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In the matter of:

Bakersfield Hispanic Education Family Foundation	KFBA-LP	BLL-20190823ABK
South Omaha Hispanic Education Family Foundation	KXOM-LP	BLL-20190823ABJ
North Eagle Pass Hispanic Education Family Foundation	KYEP-LP	BLL-20190823AAF
North Longview Hispanic Education Family Foundation	KYLG-LP	BLL-20190823ABI
Norfolk Community Radio	No Callsign	BLL-20190823ABH
San Pedro Hispanic Community Radio (supplement)	KUSP-LP	BLL-20190802ABA

INFORMAL OBJECTION

In accordance with §73.3587 of the Commission's Rules, REC Networks ("REC") is filing an *Informal Objection* on the above captioned applications.¹ Specifically, we are extending our previously filed *Informal Objection* against 11 license applications from stations included in the original *Informal Objection* that was filed by REC on December 3, 2013 against 245 applications that involved Antonio Cesar Guel and counsel Dan Alpert ("License Objection").

The issues and concerns expressed the *Informal Objection* dated August 23, 2019 also apply to these applications. We also note that this includes Bakersfield Hispanic Education Family Foundation, where immediately after REC sent a request to withhold processing based on reports that the site was never built, they filed a modify construction permit application and had it *manually pushed through CDBS by Staff* and have the license application dismissed like it never happened.² Now that a new location is claimed, we can't ignore the fact that the previous application, which now, based on the subsequent application activity, only demonstrated **that a false certification was made on the original license application** in direct violation of 47 USC 304. Because of that false certification and the recent one for San Pedro Hispanic Community Radio, it raises serious doubt to the validity of any or all of the above captioned applications.³

As stated in the original *License Objection*, REC is asking that a *Letter of Inquiry* be initiated on all pending applications for which REC can object to. In that *Letter of Inquiry*, it needs to be determined that the parties who are actual people and that they consented to being a board

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 File No. BLL-20190820AAW (dismissed Aug 22, 2019).

³ - This pleading will be filed in *San Pedro Hispanic Community Radio*, BLL-20190802ABA as a supplement to the *Informal Objection* already filed by REC.

member of the organization (including a *requirement* of notarized statements and identity documents), statements from site owners that sites have been constructed and even independent third party reports from either a state broadcasters association, Society of Broadcast Engineers chapter or if feasible, through monitoring by the field Enforcement Bureau that these stations were actually constructed. A determination must be made whether these “entities” lack candor to be Commission licensees.

Until this pleading has been resolved by the Commission, it is REC’s intention to include any subsequent license applications for original construction permits from the original 245 applications due to this suspicion of false statements being made on these applications. REC requests that the license applications be dismissed, their underlying construction permits be forfeited and any call signs be deleted.

Our service is not for sale.

Respectfully submitted,

/S/
Michelle Bradley
Founder
REC Networks
August 26, 2019

Attachments

A copy of this pleading has been served by First Class Mail on counsel for the “applicants” on August 26, 2019.

Dan J. Alpert
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/S/
Michelle Bradley