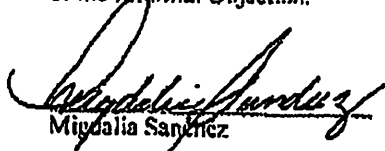


**DECLARATION OF
MIGDALIA SANCHEZ**

I am President of The Broadcasting Group, Inc., licensee of WBVL-LP. On December 18, 2018, we filed an application to assign the license of WBVL-LP to Sucredmedia, Inc. (BAL-20181218ABD).

On December 27, 2018, REC Networks filed an Informal Objection to the application. On January 10, 2019, in accordance with FCC Rules Section 73.3587, REC Networks filed a withdrawal of the pending application.

As required by FCC Rules Section 73.3588, I declare that neither The Broadcast Group, Inc. nor its principles has paid or will pay any money or other consideration for the withdrawal of the Informal Objection.

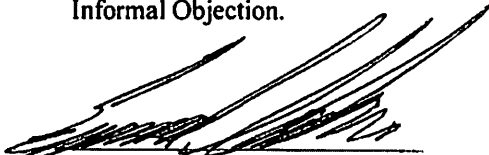

Migdalia Sanchez

**DECLARATION OF
EDUARDO COLON**

I am President of Sucremedia, Inc., proposed assignee of the license of WBVL-LP. On December 18, 2018, an application to assign the license of WBVL-LP to Sucremedia, Inc. was filed by The Broadcasting Group, Inc. (BALL-20181218ABD).

On December 27, 2018, REC Networks filed an Informal Objection to the application. On January 10, 2019, in accordance with FCC Rules Section 73.3587, REC Networks filed a withdrawal of the pending application.

As required by FCC Rules Section 73.3588, I declare that neither Sucremedia, Inc. nor its principles has paid or will pay any money or other consideration for the withdrawal of the Informal Objection.



Eduardo Colon



REC Networks / REC ネットワーク

J1 Radio/J1 ラジオ

11541 Riverton Wharf Rd

Mardela Springs, MD 21837

+1 202 621-2355

<http://www.recnet.com>

<http://www.J1FM.tokyo>

Michelle ("Michi") Bradley

太田道子

Founder of REC/Director of J1 Radio

REC 代表取締役

J1 ラジオ ディレクター

mae@recnet.com

REC is amending our *Withdrawal* to include a disclosure that REC had received no remuneration or other consideration in association with this withdrawal.

In the matter of:

The Broadcasting Group, Inc & Sucremedia, Inc.

WBVL-LP

BALL-20181218ABD

WITHDRAWAL

In accordance with §73.3587, on December 27, 2018, REC Networks (REC) filed an informal objection to the pending assignment application captioned above.¹ Based on statements made in the January 9, 2019 *Opposition* and in the revised Asset Purchase Agreement (APA) in the January 9, 2019 amendment to the above captioned application, REC is satisfied that the concerns about the uncertified transmitter have been addressed and that the APA now better represents the depreciated value of tangible items involved in this transaction in accordance with §73.865(a)(1) of the rules.²

REC overall remains concerned that "big ticket" sales like this are slowly becoming a part of a culture for the service that was initially established to provide community voices without the motivation of a profit. We remain disturbed that station brokers are listing LPFM stations for sale like they are real estate. Recently, brokers had listed two LPFM stations for sale in the Orlando metro area where this station is also located. I am not aware if this was one of those stations and for the argument of this proceeding, it is irrelevant.

While counsel for the opposition may paint REC as a self-appointed guardian for the LPFM service, we are using our legal right under the rules to point out controversial transactions as caretakers for the original intention of the LPFM service that was created in 2000 and which scope has not changed since. The Commission depends on input from the public to raise awareness of questionable applications. The APA in the above captioned application was originally considered at \$100,000 and then lowered to around \$65,000 for the application filing in which the amount

¹ - See 47 C.F.R. §73.3587 ("Before FCC action on any application for an instrument of authorization, *any person* may file informal objections to the grant.") (emphasis added) Unlike *Petitions to Deny*, *Informal Objections* do not require the formal requirements for standing such as geographic location. In order to maintain the integrity of the LPFM service as a form of local community broadcasting, all assignment and transfer applications are reviewed by REC to assure compliance with the Commission's rules.

² - See 47 C.F.R. §73.865(a)(1).

was justified by using new list prices for merchandise. Even at nearly \$40,000 reflecting depreciation, the transaction is still controversial. Despite the controversy, it does not necessarily violate the rules as a schedule was provided and unlike in *HGN Music & Education Foundation*, the schedule was not redacted.³

The underlying issue here is the big-ticket price that the station is being “sold” for and whether items up and above what is absolutely necessary to run a station (such as stage lighting mounts) should be included. However, under the current rules, it is allowed. Therefore, in accordance with those rules, there is no longer a barrier to this transaction and we will turn the overall issue to the rulemaking process.

In light of the foregoing, REC **withdraws** its *Informal Objection* in the above captioned proceeding.

REC has received no remuneration or consideration actual or promised in connection with this withdrawal. This withdrawal was initiated by REC by its own free will based on amendment based on applicants and in accordance with REC positions.

Respectfully submitted,
/S/
Michelle A. Bradley
Founder
REC Networks
Revised March 27, 2019

CERTIFICATE OF SERVICE:

A copy of this pleading will be served by U.S. Mail First Class upon counsel for this proceeding, placed in the mailbox on January 10, 2019:

Francisco R. Montero
Fletcher, Heald & Hildreth, PLC
1300 N 17th Street
Suite 1100
Arlington, VA 22209
/S/
Michelle A. Bradley

³ - See *HGN Music & Education Foundation*, BALL-20160930All, Attachment 5. See also Id. at Exhibit 5 (indicating that the schedule is redacted citing LUJ, Inc., 17 FCC Rcd. 16980 (2002)). *Dismissed* December 13, 2016.