

Request for Renewal of Silent STA for TV Red de Puerto, Inc. LPTV Stations

Background

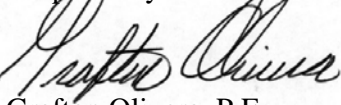
On September 2017, Hurricanes Irma and Maria hit Puerto Rico and the USVI, causing widespread devastation. Puerto Rico and the USVI suffered catastrophic losses, including the loss of cellular, radio and TV communications, and significant damages to basic infrastructure. As of the beginning of 2018 many of Puerto Rico and USVI residents remained without power, many still without reliable potable water and low on vital supplies. The President of US declared Puerto Rico a major disaster area and still many radio and TV stations remain off the air (many lost their towers) or are operating with low power, special facilities (STA's). Given the prevailing conditions, on October 2017, six months ago, TV Red de Puerto Rico requested and was granted Silent STA's for all of its LPTV stations; copy of said petition is appended to this letter.

Current Situation

It is estimated that it will still take months to fully repair the electrical grid of the USVI and PR, whose main transmission lines and generating plants were severely damaged. Puerto Rico and the USVI have suffered unprecedented devastation and losses of most of its communications systems, a Katrina-like incident that moved the FCC to create a special task force to deal with Puerto Rico and the USVI. The Chairman of the FCC, Ajit Pai, recently visited Puerto Rico, in March 2018, to personally survey the situation of the islands and the status of the communication facilities reconstruction. Chairman Pai has promised significant help from the FCC to Puerto Rican and USVI broadcasters. Given this situation, the assessment of sites where LPTV stations can move to establish temporary STA facilities has been extremely difficult. LPTV stations in addition to having to wait for three special Full Service and Class "A" TV Stations windows, are now dealing with the LPTV Displacement Window, currently in process.

It should be noted that the PR and USVI Full Service and Class A TV stations, in an arrangement reached with the FCC and T-Mobile have agreed to transition to their post-repacking channels much earlier than originally scheduled, by the end of next July. This has put a special burden on LPTV stations, most of which will be displaced, as it would be financially impossible for the LPTV stations now silent, to reconstruct their damaged facilities to resumed operations for a very short time and then find that they must invest in altogether new facilities, assuming they find channels to displace to. Given the above described circumstances, grant of an additional six-month Silent STA period for the TV Red de Puerto Rico, Inc. LPTV stations is hereby requested and believed to be justified - under the current circumstances and given the uncertain results of the current LPTV Displacement Window, remaining silent until the picture for LPTV clears is the only economically viable option. While this renewal request is being filed six months after the previous Silent STA request, the effective date of the previously granted STA, September 27, 2017, is slightly longer than the six month duration of the STA's; thus if a waiver of the FCC Rules and/or procedures is required, it is hereby requested.

Respectfully submitted on behalf of TV Red de Puerto Rico, Inc.,



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On September 5, 2017 Hurricane Irma directly hit the US Virgin Islands of St. Thomas and St. John as a Category 5 hurricane. Both islands were devastated and suffered catastrophic losses, including almost total loss of cellular, radio and TV communications facilities, the destruction of ports and of the St. Thomas airport, which became inoperative, and the destruction of the only hospital serving St. Thomas - St. John. While the island of St. Croix and Puerto Rico escaped the brunt of Irma, PR had significant damage to its electrical power network that left approx. 70 percent of households without power and 34 percent without water.

Two weeks later, on September 20, Hurricane Maria, after a direct hit of the US Island of St. Croix, Maria made landfall on Puerto Rico as a Category 4 hurricane, bringing very heavy rain and winds, "... an unprecedented atmospheric system," according to Ricardo Rosselló, governor of Puerto Rico. Hurricane Maria has devastated both St. Croix and Puerto Rico, which have suffered catastrophic losses, including the almost total loss of cellular, radio and TV communications facilities, very significant damages of ports and airports, which became inoperative. As of September 27, most of the island of Puerto Rico remains without power, and precariously low on gas, potable water, food supplies, currency (closed banks) as well as diesel to power the emergency generator of critical facilities, like hospitals (so far two persons have died in the ICU of a hospital, due to shortage of diesel), police and rescue centers.

On September 21st, the President of the US declared that major disasters exist in Puerto Rico and the U.S. Virgin Islands. By official estimates, 95% of the cellular towers in Puerto Rico are down and it is known that most radio and TV stations remain off the air, a great number of them having lost their towers (including the 1,150 ft. tower of WAPA-TV). National press and Media report that there are still several municipalities (counties) isolated due to blocked, inaccessible roads; a major dam in danger of collapsing and widespread looting has taken hold – an island wide curfew of 7 pm to 6 AM has been imposed, patrolled by the local Police, the National Guard and Federal agents.

On the back of a very difficult economic situation, the devastation in the island caused by two consecutive hurricanes had been enormous. The latest government estimates are that it will take on the order of six months, assuming an exceptional federal influx of all kind of emergency monies and help, to reconstruct the electrical grid of Puerto Rico, whose main transmission lines connecting the island are down. Similar long term projections have been made to reconstruct the electrical systems of US Virgin Islands.

In summary, the US Virgin Islands and Puerto Rico have suffered enormous devastation and the loss of most part of their communications infrastructure (including towers and access to sites), electrical power, the lack of basic supplies, transportation availability, the deterioration of health facilities, business locales, and homes, all of which have prompted the Governor of Puerto Rico to declare that the island could become "a major humanitarian crisis", if exceptional federal emergency assistance is not provided quick enough.

Given the above circumstances of the US Virgin Islands and Puerto Rico, it is not possible for TV Red de PR, Inc. to operate its network of LPTV stations and is thus it hereby requests a six-month Silent STA for all of its stations. When circumstances change for the better, and a better assessment of what is required is available, TV Red de PR will notify the FCC when operation of its facilities becomes feasible.