

### **Multiple Ownership**

The attached Engineering Exhibit prepared by du Treil, Lundin & Rackley, Inc. demonstrates that the proposed acquisition of radio station WTIL(AM), Mayaguez, Puerto Rico, by International Broadcasting Corporation (IBC) is consistent with the multiple ownership rules of the Commission.

With respect to the acquisition of Station WTIL, the Engineering Exhibit illustrates that this station is in a defined radio market in which there are 28 radio stations, 14 AM and 14 FM stations only two of which will be operated by ("IBC"), WTIL, and WKVN, Quebradillas, Puerto Rico, which is the subject of a currently pending assignment application (File No. 20030530 DLA). The acquisition of WTIL by IBC is fully consistent with the local radio station multiple ownership rules which permit a party in a radio market of at least 28 stations to have an attributable ownership interest in up to six commercial radio stations, not more than four of which are in the same service in a radio market.

WTIL is located within the Grade A contour of UHF television station WVEO(TV), Ch. 44, Aguadilla, Puerto Rico, licensed to Southwestern Broadcasting Corporation, which is commonly owned by Pedro Roman Collazo, the owner of IBC. Station WVEO(TV) operates as a satellite television station with commonly owned television station WTCV(TV), Ch. 18, San Juan, Puerto Rico and is thus exempt under Note 5 to Section 73.3555 of the Rules from application of Sections 73.3355(b) and (c) of the multiple ownership rules.<sup>1</sup>

According to the Commission's records, there are more than thirty full power commercial and noncommercial television stations licensed to Puerto Rico which is considered

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<sup>1</sup> Under the Commission's local television multiple ownership rules, IBC, SBC, and Sr. Collazo, in the aggregate, could own three television stations because the Puerto Rican DMA has more than 19 full-power commercial and noncommercial television broadcast stations.

a single market under Section 73.3555 of the Rules with respect to television ownership. (See Attachment A) Under Section 73.3555(c) of the Rules, the only limit therefore on the ownership of the radio and television stations by IBC, SBC, and Pedro Roman Collazo as it applies to the acquisition of WTIL is the radio ownership described in the above second paragraph. Thus, the proposed ownership by IBC of WTIL is consistent with both the radio and television multiple ownership rules.