

July 28, 2020

**VIA ECFS**

Marlene H. Dortch  
Secretary  
445 12<sup>th</sup> Street, SW  
Federal Communications Commission  
Washington, DC 20554

Re: *Form 308 Application for Permit to Deliver Programs to Foreign Broadcast Stations – GLR Southern California, LLC – **EXPEDITED APPROVAL REQUESTED***

Dear Ms. Dortch:

GLR Southern California, LLC (“GLR SC”), GLR SC’s parent company H&H Group USA LLC (“H&H”), as operators of Mexican radio station XEWW-AM, Rosarito, Baja California Norte, Mexico (the “Station”), and Phoenix Radio US, Inc.,<sup>1</sup> a Mandarin Chinese-language content provider (“Phoenix,” and collectively with GLR SC and H&H, “Applicants”), are filing this Application for Permit to Deliver Programs to Foreign Broadcast Stations (FCC Form 308) (“New Permit”) requesting Federal Communications Commission approval of the delivery, via internet protocol, of programming to the Station for rebroadcast into the United States.<sup>2</sup>

Starting in mid-2018, GLR SC and H&H operated the Station pursuant to an STA with a pending Section 325(c) permit application, with broadcast programming from the Station provided by Phoenix pursuant to a programming agreement.<sup>3</sup> On June 22, 2020, the International Bureau dismissed the pending Section 325(c) permit application and STA based on a determination that Phoenix should have appeared as one of the applicants for the Section 325(c) permit (“Order”).<sup>4</sup> Pursuant to the Order, Applicants are filing a revised Form 308 including Phoenix as one of the applicants for the Section 325(c) permit. Applicants are submitting

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<sup>1</sup> The International Bureau’s Order, *see infra* note 4, refers to “Phoenix Radio, LLC,” but the name of the Phoenix entity that would provide programming to the Station is “Phoenix Radio US, Inc.”

<sup>2</sup> A request for Special Temporary Authority (“STA”) has been filed concurrently with this Application. On July 22, 2020, H&H and GLR SC filed a petition for reconsideration of the International Bureau’s June 22 Order. *See Petition for Reconsideration of H&H Group USA LLC and GLR Southern California, LLC*, IB Docket No. 19-144 (filed Jul. 22, 2020). H&H and GLR SC urge the grant of this New Permit which will render their petition for reconsideration moot.

<sup>3</sup> *See* IBFS File Nos. 325-NEW-20180614-00001 and 325-STA-20180710-00002.

<sup>4</sup> *See GLR Southern California, LLC Application for a Section 325(c) Permit to Deliver Programs to Foreign Broadcast Stations for Delivery of Mandarin Chinese Programming to Mexican Station XEWW-AM, Rosarito, Baja California Norte, Mexico*, Order, IB Docket No. 19-144, DA 20-649 (IB rel. Jun. 22, 2020).

Ms. Marlene H. Dortch  
July 28, 2020  
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separate copies of the Form 308 main form for GLR SC, H&H, and Phoenix in order to provide the relevant information about each entity. Applicants have submitted a combined set of exhibits with this application.

Grant of the New Permit is in the public interest, as described in Exhibit E. GLR SC and H&H operated pursuant to an STA for nearly two years, delivering Mandarin Chinese-language broadcast programming to the more than 600,000 Chinese Americans living in the Los Angeles and San Diego areas. The Station has a strong listener base in the Los Angeles area and Applicants have developed relationships with a variety of local Los Angeles businesses who advertise on the Station. Grant of the New Permit will enable Applicants to continue providing valuable Mandarin Chinese-language programming, including local news, weather and traffic information. To the best of Applicants' knowledge, other than issues raised by Chinese Sound of Oriental and West Heritage Inc. in its Petition to Deny and related filings regarding the prior Section 325(c) permit application, Applicants are unaware of any formal complaints being submitted to the FCC in the time that this station has been programmed in Mandarin Chinese about the content of these broadcasts. Applicants request the expeditious grant of the New Permit on the terms provided in the enclosed application.

Applicants will separately remit the applicable filing fee of \$110.00. Should you have any questions regarding this matter, please contact the undersigned.

Sincerely,

/s/ James Hsu

James Hsu  
Steven Lederman  
Squire Patton Boggs (US) LLP  
[james.hsu@squirepb.com](mailto:james.hsu@squirepb.com)  
*Counsel to Phoenix Radio US, Inc.*

/s/ Paige K. Fronabarger

Paige K. Fronabarger  
David Oxenford  
Christopher D. Bair  
Wilkinson Barker Knauer, LLP  
[pfronabarger@wbklaw.com](mailto:pfronabarger@wbklaw.com)  
*Counsel to GLR Southern California, LLC  
and H&H Group USA LLC*

cc: Janice Shields  
Brandon Moss

Enclosures

Instructions For FCC 308  
Application For Permit To Deliver Programs to Foreign Broadcast Stations

- A. This form is to be used in applying under Section 325(c) of the Communications Act of 1934, as amended, for authority to locate, use, or maintain a studio in the United States for the purpose of supplying program material to a foreign radio or TV broadcast station whose signals are consistently received within the United States, or for extension of existing authority.
- B. File in DUPLICATE with the Federal Communications Commission, Washington, D.C. 20554.
- C. If the applicant holds a valid radio or TV broadcast station license or construction permit, an informal application (in letter form) may be used in lieu of this form. Any such informal application, however, must include full responses to Items 17 and 18.
- D. If programs to be delivered to foreign station(s) are of a continuing nature (rather than isolated special events), notice thereof must be published and proof of publication submitted in accordance with Section 73.3580 of the Commission's Rules.
- E. This application must be personally signed by the applicant, if an individual; by a partner, if the applicant is a partnership; by an officer, if the applicant is a corporation; by a member (who is an officer), if the applicant is an unincorporated association; by a duly elected or appointed official empowered to do so under the laws of the jurisdiction, if the applicant is a government entity; or by the applicant's attorney in case of the applicant's physical disability or absence from the United States. If the attorney signs, he/she must separately set forth the reasons why the application is not signed by the applicant. Matters stated by attorneys on belief (rather than personal knowledge) must be supported by the reasons for such belief.
- F. Answer all paragraphs, and attach and number any required exhibit(s). Incomplete applications will be returned. Paragraphs which are not applicable should be answered "D/N/A". If application is for extension of existing authority and information previously supplied is still accurate and complete, reference may be made under individual paragraphs to information "On File."
- G. Authority to deliver programs to foreign broadcast stations is not granted or extended for periods of more more than five years.

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended.

The principal purpose(s) for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, accountants, engineers, and application examiners, will use the information to determine whether the application should be granted, denied, dismissed or designated for hearing.

If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain this Authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552(a)(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCT 11, 1995, 44 U.S.C. 3507.

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PAPERWORK REDUCTION ACT**

We have estimated that each response to this collection of information will take 1 - 2 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this burden estimate, or on how we can improve the collection and reduce the burden it causes you, e-mail them to pra@fcc.gov or send them to the Federal Communications Commission, AMD-PERF, Paperwork Reduction Project (3060-1133), Washington, DC 20554. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember – you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1133.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

Instructions for FCC 308 (Page2)  
Month /Year

**FOR COMMISSION USE ONLY**  
File No.

United States of America  
Federal Communications Commission  
Washington, D.C. 20554

**APPLICATION FOR PERMIT TO DELIVER PROGRAMS TO FOREIGN BROADCAST STATIONS**  
(Carefully read instructions before filling out Form-RETURN ONLY FORM TO FCC)

1. Name of Applicant Street Address or P.O. Box City State Zip Code Telephone No.  
**H&H**  
**Group**  
**USA LLC**                      **6 The Drawbridge**                      **Woodbury, NY 11797**                      **516-921-8668**

2. Name and address to whom communication should be sent if different from item 1.

Name Street Address or P.O. Box City State Zip Code Telephone No.  
(include area code)

3. Legal identity of applicant: (only check one box)

Individual     Partnership     Corporation     Government Entity     Other

If other specify:

4. Application is for:  
 New Authorization                       Extension of Existing Authority

5. If applicant is an individual, is applicant a citizen of the United States?     YES     NO

6. If applicant is a partnership, are all partners citizens of the United States:     YES     NO

7. If applicant is a corporation:

a. Under laws of what state was it organized:

b. Is more than one-fifth of the capital stock of the corporation owned of record or may it be voted by aliens or their representatives or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?     YES     NO

c. Is any officer or director of the corporation an alien?     YES     NO

If the answer is Yes, give the following for each:

**Name**                      **Nationality**                      **Position**

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Month/Year

d. Is applicant directly or indirectly controlled by any other corporation?  YES  NO

If the answer is Yes, give the following for the controlling corporation

| Name | Address | State in which organized |
|------|---------|--------------------------|
|------|---------|--------------------------|

e. Is more than one-fourth of the capital stock of the controlling corporation either owned of record, or may it be voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?  YES  NO

f. Is any officer or more than one-fourth of the directors of the corporation an alien?  YES  NO

If the answer is Yes, give the name, nationality and position of each and give the total number of directors of the corporation.

| Name | Nationality | Position | Number of Directors |
|------|-------------|----------|---------------------|
|------|-------------|----------|---------------------|

g. Is the above-described controlling corporation in turn a subsidiary?  YES  NO

If the answer is Yes, attach as Exhibit No. \_\_\_\_\_ additional information answering the holding company questions in this paragraph for each company, including the organization having ultimate control.

8. a. If the applicant is an unincorporated association, give the following:

| Total number of members | Number of Alien Members (If any) |
|-------------------------|----------------------------------|
| See Exhibit A           |                                  |

b. State the following for alien officers or directors (if any):

| Name       | Nationality   | Position                       |
|------------|---------------|--------------------------------|
| Vivian Huo | United States | President of H&H Group USA LLC |

9. a. What is applicant's principal business? Operator of radio station

b. Does applicant or any party to this application have any interest in, or connection with, any AM, FM, or TV broadcast station (either domestic or foreign), or any application pending before the Commission?

YES  NO

If the answer is Yes, attach Exhibit No. \_\_F\_\_ giving full particulars.

10. Is applicant a representative of an alien or of a foreign government?

YES  NO

If the answer is Yes, explain.

11. a. Has any radio station authorization previously issued to the applicant or party to this application been revoked, either by the Commission or by any court?

YES  NO

b. Has any previous application by the applicant or party to this application been denied by the Commission or by a predecessor agency?

YES  NO

If the answer to (a ) and/or (b) is Yes, explain:  
See Exhibit G

12. a. Has applicant or any party to this application been found guilty of any felony by any court?

YES  NO

b. Has applicant or any party to this application been finally adjudged guilty by a federal court of the violation of the laws of the United States relating to unlawful monopoly, restraint of trade, and or unfair methods of competition?

YES  NO

If the answer to (a ) and or (b) is Yes, explain.

13. a. Address of studio or other place at which programs will originate:  
**3810 Durbin Street, Irwindale, CA 91706**

b. Telephone contact number:  
**(626) 388-1100**

c. Email address:  
**xiaoyong@phoenixtv-us.com**

14. State ownership of originating facilities  
**Phoenix Radio US, Inc. (owns the studio building from which most of the programming will originate upon grant of this application)**

15. a. Describe the means whereby programs will be delivered to foreign station(s), including the names of any interconnecting common carriers.

**Means of Transmissions include but are not limited to the following:**

- Dedicated Wireline
- Internet (IP)
- Public Switched Telephone Network (PSTN)
- Private Microwave
- Private Radio (remote pickup)
- Common Carrier Microwave
- Common Carrier Radio
- Satellite
- Or combination of methods

b. List all call signs of private transmitters in the United States  
**N/A**

| Call Sign | Company Name |
|-----------|--------------|
|           |              |
|           |              |
|           |              |
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|           |              |
|           |              |



16. Coordinated foreign station to which programs will be provided:

Call sign: **XEWW-AM** City: **Rosarito, Baja California Norte, Mexico**

AM Station

Frequency (kHz): **690**

Coordinates: **32° 17' 52" NL**  
**117° 01' 48" WL**

Nighttime  
**32° 17' 52" NL**  
**117° 01' 48" WL**

Operating power: **77 kW** **60 kW**

FM Station:

Frequency: Channel: Class:

Mode of operation: Directional/Non-directional

Maximum Effective Radiated Power (kW):

Coordinates ° ' " NL ° ' " WL

Antenna Height Above Average Terrain (HAAT):

Antenna Radiation Center Above Mean Sea Level (RCAMSL):

TV Station:

Channel:

Mode of operation: Directional/Non-directional

Maximum Effective Radiated Power (kW):

Coordinates ° ' " NL ° ' " WL

Antenna Height Above Average Terrain (HAAT):

Antenna Radiation Center Above Mean Sea Level (RCAMSL):

17. Attach as Exhibit No. B a full explanation of the legal relationship between the applicant and foreign station(s) involved, including a copy of contract (if any) with foreign station(s).
18.
  - a. Attach as Exhibit No. C a statement as to whether program deliveries are to be intermittent or regularly scheduled, and the average number of hours, per day week and or month during which the foreign station(s) involved will broadcast such progra
  - b. Attach as Exhibit No. D a detailed description of the nature and character of the programming proposed and the language to be employed.
19. **Anti-Drug Abuse Act Certification.** Assignee/transferee certifies that neither assignee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.
20. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this applicant a Model EEO Program Report on FCC Form 396-A.

CERTIFICATION

The APPLICANT acknowledges that all statements contained in this application and attached exhibits are material representations, and that the exhibits forming a part of this application are incorporated herein as if set out in full in the application. The undersigned certifies that the statements contained in this application are true, complete and correct to the best of his/her knowledge and belief and are made in good faith.

Signed and dated this 28 day of July, 2020.

H&H Group USA LLC  
(Name of Applicant)

By

  
(Signature)

President

(Title)

Vivian Huo

WILLFUL FALSE STATEMENTS MADE ON THIS FORM  
ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.

EXHIBITS furnished as required by this form:

| Exhibit No. | Para. No of form | Name of officer or employee(1) by whom or(2) under whose direction exhibit was prepared (show which) | Official Title |
|-------------|------------------|--|----------------|
| A-G         |                  | All exhibits were prepared under the direction of Vivian Huo, President of H&H Group USA LLC.        |                |

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Month/Year

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**APPLICATION FOR PERMIT TO DELIVER PROGRAMS TO FOREIGN BROADCAST STATIONS**  
(Carefully read instructions before filling out Form-RETURN ONLY FORM TO FCC)

1. Name of Applicant Street Address or P.O. Box City State Zip Code Telephone No.

**GLR  
Southern  
California  
, LLC**                      **6 The Drawbridge**                      **Woodbury, NY 11797**                      **516-921-8668**

2. Name and address to whom communication should be sent if different from item 1.

Name Street Address or P.O. Box City State Zip Code Telephone No.  
(include area code)

3. Legal identity of applicant: (only check one box)

Individual     Partnership     Corporation     Government Entity     Other

If other specify:

4. Application is for:     New Authorization                       Extension of Existing Authority

5. If applicant is an individual, is applicant a citizen of the United States?     YES     NO

6. If applicant is a partnership, are all partners citizens of the United States:     YES     NO

7. If applicant is a corporation:

a. Under laws of what state was it organized:

b. Is more than one-fifth of the capital stock of the corporation owned of record or may it be voted by aliens or their representatives or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?     YES     NO

c. Is any officer or director of the corporation an alien?     YES     NO

If the answer is Yes, give the following for each:

**Name                                      Nationality                                      Position**

FCC 308  
Month/Year

d. Is applicant directly or indirectly controlled by any other corporation?  YES  NO

If the answer is Yes, give the following for the controlling corporation

| Name | Address | State in which organized |
|------|---------|--------------------------|
|------|---------|--------------------------|

e. Is more than one-fourth of the capital stock of the controlling corporation either owned of record, or may it be voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?  YES  NO

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If the answer is Yes, give the name, nationality and position of each and give the total number of directors of the corporation.

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|-------------------------|----------------------------------|
| See Exhibit A           |                                  |

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YES  NO

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YES  NO

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b. List all call signs of private transmitters in the United States  
**N/A**

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  - a. Attach as Exhibit No   C   a statement as to whether program deliveries are to be intermittent or regularly scheduled, and the average number of hours, per day week and or month during which the foreign station(s) involved will broadcast such program.
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Signed and dated this   28   day of   July  , 20  .

GLR Southern California, LLC  
(Name of Applicant)

By

  
(Signature)

President  
(Title)

Vivian Huo

WILLFUL FALSE STATEMENTS MADE ON THIS FORM  
ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.

EXHIBITS furnished as required by this form:

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| A-G         |                  | All exhibits were prepared under the direction of Vivian Huo, President of GLR Southern California, LLC |                |

Form 308 (Page 6)  
Month/Year

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Phoenix Radio US, Inc. 3810 Durbin Street Irwindale, CA 91706 (626) 388-1100

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Name Street Address or P.O. Box City State Zip Code Telephone No.  
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3. Legal identity of applicant: (only check one box)

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If other specify:

4. Application is for:  New Authorization  Extension of Existing Authority

5. If applicant is an individual, is applicant a citizen of the United States?  YES  NO

6. If applicant is a partnership, are all partners citizens of the United States:  YES  NO

7. If applicant is a corporation:

a. Under laws of what state was it organized:

Delaware

b. Is more than one-fifth of the capital stock of the corporation owned of record or may it be voted by aliens or their representatives or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?  YES  NO

c. Is any officer or director of the corporation an alien?  YES  NO

If the answer is Yes, give the following for each:

| Name          | Nationality | Position |
|---------------|-------------|----------|
| See Exhibit A |             |          |

FCC 308  
Month/Year

d. Is applicant directly or indirectly controlled by any other corporation?  YES  NO

If the answer is Yes, give the following for the controlling corporation

| <b>Name</b>   | <b>Address</b> | <b>State in which organized</b> |
|---------------|----------------|---------------------------------|
| See Exhibit A |                |                                 |

e. Is more than one-fourth of the capital stock of the controlling corporation either owned of record, or may it be voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?  YES  NO

f. Is any officer or more than one-fourth of the directors of the corporation an alien?  YES  NO

If the answer is Yes, give the name, nationality and position of each and give the total number of directors of the corporation.

| <b>Name</b>   | <b>Nationality</b> | <b>Position</b> | <b>Number of Directors</b> |
|---|--------------------|-----------------|----------------------------|
| There are officers and more than one-fourth of the directors of the controlling corporation, Phoenix Media Investment (Holdings) Limited, that are aliens. See Exhibit A. |                    |                 |                            |

g. Is the above-described controlling corporation in turn a subsidiary?  YES  NO

If the answer is Yes, attach as Exhibit No. \_\_\_\_ additional information answering the holding company questions in this paragraph for each company, including the organization having ultimate control.

8. a. If the applicant is an unincorporated association, give the following:

| <b>Total number of members</b> | <b>Number of Alien Members (If any)</b> |
|--------------------------------|---|
|--------------------------------|---|

b. State the following for alien officers or directors (if any):

| <b>Name</b> | <b>Nationality</b> | <b>Position</b> |
|-------------|--------------------|-----------------|
|-------------|--------------------|-----------------|

9. a. What is applicant's principal business? Providing radio programming and selling advertising

b. Does applicant or any party to this application have any interest in, or connection with, any AM, FM, or TV broadcast station (either domestic or foreign), or any application pending before the Commission?

YES  NO

If the answer is Yes, attach Exhibit No. \_\_F\_\_ giving full particulars.

10. Is applicant a representative of an alien or of a foreign government?

YES  NO

If the answer is Yes, explain.

Phoenix Radio US, Inc. is an indirect subsidiary of Phoenix Media Investment (Holdings) Limited, which is a publicly traded company listed on The Stock Exchange of Hong Kong Limited. See Exhibit A for more information.

11. a. Has any radio station authorization previously issued to the applicant or party to this application been revoked, either by the Commission or by any court?

YES  NO

b. Has any previous application by the applicant or party to this application been denied by the Commission or by a predecessor agency?

YES  NO

If the answer to (a ) and/or (b) is Yes, explain:

See Exhibit G

12. a. Has applicant or any party to this application been found guilty of any felony by any court?

YES  NO

b. Has applicant or any party to this application been finally adjudged guilty by a federal court of the violation of the laws of the United States relating to unlawful monopoly, restraint of trade, and or unfair methods of competition?

YES  NO

If the answer to (a ) and or (b) is Yes, explain.

13. a. Address of studio or other place at which programs will originate:  
3810 Durbin Street, Irwindale, CA 91706

b. Telephone contact number:  
(626) 388-1100

c. Email address:  
xiaoyong@phoenixtv-us.com

14. State ownership of originating facilities  
Phoenix Radio US, Inc. (owns the studio building from which most of the programming will originate upon grant of this application)

15. a. Describe the means whereby programs will be delivered to foreign station(s), including the names of any interconnecting common carriers.

**Means of Transmissions include but are not limited to the following:**

- Dedicated Wireline
- Internet (IP)
- Public Switched Telephone Network (PSTN)
- Private Microwave
- Private Radio (remote pickup)
- Common Carrier Microwave
- Common Carrier Radio
- Satellite
- Or combination of methods

b. List all call signs of private transmitters in the United States  
N/A

| Call Sign | Company Name |
|-----------|--------------|
|           |              |
|           |              |
|           |              |
|           |              |
|           |              |
|           |              |

16. ( Coordinated foreign station to which programs will be provided:

Call sign: **XEWW-AM** City: **Rosarito, Baja California Norte, Mexico**

AM Station

Frequency (kHz): **690**  
Coordinates: **32° 17' 52" NL** Daytime **117° 01' 48" WL** Nighttime **32° 17' 52" NL** **117° 01' 48" WL**

Operating power: **77 kW** **60 kW**

FM Station:

Frequency: Channel: Class:

Mode of operation: Directional/Non-directional

Maximum Effective Radiated Power (kW):

Coordinates ° ' " NL ° ' " WL

Antenna Height Above Average Terrain (HAAT):

Antenna Radiation Center Above Mean Sea Level (RCAMSL):

TV Station:

Channel:

Mode of operation: Directional/Non-directional

Maximum Effective Radiated Power (kW):

Coordinates ° ' " NL ° ' " WL

Antenna Height Above Average Terrain (HAAT):

Antenna Radiation Center Above Mean Sea Level (RCAMSL):

17. Attach as Exhibit No. B a full explanation of the legal relationship between the applicant and foreign station(s) involved, including a copy of contract (if any) with foreign station(s).
18.
  - a. Attach as Exhibit No. C a statement as to whether program deliveries are to be intermittent or regularly scheduled, and the average number of hours, per day week and or month during which the foreign station(s) involved will broadcast
  - b. Attach as Exhibit No. D a detailed description of the nature and character of the programming proposed and the language to be employed.
19. **Anti-Drug Abuse Act Certification.** Assignee/transferee certifies that neither assignee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.
20. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this applicant a Model EEO Program Report on FCC Form 396-A.

CERTIFICATION

The APPLICANT acknowledges that all statements contained in this application and attached exhibits are material representations, and that the exhibits forming a part of this application are incorporated herein as if set out in full in the application. The undersigned certifies that the statements contained in this application are true, complete and correct to the best of his/her knowledge and belief and are made in good faith.

Signed and dated this 28 day of July, 2020

Phoenix Radio US, Inc.  
(Name of Applicant)

By Xiaoyong Wu  
(Signature)

CEO  
(Title)

Xiaoyong Wu

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE, TITLE 18, SECTION 1001.

EXHIBITS furnished as required by this form:

| Exhibit No. | Para. No of form | Name of officer or employee(1) by whom or(2) under whose direction exhibit was prepared (show which) | Official Title |
|-------------|------------------|--|----------------|
| A-G         |                  | All exhibits were prepared under the direction of Xiaoyong Wu, CEO of Phoenix Radio US, Inc.         |                |

**Alien Ownership**

There is no alien ownership of GLR Southern California, LLC or H&H Group USA LLC. GLR Southern California, LLC is a Delaware limited liability company which is 100% owned by H&H Group USA LLC, a New York limited liability company. Vivian Huo, a U.S. citizen owns 97% of the membership interests in H&H Group USA LLC. Julian Sant, a U.S. citizen owns 3% of the membership interests in H&H Group USA LLC.

Phoenix Radio US, Inc. is a Delaware corporation. Xiaoyong Wu, a citizen of China, is the only officer or director of Phoenix Radio US, Inc., and serves as Chief Executive Officer, Secretary, and Chief Financial Officer of the company. Phoenix Radio US, Inc. is a wholly-owned subsidiary of Phoenix Satellite Television (U.S.) Inc. The address for Phoenix Radio US, Inc. is:

3810 Durbin Street  
Irwindale, CA 91706

Phoenix Satellite Television (U.S.) Inc. ("Phoenix-US") is a Delaware corporation that was incorporated in September 2000. Xiaoyong Wu, a citizen of China, is the President and Chief Executive Officer of Phoenix-US. Ka Keung Yeung, a citizen of the United Kingdom and the Hong Kong Special Administrative Region, is the Secretary and Treasurer of Phoenix-US. Phoenix-US is a wholly-owned subsidiary of Phoenix Media Investment (Holdings) Limited. The address for Phoenix-US is:

3810 Durbin Street  
Irwindale, CA 91706

Phoenix-US has the following three directors:

| <b>Name</b> | <b>Citizenship</b>                      | <b>Position</b>                              |
|-------------|---|--|
| Xiaoyong Wu | China                                   | President, Chief Executive Officer, Director |
| Changle Liu | Hong Kong Special Administrative Region | Director                                     |
| Keung Chui  | Hong Kong Special Administrative Region | Director                                     |

Phoenix-US has provided television programming to cable television and satellite television systems throughout the United States for many years. To the best of Applicants' knowledge, no issues have been raised about the nature or content of this programming. Phoenix-US' television channel began broadcasting on the DIRECTV satellite television platform in November 2000. The content of Phoenix TV's programs is different from those of the Chinese mainland, Taiwan, and Hong Kong television channels that already existed in the United States. It provided a fresh "alternative option" to the Chinese-speaking audience in the United States. Shortly after Phoenix TV entered the United States market, major television broadcasting platforms conducted a questionnaire survey with their Chinese-speaking audience and the result indicated that more than 80 percent of the respondents wanted to watch Phoenix TV. As a result, mainstream television broadcasting platforms soon entered into agreements with Phoenix TV to incorporate Phoenix TV's programs into their broadcasting platforms. These platforms included, but are not limited to: DIRECTV, DISH Network, Comcast, Charter Communications (Spectrum), AT&T, Verizon, Cox Cable, and Cablevision. Phoenix TV is the largest Chinese language television service provider in the United States and Canada, broadcasts three channels 24/7, and has more than 200,000 subscribers on cable and satellite systems.

Phoenix-US' television programming is audience-oriented. Phoenix-US commits itself to truthful reporting, and insists on independence and media dignity. This is why programs of Phoenix-US are well received by the Chinese-speaking audience. These qualities and achievements make Phoenix-US stand out among Chinese language media services in North America, distinguished from government-run media services.

Phoenix Media Investment (Holdings) Limited ("Phoenix-HK") is a publicly traded company incorporated in the Cayman Islands and listed on The Stock Exchange of Hong Kong Limited in Hong Kong. The company was launched in 1996 by Today's Asia Limited (Changle Liu's company), Hong Kong Satellite Television Co., Ltd. (a subsidiary of StarTV Holdings and an indirect subsidiary of Rupert Murdoch's News Corporation), and China Wise International Limited (an advertising sales company in Hong Kong commissioned by China Central Television). They entered into an agreement to establish Phoenix Satellite TV to develop a Chinese television channel platform. Today's Asia Limited and StarTV Holdings each held an interest in 45 percent of the shares and China Wise International Limited owned 10 percent of the shares.<sup>1</sup> Changle Liu was appointed as the Chairman of the Board and Chief Executive Officer. The company's first television channel, Phoenix Satellite Television Chinese Channel, started broadcasting in Hong Kong on March 31, 1996. It is a private commercial satellite television station. Its headquarters is located in Hong Kong. In 2000, Phoenix-HK went public through an initial public offering and was listed on the Growth Enterprise Market in Hong Kong. After that, all the changes to the company's shareholder structure became public information. The company transferred the listing of its shares to the Main Board of The Stock Exchange of Hong Kong Limited in December 2008.

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<sup>1</sup> In 1999, Bank of China, through a subsidiary, acquired the entire issued share capital of the holding company of China Wise International Limited.



The largest shareholders of Phoenix-HK are the following entities:

| <b>Shareholder Name</b>                         | <b>Percentage of Publicly Traded Shares Held<sup>2</sup></b> |
|---|--|
| Today's Asia Limited <sup>(1)</sup>             | 37.33%   |
| Extra Step Investments Limited <sup>(2)</sup>   | 19.69%   |
| TPG China Media, L.P. <sup>(3)</sup>            | 12.16%   |
| China Wise International Limited <sup>(4)</sup> | 8.25%  |

(1) Today's Asia Limited is a limited liability company incorporated in Hong Kong that is 100% beneficially owned by Changle Liu, a citizen of the Hong Kong Special Administrative Region. Today's Asia Limited owns 1,864,246,000 shares of Phoenix-HK, shareholding 37.33%, (Changle Liu owns 0.05% of the shares of Phoenix-HK directly). Changle Liu's investments in China and overseas include broadcasting, petroleum, infrastructure construction, real estate development, trading, and cultural businesses.

(2) Extra Step Investments Limited, a Hong Kong company, is a wholly-owned subsidiary of China Mobile (Hong Kong) Group Limited, which in turn is a subsidiary of China Mobile Communications Group Co., Ltd. ("China Mobile"). Extra Step Investments Limited owns 983,000,000 shares of Phoenix-HK, shareholding 19.69%. Under The Securities and Futures Ordinance of the Laws of Hong Kong ("SFO"), China Mobile and China Mobile (Hong Kong) Group Limited are deemed to be the ultimate beneficial owner in the 983,000,000 shares held by Extra Step Investments Limited.

(3) TPG China Media, L.P., a Delaware Limited Partnership, is controlled by TPG Asia Advisors VI DE, Inc., which in turn is ultimately controlled by David Bonderman and James G. Coulter. Mr. Bonderman and Mr. Coulter are co-founders TCP Capital (formerly the Texas Pacific Group), a US-based company that is one of the world's largest private equity firms. TPG China Media, L.P. owns 607,000,000 shares of Phoenix-HK, shareholding 12.16%. Under the SFO, TPG Asia Advisors VI DE, Inc., Mr. Bonderman, and Mr. Coulter are all deemed to be the ultimate beneficial owner of the 607,000,000 shares held by TPG China Media, L.P.

(4) China Wise International Limited, a British Virgin Islands company, is a wholly-owned subsidiary of Cultural Developments Limited, which in turn is a wholly-owned subsidiary of Bank of China Group Investment Limited. Bank of China Group Investment Limited is a wholly-owned subsidiary of Bank of China Limited ("Bank of China"), which in turn is a subsidiary of Central Huijin Investment Ltd., which in turn is a wholly-owned subsidiary of China Investment Corporation. China Wise International Limited owns 412,000,000 shares of Phoenix-HK, shareholding 8.25%. Under the SFO, Central Huijin Investment Ltd., Bank of China, Bank of China Group Investment Limited, and Cultural Developments Limited are all deemed to be the ultimate beneficial owner of the 412,000,000 shares held by China Wise International Limited.

<sup>2</sup> Percentages based on publicly available data reviewed on July 3, 2020.

Extra Step Investments Limited, TPG China Media, L.P., and China Wise International Limited are three investors of Phoenix-HK, all being strategic shareholders and financial investors. Although with Chinese capital investment, Extra Step Investments Limited and China Wise International Limited are similar to TPG China Media, L.P., focusing on the effectiveness of Phoenix-HK's operations and financial results. None of these three investors have sent personnel to participate in Phoenix-HK's daily operations on Phoenix TV, and they have never been able to interfere with the editorial policy of Phoenix TV news.

Except for the entities and individuals listed in the chart and notes above, no other shareholder individually, or in combination with any other direct or indirect interests, holds more than 5 percent of the shares of Phoenix-HK. Extra Step Investments Limited and China Wise International Limited, with a combined percentage ownership of less than 28 percent of the shares of Phoenix-HK, are linked *indirectly* to the government of the People's Republic of China through ownership interests that it holds in China Mobile and Bank of China. China Mobile is a Chinese state wholly-owned and controlled company. Bank of China is a subsidiary of Central Huijin Investment Ltd., which is a Chinese wholly state-owned investment company incorporated under the Company Law of the People's Republic of China.<sup>3</sup> Central Huijin Investment Ltd. does not conduct any other commercial activities and does not interfere with the day-to-day business operations of Bank of China.<sup>4</sup> Neither Extra Step Investments Limited nor China Wise International Limited has ever been involved in any way in the daily operations the television or radio services that Phoenix-HK or its subsidiaries provide. The vast majority (more than 72 percent) of shares of Phoenix-HK are owned by shareholders that have *no* known linkage to the government of the People's Republic of China or to the Chinese Communist Party.

The activities of Phoenix-HK and its subsidiaries, including Phoenix-US and Phoenix Radio US, Inc., are not supervised, controlled, or directed by the government of the People's Republic of China or the Chinese Communist Party. On the contrary, the programming content of Phoenix-HK often differs from the programming provided by broadcasters on the Chinese mainland. For example, when the U.S. was attacked on September 11, 2001, Phoenix-HK provided 60 hours of live coverage, while the Chinese state broadcaster, China Central Television, waited hours to report the news and gave the event only three minutes of airtime. According to the Washington Post, Phoenix-HK's reporting of September 11<sup>th</sup> "sealed its reputation as a faster, more truthful alternative to CCTV."<sup>5</sup> Phoenix-HK also has shown its independence by providing critical

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<sup>3</sup> See Central Huijin Investment Ltd., Governance, <http://www.huijin-inv.cn/huijineng/Governance/index.shtml>.

<sup>4</sup> See *id.* (stating that Central Huijin Investment Ltd. "shall not conduct any other commercial activities, and shall not interfere with the day-to-day business operations of the state-owned major financial enterprises it controls.").

<sup>5</sup> See Philip P. Pan, *Making Waves, Carefully, on the Air in China*, Washington Post, Sept. 19, 2005, <https://www.washingtonpost.com/archive/politics/2005/09/19/making-waves-carefully-on-the-air-in-china/3f57584b-bf84-4dc1-a0f3-2ae049b423df/> (last visited July 20, 2020) (Phoenix "is most aggressive in its reporting of world events, and sealed its reputation as a faster, more truthful alternative to CCTV after the Sept. 11, 2001, terrorist attacks in the United States. While CCTV waited hours to report the news, Phoenix went live within minutes and replaced regular programming with 24-hour coverage.").

reports and documentaries on dark moments in the Chinese Communist Party’s past.<sup>6</sup> Phoenix-HK covers news that has been censored in state media and reports on material on the Internet that is not accessible on the Chinese mainland.<sup>7</sup> Censors in China occasionally block Phoenix-HK’s signal.<sup>8</sup> When the presidential election in Taiwan took place in 2016, government-run television services in China were not allowed to cover or report on it, but Phoenix-HK covered the whole process live. Except for the indirect stock interests referenced above, the activities of Phoenix-HK and its subsidiaries are not financed or subsidized by the government of the People’s Republic of China or the Chinese Communist Party. The overall process of Phoenix Radio US, Inc.’s and Phoenix-US’ program and news production is not under the leadership, influence, or control of the government of the People’s Republic of China.

Phoenix-HK has the following directors:

| <b>Name</b>            | <b>Citizenship</b>   | <b>Title</b>  |
|------------------------|--|---|
| Changle Liu            | Hong Kong Special Administrative Region                              | Chairman, Chief Executive Officer, Executive Director |
| Keung Chui             | Hong Kong Special Administrative Region                              | Deputy CEO, Executive Director                        |
| Ji Yan Wang            | Hong Kong Special Administrative Region                              | Executive Director                                    |
| Qin Jian               | People’s Republic of China   | Non-executive Director                                |
| Dong Zhang             | People’s Republic of China   | Non-executive Director                                |
| Tao Huang              | People’s Republic of China   | Non-executive Director                                |
| Qiang Chang Sun        | Hong Kong Special Administrative Region                              | Non-executive Director                                |
| Hok Lim Leung          | Hong Kong Special Administrative Region                              | Independent Non-executive Director                    |
| Thaddeus Thomas Beczak | United States of America and Hong Kong Special Administrative Region | Independent Non-executive Director                    |

<sup>6</sup> *See id.* (Phoenix “regularly challenges the party’s control of information with critical reports and documentaries on dark moments in the party’s past.”)

<sup>7</sup> *See id.* (“On one of its most popular shows, a commentator reviews headlines from newspapers around the world -- and slips in news that has been censored in state media. A similar show covers material on the Internet that is inaccessible on the mainland. Another program is modeled after CBS’s ‘60 Minutes’ and has probed China’s AIDS epidemic and rural unrest.”).

<sup>8</sup> *See id.* (“... Phoenix pushes so hard that censors occasionally block its signal.”).

|              |   |                                    |
|--------------|---|------------------------------------|
| Fenglei Fang | Hong Kong Special Administrative Region | Independent Non-executive Director |
| Di He        | Hong Kong Special Administrative Region | Independent Non-executive Director |

The address for Phoenix-HK is:

No. 2-6 Dai King Street  
 Tai Po Industrial Estate  
 Tai Po, New Territories  
 Hong Kong

On March 13, 2019, the U.S. Department of Justice (“DOJ”) sent a letter to Phoenix-US, and its Hong Kong parent company, Phoenix-HK. The letter posed a series of questions at the issue of whether Phoenix-US may be required to register under the Foreign Agents Registration Act (“FARA”). Phoenix-US and Phoenix-HK obtained an opinion of counsel that they are not a representative of a foreign government as that has been defined by FARA. In the spirit of cooperation, however, Phoenix-US and Phoenix-HK voluntarily responded to the inquiries on April 10, 2019.

On June 19, 2020, the DOJ sent a letter seeking additional information from Phoenix-US and Phoenix-HK to assist the DOJ to determine whether they are required to register under FARA. Phoenix-US and Phoenix-HK provided a response to the DOJ on July 17, 2020. As of the date of this application, neither Phoenix-US, nor Phoenix-HK, nor Phoenix Radio US, Inc. has received a demand to register under FARA.

**Legal Relationship with Foreign Station**

GLR Southern California, LLC, a Delaware limited liability company, is a wholly-owned subsidiary of H&H Group USA LLC, a New York limited liability company.

GLR Southern California, LLC currently owns 49.00% of the issued and outstanding shares in W3 Comm Concesionaria, S.A. de C.V. (“W3 Comm Concesionaria”), the licensee of Mexican radio station XEWW-AM, Rosarito, Baja California Norte, Mexico (the “Station”). GLR Southern California, LLC also owns 99% of the equity of W3 Comm Inmobiliaria, S.A. de C.V. (“W3 Comm Inmobiliaria”) which holds the operating assets of the Station in Mexico. GLR Southern California, LLC currently provides programming to the Station pursuant to that certain Station Programming and Sales Agreement dated January 25, 2006 between GLR Southern California, LLC, W3 Comm Concesionaria, and Careva, S.A. de C.V. which, through an intermediate company, owns the controlling interest in W3 Comm Concesionaria (“Programming Agreement”), a copy of which is currently on file with the Commission.<sup>1</sup>

Phoenix Radio US, Inc. proposes to provide programming to the Station pursuant to a station programming and sales agreement dated April 18, 2018 between H&H Group USA LLC and Phoenix Radio US, Inc. (“Programming and Sales Agreement”).<sup>2</sup> Through the Programming and Sales Agreement, H&H Group USA LLC and GLR Southern California, LLC retain ultimate control over the content broadcast by Phoenix Radio US, Inc. from the Station, and Phoenix Radio US, Inc. must comply with programming standards set by H&H Group USA LLC and GLR Southern California, LLC. H&H Group USA LLC and GLR Southern California, LLC have the right to preempt Phoenix Radio US, Inc.’s programming in certain situations, including where Phoenix Radio US, Inc. fails to comply with the programming standards. Phoenix Radio US, Inc. has no right to continue transmitting from the Station following termination of the Programming and Sales Agreement. Phoenix Radio US, Inc. holds no ownership interest in the Station and holds no ownership interest in H&H Group USA LLC or GLR Southern California, LLC. The nature of the relationship between Phoenix Radio US, Inc. and H&H Group USA LLC

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<sup>1</sup> See *GLR Southern California, LLC*, IBFS File No. 325-NEW-20061102-00007, Application Exhibit No. 4.

<sup>2</sup> The Programming and Sales Agreement, including all amendments to that agreement, is already on file with the Commission in IB Docket No. 19-144 submitted pursuant to a protective order granted by the International Bureau. See *GLR Southern California, LLC Application for a Section 325(c) Permit to Deliver Programs to Foreign Broadcast Stations for Delivery of Mandarin Chinese Programming to Mexican Station XEWW-AM, Rosarito, Baja California Norte, Mexico*, Protective Order, 34 FCC Rcd 3729 (2019). The copies of the Programming and Sales Agreement submitted pursuant to the protective order are hereby incorporated into this application by reference, subject to the provisions of the confidentiality request under which it was filed.

or GLR Southern California, LLC has been fully and extensively documented to the FCC in connection with the FCC Form 308 application filed June 13, 2018, in numerous pleadings filed with the FCC in connection with that application, and through thousands of documents produced to the FCC on March 22 2019 in connection with the International Bureau's Request for Production of Documents.

Although the Programming and Sales Agreement remains in place, the parties have stopped originating content for the Station in the United States to comply with the FCC's June 22, 2020 Order. All programming now broadcast on the Station originates from outside the United States pending action on the present application, Applicants' simultaneously filed request for Special Temporary Authority, or the petition for reconsideration filed by H&H Group USA LLC and GLR Southern California, LLC.

**H&H Group USA LLC *et al.***

**FCC Form 308**

**Exhibit C**

**July 2020**

**Schedule and Quantity of Program Deliveries**

The programming that is the subject of this application will be transmitted by Station XEWW-AM on a regular basis, 24 hours/day, 7 days/week.

**Nature and Character of Programming**

H&H Group USA LLC, GLR Southern California, LLC, and Phoenix Radio US, Inc. (collectively, “Applicants”) propose to provide a full range of Mandarin Chinese-language programming on station XEWW-AM (the “Station”), including music, entertainment, weather reports, local (Los Angeles) traffic reports, and local Chinese community news. The proposed programming will be intended for the Chinese-American community in southern California. Forty percent of the total programming over the course of a week will be music, punctuated by commercials and station identifications. The music will featuring Chinese-language songs from the Chinese mainland, Taiwan and Hong Kong. The remaining programming will include news, information content, and entertainment programs. For the most part, this content will address local issues in southern California (e.g., local traffic and weather), as well as entertainment and programming about lifestyle matters such as shopping, food, life insurance, and investment. The non-music content will be produced by Phoenix Radio US, Inc. at its studio in California. News headlines will be broadcast as part of world news updates. These will be drawn from a variety of reputable sources, including news sources from Hong Kong and Taiwan, as well as internationally recognized providers in the United States, such as the Associated Press, Reuters, the Los Angeles Times, NPR, and the BBC. This programming was broadcast from the Station until the FCC dismissed the request for Special Temporary Authority. To the best of Applicants’ knowledge, no objections about the nature of the programming were submitted to the FCC, and the FCC never raised any issues about that programming with the Applicants. A representative sampling of that programming was provided to the International Bureau on March 22, 2019 in response to its Request for Production of Documents, so the International Bureau is fully aware of the nature of the programming and its production. Applicants request that this material be incorporated by reference subject to the provisions of the confidentiality request under which it was filed.



**Public Interest Statement**

The Commission should find that the “public interest, convenience, and necessity would be served” by granting this application of H&H Group USA LLC, GLR Southern California, LLC, and Phoenix Radio US, Inc. (collectively, “Applicants”) pursuant to Section 309(a) of the U.S. Code and should grant the application for the following reasons.<sup>1</sup>

The programming proposed for XEWW-AM (the “Station”) would be responsive to the needs of the local community in southern California. There are more than 600,000 Chinese Americans living in the Los Angeles and San Diego areas, which is the area that the Station would cover. Chinese language programming is of interest to the local audience in these areas. The Station would provide programming to meet this need. From July 25, 2018 to June 22, 2020, the Station, pursuant to an STA, broadcasted Mandarin Chinese-language programming and had numerous listeners and advertisers. During that time, Phoenix Radio US, Inc. gave away free concert or movie tickets on air. Every time it did this, the tickets were claimed within five minutes. People who called to get the tickets were from all over the coverage area. Another indication of the listener rating and station popularity is the number of contracts Phoenix Radio US, Inc. signed with advertisers. Advertisers included the U.S. Census Bureau, Toyota, Lexus, General Motors, Hyundai, and many insurance companies. To the best of Applicants’ knowledge, other than issues raised by Chinese Sound of Oriental and West Heritage Inc. in its Petition to Deny and related filings regarding the Section 325(c) permit application filed in 2018 by GLR Southern California, LLC and H&H Group USA LLC, Applicants are unaware of any formal complaints being submitted to the FCC regarding the radio programming during that time. People liked the radio programs and they called in to express their praise and tell Phoenix Radio US, Inc. what they want. In addition, the Station would promote diversity of voices in radio programming.

Granting the application would support the FCC’s goal of diversifying media ownership and would provide economic opportunity for a business owned by a woman who is also a member of a minority group. During his tenure as Chairman of the FCC, Chairman Pai has repeatedly emphasized the importance of diversity in telecommunications, and has said that his “highest priority would be bringing the benefits of the digital age to all Americans—regardless of race, gender, religion, sexual orientation, or anything else.”<sup>2</sup> Vivian Huo, the owner of H&H Group

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<sup>1</sup> 47 U.S.C. § 309(a).

<sup>2</sup> See *Remarks of FCC Chairman Ajit Pai at the Advisory Committee on Diversity and Digital Empowerment Broadcast Symposium* (Mar. 7, 2019), <https://docs.fcc.gov/public/attachments/DOC-356473A1.pdf>. See also *Rules and Policies to Promote New Entry and Ownership Diversity in the Broadcasting Services*, Report and Order, 33 FCC Red 7911 (2017) (statement of Chairman Ajit Pai).

USA LLC, is a woman and an Asian American. Grant of the application would be to the benefit of a woman-owned and minority-owned business and would promote diversity in broadcasting.

The arrangement among the Applicants concerning the operations of the Station is well-known to the FCC through the Station's operations for nearly two years pursuant to the Special Temporary Authority, through the numerous pleadings filed in connection with the Form 308 application filed on June 13, 2018, and in connection with the thousands of documents produced by H&H Group USA LLC and GLR Southern California, LLC, with the cooperation of Phoenix Radio US, Inc., on March 22, 2019 in connection with the International Bureau's Request for Production of Documents. The arrangement among the Applicants has likely been subject to more scrutiny by the International Bureau than any previous proposal to originate programming pursuant to a Form 308 application. The Applicants have been fully transparent, and their arrangement and the proposed programming is thus well known to the International Bureau.

There have been no substantive questions raised about the programming or the arrangement among the Applicants that have not already been addressed with the FCC. The Applicants and their employees have First Amendment rights to freedom of speech and freedom of the press. They should be able to access the airwaves to provide news and information content. A government entity, such as the FCC, may not limit their freedom of speech or freedom of the press. Nor can the FCC discriminate against one applicant airing programming that is from a commercial, publicly-traded company that happens to have a headquarters in Hong Kong, when it has granted multiple applications of U.S. radio stations that are airing programming produced by companies directly controlled by foreign governments, including the government of the People's Republic of China. The entertainment and lifestyle programming that is carried on the Station poses no threat to U.S. interests or national security, and the programming serves the needs of the Mandarin Chinese-speaking population of southern California. This application should expeditiously be granted.

**H&H Group USA LLC *et al.***

**FCC Form 308**

**Exhibit F**

**July 2020**

**Response to Form 308 Question 9b**

Other than their interest in XEWW-AM, as described in Exhibit B to this application, H&H Group USA LLC and GLR Southern California, LLC hold no interests in other broadcast stations (domestic or foreign), or any other application pending before the Commission.

**H&H Group USA LLC et al.**

**FCC Form 308**

**Exhibit G**

**July 2020**

**Response to Form 308 Question 11**

Applicants have never been a party to an application that has been denied by the Commission nor have they ever held an authorization that has been revoked by the Commission or any court. As the International Bureau is aware, H&H Group USA LLC and GLR Southern California, LLC were parties to an application for a Section 325(c) permit and request for renewal of a previously granted Special Temporary Authority, which were both dismissed without prejudice to refile by the International Bureau in an Order dated June 22, 2020.<sup>1</sup> On July 22, 2020, H&H Group USA LLC and GLR Southern California, LLC filed a petition for reconsideration of the International Bureau's June 22 Order.<sup>2</sup>

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<sup>1</sup> See *GLR Southern California; Application for a Section 325(c) Permit to Deliver Programs to Foreign Broadcast Stations for Delivery of Mandarin Chinese Programming to Mexican Station XEWW-AM, Rosarito, Baja California Norte, Mexico, LLC*, Order, DA 20-649, IB Docket No. 19-144 (IB rel. Jun. 22, 2020).

<sup>2</sup> See *Petition for Reconsideration of H&H Group USA LLC and GLR Southern California, LLC*, IB Docket No. 19-144 (filed Jul. 22, 2020).

August 4, 2020

**VIA EMAIL**

Janice Shields  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Form 308 Application for Permit to Deliver Programs to Foreign  
Broadcast Stations – GLR Southern California, LLC*

Dear Ms. Shields:

On behalf of GLR Southern California, LLC (“GLR SC”) and GLR SC’s parent company H&H Group USA LLC (“H&H”), the undersigned file this letter to clarify responses to certain questions on FCC Form 308 for the 325(c) permit application submitted by H&H, GLR SC, and Phoenix Radio US, Inc. on July 28, 2020.

- **Question 3:** H&H and GLR SC clarify that both companies are limited liability companies (“LLCs”).
- **Question 8b:** H&H and GLR SC clarify that Ms. Vivian Huo is a U.S. citizen and is neither an alien nor a representative of an alien. H&H and GLR SC provided Ms. Huo’s name, nationality, and title in response to this question only out of an abundance of caution and did not intend to imply that there was alien control of either company.

Should you have any further questions regarding this matter, please contact the undersigned.

Sincerely,

/s/ Paige K. Fronabarger  
Paige K. Fronabarger  
David Oxenford  
Christopher D. Bair  
*Counsel to GLR Southern California, LLC  
and H&H Group USA LLC*

cc: Brandon Moss

August 7, 2020

**VIA EMAIL**

Janice Shields  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: Form 308 Application for Permit to Deliver Programs to Foreign Broadcast Stations**

Dear Ms. Shields:

On behalf of Phoenix Radio US, Inc. ("Phoenix Radio"), we file this letter to clarify the response to question 9b on FCC Form 308 for the Section 325(c) permit application submitted by GLR Southern California, LLC ("GLR"), H&H Group USA LLC, and Phoenix Radio on July 28, 2020. Phoenix Radio answered yes to question 9b because GLR, a party to the application, has an interest in XEWW-AM as explained in Exhibits B and F. Phoenix Radio, Phoenix Satellite Television (U.S.) Inc., and Phoenix Media Investment (Holdings) Limited do not have any interest in, or connection with, any AM, FM, or TV broadcast station (either domestic or foreign), or any application pending before the Commission.

If you have any further questions, please contact Steve Lederman at (202) 626-6283.

Sincerely,

/s/ Steven Lederman  
Steven Lederman  
James Hsu  
Squire Patton Boggs (US) LLP  
*Counsel to Phoenix Radio US, Inc.*

cc: Brandon Moss

August 10, 2020

**VIA EMAIL**

Janice Shields  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: *Form 308 Application for Permit to Deliver Programs to Foreign  
Broadcast Stations – GLR Southern California, LLC, et al.*

Dear Ms. Shields:

On behalf of GLR Southern California, LLC (“GLR SC”) and GLR SC’s parent company H&H Group USA LLC (“H&H”), and Phoenix Radio US, Inc. (“Phoenix,” and collectively with H&H and GLR SC, “Applicants”) the undersigned file this letter to correct a typographical error on FCC Form 308 for the Section 325(c) permit application submitted by Applicants on July 28, 2020. Specifically, in response to Question 16 on each FCC Form 308 submitted by Applicants, Applicants inadvertently listed the nighttime operating power as “60 kW.” Applicants file this letter to provide the correct nighttime operating power in response to Question 16 of FCC Form 308 which should read “50 kW.”

Should you have any further questions regarding this matter, please contact the undersigned.

Sincerely,

/s/ Steven Lederman  
Steven Lederman  
James Hsu  
SQUIRE PATTON BOGGS (US) LLP  
2550 M Street, NW  
Washington, D.C. 20037  
[steven.lederman@squirepb.com](mailto:steven.lederman@squirepb.com)  
(202) 626-6283  
*Counsel to Phoenix Radio US, Inc.*

/s/ Paige K. Fronabarger  
Paige K. Fronabarger  
David Oxenford  
Christopher D. Bair  
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(202) 383-3396  
*Counsel to GLR Southern California, LLC  
and H&H Group USA LLC*

cc: Brandon Moss