

Submitted: 06/16/2010 at 14:03:19

File Number: 0004258165

FCC 603 **FCC Application for Assignments of Authorization and Transfers of Control:**
Main Form **Wireless Telecommunications Bureau**
Public Safety and Homeland Security Bureau

Approved by OMB
3060 - 0800
See instructions for
public burden estimate

General Information

1) Application Purpose (Select only one) (TC)	
AA - Assignment of Authorization TC - Transfer of Control	AM - Amendment WD - Withdrawal
NT - Required Notification (For Consummation of an Assignment or Transfer) EX - Request for Extension of Time (To Consummate an Assignment or Transfer)	
2) If this application is for an Amendment (AM) or Withdrawal (WD), enter the File Number of the pending or consented to application currently on file with the FCC.	File Number:
3a) Is this application for Assignment of Authorization or Transfer of Control part of a series of applications involving other wireless license(s) held by the licensee, affiliates of the licensee (e.g., parents, subsidiaries, or commonly-controlled entities), or third parties that are not included on this application and for which Commission approval or notification is required?	(N) <u>Yes</u> No
3b) If the answer to 3a is 'Y', provide the File Number of the lead application.	File Number:
3c) Does this application for Assignment of Authorization or Transfer of Control involve the assignment or transfer of non-wireless licenses/authorizations for which Commission approval or notification is required?	(Y) <u>Yes</u> No
4) Are attachments being filed with this application?	(Y) <u>Yes</u> No

Fees and Waivers

5a) Is the applicant exempt from FCC application fees? If 'Y', attach an exhibit justifying how the applicant is exempt from FCC application fees.	(N) <u>Yes</u> No
5b) Is a waiver/deferral of the FCC application fees being requested and the application fees are not being submitted in conjunction with this application? If 'Y', attach a date-stamped copy of the request for waiver/deferral of the FCC application fees.	(N) <u>Yes</u> No
6a) Does this application include a request for waiver of the Commission's rules (other than a request for application fee waivers)? If 'Y', attach an exhibit specifying the rule section(s) for which a waiver is being requested and including a justification for the waiver request.	(Y) <u>Yes</u> No
6b) If 6a is 'Y', enter the number of rule sections involved.	Number of Rule Sections: <u>1</u>

Additional Transaction Information

7) Has this application for Assignment of Authorization or Transfer of Control already occurred?	(Y) <u>Yes</u> No
8a) The Assignment of Authorization or Transfer of Control is:	() Voluntary (X) Involuntary
8b) If 8a is 'Involuntary', provide the date that the event occurred:	(MM/DD/YYYY) <u>11/27/2009</u>
9a) Is this application a <i>pro forma</i> Assignment of Authorization or Transfer of Control?	() <u>Yes</u> No
9b) If 9a is 'Y', is this a post notification that is being filed under the Commission's forbearance procedures pursuant to Section 1.948(c)(1) of the Commission's Rules?	() <u>Yes</u> No
9c) If 9b is 'Y', provide the consummation date of the Assignment of Authorization or Transfer of Control.	(MM/DD/YYYY) <u> </u> / <u> </u> / <u> </u>
10a) Does this application involve the partitioning and/or disaggregation of geographic-area licenses? If 'Y', complete Schedule B and, if applicable, Schedule C.	() <u>Yes</u> No
10b) If 10a is 'N', does this application involve the partial assignment of site-based licenses?	() <u>Yes</u> No

11) How will/has the Assignment of Authorization or Transfer of Control be/been accomplished? Select One: ()

Sale or other assignment of assets

Court order

Reorganization or liquidation

Transfer of stock or other ownership interests

Other (voting trust agreement, management contract, etc.): Trust Agreement

Designated Entity Information (If 12a, 12b or 12c is 'Y', Schedule A is required to be completed.)

12a) Does this application for Assignment of Authorization or Transfer of Control involve any licenses that were originally awarded with bidding credits within the last five years?	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>
12b) Does this application for Assignment of Authorization or Transfer of Control involve any licenses that were originally subject to the Commission's installment payment plan?	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>
12c) Does this application for Assignment of Authorization or Transfer of Control involve any licenses that were originally granted pursuant to closed bidding within the last five years?	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>

Competition-Related Information

13) Does this application for Assignment of Authorization or Transfer of Control involve a license(s) that may be used for interconnected mobile voice and/or data services that would, if assigned or transferred, create a geographic overlap with another license(s) in which the Assignee/Transferee already holds direct or indirect interests (of 10 percent or more), either as a licensee or spectrum lessee/sublessee, and that also could be used to provide interconnected mobile voice and/or data services?	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>
14a) Does the Assignee/Transferee hold direct or indirect interests (of 10 percent or more) in any entity that already has access to 10 MHz or more spectrum in the Cellular Radiotelephone, broadband PCS, or Specialized Mobile Radio (SMR) services through license(s), lease(s), or sublease(s) in the same geographic area?	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>
14b) Would/does this application for Assignment of Authorization or Transfer of Control reduce the number of entities providing service (using spectrum in any of the three services listed in item 14a) in the affected market(s)?	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>

Broadband Radio Service and Educational Broadband Service Information

15a) Will the requested facilities be used to provide multichannel video programming?	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>
15b) If 15a is 'Y', does the Assignee/Transferee operate, control or have attributable interest (as defined in Section 27.1202 of the Commission's Rules) in a cable television system whose franchise area is located within the geographic area of the requested facilities? If 'Y', provide an exhibit explaining how the Assignee/Transferee complies with Section 27.1202 of the Commission's Rules or justifying a waiver of that rule. If a waiver of the Commission's Rule(s) is being requested, 6a must be answered 'Y'.	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>
16) Does the Assignee/Transferee comply with the programming requirements contained in Section 27.1203 of the Commission's Rules? If 'N', provide an exhibit explaining how the Assignee/Transferee complies with Section 27.1203 of the Commission's Rules or justifying a waiver of that rule. If a waiver of the Commission's Rule(s) is being requested, 6a must be answered 'Y'.	(<input type="checkbox"/>) <u>Yes</u> <u>No</u>

Assignor/Licensee Information

17) Assignor/Licensee is a(n): (Select One)			
<input type="checkbox"/> Individual	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Trust	<input type="checkbox"/> Government Entity
<input type="checkbox"/> Corporation	<input checked="" type="checkbox"/> Limited Liability Company		
<input type="checkbox"/> General Partnership	<input type="checkbox"/> Limited Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Consortium
<input type="checkbox"/> Other: _____			
18) FCC Registration Number (FRN):0007001977			
19) First Name (if individual):	MI:	Last Name:	Suffix:
20) Legal Entity Name (if not an individual): Bresnan Communications, LLC			
21) Attention To: Robert V. Bresnan			
22) P.O. Box:	And /Or	23) Street Address: 1 Manhattanville Road	
24) City: Purchase	25) State: NY	26) Zip Code:10577	
27) Telephone Number: (914)641-3300	28) Fax Number: (914)641-3301		
29) E-Mail Address:			

30) Demographics of Assignor/Licensee (Optional):

Race:	Ethnicity:	Gender:
<input type="checkbox"/> American Indian or Alaska Native	<input type="checkbox"/> Hispanic or Latino	<input type="checkbox"/> Male
<input type="checkbox"/> Asian	<input type="checkbox"/> Not Hispanic or Latino	<input type="checkbox"/> Female
<input type="checkbox"/> Black or African-American		
<input type="checkbox"/> Native Hawaiian or Other Pacific Islander		
<input type="checkbox"/> White		

Assignor/Licensee Contact Representative

31) First Name:	MI:	Last Name:	Suffix:
32) Company Name: Bresnan Communications, LLC			
33) Attention To: Robert V. Bresnan			
34) P.O. Box:	And /Or	35) Street Address: 1 Manhattanville Road	
36) City: Purchase	37) State: NY	38) Zip Code: 10577	
39) Telephone Number: (914)641-3300	40) Fax Number: (914)641-3301		
41) E-Mail Address:			

Transferor Information (for Transfers of Control only)

42) Transferor is a(n): (Select One)			
<input checked="" type="checkbox"/> Individual	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Trust	<input type="checkbox"/> Government Entity
<input type="checkbox"/> Corporation	<input type="checkbox"/> Limited Liability Company	<input type="checkbox"/> General Partnership	<input type="checkbox"/> Limited Partnership
<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Consortium	<input type="checkbox"/> Other: _____	
43) FCC Registration Number (FRN): 0007203318			
44) First Name (if individual): William	MI: J	Last Name: Bresnan	Suffix:
45) Legal Entity Name (if not an individual): Bresnan, William J			
46) Attention To: Robert V. Bresnan			
47) P.O. Box:	And /Or	48) Street Address: 1 Manhattanville Road	
49) City: Purchase		50) State: NY	51) Zip Code: 10577
52) Telephone Number: (914)641-3300		53) Fax Number: (914)641-3301	
54) E-Mail Address:			

55) Demographics of Transferor (Optional):

Race: <input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Asian <input type="checkbox"/> Black or African-American <input type="checkbox"/> Native Hawaiian or Other Pacific Islander <input type="checkbox"/> White	Ethnicity: <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female
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Transferor Contact Representative

56) First Name: William	MI: J	Last Name: Bresnan	Suffix:
57) Company Name:			
58) Attention To: Robert V. Bresnan			
59) P.O. Box:	And /Or	60) Street Address: 1 Manhattanville Road	
61) City: Purchase		62) State: NY	63) Zip Code: 10577
64) Telephone Number: (914)641-3300		65) Fax Number: (914)641-3301	
66) E-Mail Address:			

Assignee/Transferee Information

67) Assignee/Transferee is a(n): (Select One)			
<input type="checkbox"/> Individual	<input type="checkbox"/> Unincorporated Association	<input checked="" type="checkbox"/> Trust	<input type="checkbox"/> Government Entity
<input type="checkbox"/> Corporation	<input type="checkbox"/> Limited Liability Company	<input type="checkbox"/> General Partnership	<input type="checkbox"/> Limited Partnership
<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Consortium	<input type="checkbox"/> Other: _____	
68) FCC Registration Number (FRN): 0019769223			
69) First Name (if individual):	MI:	Last Name:	Suffix:
70) Legal Entity Name (if not an individual): William J. Bresnan Revocable Trust			
71) Attention To: Jeffrey S. DeMond			
72) Real Party in Interest FCC Registration Number (FRN): 0019769223			
73) Name of Real Party in Interest: William J. Bresnan Revocable Trust			
74) P.O. Box:	And /Or	75) Street Address: 1 Manhattanville Road	
76) City: Purchase		77) State: NY	78) Zip Code: 10577
79) Telephone Number: (914)641-3300		80) Fax Number: (914)641-3301	
81) E-Mail Address:			

82) Demographics of Assignee/Transferee (Optional):

Race: <input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Asian <input type="checkbox"/> Black or African-American <input type="checkbox"/> Native Hawaiian or Other Pacific Islander <input type="checkbox"/> White	Ethnicity: <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female
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Assignee/Transferee Contact Representative (if other than Assignee/Transferee)

83) First Name:	MI:	Last Name:	Suffix:
84) Company Name: William J. Bresnan Revocable Trust			
85) Attention To: Jeffrey S. DeMond			
86) P.O. Box:	And /Or	87) Street Address: 1 Manhattanville Road	
88) City: Purchase		89) State: NY	90) Zip Code: 10577
91) Telephone Number: (914)641-3300		92) Fax Number: (914)641-3301	
93) E-Mail Address:			

Ownership Disclosure Information

94a) Is the Assignee/Transferee required to file FCC Form 602, Ownership Disclosure Information for the Wireless Telecommunications Services?	(<input checked="" type="radio"/>) Yes <input type="radio"/> No
94b) If 94a is 'Y', provide the File Number of the FCC Form 602 that is required to be submitted in conjunction with this application or already on file with the FCC.	File Number: <u>0004285000</u>

Alien Ownership Information

95) Is the Assignee/Transferee a foreign government or the representative of any foreign government?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No
96) Is the Assignee/Transferee an alien or the representative of an alien?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No
97) Is the Assignee/Transferee a corporation organized under the laws of any foreign government?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No
98) Is the Assignee/Transferee a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No
99a) Is the Assignee/Transferee directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No
99b) If 99a is 'Y', has the Assignee/Transferee received a ruling(s) under Section 310(b)(4) of the Communications Act with respect to the same radio service(s) and geographic coverage area(s) involved in this application? If 99b is 'N', attach a date-stamped copy of a request for a foreign ownership ruling pursuant to Section 310(b)(4) of the Communications Act.	(<input type="radio"/>) Yes <input checked="" type="radio"/> No

Basic Qualification Information

100) Has the Assignee/Transferee or any party to this application had any FCC station authorization, license or construction permit revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No
101) Has the Assignee/Transferee or any party to this application, or any party directly or indirectly controlling the Assignee/Transferee ever been convicted of a felony by any state or federal court?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No
102) Has any court finally adjudged the Assignee/Transferee, or any party directly or indirectly controlling the Assignee/Transferee guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or any other means or unfair methods of competition?	(<input type="radio"/>) Yes <input checked="" type="radio"/> No

Assignor/Transferor Certification Statements

- 1) The Assignor/Transferor certifies either that (1) the authorization will not be assigned or that control of the license(s) will not be transferred until the consent of the Federal Communications Commission has been given, or (2) prior Commission consent is not required because the transaction is subject to streamlined notification procedures for *pro forma* assignments and transfers by telecommunications carriers. See Section 1.948(c) (1) of the Commission's Rules.
- 2) The Assignor/Transferor certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
- 3) The Assignor/Transferor certifies that it is not in default on any payment for Commission licenses and that it is not delinquent on any non-tax debt owed to any federal agency.

Typed or Printed Name of Party Authorized to Sign

103) First Name: Jeffrey	MI: S	Last Name: DeMond	Suffix:
104) Title: Co-Executor			
Signature: Jeffrey S DeMond			105) Date: 06/16/2010

**FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.
WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).**

Assignee/Transferee Certification Statements

1) The Assignee/Transferee certifies either that (1) the authorization(s) will not be assigned or that control of the license(s) will not be transferred until the consent of the Federal Communications Commission has been given, or (2) prior Commission consent is not required because the transaction is subject to streamlined notification procedures for <i>pro forma</i> assignments and transfers by telecommunications carriers. See Section 1.948(c)(1) of the Commission's Rules.
2) The Assignee/Transferee waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application.
3) The Assignee/Transferee certifies that grant of this application would not cause the Assignee or Transferee to be in violation of any pertinent cross-ownership or attribution rules.* *If the Assignee/Transferee has sought a waiver of any such rule in connection with this application, it may make this certification subject to the outcome of the waiver request.
4) The Assignee/Transferee agrees to assume all obligations and abide by all conditions imposed on the Assignor/Transferor under the subject authorization(s), unless the Federal Communications Commission pursuant to a request made herein otherwise allows, except for liability for any act done by, or any right accrued by, or any suit or proceeding had or commenced against the Assignor/Transferor prior to this assignment/transfer.
5) The Assignee/Transferee certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
6) The Assignee/Transferee certifies that neither it nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the Commission's Rules for the definition of "party to the application" as used in this certification.
7) The Assignee/Transferee certifies that it is not in default on any payment for Commission licenses and that it is not delinquent on any non-tax debt owed to any federal agency.

Typed or Printed Name of Party Authorized to Sign

106) First Name: Jeffrey	MI: S	Last Name: DeMond	Suffix:
107) Title: Co-Executor			
Signature: Jeffrey S DeMond			108) Date: 06/16/2010
FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.			
WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).			

Authorizations To Be Assigned or Transferred

108) Call Sign	109) Radio Service Code	110) Location Number	111) Path Number (Microwave only)	112) Frequency Number	113) Lower or Center Frequency (MHz)	114) Upper Frequency (MHz)	115) Constructed Yes / No
KNGQ260	IG - Industrial/Business Pool, Conventional						Y
WNKK403	IG - Industrial/Business Pool, Conventional						Y
WNKT802	IG - Industrial/Business Pool, Conventional						Y
WNMM782	IG - Industrial/Business Pool, Conventional						Y
WNSA871	IG - Industrial/Business Pool, Conventional						Y
WNUX414	GJ - Business/Industrial/ Land Trans, 809-824/854-869 MHz, Conv.						Y
WPNP820	IG - Industrial/Business Pool, Conventional						Y
WQJQ462	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ463	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ464	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ465	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ466	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ467	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ468	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ469	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ481	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ482	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ483	CF - Common Carrier Fixed Point to Point Microwave						Y

108) Call Sign	109) Radio Service Code	110) Location Number	111) Path Number (Microwave only)	112) Frequency Number	113) Lower or Center Frequency (MHz)	114) Upper Frequency (MHz)	115) Constructed Yes / No
WQJQ484	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ485	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ486	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ487	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ488	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ489	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ559	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ560	CF - Common Carrier Fixed Point to Point Microwave						Y
WQJQ805	WY - 700 MHz Lower Band (Blocks A, B, E)						N
WQJQ806	WY - 700 MHz Lower Band (Blocks A, B, E)						N
WQJQ807	WY - 700 MHz Lower Band (Blocks A, B, E)						N
WSV483	IG - Industrial/Business Pool, Conventional						Y

Attachment(s):

Type	Description	Date Entered
W	Notification of Involuntary Assignment and	06/16/2010

Exhibit A

**Notification of Involuntary Assignment and
Request for Waiver of Section 1.948(g)**

Bresnan Communications, LLC (“BCL”) is filing this involuntary transfer application to formally advise the FCC of the death of Mr. William J. Bresnan. In addition, Bresnan respectfully requests a waiver of Section 1.948(g) of the Commission’s rules to allow for the involuntary transfer of control of BCL.

BCL holds 30 wireless licenses. Mr. Bresnan did not directly or indirectly hold a controlling, or even reportable, equity interest in BCL. Nevertheless, BCL is filing this application out of an abundance of caution due to the existence of a Management Agreement between BCL’s sole corporate parent (Bresnan Broadband Holdings, LLC (“BBH”)), and Bresnan Communications, Inc. (“BCI”). Pursuant to that Management Agreement, BCI manages BBH and BCL. BCI was wholly owned and controlled by Mr. Bresnan, prior to his demise.

BACKGROUND

BCL is a broadband telecommunications service provider offering cable television service, high-speed Internet access, and digital telephone service to over 300,000 customers in Colorado, Montana, Wyoming, and Utah. BCL was founded by William J. Bresnan, who passed away on November 27, 2009. As noted above, BCL is wholly owned by BBH. Three entities, not including Mr. Bresnan, have a 10% or greater direct ownership interest in BBH. However, the management of BCL and BBH is provided exclusively by BCI, pursuant to a Management Agreement between BBH and BCI. BCI is a New York corporation, whose stock was 100 % owned by William J. Bresnan. Mr. Bresnan’s interest in BCI was placed in the William J. Bresnan Revocable Trust prior to his death, but remained under Mr. Bresnan’s control. That control over BCI terminated upon his death.

REQUEST FOR WAIVER

Section 1.948(g) of the rules ordinarily requires that involuntary transfer applications be filed within 30 days of the death of a person who directly or indirectly controlled a corporation that is an FCC licensee. Section 1.925(b)(3) of the Commission's Rules, however, provides that the Commission may grant a waiver of an FCC rule upon a showing that: (i) the underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest; or (ii) in view of the unique or unusual factual circumstances of the subject case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or that the applicant has no reasonable alternative.

BCL respectfully submits that rigid adherence to the 30 day timeframe set forth in Section 1.948(g) would be unduly burdensome and contrary to the public interest in this instance.

In the context of Mr. Bresnan's death, BCI did not immediately focus on the need to file any applications at the FCC, because Mr. Bresnan himself was neither an FCC licensee, nor was he a controlling or reportable equity owner of an FCC licensee. Moreover, day-to-day management of BCL remained with existing BCI staff. In light of the Management Agreement involving BCI and Mr. Bresnan, however, BCL has determined that Mr. Bresnan had *de facto* control over BCL. Based on that determination, BCL believes that the passage of Mr. Bresnan's interests under the Management Agreement to the William J. Bresnan Revocable Trust should be formally approved by the Commission. In light of BCL's good faith effort to submit this involuntary application, failure to grant the request, based on rigid adherence to the 30 day timeframe, would be inequitable and contrary to the public interest.

BCL notes that Mr. Jeffrey DeMond is the authorized signatory for both the transferor and transferee portions of this involuntary transfer application. Mr. DeMond serves as a co-executor of the Estate of William J. Bresnan, and as a co-trustee of the William J. Bresnan Revocable Trust. JPMorgan Chase Bank, N.A. ("JPMorgan Chase") is the other co-executor of Mr. Bresnan's estate and the co-trustee of the William J. Bresnan Revocable Trust. Ms. Mary G. Campbell, a Managing Director of JPMorgan Chase, is the designated officer of JPMorgan Chase who represents the corporate executor and trustee. However, because the signature blocks of the FCC Form 603 only accommodate a single signature, Mr. DeMond has been identified as the authorized signatory.