



Federal Communications Commission  
Washington, D.C. 20554

December 1, 2017

*In Reply Refer to:*  
1800B3-ATS

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In re: Iglesia Mundial de Oracion Inc.  
New LPFM, Houston, TX  
Facility ID No. 193863  
File No. BNPL-20131112ASX

Centro Cristiano Mundial Fe y Amor Inc.  
New LPFM, Houston, TX  
Facility ID No. 193943  
File No. BNPL-20131112ATY

Centro Mundial de Fe Inc.  
New LPFM, Houston, TX  
Facility ID No. 193950  
File No. BNPL-20131112AUM

Centro de Fe y Avivamineto del Santo Espiritu Inc.  
New LPFM, Houston, TX  
Facility ID No. 193958  
File No. BNPL-20131114BXE

## Informal Objections and Petition to Deny

Dear Counsel, Ms. Bradley, Mr. Jolly, Mr. Shaw, and Mr. Davis:

We have before us the applications filed by Iglesia Mundial de Oracion Inc. (Iglesia), Centro Cristiano Mundial Fe Y Amor Inc. (Centro Cristiano), Centro Mundial de Fe Inc. (Centro Mundial), and Centro de Fe y Avivamineto del Santo Espiritu Inc. (Centro de Fe) (collectively, Applicants) for construction permits for new LPFM stations at Houston, Texas (Iglesia Application, Centro Cristiano Application, Centro Mundial Application, and Centro de Fe Application, respectively; Applications, collectively).

Also before us are: 1) the Informal Objection (REC Objection) to the Applications filed by REC Network (REC); 2) the Informal Objection (WMRU Objection) to the Applications filed by William Marsh Rice University (WMRU); 3) the Informal Objection (Prometheus Objection) filed by Prometheus Radio Project (Prometheus) against the Centro de Fe Application; 4) the Petition to Deny (CF Petition) filed by Common Frequency (CF) against the Centro Mundial Application and Centro de Fe Application; 5) the Informal Objection (Davis Objection) filed by James B. Davis against the Centro de Fe Application; and 6) related responsive pleadings.<sup>1</sup> For the reasons set forth below, we deny the REC Objection, the WMRU Objection, the Prometheus Objection, the CF Petition, and the Davis Objection, and grant the Applications.

**Background. Applications.** The Applications were filed during the 2013 LPFM filing window and all four identified Antonio Cesar Guel (Guel) as the certifying engineer and provided an address of 8230 Antoine Dr., Houston, Texas, for the organization.<sup>2</sup> The Applications each identified a three-person board, as follows: for Iglesia, Martin Macilla, Sandra Dinora Garcia, and Aurora Perez Smith; for Centro Cristiano, Luis Acosta, Armando Juarez Guitron, and Adilla Rios; for Centro Mundial, Hugo Hernandez, Arturo Gomez-Ayala, and Estela Armilla; and for Centro de Fe, Daniel Hector Guevara, Dulce Maria Duarte Duarte, and Maria Schmelter Rodriguez.<sup>3</sup>

**Pleadings.** The REC Objection was filed against 245 applications filed during the window for which Guel served as the certifying engineer. REC argues that all 245 of these applications—including the Applications that are subject to this letter—were not filed by the applicants themselves but rather by Guel and Hispanic Christian Community Network, Inc. (HCCN), the licensee of several LPTV stations and of which Guel is the President.<sup>4</sup> REC notes that the applications contain identical educational

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<sup>1</sup> REC filed the Objection on December 2, 2013, a Supplement to the Objection against the Iglesia Application and the Centro Cristiano Application on January 15, 2015 (First REC Supplement), and another Supplement to the Objection against the Centro Cristiano Application on October 3, 2016 (Second REC Supplement). WMRU filed the WMRU Objection on January 6, 2014, a pleading styled “Preliminary Reply” on March 12, 2014, and a pleading styled “Second Preliminary Reply” on June 12, 2014. Prometheus filed the Prometheus Objection on January 9, 2014. CF filed the CF Petition on January 9, 2014. Davis filed the Davis Objection on February 8, 2017. Iglesia and Centro Mundial did not file an opposition. Centro Cristiano filed an Opposition on September 14, 2016, and Centro de Fe filed an Opposition on January 19, 2017.

<sup>2</sup> Applications at Section VI, Preparer’s Certification and Section I, Question 1.

<sup>3</sup> *Id.* at Section II, Question 3.a.

<sup>4</sup> REC Objection at 1. The Bureau has separately denied the REC Objection with regard to a number of these applications. *See, e.g., Little Rock Hispanic Education Family Foundation*, Letter Order, 1800B3-ATS (MB Aug. 23, 2016); *North San Antonio Community Radio*, Letter Order, 1800B3-ATS (MB Aug. 24, 2016); *North Tampa Community Radio*, Letter Order, 1800B3-ATS (MB Sep. 19, 2016). REC filed an Application for Review of these

statements that do not reference the local community.<sup>5</sup> REC also notes that certain applications were filed sequentially in alphabetical order, that all the applications provided Guel's telephone number and e-mail address, and that all the applicants were incorporated in Texas within several days of each other, even though not all of the applicants are based in Texas.<sup>6</sup>

In the First REC Supplement, REC argues that Iglesia and Centro Cristiano are no longer eligible to hold a noncommercial license because their corporate statuses are listed as forfeited by the Texas Secretary of State (TSOS) and therefore they are no longer recognized as nonprofit entities.<sup>7</sup> In the Second REC Supplement, REC notes that the Antoine Drive address was used by multiple applicants that filed applications during the 2013 filing window, including all the Applicants.<sup>8</sup> REC argues that this raises the question of who is the real party in interest behind the Applications.<sup>9</sup>

The WRMU Objection was filed against the Applications subject to this letter and 11 other applications prepared by Guel. The objection raises a similar argument to the REC Objection: that the Applications and others filed by Guel all bear similarities to each other, thus raising the question of who is the real-party-in-interest.<sup>10</sup> WMRU also notes that Daniel Guevara, president of Centro de Fe, provides the same address and phone number as Hector Guevara, the sole principal of Centro Cristiano de Vide Eterna (CCVE), the licensee of several noncommercial stations.<sup>11</sup> WRMU further notes that directors of Iglesia and Centro Cristiano reside at the same address as directors of other applicants.<sup>12</sup> Finally, WRMU notes that all the Applications provided the same address, specifically the Antoine Drive address, which is the address of CCVE.<sup>13</sup> WRMU argues in its Preliminary Reply that the Commission should not grant any of the applications subject to its objection until the Commission has received and WMRU reviews responses to various Letters of Inquiry (discussed below) issued to several applicants whose applications were prepared by Guel.<sup>14</sup> WRMU argues in its Second Preliminary Reply that the Commission should issue letters of inquiry to other Guel applicants, none subject to this letter.<sup>15</sup>

The Prometheus Objection was filed against the Centro de Fe Application and three other applications which have since been dismissed.<sup>16</sup> Prometheus argues that the four applicants are controlled by the same party in violation of the Commission's multiple ownership rules, noting that all the

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three decisions, which the Commission dismissed because REC did not have standing to file it. *See Little Rock Hispanic Education Family Foundation*, Memorandum Opinion and Order, 31 FCC Rcd 13762 (2016).

<sup>5</sup> REC Objection at 2. The educational statements are included as Exhibit 2 in each application.

<sup>6</sup> *Id.* at 3.

<sup>7</sup> First REC Supplement at 4.

<sup>8</sup> Second REC Supplement at 1-2.

<sup>9</sup> *Id.* at 3.

<sup>10</sup> WMRU Objection at 1-2.

<sup>11</sup> *Id.* at 5.

<sup>12</sup> *Id.* at 7-8.

<sup>13</sup> *Id.* at 8.

<sup>14</sup> Preliminary Reply at 2.

<sup>15</sup> Second Preliminary Reply at 2.

<sup>16</sup> *See* File Nos. BNPL-20131112AUP, BNPL-20131112ATF, and BNPL-20131112ATV.

applications provide the same address and identical educational narratives, and that all the applicants' articles of incorporation are identical.<sup>17</sup>

The CF Petition was filed against 63 applications that identified Guel as their engineer, including the subject Applications. It raises arguments similar to those raised in the REC Objection: that the applications "use[s] the boiler-plate forms, uniform descriptions of purpose and uniform purpose of entity throughout" and all identify Guel as their registered agent and provide his contact information.<sup>18</sup> CF also argues that the non-profit status of the applicants—including the Applicants—"is sham" because their Articles allow "any director [to] be compensated for proselytizing or *for almost any other activity*."<sup>19</sup> CF also opines that it is questionable whether any of the applicants have obtained reasonable assurance of site availability at the towers identified in their applications.<sup>20</sup>

The Davis Objection argues that Guel and Hector Guevara are the real parties in interest behind the Centro de Fe Application.<sup>21</sup> The objection further argues that grant of the Centro de Fe Application will cause interference to Station KTTF-LP, Tomball, Texas, licensed to City of Tomball.<sup>22</sup>

*Letters of Inquiry.* On February 21, 2014, the Bureau issued a Letter of Inquiry to Centro Mundial and Centro de Fe requesting documentation regarding the organizations' relationship to CCVE and use of the Antoine Drive address, the ownership of the organizations, and also requested documentation showing that the applicants had obtained reasonable assurance of site availability at the towers sites identified in their respective applications.<sup>23</sup>

Centro Mundial filed a response on April 3, 2014 (Centro Mundial Response).<sup>24</sup> The Centro Mundial Response states that CCVE's Antoine Drive building had extra space for their organization. The Centro Mundial Response provides: 1) signed declarations and copies of Texas drivers licenses for Estela Salinas Armilla, Arturo Gomez-Ayala, and Hugo Basurto Hernandez; 2) a declaration from Martin Guevara stating he spoke with an employee of Crown Castle regarding use of the tower identified in the Centro Mundial Application; and 3) a declaration from Edwin Vasquez stating that he resides at 143 Mill Stream Lane and has granted Centro Mundial permission to use the site for a main studio, as well as a copy of his Texas driver's license.

Centro de Fe filed a response on April 3, 2014. The Centro de Fe Response states that CCVE's Antoine Drive building had extra space for their organization. The Centro de Fe Response provides: 1) signed declarations and copies of Texas drivers licenses for Daniel Hector Guevara, Maria Rodriguez Schmelter, and Dulce Maria Duarte Duarte; and 2) a declaration from Martin Guevara stating that he

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<sup>17</sup> Prometheus Objection at 2-3.

<sup>18</sup> CF Petition at 2-4.

<sup>19</sup> *Id.* at 4 (emphasis in original).

<sup>20</sup> *Id.* at 5.

<sup>21</sup> Davis Objection at 1.

<sup>22</sup> *Id.* See also File No. BLL-20151227ADI.

<sup>23</sup> Letter of Inquiry from Peter H. Doyle, Chief, Audio Division, Media Bureau, FCC, to Mr. Antonio Cesar Guel (Feb. 21, 2014).

<sup>24</sup> Centro Mundial also submitted on April 3, 2014, an amendment to its application (First Centro Mundial Amendment) that revised the address for the organization to 143 Mill Stream Lane, Houston, Texas. First Centro Mundial Amendment at Section I, Question 1.a., Section II, Question 3.a.

spoke with an employee of Crown Castle regarding use of the tower identified in the Centro Mundial Application.

Based on these responses, the Bureau determined that Centro Mundial and Centro de Fe lacked reasonable assurance of site availability and on May 16, 2014, dismissed the Centro Mundial Application and the Centro de Fe Application.<sup>25</sup> Both applicants sought reconsideration, and provided letters from tower owners showing that they did in fact have assurance of site availability at the time their respective applications were filed.<sup>26</sup> Accordingly, the Bureau reinstated both of these applications.<sup>27</sup>

On October 5, 2017, the Bureau issued Letters of Inquiry to Iglesia and Centro Cristiano, requesting that they provide: 1) documentation concerning their respective board of directors and the address they had identified as their headquarters; 2) information regarding their relationship with CCVE—and the other Applicants, which had all listed the Antoine Street address in their LPPM construction permit applications; and 3) information regarding the finances of their respective organizations.<sup>28</sup>

Iglesia filed a response to the Iglesia LOI (Iglesia Response) on November 6, 2017.<sup>29</sup> Iglesia states that it rents space in the building at Antoine Drive from CCVE and that it pays that organization rent for its use of the building, supported by a copy of its lease.<sup>30</sup> Iglesia states that it originated as part of CCVE but became a separate organization in 2012.<sup>31</sup> Regarding finances, Iglesia states that it has no bank account and all funding comes from offerings from its members, and also states that Guel offered his services for free.<sup>32</sup> The Iglesia Response also provides affidavits from Martin Macilla, Sandra Dinora Garcia, and Aurora Perez Smith, and copies of Texas driver's licenses of Martin Macilla and Sandra Dinora Garcia. Aurora Perez Smith indicated that she was uncomfortable providing her driver's license, and provided a copy of an identity card issued by Iglesia and property records from Fort Bend County showing that she is the owner of the residence listed in the Iglesia Application.

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<sup>25</sup> *Antonio Cesar Guel*, Letter Order, 29 FCC Rcd 5264 (MB 2014).

<sup>26</sup> Centro Mundial and Centro de Fe submitted these documents as attachments to amendments to their applications on June 16, 2014 (Second Centro Mundial Amendment and First Centro de Fe Amendment, respectively). Both amendments also amended the organizations' respective educational narratives. Second Centro Mundial Amendment at Exh. 2; First Centro de Fe Amendment at Exh. 2. On January 17, 2017, Centro de Fe filed another amendment (Second Centro de Fe Amendment) that provided a new address for Daniel Hector Guevara. Second Centro de Fe Amendment at Section II, Question 3.a.

<sup>27</sup> *Broadcast Applications*, Public Notice, Report No. 28970 (MB Apr. 24, 2017).

<sup>28</sup> Letter of Inquiry from Peter H. Doyle, Chief, Audio Division, Media Bureau, FCC, to Dan J. Alpert, Esq. (Oct. 5, 2017) (Iglesia LOI); Letter of Inquiry from Peter H. Doyle, Chief, Audio Division, Media Bureau, FCC, to Dan J. Alpert, Esq. (Oct. 5, 2017) (Centro Cristiano LOI).

<sup>29</sup> The Iglesia Response was provided as an amendment to the Iglesia Application (Second Iglesia Amendment). The amendment also provided a revised educational narrative. Second Iglesia Amendment at Exh. 2. Iglesia had previously filed an amendment on February 2, 2015, which revised its engineering proposal to resolve the application's mutual exclusivities and make it a singleton.

<sup>30</sup> Iglesia Response at 1-2.

<sup>31</sup> *Id.* at 1.

<sup>32</sup> *Id.* at 2.

Centro Cristiano filed a response to the LOI (Response) on November 6, 2017.<sup>33</sup> Centro Cristiano states that it rents space in the building at Antoine Drive from CCVE and that it pays that organization rent for its use of the building, supported by a copy of its lease.<sup>34</sup> Centro Cristiano states that some of its members were previous members of CCVE, and some attend services conducted by CCVE.<sup>35</sup> Regarding finances, Iglesia states that it has no bank account and all funding comes from offerings from its members, and also states that Guel offered his services for free.<sup>36</sup> The Centro Cristiano Response also provides affidavits from Luis Acosta, Armando Juarez Guitron, and Adilla Rios, and copies of their Texas drivers licenses.

**Discussion.** Pursuant to Section 309(d) of the Communications Act of 1934, as amended,<sup>37</sup> petitions to deny and informal objections must provide properly supported allegations of fact that, if true, would establish a substantial and material question of fact that grant of the application would be *prima facie* inconsistent with the public interest.<sup>38</sup>

We reject the arguments that the Applications should be dismissed because of their similarities to each other or other applications filed by Guel as a consultant or that the Applicants are controlled by a common party. In a real-party-in-interest inquiry, the focus is whether a third person has an undisclosed ownership interest in an application or will be in a position to actually or potentially control the applicant.<sup>39</sup> In assessing the locus of control, the Commission examines who establishes an entity's basic operating policies with respect to programming, personnel, and finances.<sup>40</sup>

The Objectors fails to show that either Guel, Hector Guevarra, or any other party exert such control over the Applicants.<sup>41</sup> Similarities in applications do not demonstrate common control of the

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<sup>33</sup> The Centro Cristiano Response was provided as amendment to the Centro Cristiano Application (Second Centro Cristiano Amendment). Centro Cristiani had previously filed an amendment on January 29, 2015, which revised its engineering proposal to resolve the application's mutual exclusivities and made it a singleton.

<sup>34</sup> Centro Cristiano Response at 1-2.

<sup>35</sup> *Id.* at 2.

<sup>36</sup> *Id.* at 2.

<sup>37</sup> 47 U.S.C. § 309(d).

<sup>38</sup> See, e.g., *WWOR-TV, Inc.*, Memorandum Opinion and Order, 6 FCC Rcd 193, 197 n.10 (1990), *aff'd sub nom. Garden State Broad. L.P. v. FCC*, 996 F.2d 386 (D.C. Cir. 1993), *rehearing denied* (Sep. 10, 1993); *Gencom, Inc. v. FCC*, 832 F.2d 171, 181 (D.C. Cir. 1987); *Area Christian Television, Inc.*, Memorandum Opinion and Order, 60 RR 2d 862, 864, para. 6 (1986) (petitions to deny and informal objections must contain adequate and specific factual allegations sufficient to warrant the relief requested).

<sup>39</sup> See *Georgia Public Telecomm. Comm.*, Memorandum Opinion and Order, 7 FCC Rcd 7996, 7998 (1992), *citing Astroline Commc'ns. Co. v. FCC*, 857 F.2d 1556, 1564 (D.C. Cir. 1998); *KOWL, Inc.*, Memorandum Opinion and Order, 49 FCC 2d 962 (1974) (same, *citing Creek County Broad. Co.*, 31 FCC 2d 462, 22 RR 2d 891 (1971) and *Sumiton Broad. Co.*, 15 FCC 2d 400, 14 RR 2d 1000 (1968)).

<sup>40</sup> See *Edwin L. Edwards, Sr.*, Memorandum Opinion and Order and Notice of Apparent Liability, 16 FCC Rcd 22236, 22248 (2001), *aff'd sub nom. Rainbow/PUSH Coalition v. FCC*, 330 F.3d 539 (D.C. Cir. 2003); *WGPR, Inc.*, Memorandum Opinion and Order, 10 FCC Rcd 8140, 8142-46 (1995), *vacated on other grounds sub nom. Serafyn v. FCC*, 149 F.3d 1213 (D.C. Cir. 1998); *Choctaw Broad. Corp.*, Memorandum Opinion and Order, 12 FCC Rcd 8534, 8538-39 (1997).

<sup>41</sup> Compare *Robert Lund*, Letter Order, 30 FCC Rcd 14367 (MB 2015) (Oregon Department of Justice investigation demonstrated that several LPFM applicants were all controlled by one individual).

applications.<sup>42</sup> Additionally, the common contact representative identified in the applications—Guel—is an engineering consultant. We have previously noted that it is common for multiple applicants to have the same engineering consultant,<sup>43</sup> and many applicants will list their counsel or engineering consultants as their contact representatives. We also reject REC’s argument involving the sequential nature of the filing of the applications or the applicants’ incorporation in Texas. These matters are attributable to the applicants’ utilization of a common consultant and present no violation of any Commission rule or policy.<sup>44</sup> Finally, familial relationships among parties to the Applications and other persons holding broadcast interests are not, by themselves, grounds to dismiss the Applications.<sup>45</sup>

We also reject REC’s argument that Iglesia and Centro Cristiano are no longer eligible to hold an LPFM license. We have previously found an applicant for a full-service noncommercial educational (NCE) construction permit that had allowed its corporate status to lapse was still eligible for an NCE license because it had been reinstated by the state where it was incorporated and that reinstatement was given retroactive recognition by the state to the time the applicant filed its application.<sup>46</sup> Here, Iglesia’s and Centro Cristiano’s corporate status has been reinstated by the TSOS and both have had their good standing restored.<sup>47</sup> Thus, any gap in Iglesia’s or Centro Cristiano’s legal corporate existence has been erased and both applicants have satisfied the eligibility requirements of the LPFM service.<sup>48</sup> We likewise reject CF’s argument that Centro Mundial’s non-profit status “is sham.” CF has made no showing that the Applicants was improperly incorporated or are otherwise not recognized by the State of Texas.<sup>49</sup>

CF’s argument that Centro Mundial and Centro de Fe may have lacked site availability is entirely based on speculation. CF does not actually argue that either applicant lacked site availability, nor does CF provide documentation to support its argument.<sup>50</sup> Moreover, both applicants have provided documentation showing that they did obtain reasonable assurance of site availability.<sup>51</sup> Thus, we reject this argument.

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<sup>42</sup> *Mt. Zion Educ. Assoc.*, Letter Order, 25 FCC Rcd 15088, 15091-92 (MB 2010) (similarities in applications prepared by a third-party—such as being filed the same day, using the same engineer, having similar exhibits—do not demonstrate common control of applicants).

<sup>43</sup> *Eternal Word Television Network, Inc.*, Letter Order, 24 FCC Rcd 4691, 4692 (MB 2009).

<sup>44</sup> We also note that Iglesia, Centro Cristiano, and Centro de Fe have submitted revised unique educational narrative statements.

<sup>45</sup> Applicants for new LPFM stations are only required to identify family members with an interest in other media if that family member would have a significant role in the operation of the proposed LPFM station. *See* Worksheet for FCC Form 318, Worksheet #1a – Family Relationships.

<sup>46</sup> *See New Bohemia Group, Inc.*, Letter Order, 24 FCC Rcd 1357 (MB 2009) (finding that corporate dissolution was without effect because status was reinstated *nunc pro tunc*).

<sup>47</sup> The records of the TSOS may be accessed at <https://direct.sos.state.tx.us/acct/acct-login.asp>.

<sup>48</sup> 47 CFR § 73.853(a). *See also Creation of Low Power Radio Service*, Report and Order, 15 FCC Rcd 2205, 2213, para. 18 (2000) (“having decided to establish LPFM as a noncommercial service, we will require that LPFM licensees comply with the eligibility requirements of [47 U.S.C. § 397(6)(A)].”).

<sup>49</sup> *Compare Malibu FM Emergency and Cmty. Broad., Inc.*, Memorandum Opinion and Order, 30 FCC Rcd 7705 (2015) (affirming dismissal of LPFM applicant that had not completed incorporation process with State of California at the time it filed its application); *Robert Lund*, Letter Order, 30 FCC Rcd 14367 (MB 2015) (affirming dismissal of LPFM applications where Oregon Department of Justice determined applicants were not properly incorporated).

<sup>50</sup> *See* 47 U.S.C. § 309(d).

<sup>51</sup> *See* Second Centro Mundial Amendment at Attach. 1 and First Centro de Fe Amendment at Attach. 1.

Finally, we reject Davis' argument that the Centro de Fe Application should be dismissed because it could potentially cause interference to Station KTTF-LP. This argument is entirely unsupported.<sup>52</sup> Moreover, the Centro de Application meets the spacing requirements of Section 73.807 of the FCC's Rules, and we have held that an application that complies with this rule will not be dismissed on the basis of potential interference.<sup>53</sup>

**Conclusion/Actions.** Accordingly IT IS ORDERED that the Informal Objection filed on December 2, 2013, by REC Networks IS DENIED with respect to Iglesia Mundial de Oracion Inc., Centro Cristiano Mundial Fe y Amor Inc., Centro Mundial de Fe Inc., and Centro de Fe y Avivamineto del Santo Espiritu Inc.

IT IS FURTHER ORDERED that the Informal Objection filed on January 6, 2014, by William Marsh Rice University IS DENIED with respect to Iglesia Mundial de Oracion Inc., Centro Cristiano Mundial Fe y Amor Inc., Centro Mundial de Fe Inc., and Centro de Fe y Avivamineto del Santo Espiritu Inc.

IT IS FURTHER ORDERED that the Petition to Deny filed by on January 9, 2014, by Prometheus Radio Project IS DENIED with respect to Centro de Fe y Avivamineto del Santo Espiritu Inc.

IT IS FURTHER ORDERED that the Petition to Deny filed on January 9, 2014, by Common Frequency IS DENIED with respect to Centro Mundial de Fe Inc. and Centro de Fe y Avivamineto del Santo Espiritu Inc.

IT IS FURTHER ORDERED that the Petition to Deny filed by on February 8, 2017, by James B. Davis IS DENIED with respect to Centro de Fe y Avivamineto del Santo Espiritu Inc.

IT IS FURTHER ORDERED that the applications of Iglesia Mundial de Oracion Inc., Centro Cristiano Mundial Fe y Amor Inc., Centro Mundial de Fe Inc., and Centro de Fe y Avivamineto del Santo Espiritu Inc. for construction permits for new LPFM stations at Houston, Texas (File Nos. BNPL-20131112ASX, BNPL-20131112ATY, BNPL-20131112AUM, and BNPL-20131114BXE, respectively) ARE GRANTED.

Sincerely,

A handwritten signature in blue ink that reads "Peter H. Doyle" followed by a stylized monogram "PH".

Peter H. Doyle  
Chief, Audio Division  
Media Bureau

cc: Mr. Antonio Cesar Guel  
2605 Hyacinth Drive  
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8230 Antoine Dr.  
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<sup>52</sup> See 47 U.S.C. § 309(d).

<sup>53</sup> *Calvary Chapel of Redlands*, Letter Order, 31 FCC Rcd 12694, 12696 (MB 2016)



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