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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

October 31, 2018

**Re: Update to Section 310(b) Petition for Declaratory Ruling, File No. ISP-PDR
20160209-00002**

Dear Ms. Dortch:

Channel 51 License Co LLC (“Channel 51 License Co”) is updating its Petition for Declaratory Ruling to exceed the foreign ownership limits in Section 310(b) of the Communications Act to report minor changes to investors’ equity interests in Channel 51, LLC (“Channel 51”). These changes stemmed from the Managing Member of Channel 51, Paul Chisholm, increasing his equity interest from 0.52% to 0.62% in response to questions from FCC staff and to demonstrate “sufficient financial stake in Channel 51.”¹ As a result of the changes, Channel 51’s total direct foreign ownership decreased from 58.22% to 58.17%, and Channel 51’s total foreign ownership decreased from 65.82% to 65.77%

Kindly contact me with any questions regarding this submission.

Respectfully submitted,

/s/ Trey Hanbury

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¹ See Channel 51 License Co LLC, Long-Form Application, FCC Form 601, ULS File No. 0007753604.