

Narrative Statement in Support of *Pro Forma* Transfer of Control

The Pontifical Catholic University of Puerto Rico Service Association, Inc. (“PCUSA”) is the licensee of noncommercial, educational FM radio station WPUC-FM, Ponce, Puerto Rico (FCC Facility ID 9351). PCUSA is a subpart of The Pontifical Catholic University of Puerto Rico (the “University”). PCUSA is guided by a board of directors (“Board”), the members of which are appointed by the University, but the Board acts independently in exercising its oversight duties of PCUSA. WPUC-FM plays an important role in the educational life of University’s students and is staffed substantially by student volunteers. The University and WPUC-FM are Spanish speaking institutions.

WPUC-FM is operated at an extremely high level of integrity. The Pontifical Universities are Roman Catholic universities which were established and are directly under the authority of the Holy See, which provides guidance to the University as a whole and to the Board. The Pontifical Universities are licensed to grant academic degrees in sacred faculties, among them Canon Law, Philosophy, Sacred Theology and Sacred Scripture. The Pontifical Universities also follow a European system of degrees in the sacred faculties, whereby they grant the bachelor's degree, the licentiate and the doctorate. The Holy See can also provide charters to independent institutions or individual faculties at non-pontifical universities to grant pontifical degrees. Such institutions are referred to as pontifical faculties or pontifical institutes.¹

The purpose of the instant application for a *pro forma* transfer of control is to request the Commission’s consent a change in the membership of the Board of PCUSA which did not cause any material change in the control of PCUSA. The circumstance are as follows.

¹ The Pontifical Universities are under the direct authority of the Holy See, high moral standards and discipline are expected of students, and the teachings are also equivalent to the apostolic constitution of the Catholic Church. (See <https://vatican.com/The-Pontifical-Universities/> September 23, 2019).

As of October 1, 2015, the Board consisted of the following six members (called the “Old Board of the Pontifical Catholic University of Puerto Rico Service Association, Inc.” on the instant transfer of control application):

Monsenor Felix Lazaro
Rev. D. Alberto Castro Toro
Monsenor Roberto Garcia Blay
Julio E. Feliu Ramirez
Jorge Ivan Velez Arocho
Jose Hector Vivas

As of October 1, 2017, the Board consisted of the following seven members (called the “New Board of the Pontifical Catholic University of Puerto Rico Service Association, Inc.” on the instant transfer of control application):

Monsenor Roberto Garcia Blay
Jose Hector Vivas
Julio E. Feliu Ramirez
Rev. D. Alberto Castro Toro
Jorge Ivan Velez Arocho
Monsenor Ruben Antonio Gonzalez Medina
Monsenor Elias Morales Rodriguez

As shown above, the composition of the Board changed between October 1, 2015 and October 1, 2017. Monsenor Felix Lazaro resigned from the Board on December 2, 2015. Monsenor Ruben Antonio Gonzalez Medina was appointed to the Board on December 2, 2015 and Monsenor Elias Morales Rodriguez was appointed to the Board on February 13, 2019. Five members of the Board remained in place, representing a substantial majority of the Board. Therefore, PCUSA respectfully requests that the Commission consent to the *pro forma* transfer of control of PSCUA from board membership shown as of October 1, 2015 to the membership shown as of October 1, 2017, *nunc pro tunc*. Because a majority of the Board remained in place, PCUSA submits that no prior consent of the Commission was required for this change in the composition of the Board.

Because these were internal, administrative matters, there were no agreements, or similar documents, executed as part of these changes in the composition of the Board.