

Attachment to Legal STA Waiver Request of 47 CFR § 73.3700(c)
WQQZ-CD (Facility ID: 32142)
Amended June 29, 2018

CMCG Puerto Rico LLC, licensee of WQQZ-CD, Mayaguez, PR (Facility ID Number 32142), pursuant to Section 1.3 of the Commission's rules, hereby requests a waiver of 47 CFR § 73.3700(c) as set forth in paragraph 8 of *Incentive Auction Task Force and Media Bureau Grant Waiver of the Post-Auction Transition Schedule and Modify the Transition Phase Assignments of Repacked Stations in Puerto Rico and the U.S. Virgin Islands*, 33 FCC Rcd 138 (2018) ("PR Repack Public Notice").

WQQZ-CD is currently silent and off the air following damage to the station's existing facility by Hurricanes Irma and Maria in September 2017. Because of its silent status, WQQZ-CD is incapable of airing consumer education public service announcements ("PSAs") or crawls and must rely on a waiver of the consumer education requirements for post-auction transitioning stations offered in the PR Repack Public Notice.

Instead, the station will use "alternative but comparable means to notify viewers of the station's new channel" identified as acceptable in the PR Repack Public Notice. WQQZ-CD intends to coordinate with local television broadcasters in Puerto Rico to run announcements and to supplement those notices with radio and print announcements in its community of license. As we get closer to the transition date and even for a few days thereafter, the licensee plans on more intensive notices, since people generally do not pay attention when the need is not immediate.

Specifically, WQQZ-CD will air daily radio PSAs starting on or before July 3, 2018, until a few days after the transition date. It will purchase newspaper ads to run daily starting July 15, 2018 until a few days following the transition date. The script is on the following page.

A joint ad will be most effective, because it will create a greater need for people to take action if, rather than identifying one television station that is changing channel position on August 1, we can say several stations will be changing on that date. There is a good chance the rescan event will generate news coverage. People do not program specific channels, one at a time. Since the transition to digital, viewers use the rescan function on their TV's to add channels to the list of stations they can see. The Puerto Rico broadcasters need to blanket the island with notices to viewers to rescan their televisions.

Good cause exists for granting a waiver. A major event outside of the Licensee's control, an act of God, forced WQQZ-CD off of the air and rendered the station incapable of airing PSAs or crawls on its pre-auction channel as required by Rule 73.3700(c)(5). Allowing WQQZ-CD to use other stations and media will fulfill the need to educate the public on the channel change and the need to rescan their televisions if they view the station over-the-air.

WQQZ-CD

Beginning August 1 WQQZ-CD will be back on the air on channel 24. Several other television stations in Puerto Rico will be moving to new channels at the same time. To make sure you don't miss your favorite programming remember to re-scan your televisions on August 1.

Comenzando el 1 de agosto de 2018 WQQZ-CD volverá al aire en el canal 24. Otras emisoras de televisión en Puerto Rico se estarán moviendo a nuevos canales al mismo tiempo. Para estar seguro de que va a recibir su programación favorita recuerde rastrear su aparato de TV nuevamente.