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In the matter of

Albuquerque Hispanic Community Church

KAQR-LP

File # 0000094995

INFORMAL OBJECTION

In accordance with §73.3587 of the Commission's Rules, REC Networks ("REC") files this *Informal Objection* in respect to the above captioned license application.¹

STATION WAS NEVER CONSTRUCTED

On January 3, 2020, at the request of REC, a member of the Albuquerque broadcast community was dispatched multiple times to the authorized tower site. As shown in the attached photographs, there is no evidence of an antenna, more or less a tower structure. The only signal heard on the authorized frequency was KMGG-LP, another LPFM station authorized in the Albuquerque area. There is no evidence that KAQR-LP was even operating from an unauthorized location.

CONCLUSION

It is clear that in the above captioned case, the applicant has falsely certified that the facility was ever constructed and for this reason, the Commission must DISMISS the license application, FORFEIT the construction permit and DELETE the call letters. This is yet another attempt by Antonio Cesar Guel and counsel to falsely certify construction of a facility where no facility was ever constructed in what appears to be an attempt to warehouse spectrum and "sell" stations under the table.² Our service is not for sale.

Respectfully submitted,

/S/

Michelle Bradley
Founder
REC Networks
January 15, 2020

¹ See 47 C.F.R. §73.3587 ("Before FCC action on any application for an instrument of authorization, **any person** may file informal objections to the grant.") (emphasis added) Unlike *Petitions to Deny*, *Informal Objections* do not require the formal requirements for standing such as geographic location.

² See *South Omaha Hispanic Education Family Fundation*, File No. BLL-20190923ABJ (Requested dismissed after REC determined authorized site was in a parking lot in a state park within a floodplain without an environmental study); *San Pedro Hispanic Community Radio*, File No. BLL-20190802ABA (Dismissed for unknown reasons after REC provided evidence the station never constructed); *Costa Mesa Hispanic Community Radio*, File No. BNPL-20131112AEK (Failure to answer a *Letter of Inquiry* questioning an alleged unauthorized of control); *South Miami Hispanic Community Radio*, File No. BNPL-20131112BEE (Dismissed based on findings from an investigation by the Commission into allegations of an unauthorized transfer of control in which, a major transfer of control was determined.); etc.

A copy of this pleading has been served immediately by e-mail and followed up by First Class Mail on counsel for the applicant on January 16, 2020.

Dan J. Alpert
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/S/
Michelle Bradley

#1 LOOKING EAST



#2 – LOOKING NORTH



THE COORDINATES OF WHERE THE STATION WAS AUTHORIZED IS IN THE AREA AROUND WHERE THE RED STAR ON THE FOLLOWING IMAGE IS LOCATED:



SATELLITE PHOTO OF THE AUTHORIZED SITE SHOWING THE TOWER COORDINATES IN THE AUTHORIZATION AS WELL AS THE APPROXIMATE LOCATION OF WHERE THE PHOTOS WERE TAKEN FROM.

