

## GLR SOUTHERN CALIFORNIA, LLC

January 28, 2019

VIA COURIER AND ECFS

Ms. Marlene Dortch Secretary  
Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20554

Re: Request for Extension of Special Temporary Authority to Deliver  
Programs to Foreign Broadcast Station XEWW-AM, Rosarito, Baja  
California Norte, Mexico – **EXPEDITED APROVAL REQUESTED**

Dear Ms. Dortch:

On July 24, 2018, the Commission granted GLR Southern California, LLC ("Authorization Holder") Special Temporary Authority ("Current STA") in FCC File No. 325-STA-20180710-00002 to deliver cross-border transmissions of broadcast programs to AM station XEWW in Rosarito, Baja California Norte, Mexico (the "Station") pursuant to Section 325(c) of the Communications Act of 1934, as amended, and Section 25.120 of the Commission's rules. The Current STA became effective July 25, 2018 and will continue during the period which the Commission is processing Authorization Holder's application for regular authority ("Underlying Application")<sup>1</sup> or 180 days, whichever comes first. The Underlying Application was filed on June 14, 2018 and remains pending as of the date of this filing. This request for extension (along with FCC Form 308) is submitted in the event that the underlying Application is not granted within the 180 day period (as may be extended by the FCC policies that apply to authorizations expiring during the partial government shutdown. *See*, Public Notice, Impact of Potential Lapse in Funding of Commission Operations, DA 19-10 (released January 2, 2019) (where, at Page 4, the Commission stated "Any STA expiring during the suspension of regular operations are extended to the day after regular Commission operations resume"). To ensure the continued ability of the Station to continue broadcast programming to listeners in the Los Angeles area during the period in which the Commission considers the Underlying Application, Authorization Holder hereby requests that the Commission extend the Current STA for so long as the Underlying Application remains pending. Extension of the Current STA will preserve the status quo and allow Authorization Holder to continue to deliver programming to the Station while the Commission considers the Underlying Application.

Extending the Current STA serves the public interest by enabling the Authorization Holder to continue to deliver Mandarin language programming to the Station, whose signals are consistently received in southern California. This, in turn, enables will allow more than 100,000 Mandarin-speaking potential listeners in the Los Angeles metro listening area to continue to hear

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<sup>1</sup> See, FCC File No. 325-NEW-20180614-00001 (filed June 14, 2018).

Mandarin language programming at no cost. The extension of the STA preserves the current service received by these listeners while the Underlying Application is being processed. The Commission has previously determined that the Station is eligible to receive programming from U.S. entities and has concluded that the Station is operating within its operating parameters and does not cause unlawful interference.<sup>2</sup>

As noted in the Underlying Application, the Station is currently licensed to W3 Comm Concesionaria, S.A. de C.V. ("W3 Comm Concesionaria"). Authorization Holder currently owns 49.00% of the issued and outstanding shares in W3 Comm Concesionaria and 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. Authorization Holder provides programming to the Station pursuant to a Station Programming and Sales Agreement dated January 25, 2006 ("Programming Agreement"), a copy of which is currently on file with the Commission.

There have been no changes in the technical operating parameters of the Station into the United States since 2007 when the Original Permit was granted (which includes the period since the Current STA has been in effect). W3 Comm Concesionaria remains the Authorization Holder of the Station and W3 Comm Inmobiliaria continues to own the Mexican operating assets.

Payment for the required filing fee is being submitted using the Commission's fee filer system. Should you have any questions regarding this matter, please contact the undersigned.

Sincerely,



Vivian Huo  
President

Enclosures

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<sup>2</sup> See, 325(c) permit granted March 2, 2007, and most recently renewed June 14, 2017 ("Original Permit"). [http://licensing.fcc.gov/ibfsweb/ib.page.FetchPN?report\\_key=1237293](http://licensing.fcc.gov/ibfsweb/ib.page.FetchPN?report_key=1237293) (Renewal application for prior permit (June 14, 2017)).

**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. (include area code)

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

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: Limited Liability Company

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

Requesting extension of STA granted in FCC File No. 325-STA-20180710-00002

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

6. If applicant is a partnership, are all partners citizens of the United States: N/A  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
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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
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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)
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See Exhibit A - two U.S. members

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

Name	Nationality	Position
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9. a. What is applicant's principal business? Radio program supplier

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.B\_\_ 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:

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:  
**516-921-8668**

c. Email address: **vhuo@hhcapitalpartners.com**

14. State ownership of originating facilities **GLR Southern California, LLC**

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

	<u>Daytime</u>	<u>Nighttime</u>
Coordinates:	32° 17' 52" NL	32° 17' 52" NL
	117° 01' 48" WL	117° 01' 48" WL

Operating power: 77 kW 50 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. C 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. D 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 programs.
  - b. Attach as Exhibit No. E 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 28th day of January, 20 19.

GLR Southern California, LLC

(Name of Applicant)

By



(Signature)

By: Vivian Huo

President

(Title)

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



**GLR Southern California, LLC  
FCC Form 308  
Exhibit A  
January 2019**

**Alien Ownership**

There is no alien ownership. Applicant, 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.

**Current Authorizations and Applications Pending Before the Commission**

On June 14, 2018, GLR Southern California, LLC, ("Applicant"), H&H Group USA LLC and GLR Southern California, LLC filed an Application for Permit to Deliver Programs to Foreign Broadcast Stations (FCC File No. 325-NEW-20180614-00001) to deliver cross-border transmissions of broadcast programs to AM station XEWW in Rosarito, Baja California Norte, Mexico (the "Station") pursuant to Section 325(c) of the Communications Act of 1934, as amended ("Underlying Application"). The Underlying Application remains pending before the Commission as of the date hereof.

On July 24, 2018, the Commission granted Applicant Special Temporary Authority ("Current STA") in FCC File No. 325-STA-20180710-00002 to deliver cross-border transmissions of broadcast programs the Station pursuant to Section 325(c) of the Communications Act of 1934, as amended, and Section 25.120 of the Commission's rules. The Current STA became effective July 25, 2018 and was to remain in effect during the period which the Commission is processing the Underlying Application for regular authority or 180 days, whichever comes first.

**Legal Relationship with Foreign Station**

GLR Southern California, LLC is a Delaware limited liability company ("Applicant") and a wholly-owned subsidiary of H&H Group USA LLC ("Parent").

Applicant 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"). Applicant 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. Applicant currently provides programming to the Station pursuant to that certain Station Programming and Sales Agreement dated January 25, 2006 between Applicant, W3 Comm Concesionaria, and Tregtimit, S. de R.L. de CV (as successor to 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.

**GLR Southern California, LLC  
FCC Form 308  
Exhibit D  
January 2019**

**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.

**GLR Southern California, LLC  
FCC Form 308  
Exhibit E  
January 2019**

**Nature and Character of Programming**

The Applicant proposes to provide a full range of Mandarin Chinese language programming on station XEWW-AM including music, entertainment, weather report, local (LA) traffic report and local Chinese community news. A detailed description of the programming has been described in pleadings filed with the Commission in connection with FCC File No. 325-NEW-20180614-00001).

**ANTI-DRUG ABUSE ACT CERTIFICATION**

GLR Southern California, LLC certifies that no party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

By:  By: Vivian Huo  
President

Date: January 28, 2019

Federal Communications Commission

**CERTIFICATE OF SERVICE**

I, Rhea Lytle, a legal secretary with the law firm of Wilkinson Barker Knauer, LLP, hereby certify that on this 28th day of January, 2019, I served copies of the foregoing "STA Renewal" on the following via first-class United States mail, postage prepaid:

Reid Avett  
Duane Morris, LLP  
505 9<sup>th</sup> Street, N.W., Suite 1000  
Washington, D.C. 20004-2166

James L. Winston  
Rubin, Winston, Diercks, Harris & Cooke, LLP  
1201 Connecticut Avenue, N.W., Suite 200  
Washington, D.C. 20036

Brandon Moss\*  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Janice Shields\*  
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445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

\*Via Email

  
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Rhea Lytle