

July 7, 2023

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: FCC File No. 167104 Vida Ministry Inc. (FCC MX Group 200)

REPLY TO OBJECTION TO OPPOSITION TO SUPPLEMENT

Vida Ministry, Inc. (“Vida”) now seeks to “bury” the fact that it concealed a majority (51%) attributable interest in a Houston, Texas LPFM radio station held by its majority (75% voting interest) member and President. **Vida does not deny this fact.** Vida offers no slick, “long story” about how it can make a material certification falsely attesting to having no attributable interests on an official application, signed under penalty of perjury.

Still, without denying the fact of Vida’s KHGF-LP LPFM attributable ownership interest, Vida crafts its “long story” speculating on any effect of KHGF-LP on its comparative points tie-breaker outcome and any effect on its diversity of ownership points since no LPFM divestiture pledge was made since the ownership interest in KHGF-LP was being concealed. Obviously, this revelation concerns Vida since the Commission has already granted six NCE construction permits to Vida which already has a **prohibited** controlling ownership interest in an undisclosed LPFM station, and all six permits were granted without condition to divest the interest in KHGF-LP.

Vida now appeals to have Call’s supplement “swept under the rug” on procedural timing. However, Vida has already requested two extensions to file pleadings in this proceeding well beyond the cutoff dates. First with the excuse of COVID-19 and most recently with the excuse of the ULS system outage (not the LMS system that it would have used). Vida claims that the facts (mainly Vida’s undisclosed attributable interest in KHGF-LP) were “readily available” to Call. However, it is unreasonable to expect an applicant (Call) to bear the burden as an “investigative detective” to look under every stone and behind the smoke and mirrors of an applicant bent on misrepresenting an attributable interest to deceive the Commission. There should be no procedural “statute of limitations” to protect six construction permits from revocation that were granted with blatant misrepresentation of material facts.

Sincerely,



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