

In re: Bruno Goodworth Network, Inc., )  
 Financial Hardship Waiver Request of )  
 Equipment Requirements of CALM Act )  
 for )  
 Class A and Class A Eligible stations: )  
 WBGN-CD, Facility ID. 68405; WWLM-CA, Facility )  
 ID. 267, WMVH-CA Facility ID. 68394; WKHU-CA ) MM Docket No. 11-93  
 Facility ID. 68401; WJPW-CA, Facility ID. 68407; )  
 WVTX-CA, Facility ID. 68408; WNNB-CD, Facility )  
 ID. 7622; WJMB-CD, Facility ID. 68393; )  
 WEMW-CD, Facility ID. 68396; WPCP-CD, Facility )  
 ID. 68400; and WWKH-CA, Facility ID. 68409. )

**WAIVER REQUEST OF CALM ACT IMPLEMENTATION  
 BECAUSE OF FINANCIAL HARDSHIP**

Comes now Bruno Goodworth Network, Inc., (“BGN, Inc.”) pro se, as Licensee of the above referenced eleven Class A and Class A-Eligible television stations, to respectfully request a waiver of the requirement that it brings its stations into compliance with the CALM Act not later than December 13, 2012. For the reason stated below, BGN, Inc. respectfully request a period of one additional year, until December 13, 2013 to meet the requirements of the CALM Act.

BGN, Inc. certifies that it is a small television station for the purpose waivers of the CALM Act because its gross revenue during every year of its existence, including 2012, is well below \$14 million. BGN, Inc. further certifies that it would be a significant financial hardship for it to have to purchase the equipment it would need to bring its stations into compliance with the CALM Act at this time.

BGN, Inc. programs its stations by assembling full time program feeds in its main studio in Pittsburgh, PA. Those feeds consist of numerous types of video material from numerous independent sources, including networks, local programmers, advertisers, and paid program producers. BGN, Inc.’s contracts and agreements with its various program providers do not yet require each piece of video delivered to it to comply with ATSC A/85 by editing their audio to maintain a predetermined average dialog level and to label each video segment with that average dialog level. In order to comply with the CALM Act, BGN, Inc. must therefore purchase the necessary measuring equipment and complete the necessary staff training to measure and normalize the audio level of the hundreds of pieces of video that it consolidates into each of its four full time program feeds.

BGN, Inc. is a small, financially limited television licensee. BGN, Inc. has exhausted its financial reserves and credit facility completing the recent digitization of five of its eleven stations. (The future digitization of its remaining six analog Class A stations is a future cost burden.) The limitations of BGN, Inc.’s financial wherewithal is of record in its 2012 Regulatory Fee Waiver request on file with the Office of Managing Director.

BGN, Inc, does not have access to funds to comply with the CALM Act at this time. Over the next 12 months, which will include a complete programming contract renewal cycle (for the September 2013 programming year) BGN, Inc. can implement a policy of requiring all of its video program segment providers to both normalize their average program audio to a number specified by BGN, Inc. and to label each segment with that average audio number. This will dramatically reduce the cost and complexity of BGN, Inc. assembling its program feeds in a manner that complies with the CALM Act, including reducing the amount of measurement equipment needed and staff time expended to control audio levels.

Wherefore, for the foregoing reasons, BGN, Inc. respectfully requests a waiver of the CALM Act.

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Ronald J. Bruno, President  
Bruno Goodworth Network, Inc.  
December 12, 2012