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July 28, 2016

Marlene Dortch, Esq.  
Secretary, Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

RE: Request for Withdrawal of all Rainbow PUSH Coalition pleadings related to Sinclair Broadcast Group, Inc., including in the Matters of WRGT Licensee, LLC, BALCT-20020718ABH et al.; WRGT Licensee, LLC, BALCT-20031107AAU et al.; WNAB Licensee, LLC, BALCT-20050721ABW; Mediacom Communications Corporation v. Sinclair Broadcast Group, Inc., CSR-8233-C and CSR-8234-M; WJLA-TV, BTCCDT-20130809ACD; and Allbritton Communications Co., MB Docket No. 13-203

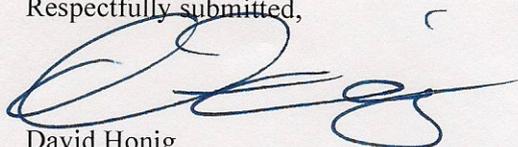
Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 73.3588, the Rainbow PUSH Coalition (“Rainbow PUSH”), by counsel, respectfully requests approval of its withdrawal, with prejudice, of all outstanding pleadings filed by Rainbow PUSH involving Sinclair Broadcast Group, Inc. (“Sinclair”), including but not limited to all applications for review or other documents requesting relief from the Media Bureau or the full Commission in the above-captioned adjudicatory proceedings (the “Challenges”).

As set forth in the attached Affidavit of David Honig, Rainbow PUSH has certified under penalty of perjury that it is requesting approval to withdraw with prejudice the Challenges consistent with 47 C.F.R. § 73.3588. Pursuant to 47 C.F.R. § 73.3588(a)(1), Rainbow PUSH certifies that neither it nor its principals has received or will receive any money or other consideration in excess of legitimate and prudent expenses in exchange for withdrawal of the Challenges. The attached Affidavit provides the remaining information required by 47 C.F.R. § 73.3588. Additionally, there is no written agreement related to the withdrawal. Pursuant to 47 C.F.R. § 73.3588(a)(4), the terms of the related oral agreement between Rainbow PUSH and Sinclair are set forth in the attached Affidavit of David Honig.

Upon review of the record, Rainbow PUSH does not believe that it would be in the public interest to further pursue the factual allegations raised in the Challenges. Accordingly, it requests approval to withdraw with prejudice the Challenges, including all factual allegations raised therein. As a result, the Commission should not consider any concerns or objections raised in the Challenges.

Respectfully submitted,



David Honig  
Counsel for the Rainbow PUSH Coalition

cc: Lyle Elder; David Brown

Affidavit of David Honig

Pursuant to 47 C.F.R. § 73.3588, the Rainbow PUSH Coalition ("Rainbow PUSH") respectfully certifies as follows:

1. Since 1998, I have been lead counsel for the Rainbow PUSH Coalition ("Rainbow PUSH") in connection with its challenges to certain issues involving Sinclair Broadcast Group, Inc. ("Sinclair") and companies affiliated with Sinclair. My co-counsel throughout that time has been Janice Mathis, Esq. Joseph Miller assisted with one pleading.
2. Rainbow PUSH is seeking approval of the withdrawal with prejudice of all of its petitions to deny and/or related pleadings involving Sinclair, including but not limited to all applications for review or other documents requesting relief from the Media Bureau or the full Commission in the following matters (the "Challenges"):
  - 2002 Cunningham Proceeding (WRGT Licensee, LLC, BALCT-20020718ABH *et al.*) (allegations transferred to the 2003 Cunningham Proceeding)
  - 2003 Cunningham Proceeding (WRGT Licensee, LLC, BALCT-20031107AAU *et al.*)
  - 2005 Nashville Proceeding (WNAB Licensee, LLC, BALCT-20050721ABW) (allegations transferred to the 2003 Cunningham Proceeding and the 2013 Allbritton Proceeding)
  - 2009 Mediacom Communications Corporation v. Sinclair Broadcast Group, Inc. Proceeding (CSR-8233-C and CSR-8234-M)
  - 2013 Allbritton Proceeding (MB Docket No. 13-203, including WJLA-TV, BTCCDT-20130809ACD)
3. Pursuant to 47 C.F.R. § 73.3588(a)(1), Rainbow PUSH certifies that neither it nor its principals has received or will receive any money or other consideration in excess of legitimate and prudent expenses in exchange for the withdrawal of the Challenges.
4. Pursuant to 47 C.F.R. § 73.3588(a)(4), Rainbow PUSH certifies that after the withdrawal of the Challenges is approved, representatives of Sinclair and Rainbow PUSH will meet to discuss, comprehensively, Sinclair's plans to assist with training, procurement, and the provision of employment opportunities for people of color within the footprints of its television stations, with a focus particularly on the four-year Historically Black Colleges and Universities situated in the markets served by television stations owned or operated by Sinclair. The parties have not discussed any specific commitments, nor have they discussed any mechanism under which Rainbow PUSH or its affiliates would receive compensation or any other consideration as a result of these discussions.
5. Rainbow PUSH has further agreed to consult and coordinate with Sinclair regarding any press release or other public announcement that Rainbow PUSH may make concerning the withdrawal of the Challenges or any matters related thereto. In addition, the parties have agreed that any such public statements will reflect their commitment to work together to form a positive relationship going forward. The parties have further agreed that neither will institute any adverse proceedings against the other based upon the pleadings that are being withdrawn.
6. Pursuant to 47 C.F.R. § 73.3588(a)(2) and 47 C.F.R. § 73.3588(a)(4), Sinclair has agreed to reimburse Rainbow PUSH in the

amount of \$80,000 for its legitimate and prudent expenses. I have agreed to serve without fee as escrow agent for the receipt, disbursement and accounting of the reimbursement. Pursuant to 47 C.F.R. § 73.3588(a)(3), set out below is an itemized accounting of selected expenses that Rainbow PUSH incurred with respect to the Challenges. See *Office of Communication of the United Church of Christ v. FCC*, 465 F.2d 519 (D.C. Cir. 1972). This accounting represents considerably less than the total time we spent on the matter, inasmuch as I have omitted my routine research hours, my internal client consultation hours, a number of pleadings, and standing declarations. We have also reduced our hourly rates. This accounting also establishes that the amount that Rainbow PUSH will receive from Sinclair is less than the total amount of the enumerated expenses.

No.	Dates	Item	DHonig Hours	JMathis Hours
1	8/1/02- 8/21/02	Petition to Deny (35 pp. plus exhs.)	47.00	3.50
2	10/4/02- 10/10/02	Application for Review (11 pp.)	16.50	0.75
3	12/6/03- 12/19/03	Petition to Deny (15 pp. plus exhs.)	23.00	2.00
4	1/23/04- 1/28/04	Reply to Opposition to Petition to Deny (10 pp.)	12.00	0.50
5	3/20/04- 3/29/04	Petition for Reconsideration (10 pp. plus Kofi Ofori expert witness declaration)	19.00	1.00
6	4/13/04	Opposition to Application for Review (4 pp.)	6.50	0.25
7	5/4/04- 5/5/04	Reply to Opposition to Petition for Reconsideration (8 pp.)	7.50	0.25
8	3/5/05	Meeting with David Williams (witness)	3.00	0.00
9	3/13/05- 3/14/05	Supplement to Petition for Reconsideration (6 pp.)	5.50	0.25
10	4/13/05- 4/14/05	Reply to Opposition to Supplement to Petition for Reconsideration (6 pp. plus David Williams' declaration)	9.25	0.25
11	5/12/05	Reply to Cunningham Response (3 pp.)	4.50	0.25
12	8/17/05- 8/25/05	Petition to Deny (WNAB-TV) (22 pp.)	36.50	2.00

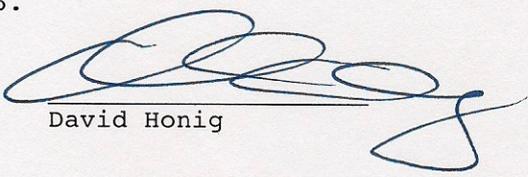
13	10/5/05- 10/12/05	Reply to Oppositions to Petition to Deny (WNAB-TV) (15 pp.) <sup>1</sup>	19.00	0.50
14	1/19/06	Comments on Motion for Decision on Application for Review (3 pp.)	2.00	0.25
15	6/18/06- 6/19/06	Letter to Commissioner Robert McDowell (responding to Sinclair letter (4 pp.))	6.25	0.50
16	8/29/13- 9/13/13	Petition to Deny (WJLA-TV) (9 pp.)	14.00	1.00
17	10/22/13- 10/24/13	Reply to Opposition to Petition to Deny (6 pp.)	11.00	0.25
18	8/21/14- 8/25/14	Application for Review (8 pp.)	15.75	1.00
19	9/22/14- 9/24/14	Reply to Opposition to Application for Review (5 pp.)	10.50	0.25
20	11/1/14- 11/4/14	Reply to Response (8 pp.)	12.00	0.25

Summary

Hours (David Honig):	274.75 hours @ \$325/hour	\$89,293.75
Hours (Janice Mathis):	15.00 hours @ \$325/hour	4,875.00
Hours (Joseph Miller):	9.00 hours @ \$250/hour	2,250.00
Expert Witness Fee (Kofi Ofori)		1,000.00
File Clerks/Archivists		750.00
Printing and Duplication (conservative estimate)		350.00
Postage		270.00
Total		\$98,788.75

I declare under penalty of perjury under the laws of the United States of America that the foregoing Affidavit is true and correct to the best of my knowledge and belief.

Executed this 28<sup>th</sup> day of July, 2016.

  
David Honig

<sup>1</sup> Joseph Miller devoted nine (9.00) hours to the preparation of this pleading. His hourly rate at the time was \$250.00/hour.