

LAW OFFICES
BORSARI & ASSOC., PLC

P.O. BOX 29
ARLINGTON, VA 22210
(703) 524-5800

FACSIMILE
(703) 524-4329

WRITER'S E-MAIL
JOHN@BORSARI.COM

2111 WILSON BLVD., SUITE 700
ARLINGTON, VA. 22201

4000 ALBEMARLE ST. NW, SUITE 100
WASHINGTON, D.C. 20016

PLEASE RESPOND TO:
Arlington

December 23, 2004
(Fax: 202-418-2827)

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

ATTN: Mary M. Fitzgerald, Esq.
Assistant Chief, Video Division
Media Bureau

Re: Aerco Broadcasting Corporation
San Juan, PR
Application for Involuntary Transfer of Control
BTC-20020130ACC (Involuntary Transfer)
WQBS (AM), San Juan, PR (Facility ID#: 573)
WSJU-TV, San Juan, PR (Facility ID# 4077)

Dear Ms. Fitzgerald:

This letter is written on behalf of my client, Aerco Broadcasting Corporation ("Aerco"), and is in response to a request from Paulette Laden of your staff to whom you have assigned this matter for processing. The purpose of this letter is to answer to two specific questions which you have posed to the applicant in the past and which were again directed to Aerco, through this office, as recently as December 8, 2004.

The pending application for involuntary transfer of control which was filed with the Commission sought permission to transfer control of Aerco from the Angel E. Roman ("Mr. Roman"), deceased to the decedent's estate which is represented by the decedent's two children- Angel O. Roman-Lopez ("Angel O.") and Ruth Evangeline Roman Lopez ("Ruth"). In connection with this application your staff has requested the following (1) proof that Mr. Roman's two adult children (listed in the application) are the only heirs to the estate and (2) evidence that Angel O. Roman-Lopez is the estate's personal representative.

With respect to the question of the identity of the decedent's surviving heirs, there is attached hereto an order entered by the Probate Court yesterday, December 22, 2004, establishing

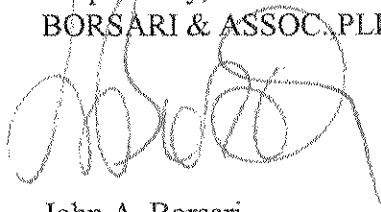
that Angel O. and Ruth are Mr. Roman's sole surviving heirs. That order (referred to as a "Resolution") was issued by the Superior Court of San Juan and is attached hereto in its original Spanish language as well as with an English translation.

Under Puerto Rico law, if the decedent died leaving a will then the person named in that instrument is appointed as executor. Alternatively, if the decedent died without leaving a will naming an executor then the surviving heirs, as a group, comprise the estates' representatives and act, collectively, on behalf of the estate. Furthermore, the authority of one heir to act for the other (s) may be delegated by use of a Power of Attorney. In the case of Aerco, Mr. Roman, Aerco's sole shareholder, died intestate, so the estate's representatives consist of the two surviving heirs, Angel O. and his sister, Ruth. Already filed with the pending application, is the power of attorney wherein Ruth delegated authority to Angel to act on her behalf. Accordingly, Angel O. Roman has the full authority to act on behalf of the heirs of the Estate.

The documents already submitted with the application, together with the attached, should answer the questions which existed and delayed action on the application. I hope that we have been responsive, finally, to the concerns of you and your staff. If you would like to have this explanation, and the attached court order, filed as an amendment to the application, I can arrange that to be done on Monday. Furthermore, if it would be helpful to have an annotated explanation of the probate law applicable to this estate provided by local counsel I can have that provided next week.

I understand that Ms Laden will not be returning to work until next week, however, in her absence should you have any questions with respect to this letter or the application, please contact me. I would like to discuss this application, in light of the foregoing, with either you or Ms. Laden at your convenience.

Respectfully,
BORSARI & ASSOC. PLLC

A handwritten signature in dark ink, appearing to read 'John A. Borsari', written over the printed name.

John A. Borsari

Enclosures

cc: Angel O. Roman-Lopez
Public Inspection File

ESTADO LIBRE ASOCIADO DE PUERTO RICO
TRIBUNAL DE PRIMERA INSTANCIA
CENTRO JUDICIAL DE SAN JUAN
SALA SUPERIOR

Sucesión de Don ÁNGEL ENRIQUE
ROMÁN COLLAZO, compuesta por sus
dos hijos mayores de edad:
ÁNGEL OSVALDO ROMÁN LÓPEZ y
RUTH EVANGELINE ROMÁN LÓPEZ

CIVIL NÚM: *KJ04-2772*

SOBRE:

Peticionarios

Declaratoria de Herederos

EX-PARTE

RESOLUCIÓN

POR CUANTO: Ángel Osvaldo Román López y Ruth Evangeline Román López presentaron una Petición para que el Tribunal los declare únicos y universales herederos de Don Ángel Enrique Román Collazo quien falleció en San Juan, Puerto Rico, el día 19 de abril de 2000.

POR CUANTO: La petición fue juramentada por el peticionario Ángel Osvaldo Román López y la misma se acompañó de prueba documental consistente en el certificado de defunción del causante; sentencia de divorcio del causante; certificados de nacimiento de los hijos del causante, Ángel Osvaldo Román López y Ruth Evangeline Román López y certificación negativa de testamento expedida por el Registro de Poderes y Testamentos.

POR CUANTO: La prueba documental que acompañó la Petición demuestra que Ángel Osvaldo Román López y Ruth Evangeline Román López son los únicos y universales herederos, con carácter de herederos forzosos, de Don Ángel Enrique Román Collazo, ya que Ángel Osvaldo Román López y Ruth Evangeline Román López son los únicos hijos del causante.

POR TANTO: Este Tribunal declara a ÁNGEL OSVALDO ROMÁN LÓPEZ Y RUTH EVANGELINE ROMÁN LÓPEZ como únicos y universales herederos forzosos de Don Ángel Enrique Román Collazo. Se ordena el desglose de los documentos originales que acompañan la Petición y que sean sustituidos en los autos por sus respectivas copias.

DADA en San Juan, Puerto Rico, *16* de *Agosto* de 2004.

REGÍSTRESE Y NOTIFÍQUESE.

CERTIFICO:

Lia Melendez Rivera Torres
Secretaría (Notula)

Por:

Adriana S. Cruz Colla
Secretaría (Notula)

[Firma]
JUEZ DE PRIMERA INSTANCIA





DECLARACIÓN DE AUTENTICIDAD

Continúa con la autenticación de copia
antes y expido la misma a petición de:

☐ Para uso oficial libre de derechos

LCDR. REBECCA RIVERA TORRES
SECRETARIA REGIONAL
Secretaria

Por: *[Signature]*
Sub-Secretario





CERTIFICACION	
Certifico que la presente es copia fiel y exacta del original que obra en autos y expido la misma a petición de:	
<i>[Signature]</i>	
<input type="checkbox"/> Previo al pago de derechos	LCDA. REBECCA RIVERA TORRES SECRETARIA REGIONAL Secretaria
<input type="checkbox"/> Para uso oficial libre de derechos	
Por:	<i>[Signature]</i> Sub-Secretario



COMMONWEALTH OF PUERTO RICO
COURT OF FIRST INSTANCE
SUPERIO COURT OF SAN JUAN

The Estate of Don ÁNGEL ENRIQUE *
ROMÁN COLLAZO, made of two * CIVIL NO:
children, of legal age: *
ÁNGEL OSVALDO ROMÁN LÓPEZ y *
RUTH EVANGELINE ROMÁN LÓPEZ * SOBRE:
Petitioners *
Declaration of Heirs *
EX-PARTE *

RESOLUTION

WHEREAS: Ángel Osvaldo Román López and Ruth Evangeline Román López filed a petition for the Court to declare them the only and universal heirs of mister Ángel Enrique Román Collazo, who died in San Juan, Puerto Rico, on the 19th day of April 2000.

WHEREAS: The petition was duly sworn by petitioner Ángel Osvaldo Román López with supporting documentary evidence consisting of the death certificate of the deceased; the divorce decree of the deceased; birth certificates of the children of the deceased, Ángel Osvaldo Román López y Ruth Evangeline Román López, and the negative certification of a wills issued by the Powers and Wills Registry.

WHEREAS: The documentary evidence supporting the petition is demonstrative that Ángel Osvaldo Román López y Ruth Evangeline Román López are the only and universal heirs, with the characteristics of forced heirs, of mister Ángel Enrique Román Collazo, since Ángel Osvaldo Román López y Ruth Evangeline Román López are the only children of the deceased.

WHEREFORE: This Court declares that **ÁNGEL OSVALDO ROMÁN LÓPEZ** and **RUTH EVANGELINE ROMÁN LÓPEZ** as the only and universal forced heirs of mister Ángel Enrique Román Collazo. It is ordered that the original documents that support this petition be substituted with their respective copies.

ON THIS DAY in San Juan, Puerto Rico, December 16, 2004.

REGISTERED AND NOTIFIED.

[Judge's Signature in Original Document]
AWILDA IRIZARRY
JUDGE OF FIRST INSTANCE

I HEREBY CERTIFY:
Rebecca Rivera Torres, Esq.
Regional Clerk

SEAL OF THE COURT OF FIRST INSTANCE
COMMONWELATH OF PUERTO RICO

Stamp Signature of:
Arodis Díaz Ortiz
Deputy Clerk

[BACK SIDE OF RESOLUTION:
CERTIFICATION:]

CERTIFICATION:

I hereby certify that this document is a true and exact copy of the original that is this case record file and issue the same upon request of:

Petitioner.

☒ Fees were paid prior to issuance.
☐ For official use only, free of fees.

Rebecca Rivera Torres, Esq.
Regional Clerk

By: [Signature of M. Alvarez]
Deputy Clerk