



(REFERENCE COPY - Not for submission)

## Amendment to a Modification of a Licensed Facility for DTS Application

File Number: **0000028318** | Submit Date: **07/14/2017** | Call Sign: **WQTO** | Facility ID: **2175** | FRN: **0001731298** | State: **Puerto Rico** | City: **PONCE**  
 Service: **DTS** | Purpose: **Minor Modification Amendment BLEDT-20130708ACB** | Status: **Granted** | Status Date: **08/11/2017** | Expiration Date: **01/28/2019** | Filing Status: **Active**

### General Information

Section	Question	Response
<b>Attachments</b>	Are attachments (other than associated schedules) being filed with this application?	Yes

### Fees, Waivers, and Exemptions

Section	Question	Response
<b>Waivers</b>	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	
	Are the frequencies or parameters requested in this filing covered by grandfathered privileges, previously approved by waiver, or functionally integrated with an existing station?	No

**Applicant  
Information**

**Applicant Name, Type, and Contact Information**

Applicant	Address	Phone	Email	Applicant Type
<b>SISTEMA UNIVERSITARIO ANA G. MENDEZ, INC.</b> Doing Business As: SISTEMA UNIVERSITARIO ANA G. MENDEZ, INC.	P.O. BOX 21345 SAN JUAN, PR 00928 United States	+1 (787) 766-2600	CA_ADIAZ@SUAGM. EDU	Private Not-for-Profit Educational Institution

**Authorization Holder Name**

Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

**Contact  
Representatives  
(2)**

Contact Name	Address	Phone	Email	Contact Type
<b>Todd D. Gray</b> Gray Miller Persh LLP	1200 New Hampshire Ave., NW Suite 410 Washington, DC 20036 United States	+1 (202) 776- 2571	tgray@graymillerpersh. com	Legal Representative
<b>BENJAMIN PIDEK , P.E</b> . <i>CONSULTING</i> <i>ENGINEER</i> MID-STATE CONSULTANTS	6197 MILLER RD., SUITE 1 SWARTZ CREEK, MI 48473 United States	+1 (810) 226- 0750	BPIDEK@MSCON. COM	Technical Representative

## Alien Ownership

Question	Response
1) Is the applicant a foreign government or the representative of any foreign government as specified in Section 310(a) of the Communications Act?	
2) Is the applicant an alien or the representative of an alien? (Section 310(b)(1))	
3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))	
4) Is the applicant an entity of which more than one-fifth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any entity organized under the laws of a foreign country? (Section 310(b)(3))	
5) Is the applicant directly or indirectly controlled by any other entity of which more than one-fourth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(4))	
6) Has the applicant received a declaratory ruling(s) under Section 310(b)(4) of the Communications Act?	
6a) Enter the citation of the applicable declaratory ruling by DA/FCC number, FCC Record citation, release date, or any other identifying information.	
7) Has there been any change in the applicant's foreign ownership since issuance of the declaratory ruling(s) cited in response to Question 6?	
7a) Enter the File or Docket Number of the Petition for Declaratory Ruling that the applicant has filed for its foreign ownership in connection with this application pursuant to Section 310(b)(4) of the Communications Act. It is not necessary to file a request for a foreign ownership declaratory ruling if the applicant attaches a showing that the requested authorization(s) is exempt from the provisions of Section 310(b)(4).	
8) Does the applicant certify that it is in compliance with the terms and conditions of the foreign ownership declaratory ruling(s) cited in response to Question 6?	
9) In connection with this application, is the applicant filing a foreign ownership Petition for Declaratory Ruling pursuant to Section 310(b)(4) of the Communications Act?	

## Basic Qualifying Questions

Section	Question	Response
<b>Revoked Application</b>	Has the Applicant or any party to this application had any FCC station Authorization revoked or had any application for an initial, modification or renewal of FCC station Authorization denied by the Commission?	No
<b>State or Federal Convictions</b>	Has the Applicant or any party to this application, or any party directly or indirectly controlling the Applicant, ever been convicted of a felony by any state or federal court?	No

**Channel and Facility Information**

Section	Question	Response
<b>Proposed Community of License</b>	Facility ID	2175
	State	Puerto Rico
	City	PONCE
	DTS Channel	19
	Designated Market Area	PUERTO RICO
<b>Facility Type</b>	Facility Type	Noncommercial Educational
	Station Type	Main
<b>Zone</b>	Zone	2

**DTS Reference Point**

Section	Question	Response
<b>Construction Permit File Number and Facility ID</b>	File Number for Current Authorized Service Area:	
	Facility ID	2175
<b>Coordinates (NAD83)</b>	Latitude	18° 04' 40.8" N+
	Longitude	066° 44' 54.6" W-

**Site 1: Antenna  
Location Data**

Section	Question	Response
<b>Antenna Structure Registration</b>	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1231838
<b>Coordinates (NAD83)</b>	Latitude	18° 04' 41.0" N+
	Longitude	066° 44' 54.0" W-
	Structure Type	TOWER-A free standing or guyed struct
	Overall Structure Height	74.1 meters
	Support Structure Height	60.1 meters
	Ground Elevation (AMSL)	615.1 meters
<b>Antenna Data</b>	Height of Radiation Center Above Ground Level	66 meters
	Height of Radiation Center Above Average Terrain	310 meters
	Height of Radiation Center Above Mean Sea Level	681.1 meters
	Effective Radiated Power	696 kW

**Site 1: Antenna  
Technical Data**

Section	Question	Response
<b>Antenna Type</b>	Antenna Type	Directional Custom
	Do you have an Antenna ID?	Yes
	Antenna ID	107424
<b>Antenna Manufacturer and Model</b>	Manufacturer:	DIE
	Model	TFU-22DSC P230 DC
	Electrical Beam Tilt	0.5
	Mechanical Beam Tilt	Not Applicable
	toward azimuth	
	Polarization	Horizontal
<b>DTV and DTS: Elevation Pattern</b>	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	Yes
	Rotation	0 degrees
	Uploaded file for elevation antenna (or radiation) pattern data	wqto dts site 1 elevation pattern.xml

**Directional Antenna Relative Field Values (Pre-rotated Pattern)**

Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)
0	0.566	90	1	180	0.566	270	1
10	0.542	100	0.959	190	0.542	280	0.959
20	0.482	110	0.844	200	0.482	290	0.844
30	0.418	120	0.683	210	0.418	300	0.683
40	0.417	130	0.52	220	0.417	310	0.52
50	0.52	140	0.417	230	0.52	320	0.417
60	0.683	150	0.418	240	0.683	330	0.418
70	0.844	160	0.482	250	0.844	340	0.482
80	0.959	170	0.542	260	0.959	350	0.542

**Additional Azimuths**

Degree	V <sub>A</sub>
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**Site 2: Antenna Location Data**

Section	Question	Response
<b>Antenna Structure Registration</b>	Do you have an FCC Antenna Structure Registration (ASR) Number?	No
	ASR Number	
<b>Coordinates (NAD83)</b>	Latitude	18° 18' 58.8" N+
	Longitude	067° 10' 47.6" W-
	Structure Type	TOWER-A free standing or guyed struct
	Overall Structure Height	61 meters
	Support Structure Height	61 meters
	Ground Elevation (AMSL)	350 meters
<b>Antenna Data</b>	Height of Radiation Center Above Ground Level	38 meters
	Height of Radiation Center Above Average Terrain	334 meters
	Height of Radiation Center Above Mean Sea Level	388 meters
	Effective Radiated Power	13.1 kW



**Site 2: Antenna  
Technical Data**

Section	Question	Response
<b>Antenna Type</b>	Antenna Type	Directional Custom
	Do you have an Antenna ID?	No
	Antenna ID	1001900
<b>Antenna Manufacturer and Model</b>	Manufacturer:	DIE
	Model	TFU-16DSB/VP-R P270 SP
	Electrical Beam Tilt	3
	Mechanical Beam Tilt	Not Applicable
	toward azimuth	
	Polarization	Elliptical
<b>DTV and DTS: Elevation Pattern</b>	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	Yes
	Rotation	0 degrees
	Uploaded file for elevation antenna (or radiation) pattern data	WQTO DTS Site 2 Elevation Pattern.xml

**Directional Antenna Relative Field Values (Pre-rotated Pattern)**

Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)
0	1	90	0.353	180	1	270	0.353
10	0.961	100	0.332	190	0.961	280	0.332
20	0.851	110	0.283	200	0.851	290	0.283
30	0.685	120	0.256	210	0.685	300	0.256
40	0.497	130	0.332	220	0.497	310	0.332
50	0.332	140	0.496	230	0.332	320	0.496
60	0.256	150	0.685	240	0.256	330	0.685
70	0.283	160	0.851	250	0.283	340	0.85
80	0.332	170	0.961	260	0.332	350	0.961

**Additional Azimuths**

Degree	V <sub>A</sub>
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**Parties to the  
Application (0)**

Information not provided.

**Attributable Interest**

Section	Question	Response
<b>Equity and Financial Interests</b>	Applicant certifies that equity and financial interests not set forth by the applicant parties are non-attributable.	
<b>Other Authorizations</b>	Does the applicant or any party to the application have an attributable interest in any other broadcast station(s).	

**Construction  
Permit  
Certifications**

Section	Question	Response
<b>Post-Incentive Auction Expedited Processing</b>	It will operate on the DTV channel for this station as established in the post-incentive auction channel reassignment public notice.	Yes
	It will operate post-incentive auction facilities that do not expand the noise-limited service contour in any direction beyond that established by the post-incentive auction channel reassignment public notice.	Yes
	It will operate post-incentive auction facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the post-incentive auction channel reassignment public notice.	Yes
	The antenna structure to be used by this facility has been registered by the Commission and will not require re-registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely affect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	Yes
<b>Environmental Effect</b>	Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? (See 47 C.F.R. Section 1.1306)	No
<b>Broadcast Facility</b>	The proposed facility complies with all of the following applicable rule sections. 47 C.F.R. Sections 74.709, 74.793 (e), 74.793(f), 74.793(g), 74.793(h)	Yes
<b>Interference Protection Provisions</b>	The proposed TV station satisfies the interference protection provisions of 47 C.F.R. Section 73.626.	Yes
<b>DTS Facility Requirements</b>	The combined coverage from all of the DTS transmitters in the proposed DTS facility covers all of the station's authorized service area, as required in 47 C.F.R. Section 73.626(f)(1).	Yes
	Each DTS transmitter's coverage is contained within either the TV station's Table of Distances area (47 C.F.R. Section 73.626 (c)) or its authorized service area, except where such coverage is of a minimal amount and necessary to meet the requirements of 47 C.F.R. Section 73.626(f)(1).	Yes, but coverage exceeds station s authorized service area by minimal amount
	Each DTS transmitter's coverage is contiguous with at least one other DTS transmitter's coverage, as required in 47 C.F. R. Section 73.626(e)(3).	Yes
	The coverage from one or more DTS transmitter(s) in the DTS facility provide(s) principal community coverage, as required in 47 C.F.R. Section 73.626(e)(4).	Yes, one transmitter provides principal community coverage
	The combined field strength of all of the DTS transmitters in the proposed DTS facility do not cause interference to another station in excess of the criteria specified in 47 C.F. R. Section 73.616, as required in 47 C.F.R. Section 73.626 (e)(5).  Note: The combined field strength level shall be determined by a "root-sum-square" calculation, where the combined field strength level at a given location is equal to the square root of the sum of the squared field strengths from each transmitter in the DTS network at that location.	Yes

Each DTS transmitter in the proposed DTS facility is located within either the TV station's Table of Distances area or its authorized service area.

Yes

**Legal  
Certifications**

Section	Question	Response
<p><b>Eligibility</b></p>	<p>The applicant certifies that it is a:</p>	
	<p>The applicant certifies that the applicant's officers, directors and members of its governing board are broadly representative of the educational, cultural, and civic segments of the principal community to be served.</p>	
	<p>The applicant certifies that the Commission has previously granted a broadcast application identified here by file number that found this applicant qualified as a noncommercial educational entity with a qualifying educational program, and that the applicant will use the proposed station to advance a program similar to that the Commission has found qualifying in applicant's previous application.</p>	
	<p>FCC File Number</p>	
	<p>The applicant certifies that its governing documents (e.g., articles of incorporation, by-laws, charter, enabling statute, and/or other pertinent organizational document) permit the applicant to advance an educational program and that there is no provision in any of those documents that would restrict the applicant from advancing an educational program or complying with any Commission rule, policy, or provision of the Communications Act of 1934, as amended.</p>	
<p><b>Character Issues</b></p>	<p>Applicant certifies that neither applicant nor any party to the application has or had any interest in, or connection with:</p> <ul style="list-style-type: none"> <li>(a) any broadcast application in any proceeding where character issues were left in unresolved or were resolved adversely against the applicant or party to the application; or</li> <li>(b) any pending broadcast application in which character issues have been raised.</li> </ul>	
<p><b>Adverse Findings</b></p>	<p>Has the Applicant or any party to this application had an adverse finding or an adverse final action taken by any court or administrative body in a civil or criminal proceeding brought under any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?</p>	
<p><b>Program Service Certification</b></p>	<p>Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	
<p><b>Local Public Notice</b></p>	<p>Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	
<p><b>Equal Employment Opportunity (EEO)</b></p>	<p>If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report.</p>	
<p><b>Holding Period</b></p>	<p>Applicant certifies that this application does not propose a modification to an authorization that was awarded on the basis of a preference for fair distribution of service pursuant to 47 U.S.C. Section 307(b).</p>	<p>Yes</p>
	<p>Applicant certifies that the proposed modification will not downgrade service to the area on which the Section 307(b) preference was based.</p>	

Applicant certifies that although it proposes to downgrade service to the area on which the Section 307(b) preference was based, applicant has provided full service to that area for a period of four years of on-air operations.	
Applicant certifies that this application does not propose a modification to an authorized station that received a credit for superior technical parameters under the point system selection method in 47 C.F.R. Section 73.7003.	Yes
Applicant certifies that the population and area within the proposed service contour (60 dBu (FM) or Noise-Limited (TV)) are greater than or equivalent to those authorized.	

**Certification**

Section	Question	Response
<p><b>General Certification Statements</b></p>	<p>The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).</p>	
	<p>The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002 (c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.</p>	
<p><b>Authorized Party to Sign</b></p>	<p><b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b></p> <p>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</p> <p>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</p>	
	<p>I certify that this application includes all required and relevant attachments.</p>	<p>Yes</p>
	<p>I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.</p>	<p><b>Margarita Millan</b>  <i>General Manager and Vice President</i></p> <p>07/14/2017</p>



## Attachments

File Name	Uploaded By	Attachment Type	Description
<a href="#"><u>WQTO CP Amendment - Application Changes 7-14-17.pdf</u></a>	Applicant	Amendment	Amendment Changes
<a href="#"><u>WQTO DTS Post IA CP EngSta 7-6-17.pdf</u></a>	Applicant	Technical Certifications	Technical Exhibit and RFR Statement
<a href="#"><u>WQTO Site 1 FCC Patterns.pdf</u></a>	Applicant	Technical Certifications	WQTO DTS Site 1 Antenna Azimuth and Elevation Data and dBk Table
<a href="#"><u>WQTO Site 2 FCC Patterns.pdf</u></a>	Applicant	Technical Certifications	WQTO DTS Site 2 Antenna Azimuth and Elevation Data and dBk Table
<a href="#"><u>wqto dts site 1 elevation pattern.xml</u></a>	Applicant	Elevation Pattern	
<a href="#"><u>WQTO DTS Site 2 Elevation Pattern.xml</u></a>	Applicant	Elevation Pattern	