21, 2026), <https://www.fcc.gov/ecfs/document/26110042053/1> (“ABC7 has helped ensure that the stories of our veterans and military are not overlooked; not only on Veterans Day but throughout the year. Without ABC7, the NYC veteran community would have much less visibility in this market, and our veterans’ voices and issues would be significantly underrepresented.”); Letter from LaShondra Jones, Chairman, Armed Services Committee, NAACP (Houston Chapter), to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110017257/1> (“It is important that stations such as [KTRK] continue to be involved in Houston’s veteran community and continue to highlight and honor the sacrifices made by servicemen and servicewomen who call Houston home.”). WTVD is the only station in its market to operate a remote news bureau, staffed with a locally based reporter and photographer, in Fayetteville, NC, which is located near U.S. Army Base Fort Bragg, creating unique opportunities for WTVD. *See* WTVD PIS at 16; Letter from Charles R. Smith, State Representative, North Carolina House of Representatives, 14th District, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110048411/1> (discussing how “WTVD’s reporters have traveled with the 82nd Airborne Division soldiers to Afghanistan, Iraq, and Kuwait. The station covers deployments from Fort Bragg and tells the human stories behind them”).

with the nation's 250th anniversary,⁸³ the Stations regularly broadcast community Fourth of July and Veterans Day celebrations.⁸⁴

Investing in their local communities. Together, the Stations employ over 1,500 members of their communities as full-time, part-time, and freelance staff,⁸⁵ and have spent millions on local newsgathering capabilities.⁸⁶ These investments allow the Stations to provide high-quality coverage of local markets; for instance, several Stations operate news bureaus that offer hyperlocal coverage of particular communities in the Stations' markets.⁸⁷ The Stations and their employees also commit substantial time and funding to local charities and other organizations.⁸⁸

⁸³ WABC PIS at 12–13; WPVI PIS at 7, WTVD PIS at 16. In addition to local programming, the Stations aired the ABC Network's two-hour primetime special *Disney Celebrates America: The Pursuit of Happiness* on June 29th and special ABC Network programming to commemorate America's 250th anniversary on both July 3rd and 4th. See '*Disney Celebrates America*' Ramps Up with a Phenomenal Lineup of Experiences Ahead of the Nation's 250th Anniversary, Walt Disney Co. (June 2, 2026), <https://thewaltdisneycompany.com/news/america-250-events-lineup>.

⁸⁴ KFSN PIS at 18, 20; KTRK PIS at 11, 17; WPVI PIS at 14; WABC PIS at 16; KABC PIS at 13, 19; WTVD PIS at 16.

⁸⁵ KABC PIS at 2; KFSN PIS at 2; KGO PIS at 2; KTRK PIS at 1; WABC PIS at 3; WLS PIS at 2; WPVI PIS at 1; WTVD PIS at 2.

⁸⁶ See, e.g., KABC PIS at 8 (new weather cameras); KFSN PIS at 5 ("Fog Tracker"); KTRK PIS at 3 ("Climavision" weather radar technology); WLS PIS at 5 (high-gain weather antennae); WTVD PIS at 3–4 (Doppler radar); WPVI PIS at 3 (weather cameras); KABC PIS at 9 (California-wide helicopter live broadcasting); KTRK PIS at 3 (Sky Eye 13 HD helicopter); WLS PIS at 8 (SkyMap 7 traffic helicopter technology); KGO PIS at 2 (fleet of more than 20 mobile news vans); WLS PIS at 4 (remote production vehicle); WTVD PIS at 4 ("StormChaser" vehicle); KFSN PIS at 4 (studio upgrades, including robotics); WABC PIS at 4–5 (augmented and virtual reality); WLS PIS at 4 (virtual set and augmented reality environment); see also, e.g., Letter from Oscar Rodriguez, President, Texas Association of Broadcasters, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 28, 2026), <https://www.fcc.gov/ecfs/document/26110062061/1> ("Despite the extraordinary expense, KTRK is now the only Houston TV station with its own helicopter – especially beneficial to the community because the State of Texas prohibits the use of drones for newsgathering.").

⁸⁷ See KABC PIS at 2; KFSN PIS at 1; KGO PIS at 1–2; WABC PIS at 2; WTVD PIS at 1; see also WTVD PIS at 16 (discussing Fort Bragg coverage).

⁸⁸ See, e.g., KABC PIS at 20–22; KGO PIS at 16–17; KTRK PIS at 18–19; WPVI PIS at 14–16; KFSN PIS at 18–19; KGO PIS at 17; WLS PIS at 21–22; WABC PIS at 17–18; see also, e.g., Letter from Christine Hayes, President & CEO, Central California Blood Center, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26109998989/1> ("ABC30 [KFSN] has also served as the

As the above, the Public Interest Statements appended to the Stations' renewal applications, and the voluminous comments in the record reflect, an exhaustive list of the Stations' coverage of and contributions to their local communities would fill reams. For additional examples, please see Appendix A.

II. Petitioners' Rationales For Denying The ABC Owned Stations' Licenses Are Meritless

Section 309(d) of the Communications Act demands that petitions to deny "contain specific allegations of fact sufficient to show that the petitioner is a party in interest and that a grant of the application would be prima facie inconsistent with [Section 309(k)]. Such allegations of fact shall, except for those of which official notice may be taken, be supported by affidavit of a person or persons with personal knowledge thereof."⁸⁹ As the D.C. Circuit has explained, "[t]his statutory standard puts a heavy burden on a party submitting a petition to deny: For a hearing on the application to be required, the party must, with statutorily required specificity and support, raise controverted factual issues that are substantial and material."⁹⁰ If the Commission finds that the

media partner for our annual Pint for a Pint Blood Drive for nearly 40 years, helping motivate thousands of community members to donate during the challenging summer months. Its coverage of blood shortages, donor stories, and community events has significantly expanded CCBC's reach and strengthened our ability to maintain a safe, reliable blood supply for the hospitals and patients we serve."); Letter from Amy Beros, President & CEO, Food Bank of Central and Eastern North Carolina, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 1 (June 24, 2026), <https://www.fcc.gov/ecfs/document/26109920471/1> ("For nearly four decades, ABC11 [WTVD] has been one of the Food Bank's most meaningful and enduring partners through the ABC11 Together Food Drive. Year after year, the station has helped turn concern into action . . . That partnership has helped provide millions of meals to people across our region.").

⁸⁹ 47 U.S.C. § 309(d)(1).

⁹⁰ *Ca. Pub. Broad. Forum*, 752 F.2d at 674. *See also Gencom*, 832 F.2d at 180–181 ("In 1960, Congress amended section 309(d) of the Act to significantly heighten the burden a petitioner must satisfy in order to obtain an evidentiary hearing.").

record does not present any substantial and material questions of fact and that the licensee has met the statutory standard, the Commission must grant the application.⁹¹

Petitioners have failed to make out a prima facie case of any violations of the Communications Act or FCC regulations. And because Petitioners have not and cannot identify any relevant or adjudicated non-FCC misconduct, their bare allegations cannot be considered under the Commission's longstanding character policy. Accordingly, Petitioners' allegations fail to raise any material factual issues that might justify a hearing.

A. The Commission Lacks Authority To Deny The ABC Owned Stations' License Renewals For Purported Partisan "Bias" In ABC's Programming.

Petitioners CAR and MRC's argument that purported bias in the Stations' programming justifies denying renewal has no basis in law or fact. The Commission cannot rest a renewal decision on the content of a station's programming. Nor may it condition renewal on whether a broadcaster gave sufficient airtime to particular viewpoints, covered particular stories, featured particular guests, adopted particular interview formats, or framed public issues in a particular manner.⁹² To the extent the law ever permits the Commission to regulate content, those exceptions are extremely narrow and inapplicable here.

1. Both The First Amendment And Section 326 Limit The Commission's Authority To Regulate Content.

It is a foundational principle of the FCC's regulatory authority that the agency cannot engage in censorship. That principle is enshrined in Section 326 of the Communications Act and has been repeatedly reaffirmed through decades of caselaw. For good reason: both the agency and

⁹¹ See *Astroline*, 857 F.2d. at 1561.

⁹² See, e.g., *Fox Television Stations, Inc.*, Memorandum Opinion and Order, 33 FCC Rcd 7221, 7225 (2018); *License Renewal Applications of Certain Commercial Radio Stations Serving Philadelphia, Pennsylvania Station WIOQ(FM) Station WJJZ(FM) (formerly WEGX(FM)) Station WMMR(FM) Stations WOGL(AM)/WOGL-FM Stations WPEN(AM)/WMGK(FM) Station WUSL-FM Station WXTU-FM Station WYSP-FM*, Memorandum Opinion and Order, 8 FCC Rcd 6400, 6402 (MMB-ASD 1993).

the courts have recognized that permitting the FCC to engage in censorship would run headlong into the guardrails of the First Amendment.

Accordingly, the FCC has repeatedly emphasized that it “has limited legal authority to act on complaints relating to the content of television or radio programming.”⁹³ For example, while the Communications Act requires the Commission to consider whether the “public interest” supports granting a broadcast license, courts have “avoid[ed] potential First Amendment issues” by construing that general requirement not “to go so far as to authorize the FCC to regulate program content.”⁹⁴

Likewise, while the “fairness doctrine” once required stations to present contrasting viewpoints, the Commission abolished that doctrine long ago after concluding that it “is unconstitutional on its face.”⁹⁵ “While the objective underlying the fairness doctrine is that of the First Amendment itself—the promotion of debate on important controversial issues—the means employed to achieve this objective, government coercion, is the very one which the First Amendment is designed to prevent.”⁹⁶ As decades of experience showed, “fear of governmental sanction resulting from the doctrine” “chill[ed] speech” by “deter[ring] the coverage of controversial issue programming.”⁹⁷ As the Commission explained, the FCC’s efforts to “intervene actively in the marketplace of ideas via ‘minute and subjective scrutiny of program

⁹³ FCC, Consumer Guides, *The FCC and Speech*, (last update Aug. 31, 2022), <https://www.fcc.gov/consumers/guides/fcc-and-speech> (last visited Jul. 27, 2026).

⁹⁴ *Motion Picture Ass’n of Am. v. FCC*, 309 F.3d 796, 805 (D.C. Cir. 2002). By contrast, “Congress has been scrupulously clear when it intends to delegate authority to the FCC to address areas significantly implicating program content.” *Id.*; see, e.g., 18 U.S.C. § 1464 (“Whoever utters any obscene, indecent, or profane language by means of radio communication shall be fined under this title or imprisoned not more than two years, or both.”); 47 U.S.C. § 315 (governing provision of broadcast time to candidates for public office).

⁹⁵ See *Syracuse Peace Council*, Memorandum Opinion and Order, 2 FCC Rcd 5043, 5047 (1987), *aff’d* *Syracuse Peace Council et al., v. FCC*, 867 F.2d 654 (D.C. Cir. 1989).

⁹⁶ *Syracuse Peace Council*, 2 FCC Rcd at 5056.

⁹⁷ *Id.* at 5049–50.

content” “perilously treads upon the editorial prerogatives of broadcast journalists,” and forces the Commission to “undertake the dangerous task of evaluating particular viewpoints.”⁹⁸ The Commission’s efforts to “second-guess broadcasters’ judgment on the issues they cover, as well as on the manner and balance of coverage,” “indisputably represents an intrusion into the broadcaster’s editorial discretion.”⁹⁹

Neither *Red Lion Broadcasting Co. v. FCC*¹⁰⁰ nor *FCC v. Pacifica Foundation*¹⁰¹ suggests otherwise. Even if rightly decided,¹⁰² neither case undermines the notion that the First Amendment protects a broadcaster’s judgments about programming. *Red Lion* specifically left open whether the First Amendment tolerates government “refusal to permit the broadcaster to carry a particular program or to publish his own view” or “censorship of a particular program.”¹⁰³ And while *Pacifica* rejected a challenge to the Commission’s authority to impose sanctions for broadcasting “indecent material,” it stressed the “narrowness of [its] holding,” and that the speech at issue lay “at the periphery of First Amendment concern.”¹⁰⁴ Here, by contrast, the FCC’s campaign (and the Petitioners’ complaints) are motivated by the ABC network’s coverage of, and commentary on, matters of public concern—core First Amendment speech.

Section 326 of the Communications Act further prohibits the Commission from engaging in content- and viewpoint-based review. That provision explicitly bars any action that would “give

⁹⁸ *Id.* at 5050–51 (citation omitted).

⁹⁹ *Id.*

¹⁰⁰ 395 U.S. 367 (1969).

¹⁰¹ 438 U.S. 726 (1978).

¹⁰² *But see FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 530 (2009) (Thomas, J., concurring) (opining that “*Red Lion* and *Pacifica* were unconvincing when they were issued, and the passage of time has only increased doubt regarding their continued validity”).

¹⁰³ 395 U.S. at 396.

¹⁰⁴ 438 U.S. at 743, 748, 750.

the Commission the power of censorship” over a broadcaster’s transmissions.¹⁰⁵ Instead, the FCC “afford[s] licensees substantial discretion over the programming they present,”¹⁰⁶ and “will not take adverse action on a license renewal application based only upon the subjective determination of a listener or group of listeners as to what constitutes appropriate programming.”¹⁰⁷

The Commission thus lacks authority to regulate speech on the supposed basis that it is “bias[ed],” “dishonest[],” or “partisan.”¹⁰⁸ Nor does the Commission have the authority to require broadcast stations to cover specific news stories that the Administration favors.¹⁰⁹

2. The Stations Have Not Violated The News-Distortion Policy Or The Broadcast-Hoax Rule.

Given the foundational principle that the FCC may not engage in censorship, the FCC has articulated only a few narrow exceptions to the general rule that the Commission does not regulate the substance of programming. Those narrow exceptions really prove the rule—the FCC will only examine a licensee’s speech in extreme scenarios like “news distortion” and “broadcast hoaxes.” Neither is remotely applicable here.

Start with the Commission’s “news distortion” policy, under which the FCC has claimed authority to investigate a licensee for deliberately staging or distorting the news.¹¹⁰ The Commission itself has long recognized this policy’s potential First Amendment problems and thus treats it as having “an extremely limited scope.”¹¹¹ The FCC “eschew[s] the censor’s role,

¹⁰⁵ 47 U.S.C. § 326; *see also Fox Television Stations, Inc.*, Memorandum Opinion and Order, 33 FCC Rcd 7221, 7226, 7229 (2018).

¹⁰⁶ *Eagle Radio, Inc.*, Memorandum Opinion and Order, 9 FCC Rcd 1294, 1295 (1994).

¹⁰⁷ *Citadel Broadcasting Company*, Memorandum Opinion and Order and Notice of Apparent Liability, 22 FCC Rcd 7083, 7101 (2007).

¹⁰⁸ MRC Pet. at 6; *see also* CAR Pet. at 6–32.

¹⁰⁹ *See* MRC Pet. at 12–17.

¹¹⁰ *See Complaints Covering CBS Program “Hunger in America,”* 20 F.C.C.2d 143, 150–51 (1969).

¹¹¹ *Galloway v. FCC*, 778 F.2d 16, 21 (D.C. Cir. 1985).

including efforts to establish news distortion in situations where Government intervention would constitute a worse danger than the possible rigging itself.”¹¹² The policy has long required complainants to identify “extrinsic evidence” beyond “the broadcast itself” that “the distortion or staging [was] deliberately intended to slant or mislead.”¹¹³ Sufficient extrinsic evidence might include “testimony, in writing or otherwise, from ‘insiders’ or persons with direct personal knowledge of an intentional attempt to falsify the news,” “evidence that a newsman had been offered or given a bribe to procure some action,” or “written memorandum readily establishing news distortion.”¹¹⁴ Petitioners do not even attempt to allege comparable facts here. Occasional mistakes and even “oral embellishments” that “concern[] [only] the *manner* of presenting the news without affecting the basic accuracy of the events reported” do not suffice.¹¹⁵ Rightly so, as punishing a broadcaster based “on an isolated mistake, or two,” could pose “serious first amendment problems.”¹¹⁶

While none of the Petitioners specifically invoke the news distortion policy, they nevertheless complain that ABC “routinely broadcasts misinformation, disinformation, and other fake news”¹¹⁷ and that various ABC network programs aired too many “anti-Trump team reports,” too much “positive” coverage of Kamala Harris, and did not devote enough time “letting viewers

¹¹² “*Hunger in America*,” 20 F.C.C.2d at 151; *id.* (“The Commission is not the national arbiter of the truth.”).

¹¹³ *Galloway*, 778 F.2d at 20.

¹¹⁴ *Application of WMJX, Inc. WMJX-FM Miami, Florida For Renewal of License*, Decision, 85 F.C.C.2d 251, 268 n.75 (1981) (collecting cases); *see also* “*Hunger in America*,” 20 F.C.C.2d at 150 (“For the Commission to investigate mere allegations, in the absence of a material indication of extrinsic evidence of staging or distortion, would clearly constitute a venture into a quagmire inappropriate for this Government agency.”).

¹¹⁵ *Applications of WPLX, Inc. (WPLX), New York, New York For Renewal of License*, Decision, 68 F.C.C.2d 381, 386 (1978) (emphasis added).

¹¹⁶ *Brandywine-Main Line Radio, Inc. v. FCC*, 473 F.2d 16, 60–61 (D.C. Cir. 1972).

¹¹⁷ MRC Pet. at 20–24.

know just how much Trump had reduced border crossings compared to his predecessor.”¹¹⁸ But these are complaints about editorial balance—decisions about which stories to cover, which candidate to feature, and how much emphasis to give different topics—or editorial commentary. The news distortion policy reaches only the deliberate rigging of the news itself and has never been understood to reach a broadcaster’s editorial judgment about what to air.

Petitioners do not identify a single fabricated event. Nor can they, for none exists. Instead, they identify only ABC network coverage or programming they dislike, but denying a license renewal for disfavored speech would be outright censorship.¹¹⁹ The Commission itself has stressed that, “in this democracy, no Government agency can authenticate the news, or should try to do so.”¹²⁰ Denying the Stations’ renewals just because they aired ABC network programming that the Commission later deemed “DEI TV” or too “anti-Trump” would stretch the rule far beyond the First Amendment’s bounds.¹²¹

The news distortion policy provides even less justification for a denial based on statements made on ABC network comedy shows like *Jimmy Kimmel Live*, or opinion commentaries on shows like *The View*.¹²² The news distortion policy has co-existed with comedy sketches for decades, even though comedy sketches often mock the news for comedic purposes. The news distortion policy has also never been applied to talk shows like *The View*, even though the hosts and guests

¹¹⁸ CAR Pet. at 13–18.

¹¹⁹ “*Hunger in America*,” 20 F.C.C.2d at 150–51; *see also* Letter from Ajit V. Pai, Chairman, FCC, to the Honorable Bernard Sanders, U.S. Senator (Apr. 12, 2018), <https://docs.fcc.gov/public/attachments/DOC-350372A1.pdf> (stating that “the FCC does not have the authority to revoke a license of a broadcast station based on the content of a particular newscast” and that “I can hardly think of an action more chilling of free speech than the federal government investigating a broadcast station because of disagreement with its news coverage or promotion of that coverage”).

¹²⁰ “*Hunger in America*,” 20 F.C.C.2d at 151.

¹²¹ CAR Pet. at 18, 33.

¹²² CAR Pet. at 19–26; MRC Pet. at 8–10.

on those shows are encouraged to provide opinion commentary. Even assuming some of the commentary on *Jimmy Kimmel Live* or *The View* contained factual inaccuracies, “isolated mistake[s]” cannot count as news distortion.¹²³ Moreover, absent exceptions not relevant here, the First Amendment protects even false speech on matters of public importance.¹²⁴ Interpreting the FCC’s news distortion policy to punish isolated inaccuracies in a late-night monologue or opinion commentary would push the rule well past the constitutional breaking point.

Nor is there any basis to conclude that the ABC Owned Stations violated the Commission’s rule against broadcast hoaxes, which prohibits licensees from broadcasting “false information concerning a crime or a catastrophe” if (1) the station licensee knew that the information was false; (2) it was foreseeable that broadcast of the information would cause substantial public harm; and (3) the broadcast did, in fact, directly cause substantial public harm.¹²⁵ “Public harm” under this rule “must begin immediately, and cause direct and actual damage to property or to the health or safety of the general public, or diversion of law enforcement or other public health and safety authorities from their duties.”¹²⁶ Here, too, the Commission has long “applied this rule narrowly in light of the substantial First Amendment concerns involved with the federal government policing the content of broadcast news.”¹²⁷ When adopting the rule, the FCC described it as a reaction to “serious broadcast hoaxes,” citing dramatic fact patterns including a station’s false report of a volcanic eruption and a radio station’s false report that a host had been shot in the station parking lot.¹²⁸ Since its enactment, there have been no adjudicated violations of the

¹²³ *Brandywine-Main Line Radio*, 473 F.2d at 60.

¹²⁴ *See United States v. Alvarez*, 567 U.S. 709, 719 (2012) (plurality opinion).

¹²⁵ 47 C.F.R. § 73.1217(a).

¹²⁶ *Id.* § 73.1217(c).

¹²⁷ *Jessica J. González*, 35 FCC Rcd 3032, 3033 (MB 2020) (citing *Alvarez*, 567 U.S. at 716 (plurality opinion)).

¹²⁸ *Amendment of Part 73 Regarding Broadcast Hoaxes*, Report and Order, 7 FCC Rcd 4106, 4106 & n.1 (1992).

broadcast hoax rule, much less a license revocation or non-renewal. Petitioners identify nothing that comes anywhere close to qualifying as a broadcast hoax.

* * *

Petitioners’ arguments boil down to the notion that broadcasters have a legal obligation to “balance” coverage across political viewpoints.¹²⁹ That is just another way of saying that the Commission should exhume the rightly-interred fairness doctrine. But “[o]n the spectrum of dangers to free expression, there are few greater than allowing the government to change the speech of private actors in order to achieve its own conception of speech nirvana.”¹³⁰ That is why the Supreme Court has said—in “one of the most important sentences in First Amendment history”¹³¹—that the “concept that government may restrict the speech of some elements of our society in order to enhance the relative voice of others is wholly foreign to the First Amendment.”¹³² The Commission should reject Petitioners’ request to regulate the content of the Stations’ speech.

B. There Have Been No Equal Opportunities Violations.

Petitioners also challenge the Stations’ compliance with the Communications Act’s “equal opportunities” rule, referencing, among other points, the Commission’s pending investigation into KTRK’s alleged failure to comply with that rule following Texas U.S. Senate candidate James Talarico’s appearance on *The View*. Petitioners’ arguments fall flat.

As an initial matter, it is important to establish what the “equal opportunities” rule is *not*. Petitioners contend that the “equal opportunities” rule stands for a general principle of editorial

¹²⁹ See MRC Pet. at 2–10; CAR Pet. at 2–32.

¹³⁰ *Moody v. NetChoice, LLC*, 603 U.S. 707, 741–42 (2024).

¹³¹ *U.S. Telecom Ass’n v. FCC*, 855 F.3d 381, 432 (D.C. Cir. 2017) (Kavanaugh, J., dissenting from denial of rehearing en banc).

¹³² *Buckley v. Valeo*, 424 U.S. 1, 48–49 (1976).

balance, and therefore use it to rehash their political bias claims.¹³³ That contention is meritless; neither Section 315 of the Communications Act nor the FCC’s equal opportunities rule require broadcast stations to achieve some government-mandated balance of programming appealing to Democrats and Republicans, conservatives and liberals, or any other particular audiences.¹³⁴ As with all other FCC rules concerning programming, the equal opportunities rule is narrow in purpose and function. It provides only that when a “legally qualified candidate” (as defined in Section 73.1940 of the rules) makes a “use” of a broadcast station, that station is obliged to (a) document the “use” in its political file¹³⁵ and (b) provide “equal opportunities” for other legally qualified candidates for the same office that timely request such opportunities.¹³⁶

While certain Petitioners complain that *The View* features more liberal than conservative guests or that a tally of jokes on another ABC network program favors one party over another,¹³⁷ neither is a violation of Section 315. Moreover, as to seven of the eight Stations, Petitioners allege no facts identifying violations of the actual requirements of the rule. As to the KTRK investigation, an open investigation is, by definition, not an adjudicated violation. No Petitioner offers anything more than the investigation’s mere existence, and a pending investigation does not a serious violation or pattern of violations make. Even if the investigation were ultimately to be resolved against KTRK, moreover, Petitioners fail to explain how a single failure to comply with the rule’s public-file requirement could warrant denying KTRK’s license renewal—let alone those of the seven Stations uninvolved with that investigation.

¹³³ See, e.g., CAR Pet. at 7, 20–22; MRC Pet. at 8–10.

¹³⁴ See 47 U.S.C. § 315; 47 C.F.R. § 73.1943.

¹³⁵ 47 C.F.R. § 73.1943.

¹³⁶ *Id.* § 73.1941.

¹³⁷ See, e.g., CAR Pet. at 20–22; MRC Pet. at 8–10.

This is particularly so given the nature of the allegations at that investigation's center. KTRK did not place a notice of James Talarico's interview in its political file for a simple reason: *The View* is a bona fide news interview program. Indeed, the Commission issued an order in 2002 stating that *The View* was exempt from the "equal opportunities" rule on that basis.¹³⁸ The Commission cannot penalize KTRK for acting in reasonable reliance on a still-effective Commission ruling by denying its license renewal application.¹³⁹

C. The FCC's EEO Regulations Provide No Basis To Deny The Stations' License Renewals.

The campaign against Disney's inclusion programs is similarly infirm. The government should have no place in dictating the values a private company promotes and discusses in pursuing lawful diversity and inclusion efforts, and how it speaks about those efforts. And it is well-established that Congress did not intend for the Commission to engage in general enforcement of antidiscrimination laws; "the FCC is not the Equal Employment Opportunity Commission (EEOC), and a license renewal proceeding is not a Title VII suit."¹⁴⁰ Instead, the Commission's review is limited solely to the issues of a licensee's service to the public interest and its qualifications to be a licensee.¹⁴¹

¹³⁸ See *The View* Declaratory Ruling. Petitioners also fail to acknowledge that had the equal opportunities rule applied to Mr. Talarico's appearance on *The View*, the qualified candidate that would have been entitled to an equal opportunity would not have been a Republican candidate, but instead, Mr. Talarico's Democratic primary opponents. Congresswoman Jasmine Crockett, Mr. Talarico's main opponent in the primary, had already appeared on the program.

¹³⁹ *Inhance Techs., LLC v. EPA*, 96 F.4th 888, 895 (5th Cir. 2024) ("[F]ederal agencies cannot surprise a party by penalizing it for good-faith reliance on the agency's prior positions." (citation modified)).

¹⁴⁰ *Bilingual Bicultural Coal. on Mass Media, Inc. v. FCC*, 595 F.2d 621, 628 (D.C. Cir. 1978).

¹⁴¹ *Id.*; see also *Lutheran Church-Missouri Synod v. FCC*, 141 F.3d 344, 354 (D.C. Cir. 1998); *Pacific and Southern Company, Inc.*, Memorandum Opinion and Order, 11 FCC Rcd 8503, 8505 (1996) ("*Pacific & Southern Co.*").

These limits are reflected in two aspects of the FCC’s EEO regulatory scheme. *First*, the FCC requires broadcasters to make efforts to ensure that members of underrepresented groups have opportunities in broadcasting;¹⁴² indeed, the very purpose of the FCC’s EEO regulations is to “ensure equal opportunity and nondiscrimination for all prospective applicants.”¹⁴³ *Second*, the FCC considers, for license renewal purposes, only instances of alleged employment discrimination severe enough to raise questions about a licensee’s basic qualifications.¹⁴⁴

The practices challenged by Petitioners do not suffice. Petitioners focus primarily on policies of the Stations’ parent company, Disney, and for nearly every practice they challenge, provide no evidence that such practices occurred at the Stations. Even had the challenged practices occurred at the Stations, those practices are exactly what the FCC’s EEO regulations *encourage*. Given that the EEO regulations expressly state that a broadcaster may *satisfy* the regulations with such inclusion practices, it cannot be the case that a broadcaster *violates* those regulations by doing just that. The challenged practices further affect the expressive content of the Stations and are thus protected by the First Amendment. Finally, sanctioning the Stations based on the novel interpretation of FCC regulations advanced by Petitioners would violate Due Process.

1. The EEO Regulations Encourage Affirmative Efforts To Increase Minority Representation.

Petitioners now seek to deny license renewals for actions that were taken to comply with decades-old regulatory mandates. Since at least 1968, the FCC has imposed both antidiscrimination and positive equal opportunity requirements on its licensees as part of its efforts

¹⁴² See 47 C.F.R. § 73.2080(b)(5); *Review of the Commission’s Broadcast and Cable Equal Employment Opportunity Rules and Policies*, Second Report and Order and Third Notice of Proposed Rule Making, 17 FCC Rcd 24018, 24055 (2002) (“2002 EEO Order”) (explaining that these activities are intended to reach broadcasters’ communities widely and to “reach segments of the labor force who may be inadvertently omitted from vacancy-specific recruitment”).

¹⁴³ *Id.* at 24042.

¹⁴⁴ See *Pacific & Southern Co.*, 11 FCC Rcd at 8505.

to “ensure that broadcast licensees strive to satisfy, and are sensitive to, the needs of their communities.”¹⁴⁵ The FCC adopted both requirements—antidiscrimination and outreach responsibilities—with the explicit purpose of increasing minority representation in broadcasting.¹⁴⁶

The FCC thus required broadcasters to submit EEO plans and employment statistics annually.¹⁴⁷ If a station’s employment statistics showed “its record of employing minorities was poor,” (*i.e.*, fell outside of a “zone of reasonableness”), the FCC would take a “closer look at [that] station’s policies,” and might require additional affirmative efforts to employ minorities or, in extreme cases, hold evidentiary hearings.¹⁴⁸ Never has the Commission sanctioned a broadcaster for insufficient *majority* group employment.

The FCC established these requirements with Congress’s approval. In 1992, Congress “codifie[d] the Commission’s equal employment opportunity rules” in Section 334 of the Communications Act.¹⁴⁹ In so doing, Congress found that: (1) “females and minorities are not employed in significant numbers in positions of management authority in the cable and broadcast television industries,” (2) “increased numbers of females and minorities in positions of management authority in the cable and broadcast television industries advances the Nation’s policy favoring diversity in the expression of views in the electronic media,” and (3) “rigorous

¹⁴⁵ *Nat’l Black Media Coal. v. FCC*, 775 F.2d 342, 344–45 (D.C. Cir. 1985).

¹⁴⁶ *See id.*

¹⁴⁷ *Id.*

¹⁴⁸ *Id.* at 345–48; *see also Beaumont Branch of the NAACP v. FCC*, 854 F.2d 501, 508 (D.C. Cir. 1988) (holding that the FCC abused its discretion when renewing a license without an evidentiary hearing after a licensee took over broadcasting stations and “black employment fell from 33.3 percent to 5.6 percent, in a labor market with a 21.7 percent black available workforce”).

¹⁴⁹ 2002 EEO Order, 17 FCC Rcd at 24026.

enforcement of equal opportunity rules and regulations is required in order to effectively deter racial and gender discrimination.”¹⁵⁰

The D.C. Circuit subsequently ruled that the FCC could not constitutionally (1) “oblige stations to grant some degree of preference to minorities in hiring,”¹⁵¹ nor (2) “create pressure to recruit women and minorities.”¹⁵² The D.C. Circuit left undisturbed, however, provisions of the FCC’s regulations that allowed, but did not require, licensees to satisfy their positive obligations by either sponsoring a job fair or listing upper-level openings with organizations “whose membership includes substantial participation of women and minorities.”¹⁵³ This provision did not “meaningfully pressure[]” broadcasters to recruit women and minorities, the D.C. Circuit reasoned, because “licensees remain free . . . to select recruitment measures that do not place a special emphasis upon the presence of women and minorities in the target audience.”¹⁵⁴

In response, the FCC issued its current EEO regulations in 2002.¹⁵⁵ These regulations, the FCC explained, were designed to “ensure that its licensees’ programming fairly reflects the tastes and viewpoints of minority groups.”¹⁵⁶ The FCC emphasized that Congress had expressly approved of the EEO regulations’ role in increasing minority representation in broadcasting.¹⁵⁷ And as justification for retaining positive outreach requirements, the FCC cited a study noting that women and minorities “still face difficulties in obtaining broadcast employment, especially in

¹⁵⁰ *Id.* at 24032.

¹⁵¹ *See Lutheran Church-Missouri Synod*, 141 F.3d at 351.

¹⁵² *MD/DC/DE Broadcasters Ass’n v. FCC*, 236 F.3d 13, 18 (D.C. Cir. 2001).

¹⁵³ *Id.* at 18–19.

¹⁵⁴ *Id.*

¹⁵⁵ *2002 EEO Order*, 17 FCC Rcd at 24019.

¹⁵⁶ *Id.* at 24029 (quoting *NAACP v. Fed. Power Comm’n*, 425 U.S. 662, 670 n.7 (1976)).

¹⁵⁷ *Id.* at 24030–32.

accessing higher level positions,” as “91.3 percent of television station general managers are White . . . while 87.4 percent are male.”¹⁵⁸

The FCC also expressly distinguished its regulations from the requirements of Constitutional provisions and Title VII, noting that its regulations are instead grounded “on the public interest standard in the Communications Act.”¹⁵⁹ Accordingly, the FCC explained, it could address through regulation “unintentional discriminatory practices” and require affirmative steps by broadcasters to redress the impact of those practices.¹⁶⁰

The Commission’s current EEO regulations thus require broadcasters to “adopt positive recruitment, job design, and other measures needed to ensure genuine equality of opportunity to participate fully in all organizational units, occupations, and levels of responsibility.”¹⁶¹ One way a station may satisfy this requirement is by “[c]o-sponsoring at least one job fair with organizations in the business and professional community whose membership includes substantial participation of women and minorities,”¹⁶² or “[l]isting [] each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women or minorities.”¹⁶³

Given that the EEO regulations expressly state that a broadcaster may *satisfy* the regulations by targeting underrepresented groups in their recruitment efforts, it cannot be the case that a broadcaster *violates* those regulations by doing just that. Indeed, the FCC explicitly adopted this understanding when issuing its current regulations; it endorsed the “use of recruitment sources targeted to minorities or females” by explaining that its rule “neither requires nor precludes the

¹⁵⁸ *Id.* at 24041.

¹⁵⁹ *Id.* at 24039.

¹⁶⁰ *See id.*

¹⁶¹ 47 C.F.R. § 73.2080(b)(5).

¹⁶² *Id.* § 73.2080(c)(2)(iii).

¹⁶³ *Id.* § 73.2080(c)(2)(xii).

use of any specific sources a broadcaster deems appropriate to achieving broad outreach.”¹⁶⁴ “[T]he use of minority-targeted sources,” the FCC explained, would not constitute unlawful discrimination so long as “a broadcaster were using recruitment sources sufficient to achieve broad outreach.”¹⁶⁵

2. Petitioners’ Primary Allegations Are Not Station-Specific

Petitioners’ challenge fails at the threshold because it targets nothing the Stations actually did. The two practices Petitioners primarily challenge belong to the Stations’ parent company, Disney: (1) inclusion standards applicable solely to television shows that are either produced or co-produced by Disney-owned studios, and (2) programs targeted at providing underrepresented groups with nondiscriminatory access to company opportunities.¹⁶⁶ Petitioners present no evidence that either practice ever occurred at the Stations, as opposed to other company entities, which means that Petitioners’ claims do not bear on whether the *Stations* operate in the public interest.¹⁶⁷ Petitioners also ignore that some of the challenged practices have since been changed (including some changes that predate the Stations’ current license terms¹⁶⁸), and thus cannot serve

¹⁶⁴ 2002 EEO Order, 17 FCC Rcd at 24048.

¹⁶⁵ *Id.*

¹⁶⁶ See America First Legal Foundation, Petition to Deny, MB Docket No. 26-131, at 7–9, 15–18 (June 28, 2026) (“AFL Pet.”), <https://www.fcc.gov/ecfs/document/26109956328/1>; Article III Project Petition to Deny, MB Docket No. 26-131, at 1–2 (June 23, 2026) (“Article III Pet.”), <https://www.fcc.gov/ecfs/document/26109876573/1>; CAR Pet. at 35–42. CAR also speculates about “candor” concerns relating to Disney’s response to an FCC investigation of Disney’s EEO practices. But Disney strongly disputes any alleged deficiencies in its compliance with investigations. And as CAR itself admits ignorance of any facts supporting its claim that Disney’s responses have lacked candor, *see* CAR Pet. at 43–44, it has necessarily failed to allege a *prima facie* case with respect to that assertion.

¹⁶⁷ See *Sagittarius Broadcasting*, 18 FCC Rcd at 22555 (“Congress, however, has expressly limited the scope of the license renewal inquiry to matters occurring at the particular station for which license renewal is sought.” (citing 47 U.S.C. § 309(k)(1))).

¹⁶⁸ The start of the licensing terms for each Station are as follows: WTVD (Dec. 10, 2020), WLS-TV (Nov. 12, 2021), KABC-TV (Nov. 18, 2022), KGO-TV (Apr. 20, 2023), WABC-TV (Aug. 28, 2024), KFSN (Sept. 9, 2024), KTRK (Sept. 9, 2024), WPVI-TV (Sept. 25, 2024).

as a basis for denying license renewal in any event. But at bottom, the practices Petitioners describe are insufficient, because neither violates the Commission’s EEO regulations.

Inclusion Standards. Petitioners first claim that ABC Entertainment’s inclusion standards constituted “explicit race- and sex-based quotas.”¹⁶⁹ This argument fails. As an initial matter, Petitioners cite no evidence that any of the Inclusion Standards were ever applied to or implemented by any of the Stations; indeed, they cannot do so, since the Inclusion Standards were not applied to the ABC Owned Stations. On their face, the Inclusion Standards apply only to entertainment productions that are part of the ABC Entertainment division, a separate division from the Owned Stations group. Section 309(k) exclusively focuses on matters occurring at the particular station for which license renewal is sought, and practices of a *separate* division are irrelevant to the Commission’s considerations here.¹⁷⁰

But further, Petitioners’ characterization of the now-expired standards as race- and sex-based quotas is simply wrong. Far from requiring quotas, the former standards explicitly forbade preferential hiring based on protected characteristics. The accompanying Frequently Asked Questions cited¹⁷¹ by America First Legal Foundation (“AFL”) state, for instance:

- “We are committed to inclusive hiring and recruiting practices, and searching for or requesting only candidates who identify with a specific demographic group would not be inclusive”;
- “[P]roductions cannot base their employment decisions on someone’s demographic identity”;

¹⁶⁹ AFL Pet. at 7.

¹⁷⁰ 47 U.S.C. § 309(k).

¹⁷¹ AFL Pet. at 10 n.8 (citing *Inclusion Standards: Frequently Asked Questions* document).

- “The Inclusion Standards do not require, encourage, or permit the use of quota systems or the making of employment decisions based on someone’s race, gender, or other demographic identities”;
- “The fact that a particular individual on the show is not from an underrepresented group will not be viewed as a negative for the production”;
- “Our productions do not make hiring or employment decisions based on demographic identities. They will continue to hire the individual who is most qualified for a position”; and
- “Demographic information will not be used as a basis for any employment decisions.”

The statements to which AFL objects¹⁷² were not requirements, but instead *outcomes* that were hoped to flow from inclusive employment practices that encouraged *all persons*, regardless of protected characteristics, to seek employment and advancement.¹⁷³ This focus on inclusive practices—for example, broad outreach in connection with recruitment and professional development—is exactly what the FCC EEO regulations require of broadcast licensees.¹⁷⁴ If Petitioners’ objection is to the pursuit of that goal, their quarrel is with the Commission, not the company.

¹⁷² See *id.* at 7–9.

¹⁷³ Again, the Frequently Asked Questions page cited by AFL proves the point. It defines “[i]nclusive hiring and employment practices” as “practices that are intended to cast the widest net possible when it comes to attracting, considering, evaluating, and retaining talent for jobs” and then states that “productions will meet the Inclusion Standards by engaging in the inclusive hiring and employment practices.” It also makes clear that “[t]he Inclusion Standards can be met through inclusive hiring and employment practices that address underlying systemic barriers to equal employment opportunities.”

¹⁷⁴ See 2002 EEO Order, 17 FCC Rcd at 24043 (“Recruitment for substantially all vacancies using sources designed to achieve broad outreach is necessary to ensure that all segments of the population have an equal opportunity to compete for broadcast . . . employment[.]”).

The Inclusion Standards were structured to allow a production to use them without employing a single numerical or percentage-based metric. For example, the standards could be met by hiring a casting director that the showrunner had not previously worked with or establishing a mentorship program. Furthermore, the standards did not define “underrepresented group” by virtue of any particular race, sex, or other protected characteristic—to the contrary, they emphasized that “[c]ontext is critical when evaluating if a group is ‘underrepresented’” and barred anyone involved in hiring decisions from asking candidates or talent about membership in any legally protected category.

Importantly, the Inclusion Standards were not mandatory. If a production demonstrated a willingness to adopt inclusive practices and nevertheless did not further the Inclusion Standards’ objectives, the production suffered no consequences. Instead, at most, the human resources team would try to identify if any additional inclusive efforts were practicable.

Moreover, EEO regulations aside, the First Amendment independently bars treating the Inclusion Standards as grounds for sanction. As stated above, the standards applied solely to television productions, a protected “medium for the communication of ideas.”¹⁷⁵ Casting and creative decisions are protected expression because “regulating the casting process necessarily regulates the end product.”¹⁷⁶ To punish ABC for the demographic composition of its shows would regulate the shows themselves: it would force ABC to accommodate a message different from its intended message and “alter the expressive content” of its productions.¹⁷⁷ Courts uniformly refuse to allow anti-discrimination statutes—Title VII, the ADA, or Section 1981 of the

¹⁷⁵ *Joseph Burstyn, Inc. v. Wilson*, 343 U.S. 495, 501 (1952).

¹⁷⁶ *Claybrooks v. Am. Broad. Cos.*, 898 F. Supp. 2d 986, 999 (M.D. Tenn. 2012).

¹⁷⁷ *See Hurley*, 515 U.S. at 573.

Civil Rights Act—to override the First Amendment’s protection of these editorial choices.¹⁷⁸

There is no basis to treat the FCC’s EEO regulations any differently.

Finally, the challenged standards were sunset in December 2024. A corporate parent’s since-expired standards for a different division that never applied to the Stations cannot possibly justify denying renewal of the Stations’ licenses.

Targeted Recruitment and Talent Development Strategies. Petitioners next point to Disney programs aimed at ensuring nondiscriminatory opportunities for members of underrepresented groups at the company. Again, Petitioners’ allegations are not specific to the Stations. And, even assuming they were, Petitioners fail to place such programs in the broader context of Disney’s recruitment and talent development efforts. As the Commission itself has made clear, recruitment and talent development programs targeted at underrepresented groups are nondiscriminatory where they are part of a broader array of efforts targeted at all employees or applicants.¹⁷⁹ While Petitioners have identified programs that may focus on select underrepresented groups, they have not shown that these programs have come at the expense of similar programs available to employees generally.

Consider each of Petitioners’ allegations in turn:

¹⁷⁸ See *McDermott v. Ampersand Pub., LLC*, 593 F.3d 950, 962 (9th Cir. 2010) (enjoining the dismissal of a newspaper’s editorial staff would create the “risk that constitutionally protected speech will be enjoined”); *McSweeney v. Cohen*, 776 F. Supp. 3d 200, 244–45 (S.D.N.Y. 2025) (imposing limits on TV casting decision “would interfere with the producers’ First Amendment rights to deliver an authentic message”); *Moore v. Hadestown Broadway LLC*, 722 F. Supp. 3d 229, 259–60 (S.D.N.Y. 2024) (dismissing race-discrimination claims against theatre production company because “[t]he decisions Hadestown makes about whom to cast for which roles—its employment decisions—are inherently expressive”); *Claybrooks*, 898 F. Supp. 2d at 997–1000 (dismissing race-discrimination claims as to casting decision because “the First Amendment protects the producers’ right unilaterally to control their own creative content”).

¹⁷⁹ See 2002 EEO Order, 17 FCC Rcd at 24048; cf. *Missouri v. Starbucks Corp.*, WL 309714, at *18 (E.D. Mo. Feb. 5, 2026) (“The mere existence of a diversity policy, without more, is insufficient to make out a prima facie case of discrimination under federal employment statutes like Title VII. The ‘more’ that is required is application of that policy in a way that materially disadvantaged an employee or an applicant.” (citation modified)).

- Statements Expressing Goal of Increasing Underrepresented Group Training and Development Opportunities:** AFL asserts that a statement by Disney communicating its intent to “increase” or “improv[e] access to training and development opportunities for members of underrepresented groups” is evidence of discrimination.¹⁸⁰ But that statement mirrors the FCC EEO rule’s mandate that the Stations “adopt positive recruitment, job design, and other measures needed to ensure genuine equality of opportunity to participate fully.”¹⁸¹ Meanwhile, the Stations offer ample training and development opportunities for employees who do not satisfy the broad and flexible definition of “underrepresented”¹⁸² and Petitioners make no attempt to argue these are deficient.
- Recruitment Programs:** CAR highlights instances in which Disney has provided some grants, scholarships, and internship programs for Historically Black Colleges and Universities (HBCUs) or “diverse” candidates for director/writing roles, claiming that such initiatives constitute discrimination.¹⁸³ But the Administration has issued an Executive Order that expressly encourages private sector investments in HBCUs,¹⁸⁴ so it cannot be unlawful discrimination for Disney to make those investments. In any event, sanctioning charitable donations that are untethered to

¹⁸⁰ AFL Pet. at 9–10 (quoting *Inclusion Standards: Frequently Asked Questions*).

¹⁸¹ 47 C.F.R. § 73.2080.

¹⁸² See generally *Investing in Our People*, Walt Disney Co., <https://impact.disney.com/investing-in-our-people> (last visited July 21, 2026) (outlining leadership development, employee learning, and educational programs available to all employees).

¹⁸³ CAR Pet. at 37–38.

¹⁸⁴ See Exec. Order No. 14283, 90 Fed. Reg. 17543 (Apr. 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/04/white-house-initiative-to-promote-excellence-and-innovation-at-historically-black-colleges-and-universities>.

an offer of employment has no basis in the FCC’s EEO regulations.¹⁸⁵ And because “donating money qualifies as expressive conduct,” finding otherwise would raise serious First Amendment concerns.¹⁸⁶ Moreover, the regulations explicitly authorize employers to focus recruitment efforts at minority groups or organizations whose membership is predominantly made up of minority groups (such as HBCUs) so long as those efforts are accompanied by other recruitment efforts aimed at the broader community.¹⁸⁷ No Petitioner has even suggested that the Stations or Disney fail to engage in recruitment efforts at other universities or community groups.¹⁸⁸

- **Networking, Mentoring, and Talent Development Programs:** Both AFL and CAR point to Disney’s demographic-affiliated or diversity-centered mentoring, networking, or training groups.¹⁸⁹ Yet nowhere do AFL or CAR allege that Disney fails to make mentoring, networking, and training opportunities available to employees that do not fall within these demographic categories. Nor do Petitioners allege that any Disney employees had ever tried to join and were denied the

¹⁸⁵ See 47 C.F.R. § 73.2080(a) (barring discrimination “in employment”).

¹⁸⁶ *Coral Ridge Ministries Media, Inc. v. Amazon.com, Inc.*, 6 F.4th 1247, 1254 (11th Cir. 2021).

¹⁸⁷ See 47 § C.F.R. 73.2080(c)(2)(iii), (xii); *2002 EEO Order*, 17 FCC Rcd at 24048; *cf. also* EEOC Compliance Manual § 15-VI (updated Apr. 2006) (“Title VII permits diversity efforts designed to open up opportunities to everyone. For example, if an employer notices that African Americans are not applying for jobs in the numbers that would be expected given their availability in the labor force, the employer could adopt strategies to expand the applicant pool of qualified African Americans such as recruiting at schools with high African American enrollment.”).

¹⁸⁸ See, e.g., Abigail Bowman, *Magical Opportunities Await Students at the Disney College Program*, Liberty Champion (Feb. 12, 2018), <https://www.liberty.edu/champion/2018/02/12/magical-opportunities-await-students-disney-college-program> (noting that Liberty University “had the highest Disney College Program attendance out of all the participating colleges this past semester”).

¹⁸⁹ AFL Pet. at 11; CAR Pet. at 40.

opportunity to participate in these programs on the basis of a protected characteristic.¹⁹⁰ AFL and CAR ignore that demographic-affiliated networking and mentorship groups have long been ubiquitous at workplaces across the nation.¹⁹¹ Furthermore, mentorship groups are “acts of expressive association,” and regulating them could implicate additional First Amendment concerns.¹⁹² In any event, Disney discontinued its voluntary talent development programs targeted at particular demographic groups in 2022. Disney continues to maintain its many mentoring and development programs targeted at all employees.¹⁹³

- **Employment Demographic Statistical Reporting:** While AFL criticizes Disney Entertainment’s reporting of diversity statistics in hiring,¹⁹⁴ there is nothing unlawful about the parent company of a broadcast licensee tracking the representation of minority groups among its employees. Indeed, the FCC’s EEO

¹⁹⁰ See *Starbucks*, 2026 WL 309714, at *19 (rejecting Title VII claim grounded in training programs targeted at specific demographic groups in part because the plaintiff “fail[ed] to point to any white or male employee turned away from these programs”).

¹⁹¹ See *Moranski v. General Motors Corp.*, 433 F.3d 537, 540 (7th Cir. 2005) (describing how, as a part of “[e]mployer-sponsored diversity initiatives [that] have become increasingly popular,” “some employers officially recognize employee groups organized on the basis of aspects of social identity”).

¹⁹² *303 Creative LLC v. Elenis*, 600 U.S. 570, 586 (2023); see *Boy Scouts of America v. Dale*, 530 U.S. 640, 649–50 (2000) (holding that Scout leaders participated in expressive activity when they “spend time with the youth members, instructing and engaging them” in order to “inculcate them with the Boy Scouts’ values”).

¹⁹³ During the time that the Talent Networks were active, Disney launched numerous mentorship, networking, and leadership development programs directed at employees irrespective of demographic characteristics. These programs included IGNITE, an eight-week leadership course from 2021 to 2024 attended by hundreds of Disney Vice Presidents, Directors, and Senior Managers; a leadership transition program for managers in critical or new roles; a personalized development program for high-potential employees who would benefit from guidance in specific areas; one-on-one career coaching, including an external program comprising biweekly meetings for six months; and a mentorship matching program in which hundreds of managers participated.

¹⁹⁴ AFL Pet. at 10–11.

regulations *require* broadcasters to monitor employment practices for instances of intentional or unintentional discrimination.¹⁹⁵ Moreover, an increase in the representation of minority groups is not probative of discrimination; such an increase could stem from innumerable causes, including efforts at broader and more inclusive recruitment.

Because the practices about which Petitioners complain do not violate the FCC’s EEO regulations, they do not justify any adverse action with respect to the Stations’ licenses.

3. Disney’s Evolving Inclusion Practices Are In Line With Other Corporate Practices That The FCC Has Approved

Petitioners’ challenges flounder even further in the context of other companies’ practices that the Commission has expressly endorsed. While the Stations’ practices have always been consistent with FCC EEO rules, Disney has over time evolved its practices, particularly following its comprehensive review of all programs and practices relating to diversity and inclusion in 2024.¹⁹⁶ These adjustments are consistent with changes made by other FCC-regulated entities that the Commission has recently endorsed in the context of merger approvals.¹⁹⁷

- In December 2024, ABC sunset the Inclusion Standards—which never applied to the ABC Owned Stations—that had previously applied to shows that are either produced or co-produced by Disney-owned production studios. Instead,

¹⁹⁵ See 47 C.F.R. § 73.2080(b)(4)–(5).

¹⁹⁶ Prior to this comprehensive review, Disney had sunset the three Talent Networks discussed below, which were only offered in 2021–22.

¹⁹⁷ See Letter from Vandana Venkatesh, Exec. Vice President & Chief Legal Officer, Verizon, to Brendan Carr, Chairman, FCC (May 15, 2025) (“Verizon Letter”), <https://www.fcc.gov/ecfs/document/105150776713979/1>; Letter from Stephanie Kyoko McKinnon, Gen. Counsel & Co-President of Bus. Operations, Skydance, to Brendan Carr, Chairman, FCC (July 22, 2025), <https://www.fcc.gov/ecfs/document/1072299913934/1>; Letter from Jamal Haughton, EVP, Gen. Counsel & Corp. Sec’y, Charter Commc’ns, Inc., to Brendan Carr, Chairman, FCC (Feb. 26, 2026) (“Charter Letter”), <https://www.fcc.gov/ecfs/document/1022786738599/1>.

Disney adopted a new “Enterprise Strategic Inclusion Framework” and took that opportunity to clarify the values Disney intends to promote, and those that it does not. Disney has confirmed that it does not seek diversity for diversity’s sake; make employment decisions based on a legally protected characteristic; attempt to change the beliefs of our employees or consumers; or advantage any group by disadvantaging another group.

- In February 2025, Disney changed a factor in its executive compensation planning program from “ESG, Diversity & Inclusion” to “Talent Strategy,” clarifying the factor’s objective of assessing how leaders incorporate different perspectives to drive business success, cultivate an environment where employees can thrive long-term, and sustain a robust pipeline to ensure long-term organizational strength.
- In March 2025, Disney began moving away from funding scholarships where the organization granting the scholarship limits eligibility to a particular demographic group.
- In October 2025 Disney discontinued its supplier diversity program, instead shifting supplier engagement into a broader sourcing framework focused on business needs and required expertise without consideration of race, gender, or other protected characteristics. None of the ABC Owned Stations had ever used Disney’s pre-2025 supplier diversity program.
- In October 2025, as part of an overall transformation of its enterprise-wide Human Resources (now People & Culture) organization, through which its teams are being asked to think and work differently to become more strategic accelerants to the business, Disney now has an Opportunity & Inclusion

department instead of a DEI department. This change better reflects the team's focus on providing broad access to opportunity and a welcoming work environment to all employees.

Petitioners fail to acknowledge Disney's current practices or to explain why those practices are deficient despite being squarely aligned with programs the Commission has repeatedly and recently endorsed.

4. Absent A Court- Or EEOC-Adjudicated Discrimination Finding, Petitioners' Allegations Do Not Justify Further FCC Proceedings

Petitioners' accusations of discrimination fail for a separate, more basic reason—there has been no court- or EEOC-adjudicated finding of employment discrimination, and none of Petitioners' allegations justify FCC action under the relevant agency policies.

The FCC “generally defer[s] action on individual complaints of employment discrimination against broadcasters and MVPDs pending final action by the Equal Employment Opportunity Commission (“EEOC”) or other government agencies and/or courts established to enforce nondiscrimination laws.”¹⁹⁸ The Commission may act on employment-discrimination complaints in the first instance only where they involve “well-supported allegations of discrimination made by a large number of individuals against one broadcast station . . . or well-supported allegations of discrimination that shock the conscience or are particularly egregious,”¹⁹⁹ and thus are so severe that they “raise questions about a licensee's basic qualifications.”²⁰⁰ None

¹⁹⁸ *2002 EEO Order*, 17 FCC Rcd at 24036.

¹⁹⁹ *Id.*

²⁰⁰ *Southern Broadcast Corporation of Sarasota*, Memorandum Opinion and Order, 16 FCC Rcd 3655, 3659 (2001). For instance, the FCC has declined to act in the face of alleged “racist remarks to a prospective applicant suggesting that it would not hire minorities,” as the record reflected that the licensee “in fact did hire minorities and women.” *Id.* The paradigm case justifying FCC action without an adjudication of guilt by a court or the EEOC involved “the wholesale departure of minority employees, inconsistent or erroneous explanations for the departure by the licensee, and a deficient EEO recruitment program.” *Pacific & Southern Co.*, 11 FCC Rcd at 8505 (emphasis added). Petitioners' allegations are incomparable.

of Petitioners’ allegations regarding employment practices warrant FCC action under these standards.

Petitioners’ complaints concern only general employment practices of the Stations’ parent company, not the Stations, based on Petitioners’ review of Disney’s public websites. Petitioners have thus failed to identify one “well-supported” allegation, let alone a “large number.” Nor do Petitioners’ allegations “shock the conscience.” Rather, Petitioners complain about employment practices ubiquitous throughout corporate America and even the federal government.²⁰¹

5. If The Commission Were To Sanction The Stations Based On Petitioners’ Novel Gloss On The FCC’s EEO Regulations, Those Sanctions Would Violate Due Process.

Petitioners allege a “clear, glaring violation of federal law,”²⁰² but absent from their petitions is any FCC determination, EEOC adjudication, or court decision finding the practices they challenge to be discriminatory when used by private employers. None exist, likely because Petitioners’ theory of discrimination—that all race-conscious practices by employers are inherently discriminatory, and that employers may not take *any* action aimed at making employees from underrepresented groups more welcome—is of quite recent vintage.²⁰³ By contrast, court decisions acknowledging the novelty and uncertain scope of Petitioners’ theory are legion.²⁰⁴ What Petitioners deem settled law is instead a matter of serious debate.

²⁰¹ For example, on December 17, 2025, the Department of Health and Human Services launched the Roy Wilkins Fellowship, an employment opportunity available only to students at HBCUs. *HHS Creates Fellowship and Career Fairs for Historically Black Colleges and Universities*, U.S. Dep’t of Health and Hum. Servs. (Dec. 17, 2025), <https://www.hhs.gov/press-room/hhs-creates-fellowship-career-fairs-hbcu.html>.

²⁰² See Article III Pet. at 2.

²⁰³ See CAR Pet. at 38 (relying solely on “recent [December 2025] guidance from the U.S. Department of Justice Office of Legal Counsel” to support its theory of discrimination).

²⁰⁴ See *Nat’l Educ. Ass’n v. U.S. Dep’t of Educ.*, 779 F. Supp. 3d 149, 199 (D.N.H. 2025) (“The obligations imposed by [a recent Department of Education letter barring DEI programs] are new. Indeed, as recently as 2023, the Department advised schools and regulated entities that DEI programs were not only lawful, but to be encouraged.”); *Perkins Coie LLP v. U.S. Dep’t of Just.*, 783 F. Supp. 3d at 174–77 & n.38 (D.D.C. 2025) (referring to the Department’s position that

The novelty of Petitioners’ legal theory dooms their requested relief under well-established due process principles. “Although an administrative agency is not bound to rigid adherence to its precedents, it is equally essential that when it decides to reverse its course, it must give notice that the standard is being changed.”²⁰⁵ “This requirement of clarity in regulation is essential to the protections provided by the Due Process Clause of the Fifth Amendment.”²⁰⁶ For the Commission to sanction a party for a violation of the agency’s rules, therefore, agency policy in effect at the time of the violation must have been sufficient “to provide a person of ordinary intelligence” with “fair notice of conduct that is forbidden or required.”²⁰⁷ Reading the FCC’s EEO regulations to now bar the practices attacked by Petitioners would violate that “first essential of due process.”²⁰⁸

In *FCC v. Fox*, the Supreme Court held unconstitutional the FCC’s imposition of sanctions for indecent broadcasting on fair notice grounds because “Commission policy in place at the time

DEI programs constitute unlawful discrimination as “uncertain[,],” “expansive,” and sufficiently unclear to be void for vagueness); *NAACP v. U.S. Dep’t of Educ.*, 779 F. Supp. 3d 53, 65 (D.D.C. 2025) (similar); *Am. Fed’n of Tchrs. v. Dep’t of Educ.*, 796 F. Supp. 3d 66, 104–05 (D. Md. 2025) (criticizing the government’s “failure to recognize that [its regulation proscribing DEI-related practices] went beyond merely restating settled principles of civil rights law”); *Diemert v. City of Seattle*, 776 F. Supp. 3d 922, 930 (W.D. Wash. 2025) (“D.E.I. programs aimed at addressing racial inequalities against Black people and other minorities are not by their very nature discriminatory against whites.”); *Dzibela v. BlackRock, Inc.*, 2024 WL 4349813, at *6 n.4 (D.N.J. 2024) (“[*Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181 (2023)] did not consider DEI policies of private employers, much less rule that such efforts were unlawful. For this reason, the Court does not find Plaintiff’s reliance on *Students for Fair Admissions* persuasive as applied to the instant case.”). The *National Education Association* court noted that as recently as 2023, the Department of Education stated that “it would be lawful for educational institutions to focus their outreach and recruitment efforts toward schools and school districts that serve predominantly students of color,” to “consider race when deciding which school districts or geographic areas to focus on,” and to “invest in programming and activities to support students’ sense of belonging, including campus cultural centers, affinity groups, DEI offices, clubs, and other programming that addresses issues relevant to student identity groups.” *Nat’l Educ. Ass’n*, 779 F. Supp. at 167–68 (citation modified).

²⁰⁵ *Bos. Edison Co. v. Fed. Power Comm’n*, 557 F.2d 845, 849 (D.C. Cir. 1977).

²⁰⁶ *FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253 (2012).

²⁰⁷ *Id.* (citation modified).

²⁰⁸ *Id.* (quoting *Connally v. Gen. Constr. Co.*, 269 U.S. 385, 391 (1926)).

of the broadcasts gave no notice to Fox or ABC that a fleeting expletive or a brief shot of nudity could be actionably indecent.”²⁰⁹ And the D.C. Circuit has *repeatedly* condemned the FCC for showing a “disconcerting willingness to judge the behavior of broadcast applicants by standards that had not been clearly enunciated when that behavior occurred.”²¹⁰ What the Commission has done here is even worse: even if Petitioners’ new interpretation were correct as a matter of law, that would not permit the FCC to punish ABC’s “good-faith” “reliance on the [agency’s] consistent, longstanding administrative construction.”²¹¹ Under those circumstances, where the Commission’s about-face has deprived ABC of “fair warning” as to what conduct the law prohibits, doing so would violate the “traditional notions of fairness” inherent in our system of justice.²¹²

The Commission has never enforced its EEO regulations against efforts by broadcasters to increase minority representation among employees. Far from it: for over *twenty years*, the FCC has required broadcasters to pursue exactly that objective and stated that focusing some recruitment efforts on minority groups would not constitute discrimination.²¹³ “Due process and

²⁰⁹ *Id.* at 254.

²¹⁰ *RKO Gen., Inc. v. FCC*, 670 F.2d 215, 222 (D.C. Cir. 1981). *See, e.g., E. Carolinas Broad. Co. v. FCC*, 762 F.2d 95, 101 (D.C. Cir. 1985) (“[A]brupt changes in discretionary agency practice or interpretation require some degree of notice.”); *Straus Commc’ns, Inc. v. FCC*, 530 F.2d 1001, 1011 (D.C. Cir. 1976) (“The licensee’s violation, then, consisted fundamentally in failing to predict the new interpretation.”); *Columbia Broad. Sys., Inc. v. FCC*, 454 F.2d 1018, 1026 (D.C. Cir. 1971) (“Lodged deep within the bureaucratic heart of administrative procedure, however, is the equally essential proposition that, when an agency decides to reverse its course, it must provide an opinion or analysis indicating that the standard is being changed and not ignored. . . .”).

²¹¹ *United States v. Pa. Indus. Chem. Corp.*, 411 U.S. 655, 673 (1973); *cf. PG&E Gas Transmission, Nw. Corp. v. FERC*, 315 F.3d 383, 389–90 (D.C. Cir. 2003) (vacating agency action as arbitrary where the agency had approved identical conduct in prior proceedings and its attempts to distinguish those precedents were “alternately nonexistent, misleading, and irrelevant”).

²¹² *Pa. Indus. Chem.*, 411 U.S. at 674.

²¹³ *See supra* Part II.C.1 (citing 2002 EEO Order, 17 FCC Rcd at 24048).

fair play do not permit [the agency] to say to [applicant]: ‘Yes, you met all the requirements and standards about which we told you, but you did not meet the one about which we did not tell you. Therefore we deny your application.’”²¹⁴ No one at the Stations could have had fair notice that the Commission’s regulations forbade conduct that the Commission *encouraged*.

D. CAR’s Allegations Regarding The ABC Network Are Unsupported And Irrelevant.

CAR also attacks the operation of the ABC Network’s affiliation contracts—that is, contracts with ABC-affiliated stations owned by someone other than Disney.²¹⁵ Notably, CAR alleges no facts to suggest, much less demonstrate, any violations of the Communications Act or FCC rules in these contracts; instead, CAR merely incorporates by reference a letter sent by then-Commissioner Carr to Disney regarding the company’s negotiations with ABC affiliates and encourages the Commission to investigate, “potentially abusive practices.”²¹⁶ Accordingly, CAR has failed to state a *prima facie* case of any FCC rule violation.

Moreover, any alleged network affiliation rule violations by definition do not involve the ABC Owned Stations that are the subject of this proceeding. Section 309(k) of the Act limits the scope of the license renewal inquiry to matters occurring at the particular station for which license renewal is sought.²¹⁷ Accordingly, allegations of misconduct by the ABC Network are not relevant for consideration in this proceeding, even if they constituted violations of the Commission’s rules (which they do not). The Commission should reject CAR’s attempt to turn individual license

²¹⁴ *Hatch v. FERC*, 654 F.2d 825, 835 (D.C. Cir. 1981) (citation omitted).

²¹⁵ CAR Pet. at 44–45.

²¹⁶ *Id.*

²¹⁷ 47 U.S.C. § 309(k); *see supra* note 61 and accompanying text.

renewal applications into an examination of industry-wide issues, particularly as the Commission has already initiated an industry-wide proceeding for such matters.²¹⁸

E. The Petitioners Misconstrue And Misapply The Character Policy.

While some Petitioners contend ABC lacks the character to hold an FCC license under the Commission's longstanding character policy,²¹⁹ such Petitioners fundamentally misconstrue and misapply the character policy. The character policy is not, as the Petitioners seem to believe, an open-ended review of whatever alleged misdeeds the Petitioners believe may reflect on the licensee's "character." Rather, the character policy assists the Commission in determining whether a licensee or applicant possesses qualities sufficient to show that it will deal truthfully with the Commission and comply with all applicable rules and standards by requiring consideration only of violations of certain Commission rules and limited categories of "non-FCC misconduct."²²⁰ As outlined above, Petitioners have failed to allege violations of Commission rules. Nor, critically, do they demonstrate any "non-FCC misconduct" recognized as relevant under the character policy.²²¹

²¹⁸ See *Empowering Local Broadcast TV Stations to Meet Their Public Interest Obligations*, Public Notice, DA 25-961 (MB Nov. 19, 2025).

²¹⁹ AFL Pet. at 18; CAR Pet. at 35–36, 43–46, 54–57; Kenneth Douglass Newman, Petition to Deny, MB Docket No. 26-131, at 8–9, 16, 21 (June 9, 2026), <https://www.fcc.gov/ecfs/document/1061014691373/1> ("Newman Pet.").

²²⁰ *Policy Regarding Character Qualifications*, Report, Order and Policy Statement, 102 F.C.C.2d 1179, 1195 (1986) ("*1986 Character Policy*"); *Policy Regarding Character Qualifications*, Policy Statement and Order, 5 FCC Rcd 3252, 3252 (1990) ("*1990 Character Policy*").

²²¹ Such conduct includes only "adjudications of both criminal and civil violations of law . . . in which a specific finding of fraudulent representation to another governmental unit is made," *1986 Character Policy*, 102 F.C.C.2d at 1196; "criminal convictions involving false statement or dishonesty . . . relevant to predicting the propensity for an applicant to deal truthfully with the Commission," *id.* at 1197; "any conviction for misconduct constituting a felony," *1990 Character Policy*, 5 FCC Rcd at 3252; and "adjudications involving antitrust or anticompetitive violations from a court of competent jurisdiction, the Federal Trade Commission, or other governmental unit charged with the responsibility of policing such activity," *1986 Character Policy*, 102 F.C.C.2d at 1202.

For the Commission to hold a hearing where non-FCC misconduct is concerned, mere allegations or complaints are not sufficient, even where such allegations are in the midst of being adjudicated.²²² In the *1986 Character Policy*, the Commission stated, “there must be an ultimate adjudication by an appropriate trier of fact, either by a government agency or court, before we will consider the activity in our character determinations.”²²³ The only precedent for considering unadjudicated non-FCC-related misconduct is where the conduct at issue is “so egregious as to shock the conscience and evoke almost universal disapprobation.” (*e.g.*, severe crimes).²²⁴

Here, all the allegations involve either unadjudicated complaints or allegations or address conduct outside of the limited scope of the non-FCC misconduct covered by the character policy. Petitioners’ assertions about pending complaints before other government agencies are unadjudicated and therefore unavailing—especially where those complaints, like the Securities and Exchange Commission complaints raised by Kenneth Douglass Newman, are outside the scope of relevant non-FCC misconduct.²²⁵ CAR and MRC similarly object to a settlement that the licensees’ corporate parent paid in 2024 in connection with a claim of alleged defamation,²²⁶ but that settlement is a privately resolved civil matter between private parties, which included no legal findings. It therefore cannot be considered an “adjudication.” Moreover, the Commission has specifically held that “[a]llegations of defamation are outside the Commission’s jurisdiction” and

²²² *1990 Character Policy*, 5 FCC Rcd at 3252 (“We continue to believe that it is appropriate to refrain from making licensing decisions based on mere allegations of relevant non-FCC misconduct, even where those allegations have resulted in an indictment or are otherwise in the process of being adjudicated by another agency or court.”).

²²³ *1986 Character Policy*, 102 F.C.C.2d at 1205. *See, e.g., Anne L. Weismann et al.*, Letter, 28 FCC Rcd 6312, 6317–18 (MB 2013).

²²⁴ *1986 Character Policy*, 102 F.C.C.2d at 1205 n.60; *see also, e.g., Contemporary Media, Inc.*, Decision, 13 FCC Rcd 14437, 14444 (1998), *aff’d sub nom. Contemporary Media, Inc. v. FCC*, 214 F.3d 187 (DC Cir. 2000), *cert. denied*, 532 U.S. 920 (2001).

²²⁵ *See Newman Pet.*; *see also AFL Pet.* at 13, 18 (citing to its own pending complaint before the Equal Employment Opportunities Commission).

²²⁶ *See CAR Pet.* at 12; *MRC Pet.* at 20–22.

are instead “properly the subject of private defamation actions under state law, not of Commission licensing proceedings.”²²⁷ Similarly, the settlements between Disney and the U.S. Department of Justice and the California Attorney General²²⁸ were not adjudications and, in any event, did not involve or relate to any of the Stations. The same applies to CAR’s baseless speculation about harms that might possibly emerge from the Stations’ parent company’s (not the Stations’) business dealings in China.²²⁹ As there is no adjudicated finding of wrongdoing regarding any of the above allegations, they do not bear on these proceedings.

* * *

Because Petitioners’ allegations do not establish violations of the Communications Act, failure to comply with the Commission’s rules and regulations, or non-FCC conduct sufficient to deserve notice under the Commission’s Character policy, Petitioners have failed to make a prima facie case that the Stations’ renewals should be designated for hearing.

III. The Early License Renewal Proceedings Must Be Dismissed As Unconstitutional First Amendment Retaliation

Because the Stations plainly satisfy the standard under Section 309(k)(1) for renewal, the Commission’s plain purpose in initiating these proceedings is to punish ABC for speech that this Administration dislikes. This clearcut case of First Amendment retaliation provides yet another reason to dismiss these proceedings.

²²⁷ *Ms. Mary Ann Applegate et al.*, Letter, 22 FCC Rcd 17302, 17304 (MB 2007); *see also Ms. Martha Beatriz López Amado*, 22 FCC Rcd 6796, 6797 (MB 2007) (“The role of the Commission in overseeing program content is limited . . . as to her claim to have been defamed by these events, such allegations are outside of the Commission’s jurisdiction.”); *John Neely, Esq.*, Letter, 22 FCC Rcd 8395, 8397 (MB 2007) (“As to claims by Objectors that Licensee has broadcast false statements or personal information about them, such as their home addresses, such allegations are outside of the Commission’s jurisdiction. Such allegations are properly the subject of private defamation or invasion of privacy actions under state law, not of Commission licensing proceedings.”).

²²⁸ CAR Pet. at 4 n.2.

²²⁹ *See id.* at 45–50.

The First Amendment “prohibits government officials from subjecting individuals to retaliatory actions after the fact for having engaged in protected speech.”²³⁰ Although government officials are free to “share [their] views freely and criticize particular beliefs,” they may not “use the power of the state to punish or suppress disfavored expression,” including by “attempt[ing] to coerce private parties in order to punish or suppress views that the government disfavors.”²³¹ Yet that is what is happening here: For well over a year, the FCC has engaged in a multi-front campaign against ABC in retaliation for speech the Administration dislikes on ABC network programming broadcast by the Stations. The demand for early renewal applications for the Stations’ licenses is just the latest escalation in that campaign.

Unconstitutional retaliation occurs where (1) the speaker “engaged in conduct protected under the First Amendment”; (2) the government “took some retaliatory action sufficient to deter a person of ordinary firmness in [the speaker]’s position from speaking again”; and (3) there is “a causal link between the exercise of a constitutional right and th[at] adverse action.”²³² All three elements are satisfied here.

Protected Speech. The Stations engaged in protected speech when they broadcast ABC News reporting, as well as on-air statements by Jimmy Kimmel and *The View*’s hosts.²³³ The First Amendment guarantees the right to exercise “editorial discretion in the selection and presentation” of such speech,²³⁴ and “a speaker has the autonomy to choose the content of his own message.”²³⁵

²³⁰ *Hous. Cmty. Coll. Sys. v. Wilson*, 595 U.S. 468, 474 (2022) (citation modified).

²³¹ *Nat’l Rifle Ass’n of Am. v. Vullo*, 602 U.S. 175, 180, 188 (2024).

²³² *Aref v. Lynch*, 833 F.3d 242, 258 (D.C. Cir. 2016).

²³³ See, e.g., *Dex Media W., Inc. v. City of Seattle*, 696 F.3d 952, 963 (9th Cir. 2012) (“The full First Amendment protection of newspapers, magazines, television shows, radio programs, and the like demonstrates that the inclusion of commercial material does not support treating those publications and broadcasts as commercial speech entitled to less First Amendment protection.”).

²³⁴ *Ark. Educ. Television Comm’n v. Forbes*, 523 U.S. 666, 674 (1998).

²³⁵ *Hurley*, 515 U.S. at 573.

That right extends to a speaker’s choices about what *not* to communicate. “Since *all* speech inherently involves choices of what to say and what to leave unsaid,” it is axiomatic that “one who chooses to speak may also decide ‘what not to say.’”²³⁶ Thus, the Stations’ decisions about what content and viewpoints to disseminate (and what *not* to disseminate) are squarely protected by the First Amendment.²³⁷

Similarly, with respect to employment practices, Disney and ABC engage in protected speech when they choose which values to promote and which issues to discuss in pursuing lawful diversity and inclusion efforts.²³⁸ Forcing networks to fall silent about these topics is government-compelled speech.²³⁹

Retaliatory Action. The Commission’s threat to the Stations’ broadcast licenses is undoubtedly an adverse action that would deter a broadcaster of “ordinary firmness” from speaking.²⁴⁰ So too are the burdensome investigation efforts²⁴¹ targeted at inclusion programs that have long been encouraged by EEO regulations and are wholly typical across the country. Faced

²³⁶ *Id.* (quoting *Pac. Gas & Elec. Co. v. Pub. Utils. Comm’n of Cal.*, 475 U.S. 1, 11, 16 (1986) (plurality op.)).

²³⁷ *See FCC v. League of Women Voters of Cal.*, 468 U.S. 364, 374–75 (1984).

²³⁸ *See Brighton Park Neighborhood Council v. McMahon*, 2026 WL 1707623, at *8 (D.D.C. June 12, 2026).

²³⁹ *Id.* (“When the [government] display[s] hostility to DEI-related activities . . . , they necessarily chill DEI-favorable speech[.]”). Senior government officials have injected themselves directly into merger review to reshape a news network—declaring it “imperative” that CNN be sold because those running it are “either corrupt or incompetent,” Jacob Wendler, *Trump Says He Hopes To See CNN Sold In Warner Bros. Merger*, Politico (Dec. 10, 2025), <https://www.politico.com/news/2025/12/10/trump-cnn-warner-paramount-skydance-media-00685810>, and later telling CNN’s own anchor, on the air, that “[w]e’re trying to have CNN go on a normal path,” CJ Womack, *Trump Accepts Jake Tapper Interview Invite, Tells Anchor He’s Trying To Move CNN Onto A ‘Normal Path’*, Fox News (July 12, 2026), <https://www.foxnews.com/media/trump-accepts-jake-tapper-interview-invite-tells-anchor-hes-trying-move-cnn-onto-normal-path>.

²⁴⁰ *Hous. Cmty. Coll. Sys.*, 595 U.S. at 477.

²⁴¹ *See Media Matters for Am. v. Paxton*, 138 F.4th 563, 580 (D.C. Cir. 2025) (explaining that “all investigative techniques are subject to abuse,” and that “bad faith use of investigative techniques” can “abridge” rights under the First Amendment (citation omitted)).

with such danger, any broadcaster would question whether its speech is worth the cost. Indeed, the public record is replete with examples of other broadcasters who, when faced with similar pressures, quickly folded to the administration’s demands.²⁴² News companies whose transactions await FCC approval have quickly committed to dismantle their diversity programs,²⁴³ turning merger clearance into a test of ideological alignment. And while the evolution of Disney’s practices puts it squarely in line with those that the Commission has endorsed when approving other companies’ transactions,²⁴⁴ the Commission has made no indication here that some form of resolution with Disney would be possible, further underscoring that its investigation is fueled by retaliation rather than policy objectives.

Causation. The connection between the Stations’ protected speech and the government’s punitive actions is also clear from the government’s own statements. For years, President Trump has expressly demanded that the Commission revoke ABC’s broadcast licenses for speech he

²⁴² See, e.g., Byron Tau, *How an AM Radio Station in California Weathered the Trump Administration’s Assault on Media*, Associated Press (Dec. 15, 2025), <https://www.ap.org/news-highlights/spotlights/2025/how-an-am-radio-station-in-california-weathered-the-trump-administrations-assault-on-media> (describing how, after the FCC opened an investigation into radio station KCBS-AM’s reports that immigration agents were in the Bay Area, the station “demoted a well-liked anchor and dialed back on political programming”); David Shepardson, *AT&T Commits to Ending DEI Programs*, Reuters (Dec. 2, 2025, 4:46 PM ET), <https://www.reuters.com/sustainability/society-equity/att-commits-ending-dei-programs-2025-12-02>.

²⁴³ See, e.g., David Folkenflik, *Trump Administration Approves Sale of CBS Parent Company Paramount After Concessions*, NPR (updated July 24, 2025, 8:04 PM ET), <https://www.npr.org/2025/07/24/nx-s1-5477530/paramount-cbs-skydance-sale-fcc-approves> (explaining that Paramount, in the course of seeking approval to merge with Skydance Media, cancelled Colbert’s show, settled a lawsuit with President Trump for \$16 million, eliminated all U.S.-based DEI programs, created an ombudsman to field complaints of ideological bias, and allegedly agreed to run “\$20 million worth of public service announcements consistent with [Trump’s] ideological beliefs”); Verizon Letter; Charter Letter.

²⁴⁴ See *supra* Part II.C.3.

dislikes.²⁴⁵ Since his appointment, Chairman Carr has subsequently opened all manner of investigations and issued a slew of burdensome investigatory requests.

The Commission’s treatment of similarly situated licensees underscores that its actions are retaliatory. The “FCC has trained its enforcement apparatus on ABC while staying conspicuously silent about other broadcasters operating under the exact same rules, in the same markets.”²⁴⁶ Notably, conservative talk radio shows have repeatedly “aired interviews with political candidates without filing notices and received no inquiry, no letter, and no investigation whatsoever.”²⁴⁷

In short, the Commission’s actions do not “reflect legitimate regulatory enforcement.”²⁴⁸ Instead, the Commission has followed a “familiar” pattern: “a complaint is filed, an investigation is opened with maximum visibility, and the process itself becomes the pressure.”²⁴⁹ Courts have already enjoined similar tactics by the Trump Administration against other political opponents as First Amendment retaliation.²⁵⁰

²⁴⁵ See, e.g., *supra* pp. 3, 6–8, 11.

²⁴⁶ Commissioner Gomez Letter at 3.

²⁴⁷ *Id.*; see also John Hendel, *Talk Radio Isn’t a Target of FCC’s ‘Equal Time’ Notice, Brendan Carr Says*, Politico (Jan. 29, 2026, 6:02 PM EST), <https://www.politico.com/news/2026/01/29/talk-radio-isnt-a-target-of-fccs-equal-time-memo-brendan-carr-says-00755660>.

²⁴⁸ Commissioner Gomez Letter at 1.

²⁴⁹ *Id.* at 3.

²⁵⁰ See *Media Matters for Am. v. FTC*, 805 F. Supp. 3d 105, 111–12 (D.D.C. 2025) (FTC investigation of media group); *Endocrine Soc’y v. FTC*, 2026 WL 1257289, at *1 (D.D.C. May 7, 2026) (FTC investigation of gender-affirming care nonprofit); *N.Y. Times Co. v. Dep’t of Defense*, 2026 WL 1872765, at *1–2 (D.D.C. June 30, 2026) (Pentagon journalist escort requirement); *Nat’l Pub. Radio, Inc. v. Trump*, 2026 WL 877434, at *1–2 (D.D.C. March 31, 2026) (executive order defunding NPR); *Perkins Coie LLP*, 783 F. Supp. 3d at 118–21 (D.D.C. 2025) (executive order targeting left-leaning law firms with sanctions, including EEOC DEI investigations); *President & Fellows of Harvard Coll. v. U.S. Dep’t of Homeland Sec.*, 788 F. Supp. 3d 182, 186 (D. Mass. 2025) (agency campaign of retaliation against Harvard); *Am. Ass’n of Univ. Professors v. Trump*, 815 F. Supp. 3d 907, 930–31 (N.D. Cal. 2025) (agency campaign of retaliation against UCLA); *Am. Ass’n of Univ. Professors v. Rubio*, 802 F. Supp. 3d 120, 194 (D. Mass. 2025) (retaliatory changes in immigration status).

IV. The Article III Project, CAR, MRC, And FF-MAC Petitions To Deny Should Be Dismissed As A Matter Of Law

A. The Article III Project, CAR, And MRC Lack Standing.

A party has standing to file a petition to deny under Section 309(d) of the Communications Act “if grant of the petitioned application would result in, or be reasonably likely to result in, some injury of a direct, tangible and substantial nature.”²⁵¹ The Commission has stated that “[i]n the broadcast regulatory context, standing is generally shown in one of three ways: “(1) as a competitor in the market subject to signal interference; (2) as a competitor in the market subject to economic harm; or (3) as a resident of the station’s service area or regular viewer or listener of the station.”²⁵² Further, “[w]hile an organization may establish standing to represent the interests of local listeners or viewers, it must provide an affidavit or declaration of one or more individuals entitled to standing indicating that the group represents local residents.”²⁵³

Several petitions fail to satisfy this standard in whole or in part because they did not provide an affidavit or declaration from a resident or regular viewer of the ABC-owned stations. *First*, the Article III Project’s pleading is unsupported by any affidavit that it represents a resident or actual viewer in any ABC-owned station area. *Second*, the CAR Petition is self-styled as a petition to deny in relation to KGO, KTRK, WLS, WPVI, and WTVD,²⁵⁴ but lacks a declaration from a resident in the service area or regular viewer of KABC, KFSN, or WABC. *Third*, the MRC Petition, which facially challenges every license at issue in the proceeding, is unsupported by an affidavit from a resident or regular viewer in the KFSN, KGO, or WTVD license areas.

Accordingly, the Commission should dismiss the petition from the Article III Project in its

²⁵¹ *Entercom License, LLC*, 31 FCC Rcd 12196, 12205 (2016).

²⁵² *Id.*; see also *Applications for Consent to the Transfer of Control of Paramount Global*, Memorandum Opinion and Order, FCC 25-43, ¶ 42 (rel. July 24, 2025).

²⁵³ *Entercom License, LLC*, Hearing Designation Order and Notice of Proposed Rulemaking, 31 FCC Rcd at 12206.

²⁵⁴ CAR Pet. at 3.

entirety, the CAR Petition as it relates to KABC, KFSN, or WABC, and the MRC Petition as it relates to KFSN, KGO, and WTVD.²⁵⁵ At minimum, the Commission should not give these Petitioners party-in-interest status as to the Stations for which no affidavit was submitted.

B. The Article III Project, CAR, MRC, And FF-MAC Petitions Should Be Dismissed For Procedural Deficiencies.

1. The Article III Project, CAR, MRC, And FF-MAC Failed To Properly Serve Their Petitions.

Petitions from the Article III Project, CAR, Frequency Forward and the Media Action Center (“FF-MAC”), and MRC are procedurally deficient for failing to provide service as required by the Act and Commission rules. Section 309(d) provides that “[t]he petitioner shall serve a copy of such petition on the applicant.”²⁵⁶ The Commission’s rules elaborate that “[d]ocuments that are required to be served must be served in paper form, even if documents are filed in electronic form with the Commission, unless the party to be served agrees to accept service in some other form” and are to include proof of service.²⁵⁷ Here, however, the aforementioned Petitioners either failed to accomplish service in the manner required or failed to accomplish service at all. The Commission should thus dismiss these petitions, or at a minimum, deny them party-in-interest status.²⁵⁸

2. The FF-MAC Petition Must Be Dismissed As Improperly Filed.

The FF-MAC Petition is not ripe and fails to comply with Section 309. The petition identifies no deficiency, rule violation, character or fitness issue, or pattern of abuse attributable

²⁵⁵ *Paramount Global*, ¶ 43.

²⁵⁶ 47 U.S.C. § 309(d)(1).

²⁵⁷ 47 C.F.R. §§ 1.47(d), (g); *see also* 47 C.F.R. § 1.939(c) (“A petitioner shall serve a copy of its petition to deny on the applicant and on all other interested parties pursuant to Section 1.47.”).

²⁵⁸ *See, e.g., Paramount Global*, ¶ 43 n.179 (finding procedural error in a petition to deny from CAR regarding service); *of Union City*, Letter, 39 FCC Rcd 3160, 3161 (MB 2024) (“[W]e find that the Petition is procedurally defective as a petition to deny [because it] does not include a certificate of service Accordingly, we will dismiss the Petition as procedurally flawed and consider it as an informal objection pursuant to section 73.3587 of the Rules.”).

to any of the eight licensees. Therefore, on its face, the FF-MAC Petition fails to address the requirements of either Section 309(k) or Section 309(d). FF-MAC's grievance is instead with the Commission itself—specifically, the FCC's decision to require early renewal filings.²⁵⁹ Whatever that critique's merits, it is a challenge to agency conduct, not a basis for finding that the Stations failed to satisfy the renewal standard. The Commission therefore should deny FF-MAC party-in-interest status.

Nor does FF-MAC's Petition seek relief based on any present defect in the Stations' renewal applications. Instead, FF-MAC's requested relief is conditional, prospective, and directed at conduct that has not yet occurred: FF-MAC asks the Commission to deny the renewal applications only “in the event Disney capitulates” to a hypothetical settlement with the Commission that may never come to pass.²⁶⁰ Because the FF-MAC Petition challenges only hypothetical agency action, it must be dismissed.

²⁵⁹ Frequency Forward, Media Action Center, Petition to Deny, MB Docket No. 26-131, at 6 (June 26, 2026), <https://www.fcc.gov/ecfs/document/26109933349/1>.

²⁶⁰ *Id.* at 1.

CONCLUSION

For the foregoing reasons, the Commission should deny the Petitions to Deny, or alternatively, dismiss these early renewal proceedings as untimely and unwarranted.

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Respectfully submitted,

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APPENDIX A – EXAMPLES OF THE ABC OWNED STATIONS’ CONTRIBUTIONS TO THE PUBLIC INTEREST

The record demonstrates that the Stations operate in the public interest every day through market-leading local news, locally tailored programming, substantial local investments, and longstanding connections within their communities. While the Stations’ renewal applications document an impressive record of public service that could speak for itself, they need not—the record is filled with submissions from officials, organizations, and residents present in the very communities the Stations serve, corroborating the Stations’ local service in their own words. This Appendix summarizes the Stations’ key contributions to the public interest.

- **ABC Owned Stations Are Present in Their Communities.**

- All ABC Owned Stations operate their studios, newsrooms, and administrative offices from within, or very close to, their communities of license.¹
- All of the Stations’ General Managers and News Directors live in the area and manage the Stations’ operations and newsgathering from these local facilities.
- Altogether, the Stations employ over 1,500 members of their local communities as full-time, part-time, and freelance staff.²

¹ KABC’s facilities are located in Glendale, CA, just north of the Los Angeles city limit.

² Renewal of License Application, KABC-TV, File Number 0000298356, KABC-TV Public Interest Exhibit, at 2 (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076ff39e706cbc019e70db9b6b007f> (“KABC PIS”); Renewal of License Application, KFSN-TV, File Number 0000298350, KFSN-TV Public Interest Exhibit, at 2 (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e706df1019e70b9d52a0082> (“KFSN PIS”); Renewal of License Application, KGO-TV, File Number 0000298344, KGO-TV Public Interest Exhibit, at 2 (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e706df1019e70a83d3a0075> (“KGO PIS”); Renewal of License Application, KTRK-TV, File Number 0000298353, KTRK-TV Public Interest Exhibit, at 1 (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076ff39e706cbc019e70cc042e0073> (“KTRK PIS”); Renewal of License Application, WABC-TV, File Number 0000298318, WABC-TV Public Interest Exhibit, at 3 (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076ff39edb9ec4019f0073b8cb1a58> (“WABC PIS”); Renewal of License Application, WLS-TV, File Number 0000298337, WLS-TV Public Interest Exhibit, at 2 (submitted May 28, 2026),

- Several of the Stations also have additional news bureaus staffed with reporters dedicated to offering hyperlocal coverage of particular areas of the Stations' markets.³
 - For instance, WTVD is the only station in its market to operate a remote news bureau, staffed with a locally based reporter and photographer, in Fayetteville, NC, which is located near U.S. Army Base Fort Bragg, creating unique opportunities for WTVD to travel extensively with the 82nd Airborne Division, report on deployments, and cover stories about servicemembers and their families.⁴

<https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e706df1019e709ba78e0066> (“WLS PIS”); Renewal of License Application, WPVI-TV, File Number 0000298324, WPVI-TV Public Interest Exhibit, at 1 (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e6a1784019e702d712106ef> (“WPVI PIS”); Renewal of License Application, WTVD, File Number 0000298327, WTVD Public Interest Exhibit, at 2 (submitted May 28, 2026), <https://enterpriseefiling.fcc.gov/dataentry/api/download/attachment/25076f919e6a1784019e70615fb2071f> (“WTVD PIS”); *see also* Letter from Alex Padilla & Adam B. Schiff, Senators, U.S. Senate, California, to Marlene H. Dortch, Secretary, FCC, at 1 (July 27, 2026), <https://www.fcc.gov/ecfs/document/26110056772/1> (“Together, [KABC, KGO, and KFSN] employ hundreds of Californians, maintain local newsrooms and reporting bureaus, produce hundreds of hours of original local programming, provide free over-the-air access to trusted news and emergency information, and partner with countless nonprofit, educational, and civic organizations across our state.”); Letter from Jamaal T. Bailey, Senator, New York State Senate, 36th District, at 1 (July 21, 2026), <https://www.fcc.gov/ecfs/document/26110045151/1> (“[T]he station has hired locally raised personalities like Shirleen Allicot and Pedro Rivera, in addition to other Emmy Award-winning and nominated anchors, that center WABC-TV as a beacon in the community and give it legitimate local credibility.”). All record submissions cited in this Appendix were filed in MB Docket No. 26-131 unless otherwise noted.

³ *See* KABC PIS at 1 (discussing remote news bureaus in Orange County, CA and Riverside County, CA); KFSN PIS at 2 (discussing remote news bureaus in Merced, CA and Visalia, CA); KGO PIS at 2 (discussing remote news bureau in San Jose, CA); WABC PIS at 2 (discussing remote news bureaus in Hempstead, NY, Long Island City, NY, White Plains, NY, and Rutherford, NJ); WTVD PIS at 1 (discussing remote news bureaus in Raleigh, NC and Fayetteville, NC); *see also* Letter from Julie Menin, Speaker, New York City Council, 5th District, to Marlene H. Dortch, Secretary, FCC, at 1–2 (July 14, 2026) <https://www.fcc.gov/ecfs/document/26110022895/1> (“With major facilities in lower Manhattan and multiple bureaus across the region, [WABC] maintains a strong local presence that enables comprehensive, on-the-ground coverage throughout New York City and the broader region. This infrastructure supports high-quality reporting and ensures that local perspectives are represented in its coverage.”); Letter from Susan Poser, President, Hofstra University, to Marlene H. Dortch, Secretary, FCC, at 1 (July 8, 2026), <https://www.fcc.gov/ecfs/document/26110004794/1> (describing how WABC’s housing of its Long Island Bureau within Hofstra’s communications school “has produced significant benefits to our students, and to the communities surrounding Hofstra, who rely on the local news coverage that ABC7 produces”).

⁴ WTVD PIS at 16; *see also* Letter from Charles R. Smith, State Representative, North Carolina

- **ABC Owned Stations Are Dedicated To Local News.**

- Collectively, the Stations produce over 390 hours per week of regularly scheduled local news, an average of almost 49 hours per station,⁵ which airs throughout the day—beginning early in the morning, continuing during the afternoon, and concluding in the late evening—offering local, national, and international news, investigative and consumer reporting, weather, and sports.
- The Stations’ dedication to local reporting is reflected by the investment of millions of dollars in recent years to improve their newsgathering capabilities.
 - These investments have included state-of-the-art weather and radar equipment,⁶ helicopters outfitted with cutting-edge technology to provide real-time traffic and breaking news coverage,⁷ new remote production

House of Representatives, 14th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110048411/1> (“WTVD’s reporters have traveled with the 82nd Airborne Division soldiers to Afghanistan, Iraq, and Kuwait. The station covers deployments from Fort Bragg and tells the human stories behind them . . .”).

⁵ These totals do not include the numerous instances, some of which are discussed below, when a Station breaks into regularly scheduled programming to provide local news coverage.

⁶ See, e.g., KABC PIS at 8 (“KABC provides accurate, minute-by-minute weather forecasts with life-saving information in an emergency that leverages new weather cameras.”); KFSN PIS at 5 (“ABC30 Fog Tracker also allows the weather team to give viewers critical safety information about what to expect during their drives. . . .”); KTRK PIS at 3 (“KTRK also has heavily invested in its weather radar technology, including by partnering with Climavision to operate radar networks across the Houston area.”); WLS PIS at 5 (discussing WLS’s upgrades to weather system hardware “to improve performance and resilience,” investments in high-gain antennas to extend “the radar system’s reception range by “three to four times . . . to sustain continuous, real-time radar coverage during severe weather”); WTVD PIS at 3–4 (“WTVD uses data from its state-of-the-art one-million-watt Doppler Radar based in Garner, NC to track severe storms.”); see also Letter from Al Green, Member of Congress, U.S. House of Representatives, 9th District, Texas, to Brendan Carr, Chairman, FCC, at 1 (July 20, 2026), <https://www.fcc.gov/ecfs/document/26110044840/1> (“KTRK-TV’s dedication to local coverage has ensured our community remains informed about breaking news such as severe weather. Its investment in the 13 Alert Radar Network, technology with greater forecast accuracy, has granted Houstonians access to potentially life-saving coverage.”).

⁷ See, e.g., KABC PIS at 9 (“KABC is the only TV station in the LA market with the ability to go live via the Station’s helicopter from anywhere in California. . . . ABC7 . . . designed a custom live connectivity solution for the Station’s news helicopter . . . which has a much greater range.”); KGO PIS at 4 (discussing SKY7 news helicopter coverage); KTRK PIS at 3 (describing Sky Eye 13 HD helicopter that can fly as fast as 100 miles per hour and has a mobile transmitting unit equipped with a Cineflex HD camera and Sony lens); WLS PIS at 8 (“ABC 7 is the only station in the market featuring SkyMap 7 technology, which provides live street mapping superimposed over video from WLS’s traffic helicopter.”); see also Letter from Randy K. Weber, Member of Congress, U.S. House of Representatives, 14th District, Texas, to Marlene H. Dortch, Secretary, FCC, at 1 (July 16, 2026),

vehicles,⁸ and advanced studio equipment, such as upgraded cameras, robotic elements, and augmented and virtual reality tools.⁹

- **ABC Owned Stations Broadcast Life-Saving Coverage.**

- Each of the Stations places the utmost priority on helping viewers to stay safe and is devoted to providing critical, real-time live coverage during weather-related

<https://www.fcc.gov/ecfs/document/26110044848/1> (explaining how KTRK’s “investment in different technologies, such as the Sky Eye 13 HD helicopter and expanded radar networks, ensures residents’ access to timely, accurate coverage and vital safety information in times of need.”).

⁸ See, e.g., KGO PIS at 2 (“ABC7 further extends its newsgathering reach through a fleet of more than 20 mobile news vans, deployed daily across the nine counties of the DMA.”); WLS PIS at 4 (“In 2022, WLS invested in a remote production vehicle, which empowers the station to cover live events both on-site and remotely, making WLS the only station in the market with the capability to broadcast large community events and parades live.”); WTVD PIS at 4 (“WTVD has a fully outfitted ‘StormChaser’ vehicle equipped with advanced technologies to track weather conditions.”).

⁹ See, e.g., KFSN PIS at 4 (“KFSN recently upgraded its studio with new camera and robotics upgrades, updated HD cameras (which are also ATSC 3.0 ready), superior lenses, a new teleprompter, and new large ‘talent monitors.’”); WABC PIS at 4-5 (“WABC . . . leverage[s] state-of-the-art weather cameras, . . . and bold presentations incorporating advanced technologies such as augmented and virtual reality.”); WLS PIS at 4 (“In 2023, WLS created a virtual set and augmented reality environment to expand how the station covers stories and delivers timely information, especially during severe weather and major local events.”); WPVI PIS at 3 (describing WPVI’s use of “new weather cameras, live reporting on site, and bigger, bolder presentations incorporating new technologies”); see also Letter from Jay Obernolte, Member of Congress, U.S. House of Representatives, 23rd District, California, to Marlene H. Dortch, Secretary, FCC, at 2 (July 8, 2026), <https://www.fcc.gov/ecfs/document/26110044874/1> (“KFSN has made significant technological investments that will ensure that Central California viewers receive cutting-edge news and information that will enhance the audience’s experience, a benefit for both the production team and viewers. . . . For example, KFSN is the only local television station that partners with the California Highway Patrol, bringing live traffic safety reports directly from the Traffic Management Center to viewers.”); Letter from Michael V. Lawler, Member of Congress, U.S. House of Representatives, 17th District, New York, to Marlene H. Dortch, Secretary, FCC, at 1 (July 13, 2026), <https://www.fcc.gov/ecfs/document/26110044860/1> (“The station’s investment in cutting-edge technology—including augmented and virtual reality weather forecasting, state-of-the-art weather cameras, and 24/7 live reporting—ensures timely, accurate, and comprehensive information. From breaking news to severe weather alerts, traffic updates, and daily community reporting, WABC delivers lifesaving coverage that is accessible to residents across the Tri-State area.”); Letter from Ken Calvert, Member of Congress, U.S. House of Representatives, 41st District, California, to Marlene H. Dortch, Secretary, FCC, at 1 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110044852/1> (“KABC . . . has expert reporters and cutting-edge technology providing viewers timely coverage of weather forecasts, life-saving emergency information, traffic awareness and forecasts”).

and other emergency situations. Many of the Stations' viewers wrote to the Commission to highlight how they rely on the Stations during these times.¹⁰

- KABC's award-winning coverage of the 2025 Southern California wildfires included 35 hours of live broadcasts without commercial interruption, followed by 11 days of continuous coverage with only brief breaks during overnight hours.¹¹ According to Robert G. Luna, the Sheriff of Los Angeles County, "many of our residents relied on [KABC's] reporting for information that kept them informed about community safety."¹² Describing KABC as being a "long-time partner" of the Los

¹⁰ See, e.g., John Woods, Express Comment (June 29, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26109954979> ("ABC 7 [WLS] Chicago is the most trusted and best local news and weather. Their storm coverage has literally saved us when a tornado was heading right for our house."); Judith D Cunningham, Express Comment (July 24, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26110047624> ("When we had tornado warnings last week, I relied on that channel to keep me informed. I trust [WPVI] Action News 6 on ABC. I switched to some other channels to see their updates, but the graphics & the meteorologist on Action News, channel 6 provided the best coverage."); Kendall Wilson, Express Comment (July 23, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26110043949> ("As a long-time resident of the Houston area, I rely heavily on ABC13 [KTRK] for critical daily coverage that directly impacts my safety and community. This station plays an indispensable role in our region by providing life-saving, accurate, and real-time information during severe weather emergencies, including hurricanes, flooding, and tropical storms."); Benjamin David, Express Comment (July 20, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26110033354> ("WTVD has been an invaluable source of local news, severe weather coverage, emergency information, and reporting on issues that directly affect the Triangle community. My family has benefited from its broadcasting during hurricanes, tornado warnings, and other emergencies.").

¹¹ KABC PIS at 3–5. KABC's AIR7 HD team warned residents of the first stages of the Hollywood Hills fire before any official alert was issued. *Id.* at 5.

¹² Letter from Robert G. Luna, Sheriff, Los Angeles County, to Marlene H. Dortch, Secretary, FCC, at 1 (June 29, 2026), <https://www.fcc.gov/ecfs/document/26110016998/1> ("LA County Sheriff Letter"); see also Letter from Caroline Menjivar, Senator, California State Senate, 20th District et al., to Marlene H. Dortch, Secretary, FCC, at 1 (July 20, 2026), <https://www.fcc.gov/ecfs/document/26110038399/1> ("CA Elected Officials Letter") ("KABC's importance is especially clear during moments of crisis. During the Palisades and Eaton fires, which displaced families, destroyed homes, and forced widespread evacuations, KABC provided continuous live reporting that tracked fire movement, evacuation orders, shelter locations, and air quality conditions. Its coverage helped residents make time-sensitive decisions about when to evacuate and how to safely return during recovery efforts."); Letter from Laura Friedman, Member of Congress, U.S. Congress, California et al., to Marlene H. Dortch, Secretary, FCC, at 2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110044800/1> ("KABC . . . is a vital source of information during emergencies, including the devastating fires in January of 2025. During the Palisades and Eaton Fires, KABC reporters delivered continuous coverage to many of our constituents and disseminated important information from public officials to protect life and property.").

Angeles Sherriff's Department, Sheriff Luna credited the station for "consistently providing our residents with timely and accurate information that has informed them of public safety issues and undoubtedly saved lives."¹³ Other local public safety officials agree.¹⁴

- Similarly, KFSN provided early alerts and real-time information on 2024 wildfires in Central California,¹⁵ with the Fresno County Fire Protection District calling the station a "key partner" that "consistently deliver[s] reliable information to our communities regarding public safety, emergency responses, community events, and critical time-sensitive

¹³ LA County Sheriff Letter at 1.

¹⁴ Letter from Jaime E. Moore, Fire Chief, Los Angeles Fire Department, to Marlene H. Dortch, Secretary, FCC, at 1-2 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110022450/1> (stating that "[KABC] has consistently served the public interest by providing timely, accurate, and responsible coverage of emergencies affecting the Greater Los Angeles region. During wildfires, severe weather, significant incidents, and other emergencies, [KABC] has played an important role in communicating life-saving information, helping residents understand evolving conditions, prepare for potential impacts, and make informed decisions to protect themselves and their families"); Letter from Chad Bianco, Sheriff, Riverside County Sheriff's Office, to Marlene H. Dortch, Secretary, FCC, at 1 (July 2, 2026) <https://www.fcc.gov/ecfs/document/26109971237/1> (stating that "[KABC] News has been a trusted partner in keeping our residents informed about important public safety matters, emergency incidents, community events, and critical information that directly impact the well-being of those we serve" and that the "potential loss of a valuable local news outlet like [KABC] News would leave a significant void in our region"); Letter from Shannon D. Dicus, Sheriff-Coroner, San Bernardino County Sheriff's Department, to Marlene H. Dortch, Secretary, FCC, at 1 (June 26, 2026), <https://www.fcc.gov/ecfs/document/26110017406/1> ("Our agency has appreciated the professionalism, responsiveness, and public service commitment shown by Mr. McMillan and the [KABC] team. Local news plays an essential role in helping law enforcement agencies communicate critical information to the public, particularly during emergencies, major incidents, natural disasters, evacuations, crime trends, public safety alerts, and other moments of urgent community concern."); Letter from Kathryn Barger, Supervisor, Board of LA County Supervisors, 5th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110017481/1> ("KABC plays an especially important role during large-scale emergencies that impact the County. . . . These efforts helped keep communities informed about evacuation conditions, safety risks, and recovery developments during a period of significant disruption.").

¹⁵ KFSN PIS at 6; *see also* Letter from Lisa A. Smittcamp, District Attorney, Fresno County District Attorney's Office, to Marlene H. Dortch, Secretary, FCC, at 2 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26110008444/1> ("Fresno County DA Letter") ("KFSN has consistently served as an important conduit for communicating timely and accurate public safety information to the residents of Fresno County."); Letter from Rosemary Caso, Executive Director, United Way of Tulare County, to Marlene H. Dortch, Secretary, FCC, at 1 (July 13, 2026), <https://www.fcc.gov/ecfs/document/26110016507/1> (noting KFSN's "essential, up-to-the-minute coverage during regional emergency crises").

notices that impact those we are committed to protecting.”¹⁶

- KGO provided award-winning coverage of a December 2024 high-magnitude earthquake that triggered a tsunami warning.¹⁷ The San Francisco Fire Department credited its “partnership” with KGO for “directly strengthen[ing] our ability to protect lives and property.”¹⁸
- Unsurprisingly, the record reflects that the three ABC Owned California stations serve “as trusted and reliable sources of information, delivering timely updates that help keep the public informed and safe” during emergencies and natural disasters.¹⁹ The same holds true for the other Stations:
 - “During times of crisis,” such as Winter Storm Enzo in January 2025 or the tornado causing major storms of December 2024,²⁰ KTRK’s “reporting provides a vital communication link that helps keep [Houston-area] citizens informed, prepared, and safe.”²¹

¹⁶ Letter from Dustin Hall, Fire Chief, Fresno County Fire Protection District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 23, 2026), <https://www.fcc.gov/ecfs/document/26110047180/1>.

¹⁷ KGO PIS at 3 n.1, 6; *see also* Letter from Jay Obernolte, Member of Congress, U.S. House of Representatives, 23rd District, California, to Marlene H. Dortch, Secretary, FCC, at 2 (July 8, 2026), <https://www.fcc.gov/ecfs/document/26110044884/1> (“KGO has repeatedly been the first to deliver critical updates during natural disasters, such as coverage of the potential impacts of a series of high-magnitude earthquakes hit Northern California in December 2024 which triggered a tsunami warning along the California coast within KGO’s viewing area.”); Letter from Josh Becker, Senator, California State Senate, 13th District et al., to Marlene H. Dortch, Secretary, FCC, at 1 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110048522/1> (“During the April 2026 storm system that downed trees, flooded roadways, and disrupted transit throughout the region, KGO provided continuous, neighborhood-level updates, alerting viewers to road closures, power outages, and rising flood risks in real time.”).

¹⁸ Letter from Jonathan Baxter, Captain, Officer in Charge, External Affairs, San Francisco Fire Department, to Marlene H. Dortch, Secretary, FCC, at 2 (July 27, 2026), <https://www.fcc.gov/ecfs/document/26110053171/1>; *see also* Letter from Jason Weber, Fire Chief, Marin County Fire Department, to Marlene H. Dortch, Secretary, FCC, at 1 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110056506/1> (“During emergencies and planned operations alike, ABC7 has provided accurate, timely, and responsible coverage that helps ensure our messages reach audiences well beyond the Department’s own communication channels.”).

¹⁹ Letter from Steven R. Stuck, President & CEO, California Broadcasters Association, to Marlene H. Dortch, Secretary, FCC, at 1 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26110005378/1>.

²⁰ KTRK PIS at 4–5.

²¹ Letter from Mitch Thames, President & CEO, Bay City Chamber of Commerce and Agriculture, to Marlene H. Dortch, Secretary, FCC, at 1 (June 26, 2026), <https://www.fcc.gov/ecfs/document/26110016761/1>; *see also* Letter from Antonio “Tony” Leal,

- WTVD provided award-winning coverage of Hurricane Helene’s devastating impact in North Carolina in 2024 with live coverage for three weeks covering the lead-up, impact, and aftermath of the storm.²²
- WLS was honored as the “Best Weather Operation” in 2026 by the Illinois News Broadcasters Association, and recently provided continuous, vital coverage of intense supercell thunderstorms and record snowstorms.²³

President & Chief Investigator, Buffalo Bayou Security LLC, to Marlene H. Dortch, Secretary, FCC, at 1 (June 19, 2026) <https://www.fcc.gov/ecfs/document/26109835198/1> (noting how the commenter, a former Chief of the Texas Rangers, the highest ranking commissioned law enforcement position in the division, “witnessed the vital role [KTRK] plays in keeping our community informed and safe. Time and again, [KTRK] has provided timely, accurate, and responsible reporting during hurricanes, flooding events, public safety emergencies, criminal investigations, traffic incidents, and other matters of significant public concern. The station has become a trusted source of information for both the public and professionals responsible for protecting the communities we serve.”); Letter from Lia Hales, Community Risk Reduction Specialist, Willowfork Fire Department, Fort Bend County ESD No. 2, to Marlene H. Dortch, Secretary, FCC, at 2 (June 23, 2026), <https://www.fcc.gov/ecfs/document/26109897322/1> (noting that “[KTRK] serves as a trusted source of local news, emergency information, severe weather coverage, public safety messaging, and community engagement”); Letter from Jacey Jetton, Founder & CEO, Jetton Solutions, to Marlene H. Dortch, Secretary, FCC, at 1 (July 1, 2026), <https://www.fcc.gov/ecfs/document/26109964089/1> (explaining how “[KTRK]’s severe weather coverage is a public safety resource that our clients, our employees, and our neighbors rely on” and that the “loss of [KTRK] would leave a meaningful gap in Houston’s emergency information network”); Letter from Edward Pollard, Council Member, Houston City Council, District J, to Marlene H. Dortch, Secretary, FCC, at 1 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110022444/1> (stating that “[KTRK] has remained a reliable community partner by . . . providing critical information during times of crisis”).

²² WTVD PIS at 4–5; *see also* Letter from Sydney Batch, Senate Democratic Leader, North Carolina General Assembly, to Marlene H. Dortch, Secretary, FCC, at 1–2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110045113/1> (“WTVD has had the critical reach and dependability the people of North Carolina have come to rely on in an emergency. We saw exactly what that is worth during Hurricane Helene, when WTVD committed to weeks of live coverage and follow-up stories on the recovery, providing families the information they needed to prepare, to stay safe, and to begin rebuilding. When so much else was uncertain, that steady stream of local reporting was a genuine public service — and that is the very thing a broadcast license is meant to protect.”); Letter from Kaylynn Suarez, Executive Director, Fayetteville Dogwood Festival, to Marlene H. Dortch, Secretary, FCC, at 2 (June 29, 2026), <https://www.fcc.gov/ecfs/document/26109952228/1> (“As one of the area’s trusted local news sources, [WTVD] provides essential coverage of community events, public safety information, weather emergencies, and stories that unite the diverse communities of central North Carolina.”).

²³ WLS PIS at 2, 6–8; *see also* Letter from John F. Curran, Senate Minority Leader, Illinois State Senate, 41st District, to Marlene H. Dortch, Secretary, FCC, at 2 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110048490/1> (“WLS-TV provided . . . multi-day reporting on the March 2025 tornadoes, and continuous coverage across June 10–11, 2026, with live reporting as the tornadoes moved through, on-the-ground coverage of rescues, follow-up as

- WPVI produced day-long live news coverage in early 2026 during two major weather events that produced record-breaking snow in the Philadelphia region,²⁴ with Congressman Brian Fitzpatrick crediting the station for its “responsiveness to severe weather and emergencies.”²⁵
 - WABC also provided live full-day coverage from throughout the New York City and Northern Jersey area for one of those same snow storms,²⁶ which the Borough President of Queens praised for “help[ing] families and businesses . . . prepare, respond and recover.”²⁷
- **ABC Owned Stations Provide Breaking News of Major Local Events.**
 - The Stations provide breaking news coverage of other non-weather-related local events affecting the community, interrupting regularly scheduled programming when necessary. Notable examples include:
 - WTVD’s award-winning breaking news coverage of a plane crash at the Raleigh-Durham International Airport in 2024 and breaking news coverage of a power grid attack in Moore County, NC in 2023;²⁸
 - KGO’s preemption of regularly scheduled programming last month to provide live aerial and additional coverage of a massive fire at a

damage surveys expanded the confirmed count, and weeks of recovery reporting and public resources such as the station’s online power-outage tracker.”).

²⁴ WPVI PIS at 3–4; *see also* Letter from Sharmain Matlock-Turner, CEO, Urban Affairs Coalition, to Marlene H. Dortch, Secretary, FCC, at 1 (July 1, 2026), <https://www.fcc.gov/ecfs/document/26109963727/1> (stating that “[WPVI] has demonstrated an enduring commitment to serving the public interest through reliable local journalism, emergency communications, public affairs programming, and community engagement”).

²⁵ Letter from Brian K. Fitzpatrick, Member of Congress, Pennsylvania 1st District, to Marlene H. Dortch, Secretary, FCC, at 1 (June 25, 2026), <https://www.fcc.gov/ecfs/document/26109951686/1>.

²⁶ WABC PIS at 5; *see also* Letter from Michael F. Uttaro, Chief Fire Marshal, Nassau County Fire Commission, to Marlene H. Dortch, Secretary, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110044618/1> (“We maintain an excellent relationship with the reports and news desk at ABC7, as they have not only provided coverage of the sacrifice and efforts of the fire and EMS personnel in Nassau County, but also help our agency in promoting fire safety tips and warnings which no government agency could do on their own.”).

²⁷ Letter from Donovan Richards, President, Borough of Queens, to Marlene H. Dortch, Secretary, FCC, at 1 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110018022/1>.

²⁸ WTVD PIS at 2; *see also* Letter from Daniel T. Blue, Senator, North Carolina General Assembly, 14th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110041393/1> (“When news breaks—a mass shooting in a Raleigh neighborhood, a shooting on the UNC campus, or a tragedy at the Raleigh Christmas Parade—WTVD interrupts regular programming to deliver the timely, accurate information our residents need.”).

medical equipment warehouse in Tracy, CA;²⁹

- WPVI’s live, on-site coverage of a 2025 medical plane crash in a busy northeast Philadelphia intersection;³⁰
- KFSN staying on-air live for hours this past April covering an extended gun battle between a suspect and law enforcement until the situation resolved;³¹
- KTRK’s on-site breaking news coverage shortly after a 2024 pipeline explosion east of Houston in Deer Park, TX;³²
- KABC’s 5.5 hours of non-stop live coverage of a tragic mass shooting at a Monterey Park, CA dance club;³³
- WLS’s breaking news coverage of the tragic Highland Park, IL July 4th parade mass shooting in 2022;³⁴ and
- WABC breaking into regular programming to provide live coverage of key news conferences and major updates during the 2026 Long Island Railroad strike and the 2025 New Jersey Transit strike.³⁵

²⁹ See *Live updates: Crews remove Tracy Medline facility’s walls to tackle interior hotspots, officials say*, ABC7 Eyewitness News, <https://abc7news.com/live-updates/tracy-warehouse-fire-live-updates-massive-breaks-medline-building-hansen-road-california/19278060/> (last visited July 29, 2026).

³⁰ WPVI PIS at 4.

³¹ KFSN PIS at 4.

³² KTRK PIS at 5–6.

³³ KABC PIS at 7–8; *see also* Letter from Jim McDonnell, Chief of Police, Los Angeles Police Department, to Marlene H. Dortch, Secretary, FCC, at 1 (July 20, 2026), <https://www.fcc.gov/ecfs/document/26110035681/1> (“For many years, ABC7 has been an invaluable public service partner to the LAPD. . . . ABC7’s commitment to factual, responsible journalism has played an important role in supporting our mission to protect and serve the people of Los Angeles.”); Letter from Janice Hahn, Supervisor, Los Angeles County, 4th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 17, 2026), <https://www.fcc.gov/ecfs/document/26110027884/1> (“Whether reporting on the ongoing land movement in Rancho Palos Verdes, the proposed eradication of the deer on Catalina Island, or other issues unique to our coastal communities, KABC ensures that residents have access to reliable information that helps them understand rapidly evolving situations and make informed decisions.”).

³⁴ WLS PIS at 8-9.

³⁵ WABC PIS at 5-6.

- **ABC Owned Stations Provide Deep Local Coverage.**

- The Stations’ journalists also provide extensive coverage of the local institutions that shape their communities, such as local governments, school systems, transit authorities, and judicial systems. For instance:
 - KABC, KGO, and KFSN partner to provide thorough coverage of the California state government in Sacramento,³⁶ while KTRK has extensively covered the Houston City Council’s efforts to address a continual budget shortfall.³⁷
 - WLS reported on the 2024 leadership turmoil within the Chicago Board of Education,³⁸ and WTVD continually reports on overcrowding issues in Wake and Cumberland County schools.³⁹
 - 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.⁴⁰
 - WPVI provided sustained coverage of the 2025 funding crisis for the

³⁶ KABC PIS at 10; *see also* Letter from Kevin Mullin, Member of Congress, California et al., to Marlene H. Dortch, Secretary, FCC, at 2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110042054/1> (“In addition to breaking news, KGO’s local programming is attuned to the everyday needs and concerns of Bay Area residents. The station’s journalism covers not only breaking news but also topics at issue in the civic life of our region, including homelessness, transportation, education, and environmental challenges.”); Letter from Hilda L. Solis, Chair, Board of Supervisors, County of Los Angeles, 1st District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 25, 2026), <https://www.fcc.gov/ecfs/document/26110055976/1> (“Beyond emergency response, KABC provides daily coverage of issues that directly affect the lives of Angelenos, including public safety, transportation, weather and local government.”).

³⁷ KTRK PIS at 14-15; *see also id.* at 8 (discussing the station’s coverage on the state takeover, and eventual restoration of local control of the Houston Independent School District); Letter from Rania Mankarious, CEO, Crime Stoppers of Houston, to Marlene H. Dortch, Secretary, FCC, at 1 (July 1, 2026), <https://www.fcc.gov/ecfs/document/26109963978/1> (“[KTRK’s] reporting has helped amplify critical safety messages, encouraged crime reporting, connected victims with resources, and increased awareness of issues that affect families across Southeast Texas.”).

³⁸ WLS PIS at 9.

³⁹ WTVD PIS at 17–18; *see also* Letter from Robert T. Reives II, Democratic Leader, North Carolina House of Representatives, 54th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110056459/1> (“Few stations anywhere cover schools, students, and teachers with the depth and consistency that WTVD brings to central and eastern North Carolina.”).

⁴⁰ WABC PIS at 14.

local transit authority.⁴¹

- KFSN has a designated court reporter to track significant cases, with the station featuring court coverage on a nearly daily basis,⁴² and Orange County, CA’s District Attorney credited KABC with being “invaluable” in its crime-related reporting.⁴³
- The Stations’ dedicated public affairs programming provides an opportunity to examine local issues in even more depth.
 - KABC’s *Eyewitness Newsmakers with Marc Brown* takes a comprehensive look at top local issues, including regular interviews with LA-area policymakers.⁴⁴
 - WPVI’s *Inside Story* features local opinion-leaders commenting on social issues, local and statewide politics, and news events of the previous week occurring in Philadelphia, Southeastern Pennsylvania, Southern New Jersey, and Delaware.⁴⁵
 - WABC’s *Eyewitness News Up Close* provides in-depth discussions with newsmakers about topics of timely importance to the Greater New York area.⁴⁶

⁴¹ WPVI PIS at 4.

⁴² KFSN PIS at 15; *see also* Letter from Jerry P. Dyer, Mayor, City of Fresno, to Marlene H. Dortch, Secretary, FCC, at 1 (July 13, 2026), <https://www.fcc.gov/ecfs/document/26110022885/1> (“During my tenure [as Fresno Police Department Chief], [KFSN]’s reporting on public safety helped locate dangerous criminals and contributed to a safer Fresno – a role the station continues to play today.”).

⁴³ Letter from Todd Spitzer, District Attorney, Orange County District Attorney’s Office, to Marlene H. Dortch, Secretary, FCC, at 1 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110056439/1> (“ABC7, and the incredible men and women of the ABC7 team, have been invaluable in helping tell the stories of crime victims, assisting in identifying suspects, and educating the public on crime trends, scams that target our elderly relatives, and protecting children from sexual predators.”).

⁴⁴ KABC PIS at 12.

⁴⁵ WPVI PIS at 6; *see also id.* at 7 (discussing WPVI’s *Visions*, “a quarterly community affairs program dedicated to featuring stories focusing on various groups in the Philadelphia area, profiling local businesses, cultural institutions, and reporting on issues affecting those communities”).

⁴⁶ WABC PIS at 7; *see also id.* (discussing WABC programs *Tiempo* and *Here and Now*, which address matters of significance to New York’s Latino and African American communities); Letter from Michael Giannaris, Deputy Leader, New York State Senate, to Marlene H. Dortch, Secretary, FCC, at 1 (June 21, 2026), <https://www.fcc.gov/ecfs/document/26110037991/1> (“Shows such as *Eyewitness News Up Close*, *Tiempo*, and *Here and Now* provide in-depth discussions with community leaders and policymakers, helping residents better understand issues

- KTRK’s *This Week in Texas* covers how local, state, and federal policy and politics impact Texas generally, and Houston in particular.⁴⁷
 - *The Maddy Report* on KFSN provides a deeper understanding of the issues facing the nation, California, and the Fresno region.⁴⁸
- **ABC Owned Stations Produce Significant Local Programming.**
 - In just the last few years, the Stations’ investigative and consumer reporting teams have helped local viewers recover millions of dollars from companies and local governments. Many of these viewers struggled for months to obtain promised funds or assistance until a Station’s reporter intervened—which, “like magic” would finally lead to positive results.⁴⁹ The record is replete with examples:

ranging from public policy to education and community development.”); Letter from Andrew Hevesi, Assemblymember, New York State Assembly, 28th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 21, 2026), <https://www.fcc.gov/ecfs/document/26110038311/1> (highlighting the value of WABC’s public affairs programming); Letter from Amanda Farias, Council Member, New York City Council, 18th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110045161/1> (same); Letter from Nantasha Williams, Deputy Speaker, New York City Council, 27th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110048104/1> (same); Letter from Jessica Scarcella-Spanton, Senator, New York State Senate, 23rd District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 27, 2026), <https://www.fcc.gov/ecfs/document/26110056289/1> (same); Letter from Michelle Fizer Peterson, Director of Development & External Affairs, Bronx Council for the Arts, to Marlene H. Dortch, Secretary, FCC, at 1 (June 25, 2026), <https://www.fcc.gov/ecfs/document/26109875849/1> (discussing the organization’s appearance on *Tiempo* and lauding WABC’s “commitment to delivering high-quality public affairs programming and community-focused content that serves the public interest in the New York Metropolitan area”).

⁴⁷ KTRK PIS at 9–10; *see also* Letter from Carol Alvarado, Senator, Texas State Senate, 6th District, to Marlene H. Dortch, Secretary, FCC, at 2 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110042989/1> (“KTRK’s deep local presence is equally impactful. The station produces more than 66 hours of live local news each week and airs public affairs programming such as *This Week in Texas*, which explores how policy decisions affect Houston-area communities.”).

⁴⁸ KFSN PIS at 10; *see also* Letter from Mario A. Gonzalez, Executive Director, Education and Leadership Foundation, to Marlene H. Dortch, Secretary, FCC, at 1 (July 8, 2026), <https://www.fcc.gov/ecfs/document/26110038498/1> (“ABC30 [KFSN] has demonstrated a deep understanding of the Central Valley and the people who call it home. Its commitment to local journalism and community-focused programming ensures that viewers receive relevant, timely, and trustworthy information.”).

⁴⁹ WTVD PIS at 12 (describing the experience of how a Durham man was able to receive \$1,300 worth of airline credits after a WTVD reporter got involved).

- \$645,000 paid to Pennsylvania consumers by a mortgage company as part of an April 2026 settlement that stemmed from WPVI’s reporting,⁵⁰
 - A car insurance company issuing a \$5,675 check to a WTVD viewer who had struggled for a year to get the insurance company to honor the claim,⁵¹
 - A former LA school teacher and KABC viewer getting their pension restored,⁵² and
 - A KTRK viewer having the power restored to their apartment building.⁵³
 - In supporting his local station, Manhattan’s Borough President noted that “WABC’s ‘7 On Your Side’ reporting has helped viewers recover millions of dollars, totaling approximately \$2.7 million since August 2024, and has addressed systemic issues affecting consumers.”⁵⁴
- In addition, many of the Stations’ viewers filed comments in this proceeding to share their stories of how an ABC Owned Station provided help.
- Commenters described how, after contacting an ABC Owned Station

⁵⁰ WPVI PIS at 9; *see also id.* at 10 (discussing reimbursements from a furniture company and airline). WPVI’s volunteer-staffed “Call to Action” team, which is trained to assist callers with consumer issues, help recover or save callers over \$100,000 in the first quarter of 2026. *Id.*

⁵¹ WTVD PIS at 11–12.

⁵² KABC PIS at 15–16.

⁵³ KTRK PIS at 13; *see also* Letter from E. Sam Harless, State Representative, Texas House of Representatives, 126th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110043142/1> (“Through its longstanding “Action 13” consumer unit and partnerships with ABC News investigative teams, the station has exposed issues impacting local communities, like fraudulent business practices and infrastructure concerns, while helping drive meaningful solutions for residents.”); Letter from Ann Johnson, State Representative, Texas House of Representatives, 134th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 23, 2026), <https://www.fcc.gov/ecfs/document/26110056511/1> (describing the benefits of KTRK’s investigative journalism); Letter from Jon E. Rosenthal, State Representative, Texas House of Representatives, 135th District, to Marlene H. Dortch, Secretary, FCC, at 2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110056528/1> (same).

⁵⁴ Letter from Brad Hoylman-Sigal, Manhattan Borough President, to Marlene H. Dortch, Secretary, FCC, at 1 (July 6, 2026) <https://www.fcc.gov/ecfs/document/26110017821/1>; *see also* Letter from Jessica Ramos, New York State Senator, Senate District 13, to Marlene H. Dortch, Secretary, FCC, at 1 (July 14, 2026) (“Brad Hoylman-Sigal Letter”) <https://www.fcc.gov/ecfs/document/26110017920/1> (commending WABC’s “investigative reporting that has helped New Yorkers recover unpaid wages and brought attention to issues affecting working families”); Letter from James F. Gennaro, New York City Council Member, District 24, to Marlene H. Dortch, Secretary, FCC, at 1 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110017955/1> (describing the successes of WABC’s investigative journalism).

reporter for help, they were able to reclaim thousands of dollars worth of refunds or assistance from a variety of companies and institutions, including Airbnb,⁵⁵ ADT,⁵⁶ Best Buy,⁵⁷ Chase Bank,⁵⁸ Citibank,⁵⁹ Limitless Sky Travel,⁶⁰ Sony,⁶¹ Sezzle (“a buy-now-pay-later company”),⁶² and StubHub.⁶³

- In addition, one commenter commended KGO reporter Brinke Guthrie who worked for eight months to obtain a \$1,200 check from the IRS

⁵⁵ Letter from Hani Esmaeili to Marlene H. Dortch, Secretary, FCC, at 1 (June 24, 2026), <https://www.fcc.gov/ecfs/document/26109913944/1> (describing how the station helped recover a \$1,400 refund from Airbnb); Letter from Yasin Khatami to Marlene H. Dortch, Secretary, FCC, at 1 (June 27, 2026), <https://www.fcc.gov/ecfs/document/26109945199/1> (explaining how after several months of trying without success, the station helped him receive a \$1,312 refund from Airbnb).

⁵⁶ Letter from Joanna Schwarcz to Marlene H. Dortch, Secretary, FCC, at 1 (June 24, 2026), <https://www.fcc.gov/ecfs/document/26109945153/1> (“After months of go round, in desperation I contacted [KGO]. Within days, I was contacted by an ADT representative who amazingly somehow saw his way clear to absolve me from all charges.”).

⁵⁷ Letter from Cat Taylor to Marlene H. Dortch, Secretary, FCC, at 1 (July 3, 2026), <https://www.fcc.gov/ecfs/document/26109977355/1> (“With [KGO]’s help I was able to get a refund on the fee” from Best Buy).

⁵⁸ Letter from Joseph D. Cantara to Marlene H. Dortch, Secretary, FCC, at 1 (June 18, 2026), <https://www.fcc.gov/ecfs/document/26109834976/1> (describing how after contacting WABC, “[t]he very next day . . . the \$10,000.00 that we were attempting to get back for months at this point from Citibank, was deposited in our account because of [Nina Pineda’s] efforts and advocating on our behalf!”).

⁵⁹ Letter from Nona Smith & Art Weininger to Marlene H. Dortch, Secretary, FCC, at 1 (June 17, 2026), <https://www.fcc.gov/ecfs/document/26109959965/1> (describing how the station assisted in securing a \$11,000 refund from Chase Bank after their checking account was fraudulently charged).

⁶⁰ Letter from Linda Wegner & Glen Wegner to Marlene H. Dortch, Secretary, FCC, at 1 (June 22, 2026), <https://www.fcc.gov/ecfs/document/26109836799/1> (“We contacted [KGO] for help in getting our \$\$ back. In May 2026 we received our \$3,498 back to us. We had directly contacted Limitless Sky Travel with no results but after asking [KGO] for help, we were successful.”).

⁶¹ Letter from Cassandra Raul to Marlene H. Dortch, Secretary, FCC, at 1 (June 18, 2026), <https://www.fcc.gov/ecfs/document/26109835138/1> (the station “was able to get ahold of Sony and help me resolve a scamming issue that had been plaguing my inbox and password insecurity”).

⁶² Letter from April K Edwards to Marlene H. Dortch, Secretary, FCC, at 1 (June 24, 2026), <https://www.fcc.gov/ecfs/document/26109937566/1> (describing a \$210 refund secured from Sezzle with the station’s help).

⁶³ Letter from Cindy Armanini & Katie Armanini to FCC, at 1 (submitted July 13, 2026), <https://www.fcc.gov/ecfs/document/26110014163/1> (describing how the station helped them obtain World Cup tickets from StubHub after the company failed to provide the original tickets).

Economic Impact Payment Program for the viewer's elderly father.⁶⁴

- Investigative reporting by the Stations not only increases viewer awareness of issues facing their communities, it has directly affected meaningful change – leading to new state laws, criminal prosecutions, restitution payments, civil lawsuits, settlements, and new investigations by law enforcement.
 - As New York State Senator Joseph Addabbo highlights with respect to his local station, “WABC’s impactful investigative reporting has addressed real challenges facing my constituents,” helping “individuals recover unpaid wages and brought attention to systemic issues affecting residents, reinforcing the role of local journalism in driving accountability and tangible outcomes.”⁶⁵
 - WLS’s years-long reporting on the problem of “squatters,” individuals who do not own a property taking up residence there, which included a special on the statewide problem of squatting, eventually led to a 2025 Illinois law being passed to address the issue.⁶⁶ A WABC investigative reporter helped a local resident reclaim a home from squatters, and the station’s reporting led to a criminal prosecution and eventually a law change.⁶⁷

⁶⁴ Letter from Michael Bates to Marlene H. Dortch, Secretary, FCC, at 1 (June 28, 2026), <https://www.fcc.gov/ecfs/document/26109950183/1> (“The [KGO] crew is relentless in bringing about triumphant results, I am positive that without their help, my dad’s \$1200 would have been lost.”); *see also* Letter from Rhonda Lyons to Marlene H. Dortch, Secretary, FCC, at 1 (June 22, 2026), <https://www.fcc.gov/ecfs/document/26109840317/1> (describing Guthrie’s effort to assist her with excessive noise coming from a local elementary school after the viewer struggled for over seven months, and urging the FCC to “renew [KGO’s] broadcast license so they can continue being a valued and respected resource for the community”); Letter from Robert Dilfer to Marlene H. Dortch, Secretary, FCC, at 1-2 (July 27, 2026), <https://www.fcc.gov/ecfs/document/26110056848/1> (describing KGO’s two months-long effort to assist him resolve a tax issue with the IRS resulting in a “favorable resolution” that would “not . . . have been successfully resolved without ABC-7-KGO-TV’s assistance”).

⁶⁵ Letter from Joseph P. Addabbo, Senator, New York State Senate, 1st District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 13, 2026), <https://www.fcc.gov/ecfs/document/26110017881/1> (“NY Senator Addabbo Letter”); *see also* Brad Hoylman-Sigal Letter at 1 (noting how WABC’s “investigative reporting has contributed to meaningful outcomes like legal action that both protects residents and benefits the broader public”).

⁶⁶ WLS PIS at 16; *see also id.* at 15 (“The I-Team was also able to assist a grieving mother by determining the identity of the person who murdered her son while he was serving prison time for a non-violent parole violation; the I-Team’s investigation led to murder charges and a conviction.”).

⁶⁷ WABC PIS at 2; *see also id.* at 11 (discussing how WABC reporting led to Putnam County, NY farmers receiving important legal protections).

- Reporting by WPVI’s investigative team led to separate criminal charges for an owner of a local interior design company fraudulently taking orders for undelivered furniture and a local contractor, the latter of which was also required to pay restitution to defrauded customers.⁶⁸
- KGO’s award-winning investigation of a local county sheriff improperly favoring campaign donors led to an FBI investigation.⁶⁹
- The North Carolina Attorney General sued a wedding photographer who took customers’ money without providing pictures or video after WTVD’s reporting uncovered the scam.⁷⁰
- A judge nullified more than \$100 million of questionable mechanics liens filed against an individual’s property after a KABC investigation exposed the liens.⁷¹
- The Cook County, IL County Assessor corrected thousands of assessment errors after WLS reporting revealed mistakes and high increases in property tax assessments.⁷²
- North Carolina DMV wait times plunged after a WTVD investigation into consumer complaints.⁷³

⁶⁸ WPVI PIS at 10–11; *see also* Letter from Joseph P. Ciresi, Member, Pennsylvania House of Representatives, 146th District, to Marlene H. Dortch, Secretary, FCC, at 2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110044887/1> (“WPVI’s investigative and consumer reporting teams regularly uncover issues that directly affect Pennsylvanians and help deliver meaningful results. Recent efforts have led to substantial financial recoveries for consumers, exposed public safety concerns, and prompted corrective actions by businesses and institutions, demonstrating the real-world impact of the station’s reporting.”).

⁶⁹ KGO PIS at 4.

⁷⁰ WTVD PIS at 12.

⁷¹ KABC PIS at 16.

⁷² WLS PIS at 14-15.

⁷³ WTVD PIS at 13; *see also* Letter from Jay J. Chaudhuri, Senate Minority Whip, North Carolina General Assembly, 15th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 27, 2026), <https://www.fcc.gov/ecfs/document/26110055711/1> (“When the [WTVD] I-Team examined the payment practices of a foundation operating summer camps in Durham and Raleigh, vendors and employees who were owed money finally got paid. And when the I-Team revisited a hit-and-run investigation that had languished for nearly two years, prosecutors and law enforcement followed up.”).

- **ABC Owned Stations Deliver Results for Viewers and Meaningful Change in Their Communities.**

- Each of the Stations also produces original programming to highlight unique local events and cultural institutions.

- For instance, all of the stations showcase significant local parades commemorating various holidays throughout the year.⁷⁴
 - WPVI owns, organizes, produces, and broadcasts the Philadelphia Thanksgiving Day Parade, the oldest parade of its kind in the United States—if not for WPVI’s efforts, the now 106-year-old tradition would no longer exist.⁷⁵
 - Stations also regularly produce specials highlighting notable community events, such as the Cary, NC Lazy Daze Festival,⁷⁶ the Houston Livestock Show & Rodeo,⁷⁷ the Magnificent Mile Lights

⁷⁴ See, e.g., KABC PIS at 19-20; KFSN PIS at 17; KGO PIS at 15-16; KTRK PIS at 17-18; WABC PIS at 17; WLS PIS at 13; WPVI PIS at 14–15; WTVD PIS at 9; *see also* Letter from C.C. Yin, Founder & CEO, & Joe Johal, National Governing Board Chair, Asian Pacific American Public Affairs Association (APAPA), to Marlene H. Dortch, Secretary, FCC, at 1 (June 30, 2026), <https://www.fcc.gov/ecfs/document/26110008014/1> (“We also appreciated ABC7’s broadcast coverage of the San Francisco Chinese New Year Parade, one of the region’s signature cultural celebrations. Through these and many other stories over the years, ABC7 has consistently helped inform the public about the people, organizations, and events that contribute to the strength and diversity of our communities.”); Letter from Rafael Toro, National Director of Public Relations, Goya Foods, to Marlene H. Dortch, Secretary, FCC, at 2 (June 23, 2026), <https://www.fcc.gov/ecfs/document/26110015298/1> (“ABC7 [WABC] has also highlighted many of the cultural celebrations that are central to our community identity, including Goya’s longstanding participation in the National Puerto Rican Day Parade and other events that celebrate the heritage, traditions, and contributions of Hispanic Americans.”); Letter from Helen Salahuddin, COO, Pennsylvania Juneteenth Initiative, to Marlene H. Dortch, Secretary, FCC, at 1 (July 1, 2026), <https://www.fcc.gov/ecfs/document/26109968074/1> (“In addition to its extensive news and community affairs coverage, 6ABC [WPVI] annually airs the Philadelphia Juneteenth Parade, significantly expanding the reach and impact of this important cultural celebration. By broadcasting the parade, 6ABC enables thousands of viewers throughout Philadelphia, Southern New Jersey, and Delaware to participate in and experience this historic event, including seniors, individuals with disabilities, and others who may be unable to attend in person.”).

⁷⁵ WPVI PIS at 14

⁷⁶ WTVD PIS at 9; *see also* Letter from Maureen S. Rush, President, & Erin Zimmerman, Executive Director, Philadelphia Police Foundation, to Marlene H. Dortch, Secretary, FCC, at 1 (July 8, 2026), <https://www.fcc.gov/ecfs/document/26109998949/1> (“The station’s broader community engagement—including sponsoring and broadcasting major regional traditions like the annual Thanksgiving Day Parade—brings people together and solidifies 6ABC as a true source of pride and a deeply embedded part of the fabric of the Philadelphia community”).

⁷⁷ KTRK PIS at 17; *see also* Letter from Wesley Sinor, Chairman of the Board, & Chris

Festival,⁷⁸ the Philadelphia Flower Show,⁷⁹ and the Bay to Breakers race.⁸⁰

- KTRK has broadcast live Houston Symphony concerts for over 70 years.⁸¹
 - Each fall and spring WABC airs previews of the upcoming Broadway season.⁸²
 - Both WPVI and WLS also air Catholic mass each Sunday in conjunction with their local archdioceses.⁸³
- Coverage of local, state, and national elections and local political issues by the ABC Owned Stations keeps viewers informed and better enables them to exercise their right to vote.⁸⁴

Boleman, President & CEO, Houston Livestock Show and Rodeo, to Marlene H. Dortch, Secretary, FCC, at 1-2 (July 16, 2026), <https://www.fcc.gov/ecfs/document/26110044312/1> (“ABC13 has long served the public interest through its commitment to community-centered reporting and partnership with the Rodeo. For more than four decades, ABC13 has helped . . . families, longtime supporters, students, volunteers and viewers who may not be able to attend in person to still feel connected to one of Houston's most meaningful civic traditions.”).

⁷⁸ WLS PIS at 13.

⁷⁹ WPVI PIS at 8.

⁸⁰ KGO PIS at 16.

⁸¹ KTRK PIS at 11; *see also* Letter from Gary Ginstling, Executive Director & CEO, Houston Symphony, to Marlene H. Dortch, Secretary, FCC, at 2 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110025845/1> (“ABC13 has regularly amplified the Houston Symphony's reach by producing annual half-hour television specials giving its audience behind-the-scenes glimpses of the Symphony's artists and programs. Subjects have spanned from profiles of our Music Directors to coverage of our international tours. . . . The loss of ABC13 would be devastating to the Houston Symphony, the entire arts community, and all of Houston.”); *see also, e.g.*, Letter from Oscar Rodriguez, President, Texas Association of Broadcasters, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-131, at 2 (July 28, 2026), <https://www.fcc.gov/ecfs/document/26110062061/1> (“KTRK also produces multiple half hour specials annually to raise public awareness on a wide range of topics, from hurricane preparedness to awareness for various health Issues. The Houston arts community is also a focus of the station's special programming which has highlighted the work of the Houston Ballet and Houston Museum of Natural Science, for example.”).

⁸² WABC PIS at 14.

⁸³ WPVI PIS at 7; WLS PIS at 13.

⁸⁴ *See, e.g.*, WABC PIS at 8 (“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”); WTVD PIS at 15 (“WTVD's ‘Your Voice Your Vote’ series provides viewers with information on various candidates running for office and information on local political contests”).

- The Stations provide live coverage of key races⁸⁵ and produce candidate debates, town halls, and forums featuring candidates from both major political parties to educate viewers on issues and candidates.⁸⁶
- The Stations work with non-profits to develop civic engagement in their communities by ensuring voters have access to critical election information,⁸⁷ and produce special programming and news reports to keep viewers informed about current issues facing their communities

⁸⁵ See, e.g., KFSN PIS at 14-15 (discussing “[r]ecent [live] coverage includes the 2024 presidential election and the 2025 California Proposition 50 election”); WLS PIS at 17-18 (“For the 2024 elections, ABC 7 provided a full night of live coverage of national, statewide, and local election results, and for the 2026 midterms, ABC 7 dedicated the entire live 10pm newscast to statewide coverage of key congressional races and important local contests”); WTVD PIS at 16 (“On election nights, WTVD provides up-to-date coverage of national, state, and local elections so that area viewers know which candidates won their races as soon as possible.”).

⁸⁶ See, e.g., KABC PIS at 12 (“In addition to covering elections, government, and politics as part of its newscasts, KABC produces debates and candidate forums as well as specials that help viewers understand California’s infamously complex and numerous ballot propositions.”); KGO PIS at 10 (“[I]n 2024, ABC7 News partnered with *The San Francisco Standard* to host a ‘Your Voice Your Vote’ special in which San Francisco mayoral candidates were interviewed ahead of the November 2024 election.”); WLS PIS at 18 (“In 2026, the station, in partnership with the League of Women Voters of Illinois and Chicago, and Univision Chicago, hosted both the 2026 Democratic U.S. Senate Primary Forum and the 2026 Republican U.S. Senate Primary Forum.”); WPVI PIS at 12 (“Leading up to the November 2024 elections, WPVI produced a live one-hour debate with the candidates running for U.S. Senate in Pennsylvania.”); WTVD PIS at 15-16 (“Eyewitness News extensively covered local political campaign events held by candidates for federal offices, including a town hall with President Donald Trump in October 2024 in Fayetteville and a campaign stop in Raleigh held by then Senator, now-Vice President J.D. Vance.”).

⁸⁷ Letter from Deborah Brodheim and Kai Rosenthal, Co-Presidents, League of Women Voters of the City of New York, to Marlene H. Dortch, Secretary, FCC, at 1 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110019555/1> (“LOWV NY Letter”) (“Together, we [the League of Women Voters and WABC] have worked to ensure that the voters and citizens of New York City have access to critical election information, including voter registration deadlines, understanding how Ranked Choice Voting works, how to apply for mail-in ballots and we have provided nonpartisan information on candidates including cosponsoring candidate debates that give New Yorkers an opportunity to hear directly from those on the ballot.”); Letter from Lauren Cristella, President of Committee of Seventy, to Marlene H. Dortch, Secretary, FCC, at 1 (submitted July 15, 2026), <https://www.fcc.gov/ecfs/document/26110020157/1> (“As CEO of C70, I have regularly appeared on [WPVI] 6abc’s Inside Story to help viewers understand how elections and local government actually work — coverage that translates civic processes many residents find opaque into information they can use.”); see also LOWV NY Letter at 2 (“WABC-TV created our *Constitution Conversations* video to help encourage New Yorkers to understand the founding document.”).

and the efforts of local policymakers to address those issues.⁸⁸

- The ABC Owned Stations also provide robust local sports coverage that enables fans to keep up with their favorite local professional, college, and high school sports teams, including live coverage of games and recurring segments on local teams and athletes.⁸⁹ The Stations have gone above and beyond to keep fans engaged, sending live crews to cover historic runs of local teams:
 - KABC was the only local station to send reporters to cover the UCLA women’s basketball team’s first NCAA Championship in Phoenix.⁹⁰
 - WLS provided on-site coverage in Indianapolis for the University of Illinois’ first men’s NCAA Tournament run to the Final Four in two decades.⁹¹
 - The Stations celebrate the successes of local teams along with their communities, providing extensive coverage of championship winning teams and local community celebrations.⁹²

⁸⁸ See, e.g., KFSN PIS at 7 (“The [U.S. Senate] forum allowed [KFSN’s] Armstrong to focus on several issues concerning Valley residents, including the ongoing water shortage impacting Central California farmers and the fentanyl crisis gripping the state.”); KGO PIS at 11 (“In the ongoing ‘Take Action San Francisco’ programming, ABC7 journalists hold local elected officials’ feet to the fire on their efforts to address issues such as homelessness, public safety, the economy, and the drug crisis.”); KTRK PIS at 14–15 (“Eyewitness News extensively covers the City Council’s and Mayor Whitmire’s ongoing efforts to solve the continuing budget shortfall, crime, traffic and road conditions, and drainage issues.”); WPVI PIS at 12–13 (“Action News also provides deep political coverage of local issues, with recent examples including the City of Philadelphia’s budget challenges, a plan to close schools in the Philadelphia Public School District, and changes to curfew laws in certain Jersey shore communities.”).

⁸⁹ See, e.g., KABC PIS at 18 (“KABC carries the Los Angeles Rams’ *Monday Night Football* games”); KFSN PIS at 17 (“*Bulldog Breakdown*: ABC30 broadcasts a weekly segment on Fresno State athletics, focusing on the latest from the premier university in KFSN’s viewing area”); KTRK PIS at 15-16 (“[T]he station broadcasts Texans-related programs such as ‘Inside the Game,’ which provides a comprehensive recap of each game with exclusive in-studio interviews and highlights, and ‘Countdown to Kickoff,’ which airs before each game”); WPVI PIS at 14 (“During the Eagles championship run in the 2025 NFL playoffs, WPVI aired 25 hours of dedicated Eagles coverage”).

⁹⁰ KABC PIS at 19.

⁹¹ WLS PIS at 20-21.

⁹² See, e.g., KABC PIS at 19 (“KABC also helped Angelenos celebrate their hometown team by airing the World Series Parade for the Los Angeles Dodgers in 2024 and 2025.”); KGO PIS at 15 (“[T]he Station aired a live two-hour special in June 2022 for the ‘Dub Nation Celebration,’ after the Warriors won the NBA title.”); WABC PIS at 16 (“WABC broadcast the WNBA champion New York Liberty’s ticker-tape parade in the Canyon of Heroes in downtown Manhattan in October 2024.”); WPVI PIS at 13–14 (“6abc aired ‘Battle in the Big Easy,’ previewing Super

- Beyond professional and college athletics, the Stations also feature the next generation of local stars by reporting on high school and youth sports.⁹³
- The Stations also understand that local fans turn to them for more than just scores and highlights, and so they cover developments in the sporting world that affect their local communities and report on human-interest stories that shine a light on local teams, athletes, and coaches.⁹⁴

Bowl LIX, on-site from New Orleans, produced live breaking news coverage after the Eagles’ NFC Championship and Super Bowl victories, and aired a seven-hour ‘Action News Special: The 2025 Championship Parade.’”); WTVD PIS at 21-22 (discussing the station’s coverage of the NHL Stadium Series outdoor hockey game between the Carolina Hurricanes and Washington Capitals); *see also* CA Elected Officials Letter at 1-2 (“By broadcasting Los Angeles Dodgers World Series celebrations and parades, the station allows millions of residents to participate in shared civic moments, strengthening community connection across neighborhoods.”); Letter from Tony Simone, Assemblymember, New York State Assembly, 75th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110041334/1> (discussing how WABC “connects viewers to significant cultural and civic events that define New York, including coverage of major sporting events, local teams, and citywide celebrations, helping ensure broad public access to these moments”); Letter from Linda B. Rosenthal, Assemblymember, New York State Assembly, 67th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 10, 2026), <https://www.fcc.gov/ecfs/document/26110034342/1> (same); Letter from Keith Powers, Assemblymember, New York State Assembly, 74th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26110041889/1> (same); Letter from Grace Lee, Assemblymember, New York State Assembly, 65th District, to Marlene H. Dortch, Secretary, FCC, at 2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110042275/1> (same).

⁹³ *See, e.g.*, KGO PIS at 14 (“[I]n February 2026, KGO featured Oakland’s Bishop O’Dowd High School girls soccer team as they completed a historic, undefeated season.”); KTRK PIS at 16 (“Eyewitness News also regularly features local high school athletes and their achievements both on and off the field through its Athlete of the Week award and news segment.”); WTVD PIS at 20 (“[D]uring every high school football season, the ABC11 sports team produces live coverage for Friday Night Football.”).

⁹⁴ *See, e.g.*, KGO PIS at 14 (“ABC7 also is providing coverage of the area’s preparations to host games for this summer’s World Cup, which will occur at Levi’s Stadium in Santa Clara.”); KTRK PIS at 16 (discussing the station’s stories on the expected economic benefits for Houston of hosting World Cup games and information on the matches themselves); WABC PIS at 15 (“WABC is also providing coverage of the area’s preparations to host games for this summer’s World Cup.”); KFSN PIS at 17 (discussing a story on a high school senior’s return to baseball after a traumatic brain injury and dissociative amnesia from a car accident); KGO PIS at 14 (discussing a report on a 5-year old San Jose Sharks superfan who battled and beat Leukemia over the course of two years and was invited by the team to read the starting lineup and ring a bell for the team in the Sharks’ locker room before a game); WABC PIS at 16 (discussing a report on a 12-year-old born with a congenital heart defect who plays hockey and sells apparel

- **ABC Owned Stations Honor America.**

- The ABC Owned Stations honor America, including most recently through their coverage of the nation’s 250th anniversary and other patriotic programming.⁹⁵
 - WABC launched “ABC7 Celebrates America: 250,” showcasing local historical sites.⁹⁶
 - WPVI produced *6abc In Pursuit of Philadelphia History*, a companion program to a 10-part documentary series on the region’s role through American history called *In Pursuit – Philadelphia and the Making of America*.⁹⁷
 - WTVD provided extensive coverage of President Trump’s visit to Fort Bragg, including the kickoff celebrations for the U.S. Army’s 250th birthday.⁹⁸
- The Stations also honor our nation’s servicemembers through annual broadcasts of local Veterans Day events⁹⁹ and news stories profiling servicemembers, U.S. military veterans, and veteran-owned businesses,¹⁰⁰

for heart-defect awareness).

⁹⁵ In addition to locally produced programming, the Stations proudly aired the ABC Network’s two-hour primetime special *Disney Celebrates America: The Pursuit of Happiness* on June 29th and special ABC Network programming to commemorate America’s 250th anniversary on both July 3rd and 4th. See The Walt Disney Company, ‘*Disney Celebrates America*’ Ramps Up with a Phenomenal Lineup of Experiences Ahead of the Nation’s 250th Anniversary (June 2, 2026), <https://thewaltdisneycompany.com/news/america-250-events-lineup>.

⁹⁶ WABC PIS at 12-13.

⁹⁷ WPVI PIS at 7.

⁹⁸ WTVD PIS at 16.

⁹⁹ See, e.g., KFSN PIS at 18; KTRK PIS at 18; WPVI PIS at 14; WABC PIS at 17; see also Letter from Gabe Villasenor, President, Central Valley Veterans Day Parade, at 1 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110038470/1> (“Channel 30 (KFSN) also covers the accomplishments of Veterans across the Greater-Central Valley area. Last Veteran’s Day, Channel 30 interviewed several Veterans during the parade and brought their story to every television in the central valley that was watching the event. This played an important role in revitalizing patriotism and citizenship in the community.”); Letter from LaShondra Jones, Chairman, Armed Services Committee, NAACP (Houston Chapter), to Marlene H. Dortch, Secretary, FCC, at 1 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110017257/1> (“It is important that stations such as ABC13 [KTRK] continue to be involved in Houston’s veteran community and continue to highlight and honor the sacrifices made by servicemen and servicewomen who call Houston home.”).

¹⁰⁰ See, e.g., KABC PIS at 13 (“For more than almost nine years, “ABC7 Salutes” has been committed to telling the stories of local veterans every Friday at 6pm.”); KFSN PIS at 20 (describing the station’s coverage of Central Valley Honor Flights, including live coverage

while commemorating America's independence by broadcasting community Fourth of July celebrations.¹⁰¹

- Many veterans submitted comments expressing their appreciation for their local ABC Owned Station, with several poignantly noting that the Commission is interfering with the Stations' freedom of speech that they fought to defend.¹⁰²

during an April 2026 trip to Washington, D.C.); KTRK PIS at 11 (discussing the station's coverage of "Veteran's Brew, a coffee shop designed by veterans to help bring the military community together"); WTVD PIS at 16 (discussing the station's "stories of how servicemembers and their families come together at times of uncertainty with looming deployments"); *see also* Letter from Mark Otto, President & Executive Director, United War Veterans Council, to Marlene H. Dortch, Secretary, FCC, at 1 (July 21, 2026), <https://www.fcc.gov/ecfs/document/26110042053/1> ("ABC7 [WABC] has helped ensure that the stories of our veterans and military are not overlooked; not only on Veterans Day but throughout the year. Without ABC7, the NYC veteran community would have much less visibility in this market, and our veterans' voices and issues would be significantly underrepresented."); Letter from Tramecia Garner, Executive Director, Swords to Plowshares, to Marlene H. Dortch, Secretary, FCC, at 2 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110042324/1> ("ABC7 [KGO] has reported on . . . the needs and concerns of the local veteran community – such as the impact of fireworks on veterans living with PTSD – as well as the grand openings of our permanent supportive housing sites and local resource fairs for veterans. Their reporting equips the public with accurate information about homelessness and veteran issues in the Bay Area, while also highlighting the work still needed to address them.").

¹⁰¹ *See* KABC PIS at 20 ("KABC broadcast the Huntington Beach 4th of July Parade live on July 4, 2025, as it has in the past."); KTRK PIS at 17 (describing the station's broadcast of "Freedom Over Texas," Houston's celebration of Independence Day); *see also* Letter from Dancie Ware, President, Dancie Perugini Ware Public Relations, to Marlene H. Dortch, Secretary, FCC, at 1 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26109998271/1> (discussing KTRK's partnership in "providing extensive news coverage, promotional campaigns, and television specials for many of Houston's landmark events and initiatives. These have included . . . Fourth of July celebrations [and] the nation's upcoming 250th anniversary celebration.").

¹⁰² *See, e.g.*, Lillian Ochs, Express Comment (June 30, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26109958607> ("I, as well as the rest of America, have the right to watch and listen to which ever news stations of my choosing. . . . I am a Navy veteran, this is a part of the freedom that I fought for, and that I was willing to sacrifice my life for."); Joseph Domenico Sr., Express Comment (July 7, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26109999717> ("The FCC maneuvering to revoke the broadcast licenses of Disney owned stations is an abomination and in complete disregard of the 1st amendment. I am veteran military officer sworn to defend that constitution and did not take that lightly."); Lisa LaRue Nebout, Express Comment (July 13, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26110015068> ("I am a Navy Veteran and honestly feel I fought for our freedoms and this is just taking them away. Government should NOT decide who or what programs we can watch."); Norman Haase, Express Comment (July 21, 2026), <https://www.fcc.gov/ecfs/search/search-filings/filing/26110038659> ("We demand no government interference with ABC. I served in the Marine Corps (1963-1968) to help protect

- **ABC Owned Stations Are Market Leaders.**
 - The market-best ratings the Stations’ local news broadcasts earn are clear proof that they are serving their communities well. Each of the ABC Owned Stations faces fierce local news competition from other affiliates in their markets, and in such a competitive environment, ratings serve as the viewers’ ultimate verdict on how effective a broadcaster is in addressing its community’s needs. The verdict is clear: the ABC Owned Stations consistently are a cut above the competition.
 - In seven out of the eight markets, the ABC Owned Station’s local news broadcasts are ranked number one in every single daypart, and the eighth station is ranked first for morning news and second in all other dayparts.¹⁰³
 - Several of the Stations have been market leaders for many years or even decades, with some local news broadcasts outperforming the competition by 75% or more.¹⁰⁴
 - WABC’s Channel 7 Eyewitness News is the most watched local news in the United States, and has been the most-watched television station in the nation for over twenty years.¹⁰⁵
 - Awards and other third-party honors offer further evidence of the Stations’ outstanding efforts.
 - During the Stations’ current license terms, national, regional, and local organizations awarded or honored the ABC Owned Stations’ reporting and staff over 200 times.
 - These honors included a 2025 Peabody Award for KABC’s aforementioned 2025 wildfire coverage.¹⁰⁶

such freedoms as press and speech.”).

¹⁰³ See KABC PIS at 1; KFSN PIS at 1; KGO PIS at 1; KTRK PIS at 1; WABC PIS at 1; WLS PIS at 1; WPVI PIS at 1; WTVD PIS at 1.

¹⁰⁴ WABC PIS at 1 (“WABC has been the leader in local news and entertainment programming in the New York City area for more than 60 years.”); WPVI at 1 (describing “the station’s over 40-year run as the market’s local news leader”); *id.* at 6 (“From May 2025 through April 2026, Action News was not just the number one newscast, it more than *doubled* the audience of its closest competitor in almost all dayparts.”); WLS PIS at 11 (“[T]he station leads its closest competitor in news ratings by over 75%. . . . and the station’s 4pm, 5pm, and 6pm newscasts have retained their number one ranking for over 30 years.”); KGO PIS at 1 (“ABC7 Eyewitness News has been the most watched 4:00 p.m., 5:00 p.m., and 6:00 p.m. local news in market the since 2018, and number one from sign-on to sign-off since 2020.”).

¹⁰⁵ WABC PIS at 1.

¹⁰⁶ KABC PIS at 2-3.

- KFSN won the 2026 Service to America Award from the National Association of Broadcasters for *Killer High*, its documentary style public service reporting series on opioid addiction in California’s San Joaquin Valley.¹⁰⁷
 - The Stations also received 15 Edward R. Murrow Awards—with KABC, KGO, and WABC all taking national honors¹⁰⁸—and over 85 local Emmy Awards.¹⁰⁹
- **The Stations Thoroughly Invest in their Communities.**
 - The Stations’ investments in their communities run deep. Beyond reporting the news, the Stations elevate local businesses and organizations in their programming and news segments, promote vital causes through numerous public service announcements (PSAs), and lead community initiatives that deliver meaningful support throughout their local markets. These efforts show that the Stations do not just report on their communities but are active participants in them.¹¹⁰
 - Through regularly scheduled programming and recurring news segments, the Stations boost local restaurants, shops, and other businesses. Examples of such programming include:
 - WPVI’s *FYI Philly* and Action News recurring segments “Made in PA,” “The Dish,” and “6abc Loves the Arts,”¹¹¹

¹⁰⁷ KFSN PIS at 2; *see also* Fresno County DA Letter at 2 (crediting KFSN for “rais[ing] awareness about the dangers of illicit fentanyl” and “devot[ing] significant time and resources to educating our community about this growing crisis”).

¹⁰⁸ *See* KABC PIS at 2; KGO PIS at 3; WABC PIS at 3; WTVD PIS at 2; WLS PIS at 2.

¹⁰⁹ *See* KABC PIS at 3; KFSN PIS at 3; KGO PIS at 3; KTRK PIS at 1; WABC PIS at 3; WLS PIS at 2–3.

¹¹⁰ *See, e.g.*, Letter from Lizzie Fletcher, Member of Congress, Texas et al., to Brendan Carr, Chairman, FCC, at 1 (July 28, 2026), <https://www.fcc.gov/ecfs/document/26110045101/1> (“KTRK-TV’s role as a community partner cannot be overstated. Through events like the Houston Livestock Show & Rodeo, Houston Marathon, and annual parades, the station celebrates Houston’s heritage and culture.”); Letter from Annalisa Perea, Councilmember, Fresno City Council, 1st District et al., to Marlene H. Dortch, Secretary, FCC, at 2 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110056745/1> (“KFSN’s . . . willingness to dedicate airtime and resources to issues affecting local residents has helped inform the public, foster civic participation, and highlight the work of organizations committed to improving our region.”).

¹¹¹ WPVI PIS at 7 (“FYI Philly, places the spotlight on local businesses and restaurants—featuring at least six to eight per episode—helping to inform viewers about their community and supporting the local economy by increasing exposure to local establishments”); *id.* at 12 (“‘Made in PA’ segments feature businesses and entrepreneurs originating from Pennsylvania. . . . ‘The Dish’ is a regular segment exhibiting local restaurants. . . . ‘6abc Loves the Arts’ is a weekly segment presenting and supporting Philadelphia’s, arts, music, and cultural institutions.”); Letter

- WLS’s *Windy City Weekend* and “Our Chicago” stories,¹¹²
 - WTVD’s monthly program *ABC11 Together Perspectives* and recurring “North Carolina Made” segments,¹¹³
 - “Celebrating Small Business” on WABC,¹¹⁴ and
 - “Dine and Dish” on KFSN.¹¹⁵
- Each of the Stations also has a Localish Network channel with programs that feature local restaurants, local places to visit, and inspirational people in their

from Joe Conti, President, Pennsylvania Association of Broadcasters, to Marlene H. Dortch, Secretary, FCC, at 2 (June 23, 2026), <https://www.fcc.gov/ecfs/document/26110044877/1> (“Beyond news coverage, WPVI plays a significant role in highlighting and strengthening Pennsylvania’s civic and cultural life. Its locally produced programming including Inside Story, FYI Philly, and Visions explores public policy, economic development, community issues, and regional culture. These programs ensure that viewers not only receive breaking news but also gain deeper insight into the issues and institutions shaping their communities.”).

¹¹² WLS PIS at 11–12 (“Our Chicago’s focus is community-centric storytelling, spotlighting local businesses, grassroots organizations, and everyday people positively contributing to their neighborhoods. . . . *Windy City Weekend* . . . provides viewers with the latest information on a variety of topics, including upcoming local events, local restaurants and businesses, food and recipe ideas, and celebrity and entertainment news.”); *see also* Letter from Cristina Castro, Senator, Illinois State Senate, 22nd District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 10, 2026), <https://www.fcc.gov/ecfs/document/26110045132/1> (“Beyond breaking news, WLS provides programming that highlights Chicago’s communities and civic life. Initiatives such as Our Chicago and Windy City Weekend showcase neighborhood stories, local businesses, and community leaders. These programs also facilitate discussions on issues affecting residents across the region.”).

¹¹³ WTVD PIS at 8 (“ABC11 Together Perspectives, covers inspirational stories from local businesses, nonprofit organizations, and people. . . . Eyewitness News’ weekly segment, North Carolina Made, spotlights homegrown businesses, local products, and workers who are shaping culture and community pride.”); *see also* Letter from Jim Beley, Executive Director, North Carolina Hospitality Alliance, to Marlene H. Dortch, Secretary, FCC, at 1 (June 29, 2026), <https://www.fcc.gov/ecfs/document/26110025736/1> (“Regarding [WTVD’s] local reporting, I am often taken by the number of human interest stories that are aired, which demonstrate that our area residents care for one another. It would be a terrible loss to our hospitality operators which rely on this positive ‘foot-forward’ messaging on our growing community.”).

¹¹⁴ WABC PIS at 14 (“As part of ‘Celebrating Small Business,’ WABC showcased several local small businesses from around its viewing area.”).

¹¹⁵ KFSN PIS at 13 (“Anchor Dale Yurong reports once a week on local restaurants, highlighting the food and people that make those eateries special. Restaurant owners have credited these “Dine and Dish” stories with helping bring in countless new customers.”); *see also* Fresno County DA Letter at 2 (“Throughout the years, KFSN has distinguished itself not only through its journalism, but through its genuine investment in highlighting the people, organizations, and stories that define our community”).

communities.¹¹⁶

- The Superintendent of the Alvin Independent School District outside of Houston praised its “partnership” with KTRK’s Localish team and credited the station with helping “shine a spotlight on students making a difference and has provided our families and community with uplifting stories that might not otherwise receive widespread attention.”¹¹⁷
- All of the Stations air hundreds of PSAs per month on a wide range of subjects that are relevant to their local communities, including health, education, public safety, and community initiatives, with many of these PSAs promoting awareness of local charities and their fundraising events.¹¹⁸

¹¹⁶ KABC PIS at 14-15; KFSN PIS at 11-12; KGO PIS at 13; KTRK PIS at 12; WABC PIS at 9; WLS PIS at 14; WPVI PIS at 8-9; WTVD PIS at 10-11.

¹¹⁷ Letter from Rhonda Mason, Superintendent, Alvin Independent School District, to Marlene H. Dortch, Secretary, FCC, at 1 (submitted July 15, 2026), <https://www.fcc.gov/ecfs/document/26110020046/1>; *see also* Letter from Janice Jucker, President, Three Brothers Bakery, to Marlene H. Dortch, Secretary, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110042334/1> (“ABC13 does a great job of sharing news/features of our local interest. I cannot even imagine our community without the important coverage provided by this wonderful local station. These local stations are important for small businesses because we generally cannot get national coverage, but by reaching out to the great reporting team at KTRK we can still get out our message.”).

¹¹⁸ KABC PIS at 14 (“In just the first quarter of 2026, KABC aired 668 PSAs on topics such as CPR/AED, Alzheimer’s, donating blood, the dangers of drunk/buzzed driving, Walk United LA (a benefit for unhoused neighbors, low-income families, and underserved students), and Wheelchairs for Warriors (which promotes support to America’s heroes who are injured in the line of duty).”); KFSN PIS at 11 (“KFSN aired hundreds of PSAs [in the first quarter of 2026] including on topics such as giving blood with the American Red Cross, getting screened for colorectal cancer, the Starlight’s Children’s Foundation, the V Cancer Foundation, the Make a Wish: Gala of Wishes Benefit, the Marjaree Mason Center Soiree Benefit, Big Brothers Big Sisters Central California: Bowlathon, and the Alzheimer’s Foundation of America.”); KGO PIS at 12-13 (“from January 1 through May 20, 2026, KGO aired more than 900 PSAs on topics and organizations such as: Black Legends of Silicon Valley, Make-A-Wish Greater Bay Area, Friends of Children With Special Needs, San Francisco Community Health Center, and TV Roadblock (a drunk driving prevention campaign).”); KTRK PIS at 11-12 (“Since . . . September 2024, KTRK has aired PSAs on topics as such the Gulf Coast Blood annual blood drive; “Share Your Holidays,” which supports the Houston Food Bank; “Every Kid Sports,” which aims to help underserved children receive access to athletic activities; the Disney Ultimate Toy Drive; “Share Your School Supplies,” which supports local teachers; the “Magic of Storytelling,” which provides books to students; and the Starlight Children’s Foundation, which provides fun programs for children in hospitals.”); WABC PIS at 9 (“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

- New York State Assembly Member Robert Carroll highlighted WABC’s PSAs “on issues such as food insecurity and public safety, and supporting initiatives like the “7 Days of Giving” campaign that highlights nonprofits across New York City,” as reflecting the station’s “strong commitment to community service.”¹¹⁹
- Record submissions demonstrate that these PSAs make a real difference to local organizations and viewers.
 - The Les Turner ALS Foundation reports that thanks to WLS’s PSAs promoting the organization’s Walk of Life, the station “has helped us raise more than \$6 million to combat ALS over the last decade alone.”¹²⁰

Month, 7 In Your Community, Daylight Saving Spring Weekend, and the 5-Borough Race. During the license period under review, WABC aired the Missing Kids Campaign PSA on a regular basis during all local newscasts.”); WLS PIS at 14 (“Among the many topics addressed by PSAs during WLS’s most recent license term were youth mental health, car seat safety, emergency preparedness, stopping animal cruelty, drug addiction, and veterans support. PSAs also aired in support of many non-profit organizations, including the Alzheimer’s Association, the American Cancer Society, the American Heart Association, the American Lung Association, the Les Turner ALS Foundation, the National MS Society, and the Ronald McDonald House.”); WPVI PIS at 8 (“WPVI aired PSAs [in the fourth quarter of 2025 and first quarter of 2026] on topics including: the 6abc Philly Blood Drive, 6abc Beating the Odds Against Breast Cancer, 6abc Holiday Food Drive, profiles on veterans organizations, organ and tissue donation, interviews with experts from local medical industries, and Project Roadblock, which promotes safe driving during the holidays.”); WTVD PIS at 10 (“WTVD aired over 300 PSAs [in the first quarter of 2026] that benefited nonprofit organizations including the American Heart Association, American Red Cross, Warmth for Wake-Poverty, Aging Gracefully, AARP, Magic of Storytelling-Literacy, Alzheimer’s Association, and the Lung Cancer Initiative.”).

¹¹⁹ Letter from Robert Carroll, Assemblymember, New York State Assembly 44th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 2, 2026), <https://www.fcc.gov/ecfs/document/26110017864/1>; *see also* NY Senator Addabbo Letter at 2 (“WABC’s commitment to public service is further demonstrated through its extensive use of public service announcements. I understand that in just one quarter, the station aired more than 1,400 PSAs covering critical topics such as health, safety, and community resources so that residents are informed about the services and support systems available to them.”); Letter from Amanda N. Septimo, Assemblymember, New York State Assembly, 86th District, to Marlene H. Dortch, Secretary, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110045167/1> (“Through public service announcements, community partnerships, and campaigns highlighting local nonprofits, small businesses, and neighborhood organizations, the station has consistently invested in the communities that make New York extraordinary.”).

¹²⁰ Letter from Laura Freveletti, CEO, Les Turner ALS Foundation, to Marlene H. Dortch, Secretary, FCC, at 1 (July 14, 2026), <https://www.fcc.gov/ecfs/document/26110017522/1>; *see also* Letter from Nancy L. Wright, CEO, Girl Scouts of Greater Chicago, to Marlene H. Dortch, Secretary, FCC, at 1 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110047581/1>

- The Alzheimer’s Association’s Northern California Chapter notes how KGO’s PSAs on upcoming events, news stories, and on-air talent hosts “helped us make an impact on thousands of community members.”¹²¹
 - Tell Every Amazing Lady, a non-profit group based in Brooklyn supporting ovarian cancer awareness and support, relayed how one of their members “found community and support within our foundation and would not have learned about us without ABC7,” which aired PSAs about the organization.¹²²
 - Visit Philadelphia recently partnered with WPVI—“a powerhouse in the Greater Philadelphia Market” —for civic pride PSAs because for “Philadelphians, 6ABC represents their home team and their community - boosting Philadelphian’s feelings of civic pride.”¹²³
- The record is filled with examples illustrating how the ABC Owned Stations have made deep and lasting connections with their communities.
 - Among these extensive efforts are blood drives broadcast and sponsored by the Stations that have contributed to saving thousands of lives.¹²⁴

(“Throughout the course of our long affiliation, ABC7 [WLS] has invested focus, time, and resources into sharing important stories, including PSAs, about everyday people from urban, suburban, and rural communities giving back and achieving milestones.”).

¹²¹ Letter from Ken Toren, Chapter Executive, Alzheimer’s Association Northern California Chapter, to Marlene H. Dortch, Secretary, FCC, at 1 (June 30, 2026), <https://www.fcc.gov/ecfs/document/26109960942/1>; *see also* Letter from Elba Aranda-Suh, Executive Director, National Latino Education Institute, to Marlene H. Dortch, Secretary, FCC, at 2 (June 30, 2026), <https://www.fcc.gov/ecfs/document/26110007583/1> (describing how WLS “has been more than a news organization. It has been a community partner. The station has supported NLEI through public service announcements, participation in community events, and the participation of its award winning on-air talent to help elevate causes that matter to Chicago families. Those efforts reflect a genuine investment in the well-being of our region.”).

¹²² Letter from Pamela Esposito-Amery, Co-Founder & CEO, Tell Every Amazing Lady, to Marlene H. Dortch, Secretary, FCC, at 1 (June 18, 2026), <https://www.fcc.gov/ecfs/document/26109838739/1>.

¹²³ Letter from Angela Val, President & CEO, Visit Philadelphia, to Marlene H. Dortch, Secretary, FCC, at 1-2 (June 29, 2026), <https://www.fcc.gov/ecfs/document/26109952817/1>.

¹²⁴ *See, e.g.*, Letter from Christine Hayes, President & CEO, Central California Blood Center, to Marlene H. Dortch, Secretary, FCC, at 1 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26109998989/1> (“ABC30 [KFSN] has also served as the media partner for our annual Pint for a Pint Blood Drive for nearly 40 years, helping motivate

- Food drives have raised tons of food and supplied millions of meals to ensure that local residents do not go hungry.¹²⁵
- Station-sponsored school supply drives make sure local students have the tools they need for learning.¹²⁶

thousands of community members to donate during the challenging summer months. Its coverage of blood shortages, donor stories, and community events has significantly expanded CCBC’s reach and strengthened our ability to maintain a safe, reliable blood supply for the hospitals and patients we serve.”); Letter from Michael Iliopoulos, Marketing Manager, Gulf Coast Blood, to Marlene H. Dortch, Secretary, FCC, at 1 (July 8, 2026), <https://www.fcc.gov/ecfs/document/26110001594/1> (“KTRK has been a valued media partner to Gulf Coast Blood and has played an important role in supporting our mission. Through blood drive partnerships, public service messaging, and community coverage, KTRK helps raise awareness about the ongoing need for blood donations and encourages viewers to take action.”).

¹²⁵ See, e.g., Letter from Brian Greene, President & CEO, Houston Food Bank, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-191, at 1–2 (June 22, 2026), <https://www.fcc.gov/ecfs/document/26109835100/1> (“Houston Food Bank Letter”) (“ABC13 [KTRK] has spearheaded the iconic Share Your Holidays food drive. . . . By leveraging its broadcast reach, ABC13 actively educates the public on the realities of food insecurity and rallies viewers from across Greater Houston and beyond to donate both non-perishable goods and financial contributions.”); Letter from William Benton, Mayor, City of Rosenberg, to Marlene H. Dortch, Secretary, FCC, at 1 (July 1, 2026), <https://www.fcc.gov/ecfs/document/26110038843/1> (“The ABC13 [KTRK] Share Your Holidays Drive has also become tradition for our community, and without it, and the stalwart that is the television station, we certainly would not see the same progress and growth we’ve enjoyed in this decades-long partnership.”); Letter from Amy Beros, President & CEO, Food Bank of Central and Eastern North Carolina, to Marlene H. Dortch, Secretary, FCC, at 1 (June 24, 2026), <https://www.fcc.gov/ecfs/document/26109920471/1> (“For nearly four decades, ABC11 [WTVD] has been one of the Food Bank’s most meaningful and enduring partners through the ABC11 Together Food Drive. Year after year, the station has helped turn concern into action . . . [t]hat partnership has helped provide millions of meals to people across our region.”); Letter from Caitlin Sly, President & CEO, Contra Costa Food Bank, to Marlene H. Dortch, Secretary, FCC, at 1 (July 27, 2026), <https://www.fcc.gov/ecfs/document/26110056436/1> (“Through initiatives such as the annual Feed California food drives, [KGO] has helped connect community members to hunger-relief efforts and encouraged support for local food banks.”); Letter from Loree D. Jones Brown, CEO, Philabundance, to Marlene H. Dortch, Secretary, FCC, at 2 (July 24, 2026), <https://www.fcc.gov/ecfs/document/26110056566/1> (“For almost two decades, 6ABC [WPVI] has run a telethon for Philabundance, raising funds and awareness about the issue of hunger.”).

¹²⁶ KABC PIS at 21 (“In partnership with Disney and DonorsChoose, KABC contributes in-kind airtime to the annual Back to School: Support for Our Teachers campaign, empowering teachers by matching public donations for resources focused on storytelling and arts education in local schools.”); KGO PIS at 17 (“Station Employees have also participated in school supply drives in support of the Boys and Girls Club of Oakland and other local organizations during back-to-school season.”); KTRK PIS at 18 (“The station and the Houston Food Bank also partner on the ‘Share Your School Supplies Drive,’ with KTRK’s anchors and reporters fanning out across

- Toy drives have brought joy to countless children, delivering millions of toys to families with limited resources.¹²⁷
- By leveraging news coverage, special programming, on-air talent hosts, and other station resources, the Stations have partnered with charitable organizations in their communities to raise millions through fundraising initiatives and otherwise further those organizations' missions.¹²⁸

Houston, Galveston, Richmond, Spring, and Sugar Land to collect donations helping teachers in more than 40 southeast Texas school districts.”); WPVI PIS at 15–16 (“WPVI donates 100 book bags, filled with school supplies and a personal note of encouragement written by 6abc team members, to local organizations for distribution within the community.”); Letter from Elizabeth J. Dooley, President & CEO, Educational Employees Credit Union, to Marlene H. Dortch, Secretary, FCC, at 2 (July 20, 2026), <https://www.fcc.gov/ecfs/document/26110041780/1> (“Each summer, EECU partners with ABC30 on a *Back-to-School Drive* that helps ensure students throughout the Central Valley have supplies they need for a successful school year. . . . Through a partnership with First Book, ABC30 distributes approximately \$3,750 worth of new books to an underserved Central Valley school each year as part of the *Magic of Storytelling* campaign, sponsored by EECU.”).

¹²⁷ KABC PIS at 21 (“For 34 years, ABC7 has partnered with Southern California firefighters to inspire hope and bring joy to children in need by encouraging donations of new, unwrapped toys or sports equipment in Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties . . . hauling in more than 298,700 toys in 2025.”); KFSN PIS at 19 (“In each of 2024 and 2025, KFSN’s Toys for Tots Marathon Weekend raised nearly \$50,000 and collected over 10,000 toys—the biggest toy drive in Central California.”); KGO PIS at 17 (“The Station’s team also participates in local Toys for Tots efforts each holiday season, with KGO employees donating and helping sort donated toys for distribution.”); WLS PIS at 22 (“WLS also sponsors and [has] an on-site reporter doing live remotes from the drop-off site for the annual ‘Stuff the Big Bus Toy Express’ campaign, making holiday wishes come true for children in need by supporting the Marine Corps Reserve Toys for Tots.”); WPVI PIS at 15 (“Station employees donated hundreds of unwrapped toys for the Toys for Tots Philadelphia Chapter.”).

¹²⁸ See, e.g., KABC PIS at 21 (“KABC has sponsored the Susan G. Komen ‘More Than Pink’ Walks for several years through PSAs leading up to the event, participation in the event, and reporting live from the crowd at the LA Walk. . . . “KABC contributes in-kind airtime, producing positive storytelling about [Make-A-Wish] granting of over 175,000 life-changing wishes for children whose health is in crisis.”); KFSN PIS at 18 (“KFSN has helped raise millions of dollars over the years for local charities, including Valley Children’s Hospital, Marjaree Mason Center (which helps provide shelter, healing, and hope for those affected by domestic violence), the National Alliance for Mental Illness, Central Valley Veterans, Reading and Beyond, the local Rotary, and others.”); KGO PIS at 18 (“KGO is also deeply involved in supporting research and raising awareness of Alzheimer’s Disease in partnership with the Alzheimer’s Association. In addition to news coverage of fundraising events and advances in research, anchors and reporters regularly volunteer to emcee annual Bright Night Gala fundraisers as well as each of the three area annual Walks to End Alzheimer’s.”); KTRK PIS at 19 (“[F]or the past nine years, the station has supported the Pick Your Pet campaign, which in 2026 led to a record 216 dogs and cats finding new homes.”); WABC PIS at 18 (“WABC station

- ABC Owned Station employees also directly give back to the community through volunteerism and charitable giving organized by the Stations.¹²⁹

personnel frequently host and attend events to promote charitable causes and raise money for nonprofit and educational organizations.”); WLS PIS at 22 (“ABC 7 on-air talent frequently participates in local non-profit events, which Eyewitness News supports through storytelling leading up to the event.”); WPVI PIS at 15 (“For nearly 30 years, 6abc has partnered with the Philadelphia Fire Department and other sponsors on Operation Save-a-Life, a fire safety program that has donated almost a half million free fire alarms to residents across Philadelphia and the surrounding counties.”); Letter from Marcia Morey, Representative, North Carolina House of Representatives, 30th District, to Marlene H. Dortch, Secretary, FCC, at 1-2 (July 16, 2026), <https://www.fcc.gov/ecfs/document/26110023061/1> (“ABC11 [WTVD] anchors and meteorologists have emceed the Walk to Defeat ALS, hosted the American Heart Association's Heart Ball and Go Red for Women events, hosted the Gail Parkins Memorial Ovarian Cancer Walk, supported the Durham CROP Walk for hunger relief, and participated in National Night Out events building trust between communities and law enforcement.”); Letter from Jeremy Klemanski, President & CEO, Gateway Foundation, to Marlene H. Dortch, Secretary, FCC, at 1 (July 22, 2026), <https://www.fcc.gov/ecfs/document/26110041574/1> (“ABC7 is a valued community partner to Gateway Foundation that has helped spread awareness of substance use and mental health issues throughout the Chicagoland area. Since 2024, Karen Jordan, news anchor with ABC7 Eyewitness News, has generously served as the emcee for Gateway Foundation's annual Connecting for Recovery Fundraising Luncheon.”); Letter from Kevin Radelet, Executive Director, Leukemia Research Foundation, to Marlene H. Dortch, Secretary, FCC, at 2 (July 21, 2026), <https://www.fcc.gov/ecfs/document/26110038551/1> (“Each year, WLS-TV airs dozens of public service announcements, broadcasts the [Gibbons Run & Walk] start live during its top-rated newscasts, features interviews with patients, physicians, researchers, and supporters from the event site, and incorporates ongoing coverage throughout the year. Importantly, these stories consistently focus not simply on promoting a fundraising event, but on raising public awareness of leukemia, the urgent need for continued research, and the challenges faced by patients and their families.”); Letter from Mark Guthrie, Board Chair, & Doug Karr, Board Member and Chair, Communications Committee, Gulf Coast Workforce Board, to Marlene H. Dortch, Secretary, FCC, at 2 (July 17, 2026), <https://www.fcc.gov/ecfs/document/26110034290/1> (“The Gulf Coast Workforce Board adopted a resolution honoring Mr. Natario and KTRK-TV for their service to the region's jobseekers and employers and presented Mr. Natario with the Board's first community workforce champion award . . . because the station's work has extended the reach of public workforce services far beyond what our own resources could achieve, at no cost to the taxpayer, and with consistent accuracy and integrity.”).

¹²⁹ See, e.g., KGO PIS at 17 (“KGO staff volunteer twice a year at food banks around the Bay Area.”); *id.* at 17 (“Each December, KGO employees, in partnership with Disney VoluntEARS and the Starlight Children's Foundation, create holiday cards to bring cheer to Make-A-Wish participants and young patients in children's hospitals.”); Letter from Charlene Veba, Executive Director, Vitalant, to Marlene H. Dortch, Secretary, FCC, at 1 (July 2, 2026), <https://www.fcc.gov/ecfs/document/26110004329/1> (“For well over a decade, KGO-TV has been a valued community partner by hosting employee blood drives that help strengthen the local blood supply. These blood drives demonstrate the station's commitment to public service by

- In addition to those cited above, dozens of organizations that have witnessed and benefitted from the support of their local ABC Owned Stations have submitted comments in this proceeding to discuss the various ways in which the Stations have become indispensable members of their communities and to urge the Commission to allow those efforts to continue unimpeded by renewing the Stations' licenses. Among these many submissions:
 - The Los Angeles Society for the Prevention of Cruelty to Animals credits KABC for having “helped hundreds – if not thousands – of homeless pets find loving families” through the station’s “Adopt a Pet” segment, bi-annual “Puppy Palooza event,” and for coverage that “inspire[s] the community to act” through pet fostering, food donations, and reporting animal cruelty.¹³⁰
 - Poverello House, a Fresno-based non-profit, praises KFSN for being “an extraordinary partner to Poverello House and an essential public service institution for the Central Valley,” working with the organization to broadcast the “annual Call for Hope Telethon, helping [to] raise critical funding and awareness” for “individuals and families experiencing homelessness, hunger, addiction, and poverty throughout the Central Valley for the life-changing services we provide throughout the region.”¹³¹

encouraging its employees to give back in a meaningful way and helping ensure lifesaving blood is available for Bay Area patients. Every donation collected through these efforts has the potential to help multiple patients, making KGO-TV's longstanding support an important contribution to the health and well-being of our community.”); Houston Food Bank Letter at 2 (“[KTRK] anchors, executives and staff frequently participate in volunteer shifts, physically sorting and loading pallets of food for the community, and they also partner with Houston Food Bank and other local businesses, school districts and places of worship to establish remote food drop-off sites during critical campaigns, especially times of weather disasters.”); WABC PIS at 18 (describing how “several members of the WABC team served over 150 meals at the Food Bank for New York City’s Community Kitchen”); WLS PIS at 23 (“WLS also assembled care packages for veterans and wrote holiday cards for hospitalized children as part of Operation Gratitude.”); WPVI PIS at 16 (“Station employees also volunteered at various local organizations, including the Children’s Hospital of Philadelphia, food charity Philabundance, and Cradles to Crayons, a non-profit focused on ending children’s clothing insecurity.”); Letter from Shana Filter, Director of Marketing and Development, Urban Ministries of Durham, to Marlene H. Dortch, Secretary, FCC, at 1 (July 20, 2026), <https://www.fcc.gov/ecfs/document/26110035007/1> (“Through the ABC11 Together Drive, news team members have collected and personally delivered essential items to the shelter during high-need seasons.”).

¹³⁰ Letter from Madeline Bernstein, President, spcaLA, to Marlene H. Dortch, Secretary, FCC, at 1 (June 26, 2026), <https://www.fcc.gov/ecfs/document/26109958471/1>.

¹³¹ Letter from Zachary D. Darrah, CEO, Poverello House, to Marlene H. Dortch, Secretary, FCC, at 1 (July 10, 2026), <https://www.fcc.gov/ecfs/document/26110007522/1>.

- Friends of Children with Special Needs, a Fremont, CA-based non-profit, lauds KGO as “a longtime supporter of the special needs community and a valued partner of FCSN,” which has “covered our annual Special Needs Talent Showcase, helping us share the talents and accomplishments of children and adults with developmental disabilities” and “helped our community better understand and appreciate individuals with disabilities while encouraging greater acceptance and inclusion.”¹³²
- Literacy Now, a Houston non-profit, states that KTRK, “a trusted community institution,” has “been an outstanding community partner, not only to Literacy Now but to countless organizations throughout Houston,” and serves as an exclusive television media partner to support *Houston Reads Day*, “promot[ing] the event on-air and online, provid[ing] production support, and encourage[ing] its staff and talent to volunteer as readers in local schools.”¹³³
- Friends of Firefighters, a New York City-based non-profit, expresses its gratitude to WABC for its “longstanding dedication to public service,” calling the station “an invaluable partner in helping raise awareness of the unique mental health challenges faced by firefighters and first responders” and explaining that WABC’s “thoughtful reporting and community-focused coverage” has “increased awareness of our mission, fostered meaningful community engagement, and helped ensure that firefighters know support is available when they need it most.”¹³⁴
- The Union League Boys & Girls Clubs of Chicago describes WLS as “a true community partner to our organization . . . consistently help[ing] elevate the voice of the young people we serve by shining a spotlight on our mission, our programs, and the opportunities available to youth across Chicago” and explains how “[m]embers of the ABC 7 team have volunteered with our youth, participated in community events, supported our back-to-school block parties, and engaged directly with the young people and families we serve.”¹³⁵

¹³² Letter from Kelly Ko, Senior Director of Community Relations and Programs, Friends of Children with Special Needs, to Marlene H. Dortch, Secretary, FCC, at 1 (June 26, 2026), <https://www.fcc.gov/ecfs/document/26109953795/1>.

¹³³ Letter from Jacklyn Minimah-Wilson, CEO, Literacy Now, to Marlene H. Dortch, Secretary, FCC, at 1 (June 29, 2026), <https://www.fcc.gov/ecfs/document/26109951762/1>.

¹³⁴ Letter from Nancy Carbone, Founder & Executive Director, Friends of Firefighters, to Marlene H. Dortch, Secretary, FCC, at 2 (June 30, 2026), <https://www.fcc.gov/ecfs/document/26110005054/1>.

¹³⁵ Letter from Mary Ann Mahon-Huels, President & CEO, & Leora Conway, Vice President of Development, Union League Boys & Girls Club, to Marlene H. Dortch, Secretary, FCC, at 2

- The Police Athletic League of Philadelphia writes that WPVI “has been an invaluable partner to PAL and the communities we serve . . . consistently highlight[ing] our mission, cover[ing] our events and community stories, and help[ing] amplify the impact of our programs. The visibility and credibility provided by 6ABC have strengthened our ability to engage supporters, attract volunteers, and connect families with valuable resources and opportunities.”¹³⁶
- Duke Cancer Institute calls WTVD “an extraordinary community partner,” providing “support [that] has gone far beyond simply covering our event,” explaining that “ABC 11 has featured our mission through on-air news stories, interviews, community announcements, and live coverage, while their anchors and reporters have served as emcees at our annual walk & 5K. Their presence at our event and their willingness to tell stories of ovarian cancer survivors and families have helped educate the public on a disease that often receives little attention.”¹³⁷
- Finally, the Stations are committed to cultivating the next generation of local journalists by opening their doors to their communities.
 - During their current license terms, the Stations have collectively hosted over 100 station tours, welcoming local schools and non-profit groups and “providing young people with an inspiring opportunity to learn about careers in journalism and media while seeing firsthand how local news serves the public.”¹³⁸

(July 1, 2026), <https://www.fcc.gov/ecfs/document/26109964342/1>.

¹³⁶ Letter from Erica Vanstone, Executive Director, and Pat Ward, Board Chair, Police Athletic League of Philadelphia, to Marlene H. Dortch, Secretary, FCC, at 1 (July 15, 2026), <https://www.fcc.gov/ecfs/document/26110025391/1>.

¹³⁷ Letter from Melanie Parkins Bachelier, Founder, Gail Parkins Memorial Ovarian Cancer Walk & 5K Run, Duke Cancer Institute, to Marlene H. Dortch, Secretary, FCC, at 1 (July 8, 2026), <https://www.fcc.gov/ecfs/document/26110004506/1>.

¹³⁸ Letter from Rebecca Darugar, Executive Director, 826NYC, to Marlene H. Dortch, Secretary, FCC, at 1 (June 28, 2026), <https://www.fcc.gov/ecfs/document/26109998288/1>; *see also* KFSN PIS at 18-19 (“Highlights from early 2026 include *Action News* anchors . . . providing station tours to local high school students. . .”); KGO PIS at 18-19 (“In January 2025, KGO hosted Head-Royce High School students learning public speaking with Good Morning America’s Becky Worley. Guests toured the newsroom, control room and studio, watched a live newscast, and practiced public speaking on KGO’s East37 set. In July 2024, KGO’s Kristen Sze hosted students with Hip Wah Summer Program from Oakland’s Chinatown with a behind-the-scenes tour of the newsroom and a live viewing of the 11AM News in the studio, followed by a Q&A session.”); KTRK PIS at 19 (“KTRK also regularly opens its doors to area students while making sure station staff are a consistent presence at community events. Since 2024, the Station has conducted over 63 tours with local school groups and community organizations.”); WABC PIS at 17 (“Station personnel regularly speak to students and provide station tours to local high

schools and organizations.”); WPVI PIS at 16 (“Since September 2024, 6abc has conducted approximately 35 station tours with local school groups and participated in four schools’ career days.”); WLS PIS at 23 (“Since 2023, the station has provided tours for 18 separate groups from area colleges, high schools, middle schools, elementary schools, and other community organizations.”); Letter from Ashley Adams, Executive Director, Creative Educators Network, to Marlene H. Dortch, Secretary, FCC, at 1 (June 25, 2026), <https://www.fcc.gov/ecfs/document/26109928514/1> (“ABC7 [KGO] has generously hosted multiple on-site field experiences for the educators we serve. During these visits, educators tour the newsroom and studio facilities, engage directly with broadcasting professionals, and learn about the evolving demands of careers in news, media, and communications.”); Letter from Kathleen Rivera, Executive Director & CEO, North Shore Child and Family Guidance Center, to Marlene H. Dortch, Secretary, FCC, at 1 (June 30, 2026), <https://www.fcc.gov/ecfs/document/26109959034/1> (“Our team has had the opportunity to tour the [WABC’s] station, and we look forward to bringing the children and families we serve for a future visit that will provide a unique respite experience.”); Letter from Jennifer Halperin, Internship & Career Advisor, Columbia College Chicago, to Marlene H. Dortch, Secretary, FCC, at 1 (July 6, 2026), <https://www.fcc.gov/ecfs/document/26109989930/1> (discussing WLS journalists providing “internship and mentorship for our students” and how many of those students “have gone on to become prominent journalists and communicators of other forms across the country”); Letter from Curtis J. Benjamin, CEO, Saving Our Daughters, to Marlene H. Dortch, Secretary, FCC, at 1 (submitted June 17, 2026), <https://www.fcc.gov/ecfs/document/26109834857/1> (“With [WABC’s] support over the years and the involvement of their executives and anchors—whom we affectionately call Celebrity Godparents—ABC7 has focused on career development, helping our girls explore and strengthen skills related to journalism, television and film.”).

APPENDIX B – AI ANALYSIS OF PUBLIC COMMENTS

Results

Category	Number of Filings	Percentage of Total
Support Renewal	122,544	85.9%
Object to FCC	14,894	10.4%
Oppose Renewal	602	0.4%
Mixed	123	0.1%
Not Discernible	4,558	3.2%
Total	142,721	100%
Total in Favor of Stations	137,438	96.3%

**Public comments in MB Docket No. 26-131 as of midnight UTC on July 27, 2026.*

Of the 142,721 classifiable comments, 122,544 (85.9%) supported grant of the license renewals (“Support Renewal”); 14,894 (10.4%) objected to the Commission’s early license-renewal review itself without expressly addressing whether the licenses should be renewed (“Object to FCC”); 602 (0.4%) opposed renewal (“Oppose Renewal”); 123 expressed mixed positions (“Mixed”); and 4,558 took no discernible position (“Not Discernible”). Counting together both express supporters and those objecting to the early review—the two categories aligned with the Stations’ side of the proceeding—96.3% of comments were favorable to the Stations’ position (“Total in Favor of Stations”).

Methodology

Between May 29, 2026, when the Commission opened MB Docket No. 26-131, and 11:59:59PM (UTC) on July 27, 2026, members of the public filed 142,744 comments in the proceeding, all of which are publicly available in the FCC’s Electronic Comment Filing System (“ECFS”).¹ Every comment received and available in ECFS through that date was downloaded

¹ FCC Electronic Comment Filing System, MB Docket No. 26-131, [https://www.fcc.gov/ecfs/search/search-filings/results?q=\(proceedings.name:\(%2226-131%22\)\)](https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2226-131%22))).

by Claude (Anthropic’s AI assistant) using an automated pipeline built around the Commission’s public ECFS Application Programming Interface (“API”). Where a comment contained an attachment, such as a letter submitted in PDF or Word format, the attachment was also retrieved via an automated browser session, and its text extracted. A small number of filings (23) contained no machine-readable text (blank or image-only submissions) and are not included in the totals in the chart above. To guard against gaps or transmission errors, the entire docket was downloaded twice, independently, and the two copies were required to match record-for-record; the resulting count was separately confirmed against the FCC’s own reported total for the period.

Each comment was evaluated under a fixed, written set of coding rules that separately considered two questions: the commenter’s position on grant of the Stations’ license renewals, and the commenter’s view, if any, of the Commission’s decision to require early renewal filings. A comment was counted as supporting renewal only if it expressed support for the Stations or their licenses; comments objecting solely to the early-review process were assigned their own category and were not counted as support. The collection and analysis were designed and carried out by Claude, an artificial-intelligence system developed by Anthropic, working at counsel’s direction; before any comment was classified, the analysis plan was reviewed by an artificial-intelligence system from a different developer (OpenAI’s Codex), and after the analysis was complete, the same system reviewed the finished results and documentation; its critiques at both stages were addressed and its final assessment identified no remaining issues. Every comment was classified twice, in two separate runs using two different large-language-model classifiers (both Anthropic Claude models) applying the same written rules; disagreements were resolved by a third, separately run classification, and residual conflicts by human review. Each classification was required to identify a verbatim passage from the comment supporting it, and software verified character-by-character that every such passage in fact appears in the comment. The method was validated against a blinded sample of comments coded by human reviewers by hand. In the

primary validation sample — a random sample drawn to mirror the docket as a whole — the automated classifications matched the human coders' consensus 93.3% of the time. The remaining disagreements were all minor: not once did the humans read a comment as supporting the Stations (or objecting to the FCC's review) while the machine read it as opposing renewal, or the reverse. As a further check, a classifier from an unaffiliated vendor (OpenAI's Codex) applied the same written rules to the same blinded sample. It agreed with Claude in 92.0% of the cases, agreed with the human coders' consensus in 90.0% of cases, and produced a support percentage within 0.1 points of the reported figure. Like the two codings it was checking, it never flipped a comment from one side of the proceeding to the other: no comment that the humans or the automated system read as supporting the Stations was coded by Codex as opposing renewal, or the reverse.

Because no automated classification is perfect, the hand-coded validation sample was also used to estimate what fully human coding of the entire docket would find. That analysis estimates a support share of 88.1% (95% confidence interval 84.2% to 91.8%); the reported figure lies below that central estimate, suggesting it is, if anything, conservative.

Declaration of Wendy Granato

I, Wendy Granato, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station KABC-TV, Los Angeles, CA, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Wendy Granato
General Manager,
KABC Television, LLC

Executed on: July 29, 2026

Declaration of Martin Ortiz

I, Martin Ortiz, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station KFSN-TV, Fresno, CA, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Martin Ortiz

Martin Ortiz
General Manager,
KFSN Television, LLC

Executed on: July 29, 2026

Declaration of David L. Wurtzel

I, David L. Wurtzel, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station KGO-TV San Francisco, CA, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

David Wurtzel

David L. Wurtzel
General Manager,
KGO Television, Inc.

Executed on: July 29, 2026

Declaration of Michael Carr

I, Michael Carr, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station KTRK-TV, Houston, TX, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Michael Carr

Michael Carr
General Manager,
KTRK Television, Inc.

Executed on: July 29, 2026

Declaration of Marilu Quevedo-Galvez

I, Marilu Quevedo-Galvez, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station WABC-TV, New York, NY, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Marilu Quevedo-Galvez
General Manager,
WABC Television (New York), LLC

Executed on: July 29, 2026

Declaration of John H. Idler

I, John H. Idler, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station WLS-TV, Chicago, IL, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



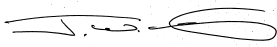
John H. Idler
General Manager,
WLS Television, Inc.

Executed on: July 29, 2026

Declaration of John W. Morris

I, John W. Morris, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station WPVI-TV, Philadelphia, PA, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



John W. Morris
General Manager,
WPVI Television (Philadelphia), LLC

Executed on: July 29, 2026

Declaration of Rob Elmore

I, Rob Elmore, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to television station WTVD, Durham, NC, and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Rob Elmore

Rob Elmore
General Manager,
WTVD Television, LLC

Executed on: July 29, 2026

Declaration of Jennifer K. Reberger

I, Jennifer K. Reberger, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition with respect to the FCC Enforcement Bureau's investigation into the employment practices of the Stations and the Stations' responses thereto and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Jennifer K. Reberger
EVP, Human Resources,
Disney Entertainment Television

Executed on: July 29, 2026

Declaration of Shawna M. Swanson

I, Shawna M. Swanson, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the “Opposition”). I have personal knowledge of the facts contained in the Opposition with respect to the employment practices of The Walt Disney Company and its subsidiaries and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Shawna M. Swanson
Deputy General Counsel
The Walt Disney Company

Executed on: July 29, 2026

Declaration of Eric N. Lieberman

I, Eric N. Lieberman, hereby state as follows. I have reviewed the foregoing Opposition to Petitions to Deny Renewals of Licenses (the "Opposition"). I have personal knowledge of the facts contained in the Opposition not otherwise addressed by another declaration submitted with the Opposition and declare that, to the best of my information, knowledge, and belief, which includes knowledge based on information provided to me by others, such facts are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Eric N Lieberman

Eric N. Lieberman
Assistant Secretary of KABC
Television, LLC; KFSN Television,
LLC; KGO Television, Inc.; KTRK
Television, Inc.; WABC Television
(New York), LLC; WLS Television,
Inc.; WPVI Television (Philadelphia),
LLC; WTVD Television, LLC

Executed on: July 29, 2026

CERTIFICATE OF SERVICE

I, Adam Copeland, hereby certify that on this 29th day of July, 2026, I caused a copy of the foregoing Opposition to Petitions to Deny Renewals of Licenses to be served via U.S. Priority Mail upon:

America First Legal Foundation
611 Pennsylvania Ave SE #231
Washington, DC 20003
Attn: Emily Percival

Article III Foundation
PO Box 26141
Alexandria, VA 22313-6141
Attn: William Chamberlin

Center for American Rights
1341 W. Fullerton Ave., Suite 170
Chicago, IL 60614
Attn: Daniel R. Suhr

Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, N.W. #301
Washington, D.C. 20016
Attn: Arthur V. Belendiuk
Counsel for Frequency Forward and the Media
Action Center

Media Research Center
2340 Dulles Corner Blvd, Suite 1000
Herndon, VA 20171
Attn: David Bozell

Kenneth Douglass Newman
17412 Ventura Boulevard #489
Encino, California 91316

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

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

/s/ Adam Copeland
Adam Copeland