



Federal Communications Commission
Washington, D.C. 20554

July 16, 2019

Nancy A. Ory, Esq.
Lerman Senter PLLC
2001 L Street, NW
Suite 400
Washington, D.C.

Re: WVOZ-TV, Ponce, Puerto Rico; Fac. Id. No. 29000
WVEO, Aguadilla, Puerto Rico, Fac. Id. No. 61573
WTCV, San Juan, Puerto Rico, Fac. Id. No. 28954

Dear Counsel:

This is with respect to your July 9, 2019 letter on behalf of Spanish Broadcasting System Holding Company, Inc. (SBS), the licensee of full power television stations WVOZ, virtual channel 48, WVEO, virtual channel 44, and WTCV, San Juan, Puerto Rico, virtual channel 18. SBS would like to use virtual channel 18 for its commonly-owned stations WVOZ-TV and WVEO, which have overlapping service contours with WTCV and each other.

We note that that "Annex B: Additional Constraints on Virtual Channel Table For the U.S. (Normative) 1. ASSIGNMENT OF MAJOR CHANNEL NUMBER VALUES FOR TERRESTRIAL BROADCAST IN THE U.S." provides that:¹

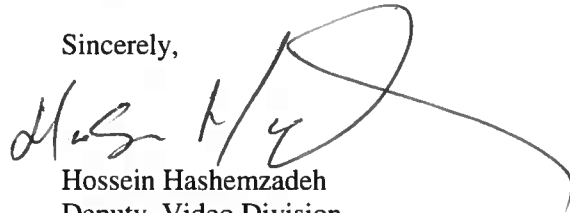
5) If a broadcaster owns or controls broadcast licenses for two or more different RF channels having overlapping service areas, he may use a common major_channel_number for all services on all channels. He may choose the major_channel_number as determined above for any one of the RF channels. The values in the minor_channel_number fields must be partitioned to ensure that there is no duplication of the two-part channel number in the DTV service area, including the overlapping DTV service areas of other broadcasters using that same major_channel_number.

¹ See 47 CFR § 73.628(d). The mandatory requirements for assigning the major and minor channel components of Part 73 stations are set forth in Annex B.

Because SBS's three full power stations are commonly-owned and have overlapping service areas, they may all use the major channel number assigned to WTVC (virtual channel 18). Each station must use a unique minor channel number to ensure that there is no duplication of the two-part channel number in the stations' DTV service areas.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hossein Hashemzadeh', with a large, sweeping flourish extending to the right.

Hossein Hashemzadeh
Deputy, Video Division
Media Bureau