

January 14, 2015

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JAN 14 2015

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Attn: Rodolfo F. Bonacci

Re: WRITTEN STATEMENT TO ORDER TO SHOW CAUSE

WWKS-FM Cruz Bay, VI
Facility ID No. 31084
GARK, LLC
BLH-19970310KC

WNVE(FM) Ceiba, PR
Facility ID No. 3250
Western New Life, Inc.
BLH-20140717ACI

Emergency File Room

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Dear Mr. Bonacci:

This written statement is submitted on behalf of GARK, LLC, the licensee of WWKS(FM), Cruz Bay, Virgin Islands, in response to the December 15, 2014 letter from Rodolfo P. Bonacci, Assistant Chief, Audio Division, Media Bureau, notifying GARK, LLC of the above-referenced WNVE(FM) minor change application requesting the substitution of Channel 271B for Channel 267B at Cruz Bay, Virgin Islands and the modification of the WWKS(FM) license.

In FCC File No. BALH-20141021AAU, the assignment of the WWKS(FM) license to RJ Watkins Group, LLC is proposed. Consummation of the transaction is expected to occur shortly.

Attached is the written statement of RJ Watkins Group, LLC, the proposed assignee of WWKS(FM), which statement GARK, LLC endorses, adopts, and advances as the position of GARK, LLC in this proceeding.

Respectfully Submitted,

GARK, LLC

By 
John F. Garziglia
Its Attorney

cc: Lee J. Peltzman, Esq., Counsel to Western New Life, Inc.
Jerrold Miller, Esq., Counsel to Lifeline, LLC
Peter Tannenwald, Esq., Counsel to RJ Watkins Group, LLC

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Federal Communications Commission
Office of the Secretary

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Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, DC 20554

Re: WWKS(FM), Cruz Bay, VI, FID 31084
File No. BLH-19970310KC

WNVE(FM), Ceiba, PR, FID 3250
File No. BPH-20140717ACI

Attention: Audio Division, Media Bureau

RESPONSE TO ORDER TO SHOW CAUSE

Dear Ms. Dortch:

This letter is written on behalf of R.J. Watkins Group, LLC ("Watkins") in response to the Media Bureau's *Order to Show Cause* ("Order") in the above-referenced matter, issued December 15, 2014. The Order proposes a modification of license for Station WWKS, to change its frequency from Channel 267B to Channel 271B, to accommodate a request by Western New Life, Inc. ("WNL") to modify the license for WNVE(FM), Ceiba, PR, to specify operation on Channel 268B.

The current licensee of WWKS is GARK, LLC. Watkins is the approved assignee of the license for WWKS in BALH-20141021AAU, granted December 12, 2014. Because Watkins is likely to be the licensee of WWKS at the time the channel change must be implemented, Watkins is responding to the Order.

FLETCHER, HEALD & HILDRETH, P.L.C.

Fletcher, Heald & Hildreth

Re: WWKS(FM)/WNVE(FM) - Response to Order to Show Cause

Marlene H. Dortch, Secretary

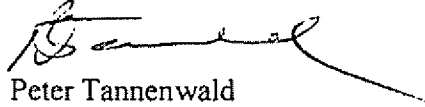
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Watkins notes that Lifeline, LLC ("Lifeline"), licensee of WEVI(FM), Frederiksted, VI, which is also the subject of the Order, has filed a letter opposing the channel change and explaining why WNL has not made an adequate Section 307(b) showing. Watkins neither opposes nor supports the change but is submitting this letter with respect to the statement in the Order that WNL has committed to comply with the established requirement to reimburse Watkins for the cost of the channel change.

Watkins wishes to make sure that WNL is aware of the fact that the WWKS antenna is nearly 20 years old and is located in a salt water climate where corrosion is commonplace and inevitable. Watkins' consulting engineer has advised that it is likely after so many years in an adverse environment, it will not be possible to make physical modifications to the antenna to retune it, and the antenna will have to be replaced if the channel is changed. The WWKS transmitter is also old and may not be retunable, in which case it too will require replacement. Watkins will expect WNL to pay whatever it may cost for WWKS to be able to operate properly on its new channel, including taking into account the age and condition of the WWKS equipment and their impact on whether the equipment can be modified or must be replaced.

Respectfully submitted,



Peter Tannenwald

Kathleen Victory

Counsel for R.J. Watkins Group, LLC.

cc: Mr. Darrell Baugess, FCC
Lee. J. Peltzman, Esq., Counsel for Western New Life, Inc.
Jerrold Miller, Esq., Counsel for Lifeline, LLC
John Garziglia, Esq., Counsel for GARK, LLC