

James Henderson
181 Henderson Road
Decatur, AL 35603

07/24/2015

Office of the Secretary
ATTN: Barbara Kreisman
Chief, Video Division, Media Bureau
Federal Communications Commission
445 12th Street, SW
Room 2-A666
Washington, DC. 20554

Subject: Petition for Eligible Entity Status, Emmanuel Broadcasting Corporation, WMJN-LP.
Somerville, AL, Facility ID 10593, Channel 29, File No. BLTDL-20150126ABT

Dear Ms. Kreisman:

Thank you for the opportunity to file a petition for Eligible Entity Status in accordance with DA-679 and to explain why we believe our station is eligible for full Class A station protection and should be added to the DA-679 appendix listing eligible stations for the auction.

Also thank you for giving us the opportunity to respond to your reply of July 17th, requesting additional information as well as allowing us to upload certain documentation for your consideration..

I hope our responses below to your questions will be sufficient for us to retain Class A status.

Regrettably we were in error as new owners not skilled in FCC requirements and procedures and made mistakes in filing procedures, but have continued to operate the station as a Class A station and in fact the FCC TV Query for our station continues to list us as a Class A station under "station information." Which we have taken to mean that we are a Class A station.

We've gained the understanding and skill to conform to all the Commissions requirements, and are working diligently to do so. We certainly never willingly violated the Commissions filing procedures and assure you this will not happen again.

This is to respond to your specific questions.

1. In answer to your first question, unfortunately I misunderstood the FCC Form 301 CA instructions, which in the general instructions stated in A(c) that the form is used for licensees seeking a license to cover their authorized Class A construction permit facilities. I misinterpreted this to only apply to the original license to cover when the when the station first received its Class A. Status, especially given that as mentioned above we have continued to shown in TV Query as a Class A station. This led to my misunderstanding that our station is a low power station, but with Class A status, and that

we could use LPTV forms. We now understand this is not correct and in the future we will fully comply if allowed the opportunity.

2. In answer to your second question, this was in error in part because of my misunderstanding in 1, above, knowing that we would never knowingly use an incorrect form or violate any requirement that would trigger action by the Commission to terminate our Class A status. I should not have assumed that the Commission would return any incorrect filing for correction and re-submittal, although we are aware that the Commission has often been generous in other instances returning incorrect filings for correction..
3. In answer to your third question, unfortunately we were not aware of the need to file Petitions for Reconsideration for the forms that were improperly filed. We now understand the CDBS procedure for informal filing Petitions for Reconsideration.. Since there is no deadline stated in the CDBS instructions for submitting Petitions for Reconsideration we respectfully request your approval for us to file a Petition for Reconsideration to correct each incorrect filing.
4. In answer to your fourth question as to why we failed to establish and maintain an electronic public file, I hope you will consider that we have maintained a complete local file in the spirit of the requirement, and have tried on occasion to up load our Public File documents. Unfortunately when I sought help from the help desk I misunderstood the response that we did not have to maintain a public file. I take full responsibility for this misunderstanding and it took Mr. Hashemzadeh's efforts to get us access this week.
5. In answer to your fifth question, I have on several occasions attempted to upload the Public file documents required by Section 73.3526, but was not allowed access to the site and failed to follow up sufficiently. We mistakenly believed that a local file would be sufficient back up under these circumstances.
6. In answer to your sixth question I make the declaration under my signature to this letter that I have personal knowledge of the facts and am signing under penalty of perjury that the facts and information provided in this response are both true and correct and that we have continued to operate as a Class A station and have met all regulatory requirements.

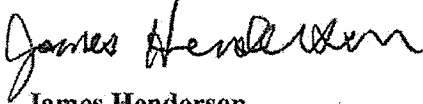
This is also to respond to your allowing us to establish an electronic public file and have done so by up loading our key local public file documents which we believe meet all the requirement of CFR Section 73.3526, Local Inspection File.

We were in error but are working hard to correct all deficiencies and prevent any recurrence. We respectfully ask that we be allowed to continue to serve our county with local programming to meet local needs as a Class A station.. Our understanding is that our frequency may be too low in the spectrum for the auction, but that with the expected re-packaging our continued existence is at risk.. Concerning the auction we request that our station be designated an eligible facility for the auction, placed on the list and enabled to submit FCC Form 2100, Schedule 381, and be allowed to participate in the auction. .

Like many small stations we add value to our communities with local programming not provided by larger stations and do this with limited resources. There are no full power stations in our county. As part of our commitment to our audience we invested over \$50,000 to go digital to better serve our area. We believe it would be in the best interest of our community if we are allowed to stay on the air to serve them, and we respectfully ask that you approve this request so we can do so.

Thank you for your consideration.

Respectfully,

A handwritten signature in cursive script that reads "James Henderson".

James Henderson
WMJN-TV
256-337-0826