

POSTED
1/10/14

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

JAN - 6 2014

Federal Communications Commission
Office of the Secretary

In the matter of:

Certain LPFM Applications

) BNPL-20131112AGD
) BNPL-20131112ATV
) BNPL-20131114BXE
) BNPL-20131112ATF
) BNPL-20131112AUP
) BNPL-20131112AUS
) BNPL-20131112AUM
) BNPL-20131112ADM
) BNPL -20131114ACX
) BNPL -20131112BEN
) BNPL-20131112AUD
) BNPL-20131112ATY
) BNPL-20131112ASX
) BNPL-20131113AAO
) ~~BNPL-20131112ATV~~

To: Chief, Audio Division, Media Bureau

Informal Objection

William Marsh Rice University ("Rice"), applicant for a new LPFM station to serve Houston, Texas on Channel 241 (File No. BNPL-20131113ACU), hereby submits this Informal Objection to the above-captioned applications. With one exception, the captioned applications were identified by the Informal Objection ("Objection") filed on December 2, 2013 by REC Networks ("REC"). This Informal Objection supplements the REC Objection by focusing on applications that have now been accepted for filing as a "singleton" or assigned to an MX Group in which at least one application specifies Houston as a community of license.

The REC Objection identifies some 244 LPFM applications, more than eight percent of the LPFM applications filed in the recent LPFM filing window, that are the product of an

application mill. REC questions whether these applicants are bona fide “local” organizations, as they claim to be and notes that all the applications were prepared by Antonio Cesar Guel (“Guel”), 100% owner of Hispanic Christian Community Network, Inc., which is the licensee of 11 LPTV stations.¹ The Guel applications bear all the indicia of a cookie cutter operation: they were prepared by the same “consultant” and filed by the same attorney. The applicants were incorporated at approximately the same time, all in the State of Texas. All applicants have identical statements of educational purpose.

Since the filing of the REC Objection, many of the above-captioned Houston-area Guel applications have been accepted for filing as singletons or identified as part of an MX group in which Houston is a community of license. Grant of these applications without considering the issues raised below would condone an abuse of FCC processes,² frustrate the principles of localism and diversification on which the LPFM service is founded, and harm bona fide LPFM applicants such as Rice.

Available frequencies are scarce in urban areas such as Houston, and MX Groups in these areas are crowded. There are five applicants in Rice’s MX Group 336, nine applicants in MX Group 335, two applicants in MX Group 337, and five applicants in MX Group 361. In all of these MX Groups (the “Houston MX Groups”), Houston, Texas is designated as the community of license by at least one applicant. Granting the above-captioned applications will diminish the opportunities for technical settlements among the Houston MX Groups by depriving applicants of opportunities to make major changes after tentative selectees are determined. In addition to

¹ See BOA-20131220HCO.

² A real party in interest is a third party that has an undisclosed ownership interest or is in a position to “actually or potentially control the operation of the station.” See *Georgia Public Telecommunications Commission*, 7 FCC Rcd. 7996 (1992). A failure to disclose a real party in interest is an abuse of Commission processes because it deprives the Commission and the public of the opportunity to scrutinize the qualifications of the real applicant.

supporting the REC Objection, Rice supplements the REC Objection to point out an additional Guel application and to articulate additional objections to the above-captioned Guel applications.

The following application, which was not identified in the REC Objection, is now a singleton:

BNPL -20131112AGD Ch. 231, Houston, Texas
HILSHIRE VILLAGE COMMUNITY RADIO

Although not identified as a Guel application in the REC Objection, this application was prepared by Guel and filed by the attorney who filed other Guel applications. The applicant's educational purpose is identical to that of other Guel applicants

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

The following Guel applications which were opposed in the REC Objection are also now singletons. Each has an identical "Educational Purpose." Each was incorporated in Texas at approximately the same time. Each qualified as "local" on virtually the same date. The applicants typically have the same ownership structure: namely, one director who holds a 70% voting interest in the applicant and two other directors, each of whom holds a 15% voting interest in the applicant.³

BNPL-20131112ADM Ch. 291, Bellaire, Texas
BELLAIRE RADIO OF THE COMMUNITY

Rec Objection – Yes
Status – ACCEPTED FOR FILING - 12/13/2013
MX Group NA
Email: CESARGUELHCCN@AOL.COM

The address proposed as a main studio, 8600 Beechnut Street, Houston, Texas, appears to be an empty lot. The location is not identified in Houston tax records. The contact phone number is identical to that of Sugar Land Community Radio, BNPL-20131112BEN, Ch. 223, Sugar Land, Texas, and Missouri City Community Church, BNPL-20131113AAO Ch. 287, Missouri City, Texas.

The contact email address is that of Cesar Guel.

If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

³ Two exceptions to this rule are the application of Hilshire Village Community Radio, BNPL-20131112AGD, and Bellaire Radio of the Community, BNPL-20131112ADM. These applicants have three directors, each with a 33% voting interest.

BNPL-20131112ATV Ch. 223, Houston, Texas
CENTRO CRISTIANO DE AMOR INC.

Rec Objection – Yes
Status – ACCEPTED FOR FILING - 12/05/2013
MX Group – NA

This application identifies as a director and holder of 15% of the voting interests of the applicant, a Saul Hasael Zamorron of 11803 Boxhill Dr., Houston TX 77066. That address is shared with Dulce Maria Duarte Duarte, a director and holder of a 15% voting interest in Centro De Fe Y Avivamineto Del Santo Espiritu Inc., BNPL-20131114BXE, Houston, Texas.

This application also identifies as a director and holder of 15% of the voting interests of the applicant, a Maria Jaimes of 11302 Old Telegraph Rd., Houston, TX 77067. That address is shared with Uvaldo Jaimes Medrano, a director and holder of a 15% voting interest in Centro Cristiano De Fe Inc., BNPL-20131112AUP, Houston, Texas.

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

BNPL - 20131112BEN Ch. 223, Sugar Land, Texas
SUGAR LAND COMMUNITY RADIO

Rec Objection – Yes
Status - ACCEPTED FOR FILING - 12/05/2013
MX Group – NA

The contact phone number is identical to that for Bellaire Radio of the Community, BNPL-20131112ADM Ch. 291, Bellaire, Texas and Missouri City Community Church, BNPL-20131113AAO Ch. 287, Missouri City, Texas.

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

BNPL-20131114ACX Ch. 237, Houston Texas
HOUSTON CENTRO CRISTIANO DE RESTAURACION

Rec Objection – Yes
Status - RECEIVED 11/14/2013
MX Group – 361

This application is not a singleton, but if dismissed along with the application of Sugar Land Community Radio, BNPL-20131112BEN, the frequencies could be used by applicants in the Houston MX Groups during the major change window.

BNPL-20131114BXE Ch. 237, Houston, Texas
CENTRO DE FE Y AVIVAMINETO DEL SANTO ESPIRITU INC.

Rec Objection – Yes
Status – ACCEPTED FOR FILING - 12/05/2013
MX Group – NA

The application of Centro De Fe Y Avivamineto Del Santo Espiritu, Inc. identifies a Daniel Hector Guevara as a director and holder of a 70% voting interest in the applicant. Mr. Guevara's address is 8230 Antoine Dr., Houston, Texas 77088. A Mr. Hector Guevara, at 8230 Antoine Dr., Houston, Texas 77088, is the sole principal of Centro Cristiano De Vida Eterna, licensee of full-service noncommercial stations KQVI-FM, Cedar Lake, Texas; KNLY(FM), New Waverly, Texas; KQBI(FM), Encinal, Texas; and KPAL(FM), Palacios, Texas.⁴ Daniel Hector Guevara and Hector Guevara share a phone number as well as an address.

As noted above, the address for this applicant, 8230 Antoine Dr., Houston, Texas, 77088, is the same as that of Centro Cristiano De Amor Inc., BNPL-20131112ATV, Houston, Texas.

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

BNPL-20131112ATF Ch. 273, Houston, Texas
CENTRO MUNDIAL DE ALABANZA INC.

Rec Objection – Yes
Status – ACCEPTED FOR FILING - 12/05/2013
MX Group - NA

Blanca E. Guevara is a director and holder of a 70% voting interest in this applicant with an address of 2080 Antoine Dr., Houston Texas 77055. She is also the owner of 8322 Blacksmith Dr., Houston, Texas 77064,⁵ the same address as that of Claudia Ileana Solis, a 70 % voting director of Ministerio De Restauracion, Conroe, Texas, BNPL-20131112ATP.

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

⁴ See BOS-20130930AMI.

⁵ See

<http://www.hcad.org/records/details.asp?crypt=%94%9A%B0%94%BFg%85%8E%83%7Dim%8E%8A%tXwXW%9E%99%A2%D3%89%95%C2e%7CU%8A%7F%86%C0%AB%A8%AD%86%5E&bld=1&tab=2>

BNPL-20131112AUP Ch. 287, Houston, Texas
CENTRO CRISTIANO DE FE INC.

Rec Objection – Yes
Status – ACCEPTED FOR FILING - 12/05/2013
MX Group - NA

This application identifies a Sara Guevara as a director and holder of 70% of the voting interests of the applicant. Ms. Guevara's address is 8230 Antoine Drive, Houston, Texas 77088, the same address as that of Daniel Hector Guevara, a director and holder of a 70% voting interest in Centro De Fe Y Avivamineto Del Santo Espiritu Inc., BNPL-20131114BXE, applicant for Channel 237 in Houston, Texas, as well as the address of Hector Guevara, 100% owner of four full-service noncommercial stations.

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

BNPL-20131113AAO Ch. 287, Missouri City, Texas
MISSOURI CITY COMMUNITY CHURCH

Rec Objection – Yes
Status – ACCEPTED FOR FILING 12/05/2013
MX Group – NA

The contact phone number for this applicant, BNPL-20131112BEN Ch. 223, Sugar Land, Texas, Sugar Land Community Radio, is identical to that for Bellaire Radio of the Community, BNPL-20131112ADM Ch. 291, Bellaire, Texas.

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

BNPL-20131112AUS Ch. 283, Houston, Texas
IGLESIA FE Y AMOR DE DIOS INC.

Rec Objection – Yes
Status – ACCEPTED FOR FILING - 12/12/2013
MX Group – NA

This application identifies a Maria Cristina Juarez as a director and holder of 15% of the voting interests of the applicant. Her address is 9422 Camelia Crest Lane, Houston, Texas 77064. The application of Centro Cristiano Mundial Fe Y Amor Inc., BNPL-20131112ATY, Houston, Texas, identifies an Armando Juarez Guitron, as a director and voter of 15% of the voting interests of that applicant at the same address.

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

BNPL-20131112AUM Ch. 241, Houston, Texas
CENTRO MUNDIAL DE FE INC.

Rec Objection – Yes
Status – ACCEPTED FOR FILING - 12/05/2013
MX Group - NA

The application is a singleton. If dismissed, the frequency it proposes could be used by applicants in the Houston MX Groups during the major change window.

The abuse of Commission processes is even clearer when these applications are viewed as a group, rather than as individual applications. Not only do they all specify an identical “Educational Purpose,” but nine different Guel applications⁶ specify the same main studio address: 8230 Antoine Drive, Houston, Texas 77088, and the same contact phone number, 713-875-8728. In addition, many of the directors of supposedly distinct applicants are located at the same address. For example, Centro Cristiano de Amor Inc. (BNPL-20131112ATV), a singleton applicant for Channel 223 in Houston, identifies Marie Jaimes as a director. Her address is 11302 Old Telegraph Road. That is the same as the address of Uvaldo Jaimes Medrano, a director of Centro Cristiano de Fe Inc. (BNPL-20131112AUP), a singleton applicant on Channel 287 in Houston.

Centro Cristiano La Uncion de Dios Inc., BNPL-20131112AUD, applicant for Channel 235 at Houston, identifies as a director a Mr. Pablo Benigno Garcia, whose address is 4711 Newpark, Houston, Texas 77041. That is also the address for Sandra Dinora Garcia, director of Iglesia Mundial de Oracion Inc., BNPL-20131112ASX, applicant for Channel 268 at Houston. Harris County tax records identify this address as belonging to Mr. Pablo and Sandra Garcia.

⁶ BNPL-20131114BXE, BNPL-20131112AUS, BNPL-20131112AUP, BNPL-20131112AUM, BNPL-20131112AUD, BNPL-20131112ATY, BNPL-20131112ATV, BNPL-20131112ATF, and BNPL-20131112ASX.

Centro Cristiano La Uncion de Dios Inc., BNPL-20131112AUD, identifies as a director Herverth Jesaias Castillo, at 1006 Tori Drive, Richmond, Texas 77469. That is also the address of Aurora Perez Smith, a director of Iglesia Mundial de Oracion Inc., BNPL-20131112ASX, applicant for Channel 268 at Houston.

Centro Cristiano Mundial Fe Y Amor Inc., BNPL-20131112ATY, applicant for Channel 269 at Houston, identifies as a director a Mr. Armando Juavez Guitron, at 9422 Camelia Crest Lane, Houston, Texas 77064. That is the address of Maria Cristina Juarez, a director of Iglesia Fe Y Amor de Dios Inc., BNPL-2013 1112AUS, applicant for Channel 283 at Houston.

Nine Guel applicants specify the SAME main studio address, 8230 Antoine Dr., Houston, Texas 77088. 8230 Antoine Dr., is the address of Centro Cristiano De Vida Eterna, licensee of full-service noncommercial radio stations KQVI-FM, Cedar Lake, Texas; KNLY (FM), New Waverly, Texas; KQBI (FM), Encinal, Texas; and KPAL (FM), Palacios, Texas.⁷ According to tax records of Harris County, Texas,⁸ 8230 Antoine Dr. is owned by Centro Cristiano De Vida Eterna Inc, a licensee of four stations, of which Mr. Hector Guevara is the sole principal. Centro Cristiano De Vida Eterna is represented by the same attorney as the Guel applicants. In addition, a Daniel Hector Guevara is a director and holder of a 70% voting interest in Centro De Fe Y Avivamineto Del Santo Espiritu Inc and Sara Guevara is the holder of a 70% voting interest in Centro Cristiana De Fe, Inc., BNPL-20131112AUP. The address of both Sara Guevara and Daniel Hector Guevara is ... 8230 Antoine Dr., Houston, Texas, 77088.

⁷ See BOS-20130930AMI.

⁸ See

<http://www.hcad.org/records/details.asp?crypt=%94%9A%B0%94%BFg%85%8E%83%7Elk%8El%8FtXvZW%9E%99%A2%D3%89%95%C2e%7CU%8A%7F%86%C0%AB%A8%AD%86%5E&bld=1&tab=2>

The similarities among the captioned Guel applications are pervasive: the applications were prepared by the same consultant and filed by the same attorney. They are controlled by directors who share the same address. Nine applicants specify the same main studio location. That proposed main studio address is the address of Centro Cristiano De Vida Eterna, licensee of several full-service FM stations, and of Hector Guevara, the President and sole director of Centro Cristiano De Vida Eterna. These similarities, at the very least, demonstrate an attempt to “game” the FCC’s one-to-a customer ownership limitations imposed on applicants that are not tribes, tribally controlled entities, or governmental entities proposing a public safety purpose.⁹

The singleton applications identified above should not be granted. Both the singletons and the other Guel applications in MX groups clearly undermine the fundamental goals of the LPFM service – to encourage localism and diversification of ownership by limiting ownership to one LPFM station per licensee and by prohibiting cross-ownership of full-service and LPFM stations.¹⁰

The above captioned applicants reveal a concerted effort to circumvent the Commission’s strict ownership limitations by filing multiple applicants in the name of nominally different entities. The practice should not be condoned. The above-captioned applications should either be dismissed or designated for hearing.

⁹ See 47 C.F.R. § 73.855.

¹⁰ See 47 C.F.R. § 73.860.

Respectfully submitted,

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January 6, 2014

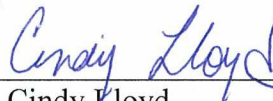
Certificate of Service

The undersigned, an employee of Garvey Schubert Barer, hereby certifies that a copy of the foregoing "Informal Objection" was served this date, by U.S. Postal Service First Class mail, postage prepaid, or *hand-delivered, upon the following:

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Cindy Lloyd

January 6, 2014