

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

27 March 2023

In re Applications of)	
)	
REMANENTE BROADCASTING NETWORK)	FRN 0031563182
)	
For NEW Reserved Channel NCE Broadcast Stations)	
Facility ID 766048 in Indian Springs, NV)	FCC File No. 0000167138
Facility ID 766056 in Salton City, CA)	FCC File No. 0000167140
Facility ID 766055 in Dudleyville, AZ)	FCC File No. 0000167141
Facility ID 766042 in Maroni, UT)	FCC File No. 0000167147
Facility ID 766053 in Boron, CA)	FCC File No. 0000167635

To: Marlene H. Dortch, Secretary
Federal Communications Commission
Attn: Media Bureau, Audio Division

REPLY TO OPPOSITION

Triangle Access Broadcasting, Inc. (“Triangle”) hereby replies to the Corrected Opposition to Informal Objection (“Opposition”) submitted March 19, 2023, by Remanente Broadcasting Network (“RBN”).¹ The Opposition was submitted in response to Triangle's Informal Objection (“Objection”) to one of several of RBN's applications for new reserved channel NCE broadcast stations.² In the Opposition, RBN addresses the current control of KRAQ-LP and KZLQ-LP without clarifying a

¹ LMS Pleading File No. 0000212715. While the Opposition was only filed in connection with Facility ID 766053 in Boron, CA, the primary arguments presented apply equally to every surviving RBN application from the November, 2021 NCE FM Filing Window as captioned.

² LMS Pleading File No. 0000186687, duplicated as file nos. 0000186680 – 0000186682 and 0000186685 against other RBN applications and as 0000186667 against a renewal application for Cadena Radial Remenente's KZLQ-LP. Pleading File no. 0000186682 was dismissed, however application no. 0000167140 was curatively resubmitted although Triangle cannot locate a corresponding Petition for Reconsideration. Triangle requests pleading no. 0000186682 also be reinstated if the curative application will be processed. Pending pleadings in file nos. 0000186679, 0000186684 and 0000186686 are against dismissed applications and are thus moot.

befuddling history. The Opposition completely sidesteps that evidence provided with Triangle's Informal Objection demonstrates where RBN's attributable parties have previously simultaneously, thus impermissibly, controlled multiple LPFM stations and have filed inaccurate official statements.

The Opposition predominantly relies upon a statement by Edith Gonzalez Werner that confirms the attributable interests in RBN and includes a statement that “all involvement in governing positions with [Cadena Radial Mision Y Vision Corp. ('Mision') and Cadena Radial Remanente ('CRR')] ceased prior to the opening of the FCC’s November 2021 filing window.”³ This statement generally resolves a concern over overlapping interests involving RBN's attributable parties at the time RBN's applications were filed, however this was but one open concern.

The Gonzalez-Werner Statement is also a tacit admission that RBN's principals have held attributable interests in both Mision and CRR.⁴ It effectively supports the IRS filings for both Mision and CRR, covering 2018 and 2019 and all listing RBN's officers, as true. This is unconscionable given that Mision and CRR previously shared attributable parties with other LPFM applicants and should be expected to understand the rule prohibiting LPFM cross ownership.⁵ Ramon Reynaga resigned from CRR after also being on the board of Cadena Radial El Manantial which also applied for an LPFM station in 2013.⁶ Delia (Gloria) Gonzalez, resigned from the Mision board after also being on the boards of Cadena Radial El Shaddai and Cadena Radial El Manantial who also submitted applications for new LPFM stations in 2013.⁷ Both Mision and CRR are now repeat offenders. RBN's Delia Gloria Gonzalez is personally a repeat offender. The failure to file required a transfer of control with the FCC is rightfully viewed as a concealment. The failures to update information with appropriate state

3 Opposition at Attachment A (“Gonzalez-Werner Statement”).

4 *id.* Involvement in governing positions could not cease unless they were actually held in the first place.

5 Objection, at 4 n.8. *See also* 47 CFR 73.860.

6 BNPL-20131113ABE, as amended January 13, 2014, at Exhibit 1. *See also* BNPL-20131113AYH.

7 BNPL-20131113ABF, as amended January 13, 2014, at Exhibit 1. *See also* BNPL-20131113ABC and BNPL-20131113AYH.

agencies are also rightfully viewed as concealments. Triangle continues to request that the Bureau consider the history of multiple LPFM ownership and obfuscation of attributable interests to determine whether RBN's principals meet the qualifications to hold broadcast licenses.⁸

RBN opines that its officers are not in a position to respond to matters pertaining to other licensees.⁹ Yet, its officers should certainly be able to complete the record with respect to actual service dates with the other licensees, and they should be able to respond regarding complaints that official filings they certified and signed disagree with other official filings. Triangle presented a compilation of inconsistent information involving RBN's principals, and RBN passed on submitting a complete response that could dispel allegations of LPFM cross ownership and lack of candor suggested by the findings.¹⁰

It remains uncontested that Delia Gloria Gonzalez has repeatedly certified, under penalty of perjury, conflicting information to various governmental agencies to demonstrate a lack of candor disqualifying her from holding any interest in an FCC license. Combined with the history of impermissible ownership attributable to each of the RBN parties, including Delia Gloria Gonzalez's repeated attempts, substantial reason exists to DENY RBN's applications.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steven L. White", with a long horizontal flourish extending to the right.

Steven L. White
Director; *Triangle Access Broadcasting, Inc.*

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⁸ Opposition, at 2-3.

⁹ Opposition, at 2 n.3.

¹⁰ An omission of material information could be deemed contrary to 47 CFR § 1.17.

Certification of Steven L. White

I, Steven L. White, declare under penalty of perjury that I have reviewed the foregoing Reply To Opposition and, to the best of my knowledge, the facts set forth therein are true and correct.

By: [Electronically Signed]
Steven L. White

Dated: March 27, 2023

Certificate of Service

I, Steven L. White, certify that a true and correct copy of the foregoing Reply To Opposition was sent, this 27th day of March, 2023, by first-class, postage paid mail to the following:

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(Common Counsel to
Remanente Broadcast Network,
Cedena Radial Remanente, and
Cedana Radial Mision Y Vision)

Concurrently, copies were sent via email to the following:

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By:



Steven L. White