

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In re Applications of

Multicultural Radio Broadcasting Licensee, LLC for Renewal of License of Stations)	FRN: 0010215812
)	
)	
WZRC (AM), New York, NY)	File no. 0000182573
WHWH (AM), Princeton, NJ)	File no. 0000182604
WPAT (AM), Paterson, NJ)	File no. 0000182686
WKDM (AM), New York, NY)	File no. 0000182689
WTTM (AM), Lindenwold, NJ)	File no. 0000182588
WWRU (AM), Jersey City, NJ)	File no. 0000182675

To: The Commission
Attn: Media Bureau

**RESPONSE TO “REPLY TO OPPOSITION TO MOTION TO STRIKE
UNAUTHORIZED PLEADING” AND
MOTION FOR LEAVE TO FILE THE RESPONSE**

Multicultural Radio Broadcasting Licensee, LLC (“MRBL”), by its counsel, hereby files this Response to UCCA’s “Reply to Opposition to Motion to Strike Unauthorized Pleading” (“Reply”) submitted on July 1, 2022 along with a Motion for Leave to File the Response. As will be demonstrated, UCCA’s latest attempt to show that the above referenced stations do not deserve to be renewed are based on speculation and assumptions. UCCA is getting more desperate to provide anything of substance and again fails miserably.

Motion for Leave

1. Once again UCCA raises new matters that could have been entered into the record in its Petition to Deny. For example, the reference to Station WZHF’s pre filing and post filing renewal announcement certifications from 2019 certainly were available to UCCA when it filed its Petition to Deny but UCCA waited until July 1, 2022 to make

arguments concerning these documents. In fact, these new matters are baseless and, as a result, MRBL is compelled to respond and justified in correcting the record. As long as UCCA continues to abuse these pleading opportunities, the stream of pleadings will continue to extend beyond the normal cycles. Thus, MRBL urges the Commission to accept this Response.

Response

2. UCCA claims that MRBL's owners are absentee landlords.¹ In support, UCCA states that the pre filing and post filing renewal announcement certifications were signed by someone hired by the programmer, RM Broadcasting LLC (Arnold Ferolito), rather than by MRBL.² However, this is nothing but pure speculation. In fact, the signer of the Certification page, Libby Parris, has worked with MRBL since June 2000 when MRBL's affiliate entity, Way Broadcasting LLC, purchased the station. Ms. Parris currently remains a fulltime employee for MRBL and Station WZHF. She has no relationship to RM Broadcasting LLC.

3. This is a prime example of UCCA's tendency to make unsupported assumptions. Contrary to UCCA's conjectures, Arthur and Yvonne Liu are hands-on owners. They make all of the major decisions concerning employment, finances and programming for all of its stations. MRBL's parent corporation is a large company with 94 full time and 134 part time employees. They have very few turnovers. Nearly all of their employees are minorities.

4. With that many employees, it is absurd to believe and assume that the radio stations have been abandoned to the programmers. The employees are involved in all

¹ Reply at para.3

² Id.

aspects of running the stations. That is their primary responsibility. Arthur and Yvonne Liu have supervisors and managers that oversee the day to day operations. Indeed, the company is involved locally in the markets in which they have stations, particularly in the New York metro area where they are based. For example, when the 9/11 disaster occurred, MRBL immediately went on the air and MRBL raised a total of \$1,457,688 from its listeners, mostly in the Chinese community, to help the victims. The money was donated to charitable organizations. There were many other instances such as when MRBL engaged in fund raising to support recovery efforts for Hurricane Katrina (raised and donated \$237,615 to charitable organizations) and the Tsunami in Southeast Asia (raised and donated \$454,614 to charitable organizations and the victims). These are just a few of the many contributions that MRBL provides to its communities and listeners.

5. When UCCA characterizes Arthur and Yvonne Liu as having abandoned its stations in favor of its programmers, UCCA has no idea what it is talking about. In this regard, UCCA spends several pages in its Reply claiming that MRBL has misrepresented its Time Brokerage Agreements.³ In support, UCCA provides an email in which undersigned counsel was asked about Time Brokerage Agreements and stated that “there is none”.⁴ However this response referred to whether there was a Time Brokerage Agreement between MRBL and Radio Sputnik, not RM Broadcasting. UCCA conveniently fails to mention that fact. MRBL can only assume that UCCA may have overlooked or forgotten that the purpose of the email statement was to emphasize to UCCA that MRBL did not have any agreement with Radio Sputnik. As a result, the Commission can ignore all of the UCCA Reply pleading from paragraphs 5 through 8.

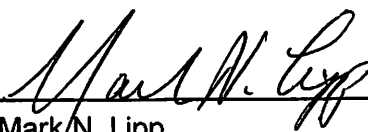
³ Reply at paras. 5-8.

⁴ Reply at Exhibit 3.

6. Throughout this proceeding, UCCA keeps searching for a way to punish MRBL for the programming on WZHF and is focused on these New York and New Jersey stations. However none of the minor issues that UCCA has identified are worthy of consideration with respect to the renewal of these stations. On the contrary, MRBL has provided diverse, popular and needed foreign language programming for various minority populations in the New York metro area. MRBL should be recognized and rewarded for its service to its listeners rather than attacked because a very small portion of its programming on WZHF is offensive to UCCA.⁵ So out of desperation, UCCA continues to file pleadings with new allegations that are based on assumptions and speculations. MRBL urges the Commission to grant the above referenced renewal applications and dismiss the UCCA Petition to Deny.

Respectfully submitted,

Multicultural Radio Broadcasting Licensee, LLC

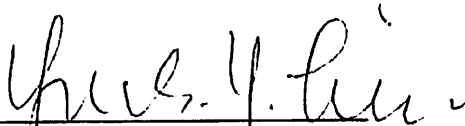
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July 12, 2022

⁵ As previously noted, there was only one program out of 57 programs listed on its 4th Q. Issues Programs list that related to the war in Ukraine.

Declaration of Yvonne Liu

I, Yvonne Liu, am Vice President of Multicultural Radio Broadcasting Licensee, LLC and Way Broadcasting Licensee, LLC. I declare under penalty of perjury that I have read the Response to Reply to Opposition to Motion to Strike Unauthorized Pleading and Motion for Leave to File the Response. I have personal knowledge of the facts. The factual statements made in this pleading are true and correct to the best of my belief and made in good faith.



Yvonne Liu

CERTIFICATE OF SERVICE

I, Mark N. Lipp, of Fletcher, Heald & Hildreth, PLC, hereby certify that I caused a copy of the foregoing "Response to 'Reply to Opposition to Motion to Strike Unauthorized Pleading" and Motion for Leave to file the Response to be sent on July 12, 2022, via email to the following individuals:

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