

Explanation of Control and Timeline of the Pendency of Applications

As noted in the Video Division's February 24, 2015 letter, and as discussed in the previously submitted exhibit "Transaction Description and Dismissal Request," Mr. Pedro Roman Collazo, the sole proprietor of WEKO and the 100% owner of International Broadcasting Corp. ("IBC"), was declared in 2011 by a court of law to be incompetent to manage his business affairs, including the operation of the FCC-licensed stations which are the subject of this application (the "Stations"). The Puerto Rican court appointed Mr. Collazo's nephew, Angel Roman Lopez, as legal guardian to handle Mr. Collazo's affairs. On December 12, 2011, applications were filed on Forms 316 seeking consent to the involuntary transfer of control of the Stations to Mr. Lopez (File Numbers BTC-20111212AHF and BTC-20111212AGU, collectively the "Short Form Applications").

Mr. Collazo died in early 2012, and a letter was submitted to the Commission providing timely notification. Because Mr. Collazo died intestate, it was not known for some time who would inherit the Stations. The court-ordered guardianship remained in place until such disposition of assets could be determined, thus no immediate amendments were made to the Short Form Applications. Mr. Lopez and his sister, Ruth Roman Lopez, were named sole heirs of Mr. Collazo's estate in August 2012.

For much of 2012 and 2013, the focus of Mr. Lopez's attention was on restoring operations and revamping the businesses of the Stations, which had suffered for years due to Mr. Collazo's deteriorating health. During this same time, IBC's FCC counsel was focused on filing and prosecuting the renewal applications for the Stations. Unfortunately, the need to further amend the Short Form Applications was overlooked. However, it should be noted that despite regular communication with several staff attorneys in both the Video and Audio Divisions during 2012 and 2013, and despite a specific inquiry to Video Division staff about the status of the pending transfer applications in March 2013, it was not until the Fall of 2013 that FCC staff contacted IBC's counsel about the sufficiency of the Short Form Applications.

In late October 2013, IBC received guidance from FCC staff directing that a long-form 315 application for transfer of control should be filed to supersede the Short Form Applications. A 315 (which is the subject of this amendment) was filed in January 2014 (the "Long Form Application").

Dialogue between the staff and IBC's counsel on the need for amendment of the Long Form Application began within the following month and continued for several months without resolution (emails can be provided upon request). Part of the delay was due to the demand by the Video Division that the transferors provide Nielsen ratings data as support for certain compliance showings. None of the Stations are Nielsen subscribers, thus obtaining this information was quite difficult. In addition, the transferors had to engage a consulting engineer to run the contour analyses requested by the staff, and engage a consultant to prepare a market analysis. Mr. Ribas prepared his analysis and submitted it to the commission in October 2014. Unbeknownst to counsel, Mr. Ribas submitted his letter directly to the FCC without identifying information, and it was never delivered to the Video Division. Finally, at the end of 2014, IBC's longtime FCC counsel Richard Swift, retired.

The transferors regret any inadvertent delays in filing the requisite applications. Mr. Lopez has, since he became guardian in 2011, asserted operational control over the stations and has endeavored to restore them to full FCC compliance and to business viability. He and his sister have exercised de facto control over the stations since their determination as heirs in August 2012. The transferors have, throughout this period, worked diligently to ensure FCC compliance and to provide responsive service to the stations' communities.