

REQUEST FOR GRANT OF LATE-FILED RENEWAL APPLICATION

BFI Licenses, LLC (“BFI”) hereby seeks renewal of its temporary-fixed satellite earth station license under Call Sign E920540 (the “License”). The License was renewed in 2002 with an expiration date of October 2, 2017.¹ Due to an administrative oversight, BFI did not timely submit its renewal application within the renewal window provided for under the FCC’s Rules. Accordingly, to the extent required, BFI requests waiver of Section 25.121(e) of the Commission’s Rules, which requires that renewal applications be filed no later than 30 days before the expiration of the license.²

The Commission may waive its rules when good cause is shown.³ The *de minimis* delay in submitting the renewal application – after the end of the customary filing window but prior to expiration – will have no negative impact on any other FCC-licensee or entity, as the earth station in question, originally licensed in 1992, has been in use for twenty-five years. Indeed, the Commission’s Rules provide a 30-day period following expiration within which an expired license may be reinstated.⁴ Granting the requested relief will affirmatively serve the public interest by allowing BFI to continue its ongoing operations, which provide a variety of transportable uplink and on-site production services to broadcasters, cable networks, government agencies and others throughout the country.

Moreover, BFI is implementing improved monitoring procedures to ensure that future renewal applications are timely filed. In particular, the company’s enhanced calendaring system will alert it to all license expirations ninety (90) days in advance of the expiration date, and thus sixty (60) days in advance of the deadline for renewal applications. This system should avoid future recurrence of late-filed renewal applications. Accordingly, grant of the requested waiver, if required, is in the public interest.

¹ See FCC File No. SES-RWL-20020812-01316 (granted 8/14/2002).

² See 47 C.F.R. §25.121(e).

³ *Northeast Cellular Telephone Co., L.P. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”); see also *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969) (“*WAIT Radio*”); 47 C.F.R. § 1.3.

⁴ See 47 C.F.R. § 25.163(a).