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1/5/2021

TO WHOM IT MAY CONCERN:

RE; Statement of Ownership

As a result of the TV channel Repack Program, WZVI was required relocate and repack its operations following Hurricanes Irma and Maria which hit the US Virgin Islands and Puerto Rico. At that time most TV and Radio stations remained dark due to widespread damage/destruction to much of the community's communications infrastructure and power grid [1] (see Exhibit 1 attached). During the intense storms, many of TV, radio and other communications towers collapsed and the essential infrastructure for fiber networks, microwave links, and electrical power was damaged.

Alpha Broadcasting's goal was to resume broadcast services to their local communities—and meet the FCC's accelerated "pre-Phase 1" deadline of August 1, 2018 [2]. Despite having to do everything from scratch, including finding a new tower site and all new equipment and antennas for an initial auxiliary and new main antenna. Because of manufacturing and shipping delays, exacerbated by the destruction and the accelerated schedule, WZVI had to get on the air in various stages using at first low power and then full power facilities. This requiring various antennas and power levels, as described in Alpha Broadcastings various FCC STA filings and repack transition reports.

Given the vast destruction of the communications infrastructure following the impact of the hurricanes, Alpha Broadcasting Corporation made arrangements with a new transmit site on Flag Hill to begin broadcast operations initially on an emergency and then on a permanent basis. This included temporarily dispensing with the normal protocols of a structural analysis, tower repairs and tower upgrades which the repack project necessitated and made provisions for.

The big three national tower ownership companies with facilities across the US Virgin Islands were seriously disrupted by the storms. [3] [4] Many of their sites were left abandoned and their operations crippled for months and were not an option. We are grateful that we were able to identify a Hardened Tower site that met our needs and requirements and that was not destroyed or damaged. Royale Tower, the local owner of this site allowed for the postponement of the normal protocols enabling us to resume broadcasting in the public interest, in return for our assurance we would return and finish the work at the back end.

Demand for competent tower personnel [5] has delayed that commitment for over 23 months. In May we received from our inventory vendor an owner approved tower inventory and working within the limitations of the Covid 19 issues we have completed the necessary Tower Study (structural analysis) and are requisitioning necessary materials, soliciting onsite engineering and erection services and where necessary revising our budget request.

¹ Mitigation Assessment Team Report FEMA September 2018 6.1.3 Emergency Operations Emergency operations for the USVI fire stations were at times impaired by the severe weather of the hurricanes. Communications became inoperable, vehicles were damaged by wind-borne debris, and critical damage to facilities created buildings that were unsafe for occupancy or emergency operations. Damage was severe enough on St. Thomas and St. Croix to prohibit on-going operations for some fire stations. High winds and wind-borne debris caused apparatus to come loose, bay door failure, broken windows, and roof system damage. The newly created breaches in the building envelopes and water accumulation on roofs provided opportunities for water to infiltrate into the interior of buildings, resulting in the loss of communication. Four stations were evacuated in the district of St. Thomas and St. John: Old Hotel Company (Fort Christian), Tango Company (Bordeaux Fire Station), Zulu Company (Captain Robert O'Connor Sr. Fire Station), and Romeo Company. Communications were sporadic between St. Thomas and St. John. Numerous communication towers, radio repeaters, and local landlines were damaged during both Hurricanes Irma and Maria. Lack of power also contributed to loss of service to local businesses, governmental agencies, and residents. Wireless communication networks were almost non-existent.

² FCC PUBLIC NOTICE DA18-35A 01/11-2018 We believe that the Stations have significant economic and community incentive to complete construction of their post-auction channel facilities as quickly as possible, given that 12 out of the 20 stations seeking waiver are currently silent,¹ but in order to ensure that the transition is completed sufficiently in advance of the start of the Phase 1 testing period (September 14, 2018), we conclude that it is in the public interest to establish a deadline of August 1, 2018, for the Stations to cease operations on their pre-auction channels so as not to divert resources from stations transitioning in Phase 1

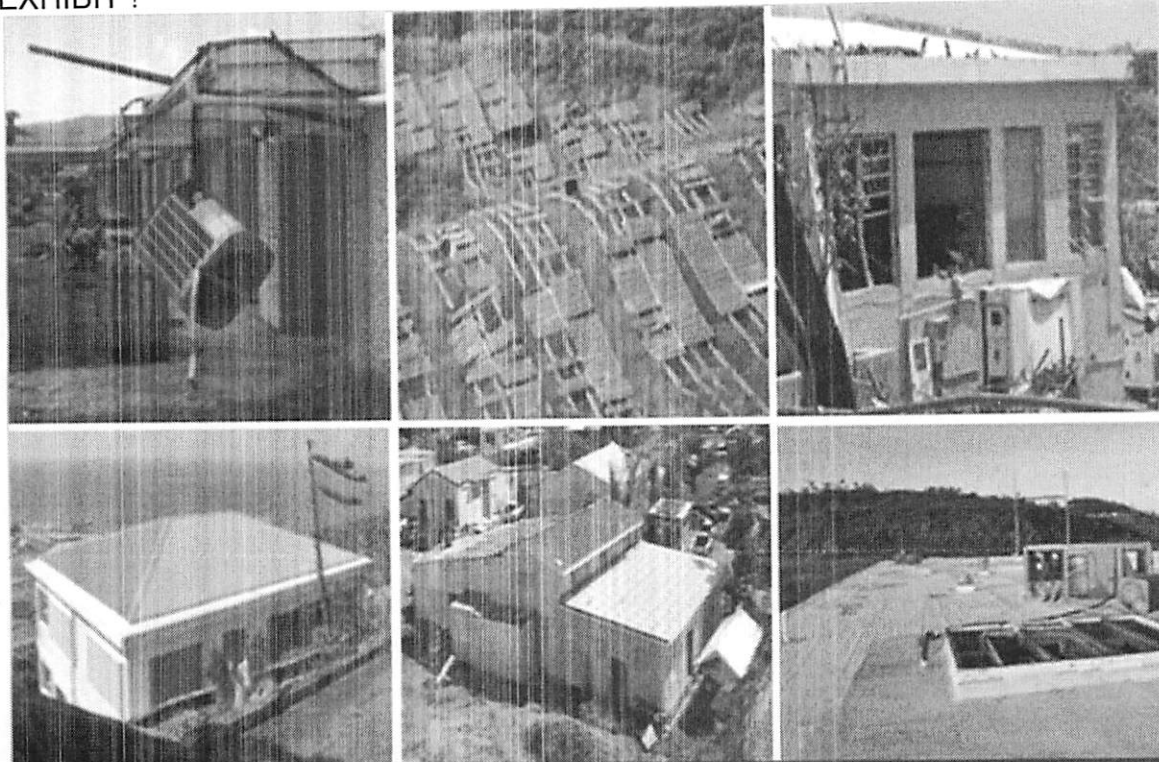
³ TOWERPOINT.COM Hurricane Maria Devastates Cellular Service in Puerto Rico & U.S. Virgin Islands- March 2019. According to the FCC's Disaster Information Reporting System, 88.3% of the cell sites in Puerto Rico were not operating as of Monday, October 2. In the U.S. Virgin Islands, 68.9% of cell sites were not operational. The lack of commercial power is a significant problem in getting these cell sites back up and running. On September 27, Elaine Duke, acting Department of Homeland Secretary, described Puerto Rico's power grid as "virtually gone."

⁴ FCC CHAIRMAN AJIT PAI March 2018- I have also directed staff to reach out to tower owners American, Crown Castle, and SBA to see how we can work together to address Puerto Rico's communications needs. Of course, Puerto Rico is not the only part of the United States facing severe challenges. The U.S. Virgin Islands also faces massive problems. Our staff has been focused on the situation there too.

⁵ FCC CHAIRMAN AJIT PAI April 2018 -Work on the next generation wireless Networks does more that keep tower construction and Maintenance companies busy. It creates an imbalance between the

supply of and the demand for skilled communications tower technicians. It is hard enough to find people with the technical skills to maintain and service communications equipment. It is harder to find people who can do this work hundreds of feet in the air.

EXHIBIT !



Mitigation Assessment Team Report

Hurricanes Irma and Maria in the U.S. Virgin Islands

Building Performance Observations, Recommendations,
and Technical Guidance

FEMA P-2021 / September 2018



FEMA