

## **Amendment to WORO-DT Application for Renewal of License (File No. 0000122549)**

On September 20<sup>th</sup>, 2017, Puerto Rico suffered a direct hit by the very destructive Hurricane Maria. Homes were demolished, potable water was largely unavailable, roads and bridges were washed out, destroyed and/or closed throughout the island, power was lost to almost all of Puerto Rico and thousands of lives were lost. The hurricane also disrupted businesses, most notably radio, television, telephone, cable, cell phone services and other communications facilities were destroyed, and the internet was at best spotty and for most of the island inoperative, preventing critical communications when it was most needed. Due to the infrastructure problems of roads and bridges being closed, most people stayed at home for a couple of months. Power to the island was completely restored in January 2019. Telecommunications followed the power restoration; many sites were not powered due to access and irregular fuel supplies.

The effects on WORO-DT were disastrous. Its tower collapsed due to the velocity of hurricane winds; its transmitter room was flooded when the roof was torn off, its studios went silent, and most station employees were unable to come to work. WORO-DT was unable to put out a signal for close to a year. STA requests were filed with the FCC to permit the station to remain silent and much later, to operate with reduced power.

Initially after the storm, the station was able to provide limited service via an LPTV licensee to a very limited area of San Juan and some neighboring municipalities, however it was unable to service its city of license Fajardo, PR.

WORO-DT was also able to provide service to a larger area via the island's sole cable operator and other third-party carriers such as

satellite facilities as telecom services came online. Also, WORO-DT was able to provide Dish Network and DIRECTV with its programming via third party agreements, therefore providing service to its viewership that couldn't receive its signal off the air via the LP TV station. WORO-DT was also able to serve the public via its internet site.

With WORO-DT silent or operating with reduced power (since October 21, 2018, with 1750 watts), little if any issues/programs and children's TV programs **were broadcast** on WORO-DT. The WORO-DT programs were however, carried on Cable TV, Satellite and LPTV alternative carriers. Despite these obstacles, every effort was made by the station to update its on-line reports and listings in preparation for the filing of the WORO-DT license renewal application on September 28, 2020.

With respect to the late-filed Issues/Programs listings in the 4<sup>th</sup> Quarter of 2014, the 3<sup>rd</sup> Quarter of 2015, the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> Quarters of 2016 and the 1<sup>st</sup> and 2<sup>nd</sup> Quarters of 2017, the station's producers delayed in providing information on relevant programming. Given that WORO-DT is a small station with limited staff, sometimes it would take longer for the producers, mostly news producers, to compile the data for the engineering department, also with limited staff, to make transcripts and put them in the filing format, further provided that there were no major problems disrupting normal operations.

For the listings that should have been timely-filed but the station off the air, namely the 3<sup>RD</sup> AND 4<sup>TH</sup> QUARTERS OF 2017, THE 1<sup>ST</sup>, 2<sup>ND</sup> AND 3<sup>RD</sup> QUARTERS OF 2018, the Quarterly Listings were late-filed because the station was using other broadcast carriage methods such as cable and satellite TV providers, as well as the WORO-DT internet site, from half the second quarter of 2018 till the beginning of the third to serve the public with news updates, the Station determined that it

should still file the reports, even if its transmitter was down (silent), because the WORO-DT programming was being carried on an LPTV, cable and satellite and addressed issues of public importance.

On January 18, 2019, WORO-DT was able to complete installation of its transmitter and antenna, enabling the station to transmit at full power. Still there was a lot to do at the transmitter site as well as the studios. For example, by letter dated September 8, 2020, WORO-DT requested an STA to operate at variance from its authorized parameters (with a Center of Radiation at 130 feet or 39.62 meters AGL). Still suffering from a limited office and engineering staff, it was difficult to file the reports in a timely manner. For the Listings due for the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Quarters of 2019, although the station's transmitter was operating at full power, the station was still working on recovering from the hurricane damage. During this period, with all the repairs and improvements being implemented, the station was still able to file the Quarterly Listings, albeit months late. It was even difficult to find contracting resources to conduct needed work because as the Commission can remember the island was also required to re-band the TV spectrum at same time as recovering from this monster storm.

With respect to the late-filed Children's TV Reports, internet problems caused the late-filing of the Reports for the 2<sup>nd</sup> Quarter of 2014 and the 1<sup>st</sup> Quarter of 2016. Since the reports are filed via internet, in the absence of service we were unable to do so in a timely manner. Absence of service in those cases were all due to ISP service outages.

For the late-filed Children's Reports for the 3<sup>rd</sup> and 4<sup>th</sup> Quarter of 2017 and the 1<sup>st</sup> and 2<sup>nd</sup> Quarters of 2018, the station remained off the air, silent. For the Report for the 3<sup>rd</sup> Quarter of 2018, the station's transmitter was back in operation, but the station was still working on recovering from the hurricane damage. Nevertheless, the Reports were

filed, albeit late. As for the missing Quarterly Reports for the 3<sup>rd</sup> and 4<sup>th</sup> Quarters of 2019, WORO-DT was struggling to get any programming out to the public and with all the communications systems problems, it was impossible to file the reports in a timely manner. Internet disruptions were common at the time and with all the recovery work and limited staff it was nearly impossible to file on time. These missing Reports have since been filed electronically with the FCC.

In January 2019 WORO-DT resumed full power transmission and by February 2019 the station was fully operational, but still had a lot of catching up to do. To prevent these lapses from recurring, absent devastating conditions beyond WORO-DT's control, such another damaging hurricane, issues program list data is now collected monthly, and the station acquired an additional dedicated internet service to have redundancy and prevent internet outages.

*The commercial licensee certifies that its advertising sales agreements do not discriminate on the basis of race or ethnicity and that all such agreements held by the licensee contain non-discrimination clauses.*

I declare, under penalty of perjury, that I am an authorized representative of, the Tele Oro-Canal 13 WORO-DT Trust, the applicant for renewal of license for WORO-DT, Fajardo, PR.

/s/ Roberto Octavio Gonzales Nieves, O.F.M.,  
Trustee and Archbishop of San Juan.  
Dated: January 28, 2022