

**Pending Renewal Applications and Network Representation Rule**

Several of the broadcast stations licensed to subsidiaries of Univision Communications Inc. ("Univision") are the subject of pending applications for renewal of license, and during the pendency of this transfer of control application and concurrently filed transfer of control applications, additional applications may be due and pending for the renewal of license of other Univision stations. This statement is submitted in furtherance of the Commission's policy permitting consummation of a multi-station transfer of control applications that overlap the renewal cycle of a subset of the stations involved in the transaction where (1) no basic qualifications issues against the transferor and transferee were raised or, if raised, were resolved favorably, and (2) transferee explicitly assents to standing in the stead of the transferor in any renewal proceeding that is pending at the time of consummation of the transfer of control. *See, e.g., Shareholders of CBS Corporation*, 16 FCC Rcd 16072, 16072-73, para. 3 (2001) ("The Commission repeatedly has held that, in multi-station transactions, it will grant the transfer of control application while the renewal application is pending as long as there are no basic qualification issues pending against the transferor or transferee that could not be resolved in the context of the transfer proceeding, and the transferee explicitly assents to standing in the stead of the transferor in the pending renewal proceeding."). The transferee hereby assents to succeeding to the place of the current licensee in any pending renewal applications, consistent with the procedures set forth in *Shareholders of CBS Corporation*.

As the Commission is aware, Univision, along with other Spanish-language networks, was granted a permanent waiver of the network representation rule, 47 C.F.R. Section 73.658(i). *See Amendment of §73.658(i) of the Commission's Rules, Concerning Network Representation of TV Stations in National Spot Sales*, 5 FCC Rcd 7280 (1990) ("National Spot Sales"); *see also Azteca International Corporation Petition for Waiver of Section 73.658 (i) of the Commission's Rules*, 18 FCC Rcd 10662 (MB 2003). Given that the Transferee is stepping into the shoes of the Transferor in regards to both the Univision broadcast stations and the Univision network, it is the Transferee's understanding that no further action on the Commission's part is necessary for the continuation of the permanent waiver of Section 73.658(i) in connection with the proposed transfer of control. *Accord Telemundo Communications Group, Inc.*, 17 FCC Rcd 6958 (2002) (no specific ruling on continuation of permanent waiver of Section 73.658(i)). To the extent such action might be deemed necessary, the Transferee hereby requests reauthorization of the permanent waiver of Section 73.658(i) granted to the Univision network in *National Spot Sales* to Univision as controlled by the Transferee.