



Federal Communications Commission  
Washington, D.C. 20554

December 7, 2011

Mr. Marcus Lamb  
President  
Word of God Fellowship, Inc.  
3901 Highway 121 South  
Bedford, Texas 76021

Re: WDDN-LP  
Washington, DC  
Request for Special Temporary Authority  
File No. BSTA-20110420AAX  
Fac. Id. 12667

Dear Station:

This concerns the above-referenced request of Word of God Fellowship, Inc. (WGF) for special temporary authority (STA) for WDDN-LP, Washington, District of Columbia. The staff granted the request on April 28, 2011, and, on April 29, 2011, Entravision Communications Corporation (Entravision) filed a Petition for Reconsideration (Petition) of that action.<sup>1</sup> For the reasons set forth below, we deny Entravision's Petition.

In its STA, WGF represented that it was going to resume operations for WDDN-LP with the digital antenna that it had purchased in conjunction with the station's digital facilities. This action was temporary, WGF stated, ". . . as we await a displacement application to allow us to move from 23 to 22 due to interference to WLYH-DT on channel 23 in Lancaster, PA . . . ."

WGF argues that Entravision's Petition does not comply with the procedural requirements of Section 1.106(b) of the Rules because Entravision has not shown why it did not oppose the request for STA but rather waited to submit a petition for reconsideration of the grant.<sup>2</sup> Entravision explains that the STA was not placed on Public Notice, and that the Commission acted upon the application within eight days of its submission.<sup>3</sup> Entravision concludes that "[i]n such cases, parties cannot be expected to submit timely objections."<sup>4</sup> WGF responds that Entravision has not stated "with particularity the manner in which the person's interests are adversely affected by the action taken" as required by Section 1.106(b)(1).<sup>5</sup>

With respect to the merits, Entravision argues that the STA should not have been granted because it failed to meet the standard provided in Section 73.1635 for the "extraordinary relief" of an STA.<sup>6</sup>

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<sup>1</sup> Also before us is WGF's Opposition filed May 6, 2011, and Entravision's Reply filed May 11, 2011.

<sup>2</sup> WGF Opposition at 2.

<sup>3</sup> Entravision Petition at 2.

<sup>4</sup> *Id.*

<sup>5</sup> WGF Opposition at 2.

<sup>6</sup> Entravision Petition at 2-3.

Entravision argues that WGF did not show “a condition precedent . . . necessitating special relief.”<sup>7</sup> Furthermore, Entravision argues that it has challenged the displacement application (File No. BDISSTL-20110224ACB) cited by WGF as support for its STA and that “having a substantial basis to dismiss the (displacement) application, there was no reason to grant an STA predicated on that application.”<sup>8</sup> WGF responds that Entravision’s “characterization of Section 73.1635(a)(3) is a bald misstatement.”<sup>9</sup>

Entravision has not shown that it is a “person whose interests are adversely affected by any action taken by the . . . delegated authority” as required for the submission of a petition for reconsideration under the Commission’s Rules.<sup>10</sup> Entravision does not allege that it would be aggrieved or adversely affected by the grant of the WDDN-LP STA or that it is a competitor in the Washington, DC market.<sup>11</sup> Thus, we conclude that Entravision has failed to meet the procedural requirements for a petition for reconsideration.

Were we to consider Entravision’s Petition on the merits, we nevertheless find that grant of special temporary authority in this case was appropriate. The reasons cited by WGF in support of its request for STA (use of temporary facilities during the pendency of an application) were of the type for which special relief is routinely granted.<sup>12</sup>

Accordingly, IT IS ORDERED, That the petition for reconsideration of Entravision Communications Corporation IS DENIED.

Sincerely,

Hossein Hashemzadeh  
Deputy Chief, Video Division  
Media Bureau

cc: Barry A. Friedman, Esq. – Counsel for Entravision Communications Corporation  
Robert L. Olender, Esq. – Counsel for Word of God Fellowship, Inc.

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<sup>7</sup> Entravision Petition at 3.

<sup>8</sup> *Id.*

<sup>9</sup> WGF Reply at 2.

<sup>10</sup> See 47 C.F.R. § 1.106(b)(1); see also 47 U.S.C. § 405(a) (stating that a reconsideration petition may be filed by a non-party who is “aggrieved or whose interests are adversely affected” by a Commission order).

<sup>11</sup> See *Aspen FM, Inc.*, 12 FCC Rcd 17852 (1997) citing *FCC v. Sanders Bros.*, 309 U.S. 470 (1940) (although it did not oppose an assignment application, petitioner had standing under Section 1.106 to file a petition for reconsideration because it would compete for listeners and thus would be “aggrieved/adversely affected”).

<sup>12</sup> Entravision’s allegations with respect to WGF’s displacement application for WDDN-LP will be considered separately.