

**Request for Special Temporary Authorization**  
NCE Station WQTO(TV), Ponce, PR (Facility ID No. 2175)

Pursuant to Section 73.1635 of the FCC's Rules, Sistema Universitario Ana G. Mendez, Inc. ("Mendez"), licensee of noncommercial educational DTV station WQTO(TV), Ponce, Puerto Rico ("WQTO"), hereby requests Special Temporary Authorization ("STA") to operate the station at a variance from its authorized parameters. Specifically, Mendez seeks STA to temporarily operate its main DTV facility at a maximum effective radiated power ("ERP") that is greater than that authorized by WQTO's currently licensed facilities but less than the ERP authorized for the station's maximized facilities in FCC File No. BMPEDT-20100202ABJ.

On June 20, 2008, Mendez applied for a construction permit to maximize the WQTO facilities by increasing the station's maximum ERP from 200 kW to 800 kW. This construction permit was granted by the FCC on October 30, 2008 in FCC File No. BPEDT-20080620AEL. Subsequently, Mendez determined that a distributed transmission system ("DTS") incorporating the station's authorized maximization facilities and a new secondary DTS site would provide better service to the WQTO service area due to terrain issues. On February 2, 2010, Mendez submitted an application for a minor modification of the WQTO maximization permit, to permit the construction of a DTS facility. The FCC granted this application on February 4, 2010 in FCC File No. BMPEDT-20100202ABJ.

Mendez now seeks STA to operate WQTO's main (DTS 1) site at an increased maximum ERP of 750 kW pending construction of the station's fully authorized DTS facility. While this increased maximum ERP is greater than that authorized by the station's currently licensed facilities (200 kW), it is nonetheless less than the maximum ERP (800 kW) authorized for the station's maximized facilities. Moreover, the proposed STA facility parameters otherwise correspond exactly to those authorized for the higher-power DTS site 1 facility.

A grant of STA to operate WQTO at a maximum ERP of 750 kW will serve the public interest by allowing WQTO to ensure that its post-transition noncommercial educational digital TV service can reach the greatest number of viewers while the authorized DTS is constructed. Indeed, operating the station at this increased ERP would provide significantly increased coverage compared to the station's existing post-transition DTV facility. *See* Engineering Statement.

Mendez is a noncommercial educational licensee and operates WQTO on a noncommercial educational basis. The licensee is therefore exempt from FCC filing fee requirements, pursuant to Section 1.1114 of the Commission's Rules, and the facility is exempt from FCC regulatory fees, pursuant to Section 1.1162 of the Rules.