

**AMC Networks Broadcasting and Technology  
Stations E000220, E040445, E000597, E000228, and E010028  
FCC Form 312**

**APPLICATION FOR LICENSE MODIFICATION**

By the associated FCC Form 312 and pursuant to Section 25.117 of the rules,<sup>1/</sup> AMC Networks Broadcasting and Technology (“AMC”) hereby requests modification of its authorizations for five stations – Stations E000220, E040445, E000597, E000228, and E010028 – to operate its transmit earth stations from a remote location. As indicated in the attached exhibit, AMC requested special temporary authority (“STA”) on March 16, 2020, to operate its transmit earth stations from a remote location in order to address the potential threat to its personnel from the novel coronavirus. That STA was granted on March 17, 2020.<sup>2/</sup> AMC now seeks permanent modification of its authorizations consistent with its approved STA request. While any AMC staff member listed in the exhibit may be contacted during periods of remote operation, Peter A. Palmisano, Director of RF Engineering at AMC, will serve as the single, central point of contact in cases of emergency and may be reached at (516) 592-1990 and [peter.palmisano@amcnetworks.com](mailto:peter.palmisano@amcnetworks.com).

If there are any questions regarding this application, the Commission should contact our counsel, Russell Fox ([rfox@mintz.com](mailto:rfox@mintz.com)) or Angela Kung ([aykung@mintz.com](mailto:aykung@mintz.com)) of Mintz.

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<sup>1/</sup> See 47 C.F.R. § 25.117.

<sup>2/</sup> See *Satellite Communications Services Information; Re: Actions Taken*, Public Notice, Report No. SES-02250, at 71 (rel. Mar. 18, 2020).

# **Exhibit**

## **REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

By the associated FCC Form 312 and pursuant to Section 25.120(b)(3) of the rules, AMC Networks Broadcasting and Technology LLC (“AMC”) hereby requests special temporary authority (“STA”), for a period of 60 days to operate its transmit earth stations from a remote location. Within the next 60 days, AMC will submit applications seeking permanent modifications of its authorizations for authorization to operate earth stations from a remote location. This STA request for which AMC seeks approval is for five stations – Stations E000220, E040445, E000597, E000228, and E010028 – which serve the purposes, and are covered by the circumstances, described below.

AMC’s affiliate, AMC Networks, Inc. operates several of the most popular and award-winning brands in television and film. Cable television networks [AMC](#), [BBC AMERICA](#) (through a joint venture with BBC Studios), [IFC](#), [SundanceTV](#), and [WE tv](#); independent film production and distribution division [IFC Films](#); and premium streaming video services [Sundance Now](#), [Shudder](#), [Acorn TV](#), [UMC](#) and [AMC Premiere](#), the offering that gives subscribers commercial-free access to AMC shows, produce and deliver distinctive, compelling and culturally relevant content that engages audiences across multiple platforms.

The earth stations covered by this request are used to transmit programming to satellites that re-distribute the programming to cable systems and other video-delivery platforms, that in turn re-distribute the programming to their customers. As the Commission is aware, AMC is authorized to operate its transmit facilities at 620 Hicksville Road in Bethpage, NY. As required by the Commission’s rules, personnel are on-site to control the operations of the transmitters, including ceasing operations if circumstances or the Commission requires.

However, like many businesses, AMC has been required to modify its operations to address the potential threat to its personnel from the novel coronavirus. Indeed, the New York City metropolitan area, where the transmitter site is located, is one of the most severely affected areas in the country. As a result, AMC personnel may be required to work remotely and not at the transmitter site.

Accordingly, AMC seeks authority to operate the earth station transmit facilities remotely. Remote control of the transmitters will comply with Section 25.271(c) of the rules. In particular:

- Consistent with Section 25.271(c)(1), the parameters of earth stations and operational functions will be able to be operated remotely, via a laptop internet connection, as effectively as if personnel were on-site, ensuring compliance with the Commission’s rules. The laptop may be operated at any location; accordingly, no address is provided for the remote control location. Nevertheless, each laptop will be equipped with stringent security protections, to prevent unauthorized control of the transmitter. The AMC staff members to be provided access to the remote location via these secured laptops are:
  - Peter A. Palmisano, Director of RF Engineering, AMC Networks  
[peter.palmisano@amcnetworks.com](mailto:peter.palmisano@amcnetworks.com) Cell - 516 592-1990

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- James N. McGarvey, Supervisor of RF Engineering, AMC Networks  
[james.mcgarvey@amcnetworks.com](mailto:james.mcgarvey@amcnetworks.com) Cell – 516 592-1979
- Richard Ferro, Manager of TOC, AMC Networks  
[Richard.Ferro@AMCNETWORKS.COM](mailto:Richard.Ferro@AMCNETWORKS.COM) Cell – 516 592-1828
- Consistent with Section 25.271(c)(2), the earth station locations are, and will continue to be protected by appropriate security measures, that will not change based on remote control.
- Consistent with Section 25.271(c)(3), AMC personnel listed above will be capable of immediately suspending operation of the station upon detection by the licensee or upon notification by the Commission, of a deviation or upon notification by another licensee of harmful interference. Those personnel will be able to re-initiate operations when interference has been resolved.
- Finally, consistent with Section 25.271(c)(4), AMC personnel will be available at all times to perform technical servicing and maintenance, if required.

STA will permit AMC to immediately transition operations to a remote location if required, preserving its ability to deliver programming and protecting the health of its personnel. In order to preserve this flexibility, AMC will submit applications for modification for its earth stations shortly. In the interim, it is in public interest for the Commission to grant STA.

If there are any questions regarding this request, the Commission should contact our counsel, Russell Fox ([rfox@mintz.com](mailto:rfox@mintz.com)) or Angela Kung ([aykung@mintz.com](mailto:aykung@mintz.com)) of Mintz.