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*In the matter of:*

North Tampa Community Radio	WQTA-LP	BLL-20190919AAP
South Corpus Christi Hispanic Education Family Foundation	KCPH-LP	BLL-20190813ABP
South Lawton Hispanic Education Family Foundation	KSLW-LP	BLL-20190822ABH
Bakersfield Hispanic Education Family Foundation	KFBA-LP	BLL-20190823ABK
Pittsburgh Community Radio	WXSQ-LP	BLL-20190815ABT
Norfolk Community Radio	WIGK-LP	BLL-20190823ABH
South Omaha Hispanic Education Family Foundation	KXOM-LP	BLL-20190823ABJ

**INFORMAL OBJECTION AND SUPPLEMENT**

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.<sup>1</sup>

As stated in other proceedings, REC is requesting that the Commission withhold processing of license applications identified as those involving Antonio Cesar Guel (Guel) and Dan Alpert (Counsel), especially in light of a considerable number of recent license applications on facilities where photographic evidence and/or statements have suggested that the facilities have not been actually built.

The underlying construction permit (CP) for North Tampa Community Radio (NTPCR) had an expiration date of September 19, 2019. The instant application was filed right on the expiration date. This is also a pattern atypical with other applications filed by Guel and Counsel.

REC has received information from a member of the broadcast community in the Tampa/St. Petersburg area who reports that they were unable to hear any signal on Channel 295 (106.9 MHz). They also reported that the coordinates are deep inside private property surrounded by forested area and therefore a 21-meter tower structure can't be seen. REC's observation also notes that 1,650 feet due south of the construction permit coordinates, there is a 425-meter tall tower (ASR #1055076). Obviously, that is not the tower structure under consideration.

If REC does receive any further information, we will supplement this *Informal Objection*. It is REC's position that this ongoing pattern of filings on or near the CP expiration date including some with a modification of the facility just prior to expiration, that the Commission look further into the validity of these applications, the signatories and certifications made to determine whether there was *mala fide* conduct on the part of Counsel and/or Guel in this and the other related proceedings.

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<sup>1</sup> - 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.

This pleading becomes the *eighth* site where either there was information that would suggest that no station was built at the site specified or that based on other conditions, that no station could be built at this site without an environmental assessment.<sup>2</sup>

As it can be concluded that this facility was never constructed, the Commission should dismiss the instant license application, forfeit the construction permit and delete the call sign. The pattern of deception is growing. We need to do everything we can to assure this does not happen in any upcoming filing windows for noncommercial services.

Our service is not for sale.

Respectfully submitted,

/S/  
Michelle Bradley, CBT  
Founder  
REC Networks  
September 24, 2019

A copy of this pleading has been served by First Class Mail on counsel for the “applicants” on September 25, 2019.

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/S/  
Michelle Bradley

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<sup>2</sup> - See *San Pedro Hispanic Community Radio*, File No. BLL-20190802ABA (*dismissed* Aug 30, 2019, photographic evidence shows no antenna construction). See also *Bakersfield Hispanic Education Family Foundation*, File No. BLL-20190823ABK (Bakersfield) (photographic evidence and certified statements suggest no antenna construction at two different authorized sites), *South Corpus Christi Hispanic Education Family Foundation*, File No. BLL-20190813ABP (photographic evidence and over the air monitoring demonstrate that no station was constructed), *South Lawton Hispanic Education Family Foundation*, File No. BLL-20190823ABK (photographic evidence and sworn statement indicating no station ever constructed) and *Pittsburgh Community Radio*, File No. BLL-20190815ABT (Pittsburgh), Informal Objection by Radio Power, Inc. (Aug 29, 2019), Norfolk Community Radio, File No. BLL-20190823ABH (photographic evidence and sworn statement indicating that no station was ever constructed), South Omaha Hispanic Education Family Foundation, File No. BLL-20190823ABJ (REC analysis that the coordinates are located on public land inside of a floodplain thus requiring an Environmental Assessment). As we are citing these filings in a manner that may impact the merits of of them, REC will file this pleading as a supplement in those proceedings, Additionally, for Pittsburgh, REC will provide a copy of this pleading to Radio Power, Inc.