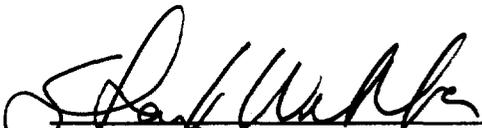


**CONCLUSION**

For the foregoing reasons, Petitioners request that the Commission reconsider its designation order and set all of Trinity's and NMTV's licenses for renewal hearings consistent with its Jefferson Radio and Grayson policies.

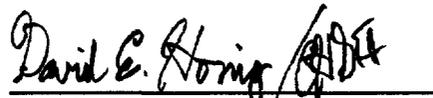
Respectfully Submitted,



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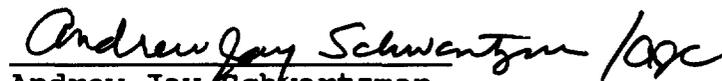
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Counsel for:

League of United Latin  
American Citizens

May 7, 1993

**DECLARATION**

1. My name is Joe Velez. I am the National President of the League of United Latin American Citizens ("LULAC"), a sixty three year old national membership organization dedicated to the promotion of civil rights and economic opportunity for Hispanics throughout the United States. LULAC has members within the viewing areas of television stations that are owned and operated by affiliates of Trinity Broadcasting Network ("TBN"), s.g., KTBN-TV, Santa Ana, California; KPAZ-TV, Phoenix, Arizona; KTBO-TV, Oklahoma City, Oklahoma; KTBW-TV, Tacoma, Washington, WKOI-TV, Richmond, Indiana; WCLJ-TV, Bloomington, Indiana; KDTX-TV, Dallas, Texas, and National Minority Television ("NMTV"), KNMT-TV, Portland, Oregon.

2. As I travel around the country, and particularly in cities with large Hispanic populations, I am a regular viewer of the stations that are owned and operated by TBN. A large number of LULAC members reside in communities with television stations owned and operated by TBN.

3. I have been told that non-parties to a proceeding may participate and may seek reconsideration of Commission decisions if they are adversely affected by the decision and if they have a good reason why it was not possible to participate in the earlier stages of the proceedings.

4. I have been told that Trinity Broadcasting of Florida ("TBF") has been designated for hearing on the issue, inter alia, of "whether NMTV, Paul F. Crouch, TBN or its affiliates or principals abused the Commission's processes by using NMTV to evade the provisions of Section 73.3555(e) of the Commission's Rules . . . ." Order at ¶ 48. I have also been told that when the Commission designated TBF for hearing, it stated that "TBN or its affiliates are free to dispose of licenses during the pendency of this proceeding . . . and may also acquire licenses during the pendency of this proceeding." Order at ¶ 45. Moreover, I have been told that the Commission stated in its Designation Order that "the outcome of this proceeding could have implications for all stations licensed to NMTV, TBN and its affiliates." Order at ¶ 45.

5. A large number of LULAC members would be adversely affected by this decision because:

(a) we are deprived of the opportunity to obtain the best practicable service because of the Commission's failure to designate TBN's television station in my viewing area for hearing. The TBN affiliate in our area will thus be permitted to continue to hold its license and to possibly dispose of its license, despite the fact that the challenges to TBN's qualifications to hold any station licenses are serious enough to possibly affect the transferability of its other stations;

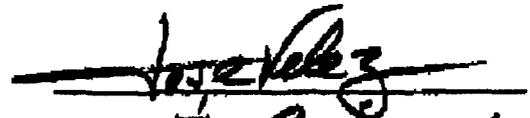
(b) We also are deprived of the benefit of maximum diffusion of control of the broadcast spectrum because of the Commission's apparent determination that allegations concerning TBN's violation of the Commission's multiple ownership limitations will not be entertained as objections to the renewal and assignment of any TBN affiliate licenses other than the single license that is the subject of the TBF proceeding; and

(c) We may be precluded from the benefit of the greater programming diversity that would have resulted from the distress sales of TBN licenses to minority applicants that could have resulted had these licenses been properly designated for hearing.

6. I have been told that it was not possible for LULAC and its members to participate in the TBF proceeding because there was no indication that the Commission intended to deviate from its well established Jefferson Radio and Grayson policy. We could not have known that the designation of the TBF license for hearing would affect our ability to challenge the TBN affiliate in other areas where our members reside. Thus, until the designation order was issued, LULAC's members suffered no injury.

I hereby state under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge and belief.

Executed on:

  
NATL President  
1600 E. DESERT INN RD.  
LAS VEGAS NV  
89109

**DECLARATION**

1. My name is Euse Hernandez. I am a member of the League of United Latin American Citizens ("LULAC"). I reside at 1238 West Chestnut Ave., Santa Ana, Calif. 92703 . I understand that this is within the viewing area of television station KTBN-TV, Santa Ana, California, that is owned and operated by an affiliate of Trinity Broadcasting Network ("TBN").

2. I regularly watch television stations serving my community.

3. I have been told that a non-party to a proceeding may participate and may seek reconsideration of Commission decisions if it is adversely affected by the decision and if they have a good reason why it was not possible to participate in the earlier stages of the proceedings.

4. I have been told that Trinity Broadcasting of Florida ("TBF") has been designated for hearing on the issue, *inter alia*, of "whether NMTV, Paul F. Crouch, TBN or its affiliates or principals abused the Commission's processes by using NMTV to evade the provisions of Section 73.3555(a) of the Commission's Rules . . . ." Designation Order at ¶ 48. I have also been told that when the Commission designated TBF for hearing, it stated that "TBN or its affiliates are free to dispose of licenses during the pendency of this proceeding . . . and may also acquire licenses during the pendency of this proceeding." Designation Order at ¶ 45. Moreover, I have been told that the Commission stated in its Designation Order that "the outcome of this proceeding could have implications for all stations licensed to NMTV, TBN and its affiliates." Order at ¶ 45.

5. I am adversely affected by this decision because:

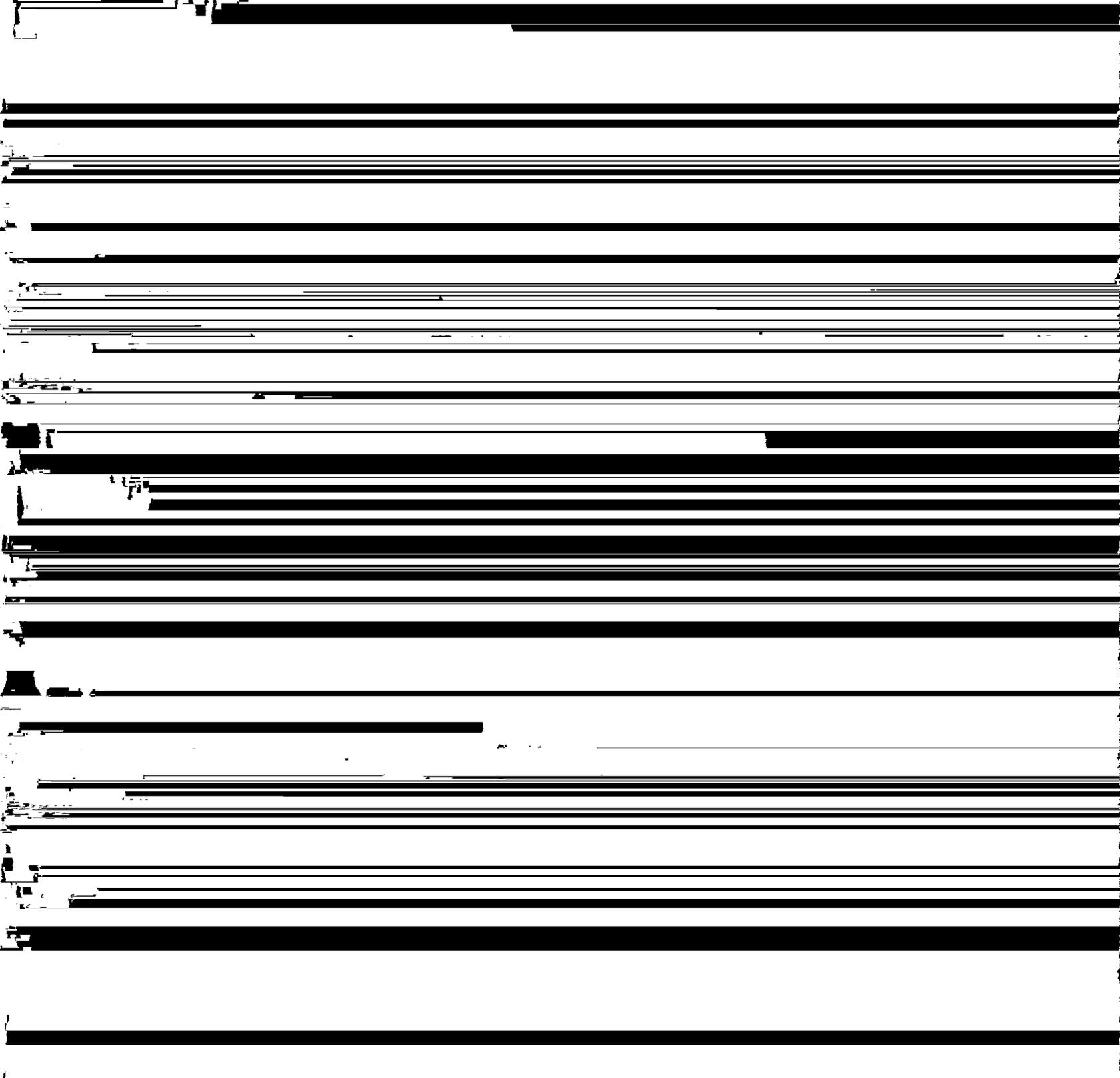
(a) I am deprived of the opportunity to obtain the best practicable service because of the Commission's failure to designate TBN's television station in my viewing area for hearing. The TBN affiliate will thus be permitted to continue to hold its license and to possibly dispose of its license, despite the fact that the challenges to TBN's qualifications to hold any station licenses are serious enough to possibly affect the transferability of its other stations;

(b) I am also deprived of the benefit of maximum diffusion of control of the broadcast spectrum because of the Commission's apparent determination that allegations concerning TBN's violation of the Commission's multiple ownership limitations will not be entertained as objections to the renewal and assignment of any TBN affiliate licenses other than the single license that is the subject of the proceeding in Miami; and

(c) I may be precluded from the benefit of the greater programming diversity that would have resulted from the distress

sales of TBN licenses to minority applicants that could have resulted had these licenses been properly designated for hearing.

6. I have been told that it was not possible for me to participate in the TBF proceeding because there was no indication that the Commission intended to deviate from its well established Jefferson Radio and Grayson policy. I could not have known that the revocation of the WAB license for hearing would affect me



DECLARATION

1. My name is Patricia Vasquez. I am a member of the League of United Latin American Citizens ("LULAC"). I reside at <sup>9575</sup> S.W. 81st Terr., Miami, FLA 33143. I understand that this is within the viewing area of television station WHFT-TV, Miami, Florida, that is owned and operated by an affiliate of Trinity

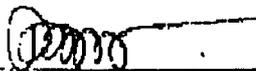
sales of TBN licensees to minority applicants that could have resulted had these licenses been properly designated for hearing.

6. I have been told that it was not possible for me to participate in the TBF proceeding because there was no indication that the Commission intended to deviate from its well established Jefferson Radio and Grayson policy. I could not have known that the designation of the TBF license for hearing would affect my ability to challenge the license of the TBN affiliate in my area. Thus, until the designation order was issued, I suffered no injury.

I hereby state under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge and belief.

Executed on:

5/7/93

  
\_\_\_\_\_

CERTIFICATE OF SERVICE

I Angela J. Campbell, this 7th day of May, 1993, hereby certify that I have placed in U.S. First Class Mail, postage prepaid, a copy of the foregoing "Petition for Reconsideration" addressed to the following:

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Administrative Law Judge  
Federal Communications Commission  
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