

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

In the Matter of)
)
Consent to Transfer Control of Certain Subsidiaries)
of Univision Holdings, Inc. to Searchlight III UTD,) MB Docket No. 20-123
L.P., ForgeLight (United) Investors, LLC, and)
Grupo Televisa, S.A.B.) File Nos. BTCCDT-20200325AAJ et al.
)
Univision Holdings, Inc.) MB Docket No. 20-122
Petition for Declaratory Ruling)

MEMORANDUM OPINION AND ORDER AND DECLARATORY RULING

Adopted: December 23, 2020

Released: December 23, 2020

By the Chief, Media Bureau:

I. INTRODUCTION

1. By this Memorandum Opinion and Order (Order) we grant the applications¹ in the attached Appendix (the Applications) that seek consent to transfer control of licenses held by indirect, wholly-owned subsidiaries of Univision Holdings, Inc. (Univision), from Madison Dearborn Partners, Providence Equity Partners, TPG, Thomas H. Lee Partners, and Saban Capital Group (collectively, Transferors), to Searchlight III UTD, L.P. (Searchlight), ForgeLight (United) Investors, LLC (ForgeLight), and Grupo Televisa, S.A.B. (Televisa) (collectively, Transferees and, jointly with the Transferors, the Applicants) conditioned upon consummation of the sale of three stations in the Puerto Rico market prior to, or at consummation of, the underlying transaction. In addition, we grant a continuing satellite exception to the Local Television Ownership Rule pursuant to note 5 of section 73.3555 of the Federal Communications Commission’s (Commission’s) rules (the rules).²

2. In connection with the Applications, Univision has also filed a Petition for Declaratory Ruling (Petition)³ requesting that the Commission, pursuant to its authority under section 310(b)(4) of the Communications Act of 1934, as amended (the Act),⁴ allow it to exceed the 25% foreign ownership

¹ Media Bureau Announces Pleading Cycle for Applications to Transfer Control of Univision Holdings, Inc., MB Docket No. 20-123, Public Notice, 35 FCC Rcd 4606 (MB 2020).

² 47 CFR § 73.3555(b), note 5. The Applicants amended the Applications on April 27, 2020, and on August 28, 2020, Searchlight and ForgeLight filed an Amendment updating the Applications.

³ Petition for Declaratory Ruling of Univision Holdings, Inc., MB Docket No. 20-122 (filed Mar. 25, 2020) (Petition). Although five parties – Univision, Searchlight, ForgeLight Univision Holdings, LLC, (ForgeLight Holdings), Multimedia Telecom, S.A. de C.V. (Multimedia Telecom), and Liberty Global Ventures Limited (f/k/a Liberty Global Incorporated Ltd.) (Liberty Global)– all participated in the Petition, only Univision as the licensee has standing to file. See 47 CFR § 1.5001. These parties amended that petition on April 27, 2020, and Searchlight and ForgeLight Holdings filed a supplement updating that amendment on August 28, 2020 (Petition Supplement). The petition was further supplemented on September 21, 2020. An update to the name of Liberty Global Incorporated was filed on May 11, 2020.

⁴ Section 310(b)(4) of the Act states:

No broadcast or common carrier or aeronautical en route or aeronautical fixed radio station license shall be granted to or held by . . . any corporation directly or indirectly controlled by any other

(continued....)

benchmark in section 310(b)(4) of the Act and section 1.5000(a)(1) of the Commission's rules.⁵ In the Petition, Univision also requests specific approval of certain entities and individuals to hold interests in Univision.⁶ Upon consideration of the record, and pursuant to section 310(b)(4) of the Act, as well as the Commission's foreign ownership rules and policies, we find that the public interest would not be served by prohibiting the foreign ownership that would be held in Univision post-closing, or by prohibiting approval of entities and individuals to hold interests in Univision as described herein.⁷ We therefore grant the Petition conditioned on compliance with the November 19, 2020 Letter of Agreement between Univision and the U.S. Department of Justice regarding national security and law enforcement issues.⁸

II. BACKGROUND

3. The Petition lays out in detail the proposed ownership structure of Univision. Pursuant to a Stock Purchase Agreement, Searchlight⁹ would acquire all of Univision's presently outstanding equity interest from its existing shareholders¹⁰ except for the ownership interest held by Multimedia Telecom.¹¹ Immediately prior to acquiring Univision's outstanding equity, Searchlight would assign approximately 50% of its interest to ForgeLight.¹²

4. After assigning approximately 50% of its interest to ForgeLight, Searchlight, a Delaware limited partnership, would have a 26.2% equity and a 29.65% voting interest in Univision.¹³ The general partner of Searchlight is Searchlight III UTD GP, LLC (Aggregator GP), a Delaware limited liability

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corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country, if the Commission finds that the public interest will be served by the refusal or revocation of such license.

47 U.S.C. § 310(b)(4).

⁵ 47 U.S.C. § 310(b)(4); 47 CFR § 1.5000(a)(1).

⁶ Petition at 2, 21-22. Under section 1.5001(i)(1) of the Commission's rules, petitioners for a declaratory ruling are required to identify and seek specific approval for any foreign individual, entity, or group that holds or would hold, directly and/or indirectly, more than 5% of equity and/or voting interests, or a controlling interest, in the petitioner's controlling U.S. parent, subject to certain exemptions including an exemption that increases the specific approval threshold to 10% for certain institutional investors. 47 CFR § 1.5001(i)(1)(3).

⁷ The Petition was placed on public comment on May 5, 2020, with comments due June 4, 2020, and replies due on June 19, 2020. *Media Bureau Announces Filing of Petition for Declaratory Ruling by Univision Holdings, Inc.*, Public Notice, 35 FCC Rcd 1520 (MB 2020).

⁸ Letter from Jonathan Schwartz, Chief Legal & Corporate Affairs Officer, Univision Holdings, Inc., to Chief, Foreign Investment Review Section (FIRS), Deputy Chief, Compliance and Enforcement (FIRS) On Behalf of the Assistant Attorney General for National Security, U.S. Department of Justice (dated Nov. 19, 2020) (Letter). See Petition to Adopt Conditions to Authorizations and Licenses, from Kathy Smith, Chief Counsel, National Telecommunications and Information Administration, MB Docket No. 20-122 (filed Dec. 9, 2020) (NTIA Petition).

⁹ Televisa would retain its existing minority ownership interest in Univision. Petition at 4.

¹⁰ See *id.* Univision's outstanding equity is currently held by the Transferors, which currently hold a 77.09% voting and 82.7% equity interest. Univision's management and its bank investors collectively represent approximately 4.3% of Univision's voting and 3.0% of its outstanding equity interest.

¹¹ *Id.* Multimedia Telecom currently holds approximately 14.2% of Univision's outstanding voting stock and 9.75% of its outstanding equity, as well as warrants which Televisa intends to exercise at or shortly after the closing of the transaction.

¹² *Id.*

¹³ *Id.* at 5.

company.¹⁴ The sole member of Aggregator GP is Searchlight Capital Partners III GP, L.P. (Searchlight GP-LP), a Cayman Islands exempted limited partnership.¹⁵ Searchlight GP-LP is controlled by its general partner, Searchlight Capital Partners III GP, LLC, a Delaware limited liability company, which is owned equally by Eric Zinterhofer, a citizen of the United States, Erol Uzumeri, a citizen of Canada, and Oliver Haarmann, a citizen of Germany.¹⁶

5. In addition to its general partner, Searchlight has three insulated limited partners, which collectively hold 100% of its equity: (1) SC III UTD, L.P. (Searchlight Caymans I), a Cayman Islands exempted limited partnership; (2) Searchlight Capital III PV (FC) AIV, L.P., a Delaware limited partnership; and (3) Searchlight Capital III UTD Co-Invest Partners, L.P., a Delaware limited partnership.¹⁷ Searchlight GP-LP is the general partner of all three of Searchlight's limited partners. Searchlight Caymans I has two insulated limited partners—SC III UTD Holdings, Ltd. (Searchlight Caymans II), a Cayman Islands corporation, and Searchlight Capital III (FC) AIV, L.P. (AIV-LP), a Delaware limited partnership.¹⁸ Searchlight Caymans II is wholly-owned by AIV-LP, and AIV-LP's general partner is Searchlight GP-LP.¹⁹

6. ForgeLight, a Delaware limited liability company, would have a 26.1% equity and 29.52% voting interest in Univision.²⁰ ForgeLight is wholly-owned by ForgeLight (United) Investors, LLC (ForgeLight-United), a Delaware limited liability company.²¹ The managing member of ForgeLight-United is ForgeLight (United) Investors MM, LLC, a Delaware limited liability company, which would have a 100% voting and 0% equity interest in ForgeLight-United.²² The other non-managing members of ForgeLight-United are: (1) WCD Services I, LLC, a Delaware limited liability company that would hold 21.01-29.41% equity and 0% voting interest in ForgeLight-United; and (2) ForgeLight (United) Investors SM, LLC, a Delaware limited liability company that would have a 15% equity interest in ForgeLight-United.²³ Wade Davis, a citizen of the United States, is the sole member of each of the three members of ForgeLight-United: (1) ForgeLight (United) Investors MM, LLC; (2) ForgeLight (United) Investors SM, LLC; and (3) WCD Services I, LLC.²⁴

7. After closing, in addition to retaining its current equity interest in Univision,²⁵ Multimedia Telecom will also exercise its existing warrants, which would result in Multimedia Telecom having a 36.1% equity and 40.83% voting interest in Univision.²⁶ Multimedia Telecom, a Mexican corporation, is owned by Televisa, a Mexican corporation, and Grupo Bissaggio, S.A. de C.V. (Grupo Bissaggio), a

¹⁴ *Id.* at 8.

¹⁵ *Id.*

¹⁶ *Id.* at 7-8.

¹⁷ *Id.* at 8.

¹⁸ *Id.* at 8-9.

¹⁹ *Id.* at 9.

²⁰ *Id.* at 5.

²¹ *Id.* at 10.

²² *Id.*

²³ *Id.*; Petition Supplement at 5.

²⁴ WCD Services I, LLC, would not hold an equity or voting interest in ForgeLight-United. Petition at 10; Petition Supplement at 5.

²⁵ Currently, Multimedia Telecom holds Class C common stock representing 14.2% of Univision's outstanding voting stock and 9.75% of its outstanding equity, as well as warrants. Petition at 4.

²⁶ *Id.* at 4, 6.

Mexican corporation.²⁷ Televisa would have an approximately 24.03% equity and 99.99% voting interest in Multimedia Telecom, and Grupo Bissagio would have a 0% voting and approximately 75.97% equity interest in Multimedia Telecom.²⁸ Grupo Bissagio is controlled by Grupo Telesistema, S.A. de C.V., a Mexican corporation, which in turn is owned by Televisa.²⁹ The Azcárraga Trust holds a 43.8% voting and a 15.1% equity interest in Televisa.³⁰

8. Additionally, upon execution of a subscription agreement, Liberty Global, a private limited company organized under the laws of England and Wales, would hold an 11.6% equity interest in Univision.³¹ Liberty Global is a direct, wholly owned subsidiary of Liberty Global plc, a public limited company organized under the laws of England and Wales.³²

9. In addition, the Applicants seek a continuing satellite exception to the Local Television Ownership Rule in the New York Designated Market Area (DMA).³³ The Applications also identify the Applicants' recognition of overlapping attributable interests in the Puerto Rico DMA, and the intent of the Transferees to divest WLII-DT and its two satellite stations, WSUR-DT and WOLE-DT, to come into compliance with the Local Television Ownership Rule.³⁴

10. Pursuant to a governance term sheet, the Agreement contemplates that post-closing Univision will be governed by a 9-member board of directors, on which Searchlight will have the right to appoint four members, ForgeLight will appoint two members, and Televisa will appoint three members. Additionally, Liberty Global will hold the right to an observer's seat on Univision's board.³⁵

11. Lastly, Univision asserts that granting its Petition will be in the public interest. Specifically, Univision contends that granting the Petition will further the Commission's goals of improving access to capital from foreign investors, promoting regulatory flexibility, and yielding greater innovation.³⁶ Additionally, Univision states that a grant will also further United States trade policy.³⁷

12. *Responsive Filings.* The League of United Latin American Voters (LULAC);³⁸ MANA, A National Latina Organization;³⁹ New York and California Attorney Generals;⁴⁰ the National Hispanic

²⁷ *Id.* at 11.

²⁸ *Id.*

²⁹ *Id.*

³⁰ Emilio Fernando Azcárraga Jean, the Executive Chairman of the Board of Directors of Televisa and a Mexican citizen, is the Trustee and sole beneficiary of The Azcárraga Trust, and personally holds an additional 1.84% voting interest and 0.63% equity interest in Televisa. *Id.*

³¹ *Id.* at 12. Liberty Global would hold non-voting convertible preferred stock, but would not hold any voting interest in the company.

³² *Id.*

³³ Applications, Comprehensive Exhibit at 44 (Comprehensive Exhibit).

³⁴ *Id.* at 35.

³⁵ *Id.* at 5.

³⁶ Petition at 12-13; *see also Review of Foreign Ownership Policies for Broadcast, Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended*, Report and Order, 31 FCC Rcd 11272, para. 11 (2016).

³⁷ Petition at 13.

³⁸ Letter from Domingo Garcia and Sindy M. Benavides, LULAC, to Marlene H. Dortch, FCC, MB Docket No. 20-122 (filed June 12, 2020).

³⁹ Letter from Amy L. Hinojosa, MANA, A National Latina Organization, to Marlene H. Dortch, FCC, MB Docket No. 20-122 (filed June 12, 2020).

Foundation for the Arts;⁴¹ Mijente and Free Press (Mijente/Free Press);⁴² and the Media Research Center (MRC) have all filed informal objections.⁴³ With the exception of the objections filed by Mijente/Free Press and MRC, all informal objections solely request a delay in issuance of the declaratory ruling.

13. In their informal objection, Mijente/Free Press asks the Commission to reject the Applications contending that allowing Univision to become foreign-owned would result in less competition, diversity, and localism, contrary to the public interest.⁴⁴ They allege that the transaction would “foreclose opportunities for diverse and local ownership of broadcast stations” by swapping one group of private equity owners for another; that the Commission has allowed “rampant broadcast consolidation” to the detriment of local content; and that the purported benefits cited by the Applications are not dependent on this transaction.⁴⁵ They also oppose the Petition on public interest grounds.⁴⁶ On July 16, 2020, the Applicants responded, characterizing Mijente/Free Press’s filing as an untimely facial attack on the Commission’s foreign ownership regulations.⁴⁷

14. On July 6, 2020, MRC filed a letter opposing the transaction and Petition in which it makes general allegations regarding bias in Univision’s current programming that it asserts will be exacerbated by foreign influence if the transaction and declaratory ruling are granted.⁴⁸ The Applicants responded on July 22, 2020, that the MRC informal objection disregards Commission precedent and is rife with mischaracterizations and inaccuracies about the Applicants and the transfer of Univision’s broadcast licenses and proposed foreign investment.⁴⁹

15. Separately, on June 1, 2020, the U.S. Department of Justice, with the concurrence of the U.S. Department of Homeland Security and the U.S. Department of Defense, filed a letter requesting that the Commission defer action on the Petition while they reviewed potential national security, law enforcement, and public safety issues.⁵⁰ We deferred action in response to this request. On December 9, 2020, the National Telecommunications and Information Administration (NTIA) submitted a Petition to Adopt Conditions to Authorizations and Licenses (Petition) on behalf of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector

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⁴⁰ Letter from Letitia James, New York Attorney General, and Xavier Becerra, California Attorney General, to Marlene H. Dortch, FCC, MB Docket No. 20-122 (filed June 19, 2020).

⁴¹ Letter from Felix Sanchez, National Hispanic Foundation for the Arts, to Marlene H. Dortch and Michelle M. Carey, FCC, MB Docket No. 20-122 (filed June 22, 2020).

⁴² Letter from Marisa Franco, Mijente and Carmen D. Scurato, Free Press to Marlene H. Dortch, FCC, MB Docket Nos. 20-122, 20-123 (filed June 18, 2020) (Mijente/Free Press Informal Objection).

⁴³ Letter from L. Brent Bozell, MRC, to Marlene H. Dortch, FCC, MB Docket Nos. 20-122, 20-123 (filed July 6, 2020) (MRC Informal Objection).

⁴⁴ *Id.* at 1.

⁴⁵ *Id.* at 3-4 (citations omitted).

⁴⁶ *Id.* at 1-2. Rather than specifically object to qualifications of any of the Applicants under the Commission’s foreign ownership rules or demonstrate how grant of this Petition would fail to meet the public interest objectives set out in the *2016 Foreign Ownership Order*, Mijente/Free Press have made vague objections to the foreign ownership declaratory ruling process which are more appropriate for a rulemaking proceeding. *Id.*

⁴⁷ Letter from Wayne D. Johnson, Counsel for Searchlight, et al., to Marlene H. Dortch, FCC, MB Docket Nos. 20-122, 20-123 (filed July 16, 2020).

⁴⁸ *See generally* MRC Informal Objection.

⁴⁹ Letter from Wayne D. Johnson, Counsel for Searchlight, et al., to Marlene H. Dortch, FCC, MB Docket Nos. 20-122, 20-123 (filed July 22, 2020).

⁵⁰ Letter from Christine M. Quinn, Attorney Advisor, National Security Division, U.S. Department of Justice, to Marlene H. Dortch, FCC, MB Docket No. 20-122 (filed June 1, 2020).

(Committee).⁵¹ In the Petition, NTIA advises the Commission that the Committee has no objection to the Commission approving the section 310(b)(4) petition, provided that the Commission conditions its approval on the assurance of Univision to abide by the commitments and undertakings it made to the U.S. Department of Justice to address national security and law enforcement risks that are set forth in the November 19, 2020 Letter of Agreement (Letter).⁵² These commitments include an obligation to designate and maintain a security officer, take steps to protect data on identifiable U.S. customers, notify the U.S. Department of Justice of any material changes to its business, and provide an annual report to the U.S. Department of Justice on its compliance with the Letter, as well as other miscellaneous requirements.⁵³

III. DISCUSSION

16. We find that that the record presents no substantial and material question of fact as to whether the transaction serves the public interest. We next find that approval of the proposed transfer of control would be in the public interest and grant the Applications -- including the request for a continuing satellite exception -- conditioned upon divestiture of overlap stations in Puerto Rico.

17. We then find that the public interest would not be served by prohibiting foreign ownership of Univision in excess of the 25% benchmark set forth in section 310(b)(4) of the Act, and accordingly, grant the Petition for Declaratory Ruling conditioned as specified below. Further, we find that the public interest would not be served by rejecting Univision's request to permit foreign investors to own up to 100% in the aggregate of Univision's equity and voting interests, and we further grant specific approval of certain entities as listed below. Therefore, we likewise grant Univision's Petition for Declaratory Ruling subject to compliance with the November 19, 2020 Letter.⁵⁴

A. Transfer of Control

18. *Standard of Review.* Section 310(d) of the Act provides that no station license shall be transferred or assigned unless the Commission, on application, determines that the public interest, convenience, and necessity will be served thereby.⁵⁵ In making this assessment, the Commission must first determine whether the proposed transaction would comply with the specific provisions of the Act, other applicable statutes, and the Commission's rules.⁵⁶ If the transaction would not violate a statute or rule, the Commission considers whether it could result in public interest harms by substantially frustrating or impairing the objectives or implementation of the Act or related statutes.⁵⁷ If the Commission is unable

⁵¹ See NTIA Petition. The Committee was established in Executive Order 13913, 85 Fed. Reg. 19643 (Apr. 8, 2020), to, among other things, review FCC applications and petitions with foreign ownership for risks to national security and law enforcement interests. The U.S. Department of Justice, the U.S. Department of Homeland Security and the U.S. Department of Defense are members of the Committee. *Id.* Sec. 3(b).

⁵² See NTIA Petition; Letter.

⁵³ See Letter.

⁵⁴ We dismiss as moot the informal objections filed by the League of Latin American Voters; MANA, A National Latina Organization; the New York and California Attorney Generals; and the National Hispanic Foundation for the Arts. These pleadings generally sought to delay a review of this transaction because of a concern that the Commission, as well as other agencies, would be unable to fully review the Petition due to the Covid-19 pandemic. The Petition, however, has been reviewed by the required executive agencies and the public has been provided ample opportunity for input. Accordingly, we dismiss the pleadings as moot.

⁵⁵ Section 310(d) of the Act requires that the Commission consider an application as if the proposed assignee/transferee were applying for the license directly. 47 U.S.C. § 310(d); *see also SBC Commc'ns Inc., and AT&T Corp. Applications for Approval of Transfer of Control*, 20 FCC Rcd 18290, 18300, para. 16 (2005) (*SBC-AT&T Order*).

⁵⁶ See, e.g., *SBC-AT&T Order*, 20 FCC Rcd at 18300, para. 16.

⁵⁷ *Id.*

to find that the proposed transaction serves the public interest, or if the record presents a substantial and material question of fact as to whether the transaction serves the public interest, section 309(e) of the Act requires that the applications be designated for hearing.⁵⁸

19. In addition, the Commission applies a two-part test when evaluating opposition pleadings under the public interest standard. First, the Commission must determine whether the pleadings contain specific allegations of fact sufficient to show that granting the application would be *prima facie* inconsistent with the public interest.⁵⁹ The first step “is much like that performed by a trial judge considering a motion for directed verdict: if all the supporting facts alleged in the [petition] were true, could a reasonable fact finder conclude that the ultimate fact in dispute had been established.”⁶⁰ Second, the Commission must then determine whether, “on the basis of the application, the pleadings filed, or other matters which [the Commission] may officially notice,” a substantial and material question of fact has been raised as to whether grant of the application would serve the public interest.⁶¹ The D.C. Circuit has made clear that the two steps of the statutory inquiry “are typically made concurrently.”⁶² That is, the Commission ordinarily does not consider separately whether pleadings make out a *prima facie* case for denial of the application because “a negative resolution of the second question alone [whether the record presents a substantial and material question of fact that warrants further inquiry in a hearing] makes the first question moot.”⁶³

20. *Public interest analysis.* Upon review of the record, we find that the proposed transaction complies with the relevant statutes and the Commission’s rules, as discussed further below. We further find that the transaction will offer public interest benefits to viewers and listeners of Univision’s stations and grant the Applications. The Transferees assert that the proposed transaction is in the public interest because their investments will support Univision’s service to its communities and to Hispanic America as a whole.⁶⁴ Specifically, they contend that their investments in additional content will substantially enhance Univision’s digital presence, which currently features Spanish-language original content and streaming the Univision Network’s informative programming.⁶⁵ In addition, according to the Transferees, their investments will ensure that Univision is on the front lines of bringing the benefits of the ATSC 3.0 standard to its viewers. We find that these commitments constitute public interest benefits.

21. We find that Mijente/Free Press’s contentions do not raise a substantial and material question of fact as to whether grant of the Applications would serve the public interest. Mijente/Free Press speculate that granting the Applications would “spin a revolving door of private equity owners and further distance corporate control of Univision stations from the local communities they are licensed to serve,”⁶⁶ but do not provide evidence of how the transfer of these existing combinations would diminish

⁵⁸ 47 U.S.C. § 309(e); see also *General Motors Corporation and Hughes Electronics Corporation, Transferors, and the News Corporation Limited, Transferee*, Memorandum Opinion and Order, 19 FCC Rcd 473, 483, para. 15 n.49 (2004); *Application of EchoStar Communications Corporation, General Motors Corporation, and Hughes Electronics Corporation and EchoStar Communications Corporation*, MB Docket No. 01-348, Hearing Designation Order, 17 FCC Rcd 20559, 20574, para. 211 (2002) (*EchoStar-DIRECTV HDO*).

⁵⁹ 47 U.S.C. § 309(d)(1); *Astroline Commc’ns Co., Ltd. Partnership v. FCC*, 857 F.2d 1556, 1561 (D.C. Cir. 1988) (*Astroline*).

⁶⁰ *Gencom, Inc. v. FCC*, 832 F.2d 171, 181 (D.C. Cir. 1987).

⁶¹ *Astroline*, 857 F.2d at 1561; 47 U.S.C. § 309(e).

⁶² *Mobile Commc’ns Corp. of Am. v FCC*, 77 F.3d 1399, 1410 (D.C. Cir. 1996) (quoting *Citizens for Jazz on WRVR v. FCC*, 775 F.2d 392, 394 (D.C. Cir. 1985) (*Citizens for Jazz*)).

⁶³ *Id.* (quoting *Citizens for Jazz*, 775 F.2d at 394).

⁶⁴ Petition Supplement at 13-14.

⁶⁵ *Id.*

⁶⁶ Mijente/Free Press Informal Objection at 1.

competition, diversity, or localism, or cause any transaction-specific harm. Moreover, their concern regarding “rampant broadcast consolidation to the detriment of local and responsive content”⁶⁷ is misplaced, as the transaction solely transfers a majority interest without increasing the number of stations owned by the new owners. To the extent that Mijente/Free Press imply that granting the Applications would foreclose the opportunity for other, more diverse and local ownership,⁶⁸ we remind all parties that section 310(d) of the Act expressly bars the Commission from “consider[ing] whether the public interest, convenience, and necessity might be served by the transfer, assignment, or disposal of the permit or license to a person other than the proposed transferee or assignee.”⁶⁹

22. We also find no merit to MRC’s speculation that Televisa will exercise undue influence with regard to Univision’s programming to the detriment of the public interest. The Commission does not involve itself in content-based programming decisions.⁷⁰ Indeed the Commission has repeatedly recognized that a licensee has broad discretion — based on its right to free speech under the First Amendment — to choose the programming that it believes best serves the needs and interests of the members of its viewers.⁷¹ Here, the unsupported recitation of allegations of Televisa’s political bias in Mexico that are at least eight years old is simply insufficient to raise the requisite question of fact regarding the proposed transaction.

23. *Puerto Rico Divestiture.* We require divestitures in order to ensure that the transaction complies with our Local Television Ownership Rule. That rule permits an entity to own up to two television stations in the same Nielsen Designated Market Area (DMA) if: (1) the digital NLSCs of the stations (as determined by section 73.622(e) of the Commission’s rules) do not overlap; or (2) at least one of the stations is not ranked among the top-four stations in the market and at least eight independently owned television stations would remain in the DMA following the combination (Top-Four Prohibition).⁷² The Applicants concede that, without divestitures, grant of the Applications alone would result in a violation of the Top-Four Prohibition of the Local Television Ownership Rule. Specifically, they inform the Commission that Searchlight and funds affiliated with Searchlight, which are ultimately controlled by Eric Zinterhofer and Andrew Frey, have an attributable interest in Hemisphere, the parent entity of the licensee of WAPA-TV, the top-rated station in Puerto Rico.⁷³ Univision currently owns WLII-DT, which is ranked third in the same DMA, and WSTE-DT, which is ranked ninth. On August 28, 2020, a subsidiary of Univision and Liberman Media Group, LLC (Liberman), filed an application to assign the license for WLII-DT and associated existing satellite stations WSUR-DT, Ponce, Puerto Rico, and

⁶⁷ *Id.* at 3.

⁶⁸ *Id.*

⁶⁹ 47 U.S.C. § 310(d).

⁷⁰ U.S. Const. Amend. 1; 47 U.S.C. § 326 (“Nothing in [the] Act shall be understood or construed to give the Commission the power of censorship over radio communications or signals transmitted by any radio station, and no regulation or condition shall be promulgated . . . by the Commission which shall interfere with the right of free speech by means of radio communication.”).

⁷¹ See, e.g., *Fox Television Stations, Inc.*, Memorandum Opinion and Order, 32 FCC Rcd 7221, para. 11 (2018); *License Renewal Applications of Certain Commercial Radio Stations Serving Philadelphia, Pennsylvania*, Memorandum Opinion and Order, 8 FCC Rcd 6400, 6401 (1993) (citing *Time-Life Broadcast, Inc.*, Memorandum Opinion and Order, 33 FCC 2d 1081, 1082 (1972) and *Office of Communications of United Church of Christ v. FCC*, 707 F.2d 1413 (D.C. Cir. 1983) (subsequent history omitted)).

⁷² 47 CFR § 73.3555(b)(1). *In the Matter of 2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 2010 Quadrennial Regulatory Review*, MB Docket Nos. 14-50, 09-182, 07-294, 04-256, 17-289, Order, 34 FCC Rcd 12360 (MB 2019) (reinstating the Local Television Ownership Rule as it existed at the time of the *2016 Quadrennial Review Order*, 31 FCC Rcd 9864 (2016)).

⁷³ Comprehensive Exhibit at 35.

WOLE-DT, Aguadilla, Puerto Rico, to Liberman.⁷⁴ We grant the Applications conditioned upon consummation of the sale of stations WLII, WSUR-DT, and WOLE-DT occurring prior to or concurrent with the instant transaction.

24. *Request for Continuing Satellite Exceptions.* We also grant a continuing satellite exemption for WFTY-TV, Smithtown, New York, further ensuring compliance with our multiple ownership rules. In the New York, NY DMA, Univision currently operates WFTY-TV, Smithtown, New York, as a “satellite” of WFUT-TV, Newark, New Jersey, pursuant to an exception to the multiple ownership rules that allows the ownership of a parent/satellite combination that would otherwise violate television ownership limits under certain circumstances.⁷⁵ Under the streamlined standards the Commission established in 2019, we reauthorize satellite status upon sale so long as an applicant can demonstrate compliance with the criteria for grant of an original satellite authorization or, in the alternative, by submission of a copy of the most recent satellite authorization along with a statement certifying that there has been no material change to the circumstances underlying this authorization.⁷⁶ The Applicants have submitted a copy of their most recent authorization granted in 2007.⁷⁷ They have also certified that there has been no material change in the underlying circumstances since then.⁷⁸ Consequently, we grant continued authority to operate WFTY-TV as a satellite of WFUT-TV.

25. *Pending License Renewal Applications.* Finally, we note that a number of license renewals are pending as of the release date of this Order.⁷⁹ Commission policy permits the processing of multi-station, multi-market transfer of control applications that involve a subset of stations with pending renewal applications if: (1) there are no basic qualifications issues outstanding with respect to the transferor and transferee; and (2) the transferee explicitly agrees to stand in the shoes of the transferor in any renewal proceeding that is pending at the time of consummation of the transfer of control.⁸⁰ None of the applications has basic qualifications issues outstanding. In addition, transferees have agreed to succeed to Transferors’ position with respect to any future renewal proceeding consistent with the procedures set forth in *Shareholders of CBS Corporation*.⁸¹ In the case of the divestiture stations WLII, WSUR-DT, and WOLE-DT, Liberman has also agreed to step in the shoes of the current licensee. After reviewing the record, we conclude that grant of the transfer will comply with section 310(d) of the Act. We conclude that all the applicants listed in the attached appendices are fully qualified and that grant of

⁷⁴ File No. BALCDT-20200824AAU. The public notice period for this application ran on September 28, 2020.

⁷⁵ 47 CFR § 73.3555, note 5.

⁷⁶ *Streamlined Reauthorization Procedures for Assigned or Transferred Television Satellite Stations et al.*, Report and Order, 34 FCC Rcd 1539 (2019).

⁷⁷ See Comprehensive Exhibit, Att. 36 (attaching *Shareholders of Univision Communications Inc.*, Memorandum Opinion and Order, 22 FCC Rcd 5842 (2007)).

⁷⁸ *Id.* at 44-45.

⁷⁹ The following stations have pending license renewals: WFDC-DT, Arlington, Virginia; WRCF-CD, Orlando, Florida; WVEN-TV, Melbourne, Florida; WAMI-DT, Hollywood, Florida; WVEA-TV, Tampa, Florida; WUVG-DT, Athens, Georgia; WLTV-DT, Miami, Florida; WUVC-DT, Fayetteville, North Carolina; WTNC-LD, Durham, North Carolina; WLII-DT, Caguas, Puerto Rico; WOLE-DT, Aguadilla, Puerto Rico; WSTE-DT, Ponce, Puerto Rico; WSUR-DT, Ponce, Puerto Rico.

⁸⁰ See, e.g., *Shareholders of CBS Corporation*, Memorandum Opinion and Order on Reconsideration, 16 FCC Rcd 16072, 16072-73 (2001) (stating that the Commission will grant transfer of control applications during the pendency of renewal applications so long as there are no basic qualification issues pending against either the transferor or the transferee that could not be resolved in the context of the transfer proceeding, and the transferee “explicitly assents to standing in the stead of the transferor in the renewal proceeding”).

⁸¹ Comprehensive Exhibit at 10. In the case of stations WLII, WSUR-DT, and WOLE-DT, both the transferee in the broader transaction and the assignee in the divestiture assignment application have agreed to “step-in-the-shoes” of the current licensee.

the applications listed therein will, following consummation and divestiture of the Puerto Rico stations listed above, both comply with our rules and serve the public interest, convenience, and necessity.

B. Declaratory Ruling

26. We further grant the Petition, as conditioned below, finding that the public interest would be served by permitting foreign ownership of Univision in excess of the 25% benchmark in section 310(b)(4) of the Act. We also find that it would not be in the public interest to prohibit the aggregate foreign equity and voting interest in Univision to exceed 25% and to increase the interest up to and including 100% voting and equity. In addition, pursuant to section 1.5001(i) of the rules, we approve the foreign equity and voting interest that would be held in Univision by each of the foreign entities or individuals in the amounts specified below.

27. *Standard of Review.* We review the Petition under section 310(b)(4) of the Act, which states that “[n]o broadcast . . . license shall be granted to or held by . . . any corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country, if the Commission finds that the public interest will be served by the refusal or revocation of such license.”

28. In the *2016 Foreign Ownership Order*,⁸² the Commission modified the broadcast licensee foreign ownership review process by extending the streamlined rules and procedures developed for review of foreign ownership of common carrier and certain aeronautical licensees under section 310(b)(4) to the broadcast context, with certain limited exceptions.⁸³ Further, in evaluating petitions relating to foreign ownership, the Commission accords deference to the expertise of the Executive Branch agencies on issues related to national security, law enforcement, foreign policy, and trade policy concerns.⁸⁴

29. The Commission has explained that, in the context of section 310(b)(4) review for broadcast licensees, the 25% benchmark for foreign ownership “is only a trigger for the exercise of our discretion, which we then exercise based upon a more searching analysis of the circumstances of each case.”⁸⁵ Moreover, the *2016 Foreign Ownership Order* expressly provides for processing of petitions involving 100% foreign ownership of a broadcast licensee’s parent, such as here.⁸⁶ To exercise the discretion conferred by statute in a meaningful way, the Commission must receive detailed information from the applicant sufficient for the Commission to make the public interest finding the statute requires.⁸⁷

30. *Section 310(b)(4) Determination and Public Interest Analysis.* We find that the public interest is served by permitting foreign ownership of Univision in excess of the 25% benchmark set forth

⁸² *Review of Foreign Ownership Policies for Broadcast, Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended*, GN Docket 15-236, Report and Order, 31 FCC Rcd 11272 (2016) (*2016 Foreign Ownership Order*).

⁸³ See generally *2016 Foreign Ownership Order*, 31 FCC Rcd 11272.

⁸⁴ *Id.* at 11277, para 6; see also *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market; Market Entry and Regulation of Foreign-Affiliated Entities*, Report and Order and Order on Reconsideration, 12 FCC Rcd 23891, 23919–21, paras. 61–63, 66 (1997), *recon. denied*, Order on Reconsideration, 15 FCC Rcd 18158 (2000).

⁸⁵ *Application of Fox Television Stations, Inc.*, Memorandum Opinion and Order, 10 FCC Rcd 8452, 8472, para. 44 (1995).

⁸⁶ *2016 Foreign Ownership Order*, 31 FCC Rcd at 11274, para. 4.

⁸⁷ See, e.g., *2016 Foreign Ownership Order*, 31 FCC Rcd at 11282, 11283–84, paras. 15, 20 (noting that the requirements adopted in the streamlined foreign ownership rules ensure that the Commission has the information necessary to evaluate and understand a licensee’s ownership structure and to fulfill its obligations under section 310(b) of the Act).

in section 310(b)(4) of the Act. We further find that it is in the public interest to grant Univision's request to permit foreign investors to own up to 100% in the aggregate of Univision's equity and voting interests, and to grant specific approval of the entities named in Section III.B. Specifically, we find that a grant will provide the companies greater access to foreign capital and thereby contribute to the strengthening of the broadcast industry.⁸⁸ We note that MRC filed the only objection to the Petition (through a joint filing against both the transaction and Petition) and, as discussed above, we are not persuaded that their arguments demonstrate harm to the public interest.⁸⁹

31. As Univision affirmed in its Petition, it has a continuing obligation under the Commission's rules to obtain Commission approval before a previously unapproved foreign individual, entity, or group of such individuals or entities acquires, directly or indirectly a greater than ten percent (or, if the interest is uninsulated as determined pursuant to the Commission's rules, a greater than five percent) equity or voting interest,⁹⁰ or a controlling interest in Univision (or increases in foreign investment by then-existing investors in Univision), as a result of any new investment or the conversion of any currently owned investment vehicle.⁹¹

32. *National Security and Law Enforcement Review.* As part of our public interest analysis, the Commission coordinates petitions for section 310(b) foreign ownership rulings with the relevant Executive Branch agencies for national security, law enforcement, foreign policy and trade policy issues.⁹² In accordance with this policy and the request of the Committee and in the absence of any objection from the Applicants, we grant the NTIA Petition, and, accordingly, we condition grant of the Applications and section 310(b)(4) petition on compliance by Univision with the commitments and undertakings set out in the November 19, 2020 Letter from Univision and the U.S. Department of Justice.⁹³ A failure to comply with and/or remain in compliance with any of the provisions of this Letter shall constitute a failure to meet a condition of these authorizations and the underlying authorizations and licenses, and thus grounds for declaring the underlying authorizations and licenses terminated without further action on the part of the Commission. Failure to meet a condition of these authorizations may also result in monetary sanctions or other enforcement action by the Commission.

⁸⁸ *Id.* at paras. 23-24.

⁸⁹ *See supra* para. 22.

⁹⁰ We note that section 1.5002(b)(2) will apply for purposes of calculating the equity and voting interests. 47 CFR § 1.5002(b)(2); *see also* 47 CFR § 1.5003 (Insulation criteria for interests in limited partnerships, limited liability partnerships, and limited liability companies).

⁹¹ *Id.* at 13-14.

⁹² *See 2016 Foreign Ownership Order*, 31 FCC Rcd at 11282, 11289, paras. 15, 34. *See also Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership*, IB Docket 16-155, Report and Order, 35 FCC Rcd 10927, 10935-36, paras. 17, 24 (2020).

⁹³ The November 19, 2020 Letter of Agreement sets forth the commitments that Univision makes to the U.S. Department of Justice to address national security and law enforcement risks arising from Univision's petition for declaratory ruling to the Commission, which includes an obligation to designate and maintain a security officer, take steps to protect data on identifiable U.S. customers, notify the U.S. Department of Justice of any material changes to its business, and provide an annual report to the U.S. Department of Justice on its compliance with the Letter, as well as other miscellaneous requirements.

33. *Specific Approval.* We also grant Univision's requests for specific approvals. Therefore, this Declaratory Ruling grants specific approval for the following 27 individuals and entities to hold up to and including the following percentages of the equity and voting interest of Univision:

- Searchlight Capital Partners III GP, L.P. – <1% equity and 30% voting interest
- SC III UTD Holdings, Ltd. – 14.83% equity and 14.83% deemed voting interest
- SC III UTD, L.P. – 26% equity and 30% voting interest
- Erol Uzumeri – <1% equity and 30% voting interest
- Oliver Haarmann – <1% equity and 30% voting interest
- Ralf Ackermann – <1% equity and 30% voting interest
- Andrew Claerhout – <1% equity and 30% voting interests
- Francois Dekker – <1% equity and 30% voting interest
- Phil Bacal – <1% equity and 30% voting interest
- Christopher Cruz – <1% equity and 30% voting interest
- Heber Ramos de Freitas – <1% equity and 30% voting interest
- Giles Marshall – <1% equity and 30% voting interest
- Nicolo Zanotto – <1% equity and 30% voting interest
- John Yantsulis – <1% equity and 30% voting interest
- Nadir Nurmohamed – <1% equity and 30% voting interest
- Multimedia Telecom, S.A. de C.V. – 36% equity and 41% voting interest
- Grupo Bissagio, S.A. de C.V. – 27% equity and 27% deemed voting interest
- Grupo Telesistema, S.A. de C.V. – 27% equity and 27% deemed voting interest
- Grupo Televisa, S.A.B. – 36% equity and 41% voting interest
- The Azcárraga Trust – 5% equity and 18% voting interest
- Emilio Fernando Azcárraga Jean – 6% equity and 19% voting interest
- Liberty Global Ventures Ltd. – 12% equity interest and 12% deemed voting interest
- Liberty Global plc – 12% equity interest and 12% deemed voting interest
- Thomas de Canniere - <1% equity and 30% voting interest
- Jonathan Laloum - <1% equity and 30% voting interest
- Michele Sheggia - <1% equity and 30% voting interest
- James Redmayne - <1% equity and 30% voting interest.

34. In addition, this Declaratory Ruling grants advance approval, pursuant to section 1.5001(k)(2), for each of the non-controlling foreign interest holders named above (excluding Liberty Global Ventures Ltd. and Liberty Global plc) to increase their interests in Univision up to and including a non-controlling 49.9% of its equity and voting interests. Additionally, this Declaratory Ruling grants advance approval for Liberty Global Incorporated Ltd. and Liberty Global plc to hold up to a 30.0% direct or indirect non-voting equity interest in Univision.

35. This ruling is subject to the terms and conditions set forth in section 1.5004 of the Commission's rules, including the requirement to obtain Commission approval before foreign ownership of Univision exceeds the terms and conditions of this ruling.⁹⁴ If, at any time, Univision knows, or has reason to know, that it is no longer in compliance with this Declaratory Ruling, section 310(b) of the Act, or the Commission's foreign ownership rules, it shall file a statement with the Commission explaining the circumstances within 30 days of the date that they knew, or had reason to know, that it was no longer in compliance.⁹⁵ Univision will be subject to enforcement action by the Commission for such non-compliance, including an order requiring divestiture of the foreign investment.⁹⁶

IV. ORDERING CLAUSES

36. **ACCORDINGLY, IT IS ORDERED**, pursuant to section 154(i) of the Communications Act, as amended,⁹⁷ and by the authority delegated by sections 0.61 and 0.283 of the Commission's rules,⁹⁸ that the applications in Appendix A seeking consent to transfer control of the license subsidiaries of Univision Holdings, Inc., to Searchlight III UTD, L.P., ForgeLight (United) Investors, LLC, and Grupo Televisa, S.A.B., pursuant to section 310(d) of the Communications Act of 1934, as amended, 47 U.S.C. § 310(d), **ARE GRANTED**, conditioned upon consummation of the sale of WLII-DT, Caguas, Puerto Rico, WSUR-DT, Ponce, Puerto Rico, and WSUR-DT, Ponce, Puerto Rico, prior to or concurrent with consummation of the applications contained in Appendix A, and upon the certifications assenting to Liberman Media Group LLC "standing in the shoes" of the licensee contained in both the applications contained in Appendix A and the assignment of stations WLII, WSUR-DT, and WOLE-DT.

37. **IT IS FURTHER ORDERED** that the Applicants' request, pursuant to the satellite exception to the Local Television Ownership Rule set forth in note 5 of section 73.3555 of the Commission's rules, 47 CFR § 73.3555, note 5, for continued authority to operate WFTY-TV, Smithtown, New York, as a satellite of WFUT-TV, Newark, New Jersey, **IS GRANTED**.

38. **IT IS FURTHER ORDERED** that, pursuant to sections 4(i)-(j), 303(r), 309, 310(b), and 310(d) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i)-(j), 303(r), 309, 310(b), and 310(d), grant of the Petition for Declaratory Ruling is **CONDITIONED UPON** compliance by Univision Holdings, Inc., with the commitments and undertakings set forth in the November 19, 2020 Letter of Agreement between Univision Holdings, Inc., and the U.S. Department of Justice. Any failure to comply and/or remain in compliance with any of the commitments and undertakings shall constitute a failure to

⁹⁴ See generally 47 CFR § 1.5004. Section 1.5004, *inter alia*, specifies that licensees have an ongoing, proactive obligation to monitor their foreign ownership compliance and to take preemptive action to remain in compliance with the Commission's foreign ownership rules and any declaratory ruling they have received. *Id.* at 1.5004(a). It sets out the requirements for when a licensee must seek Commission approval prior to any new, not previously approved foreign individuals, entities, or groups acquiring an interest in excess of the specific approval threshold. *Id.* It sets out a licensee's obligations regarding subsidiaries and affiliates and regarding the insertion of new controlling or non-controlling foreign-organized companies. *Id.* at 1.5004(b)-(d). This section specifies when a new petition for declaratory ruling must be filed and the obligations for continuing compliance, including how to report inadvertent non-compliance, and how to file a remedial petition for declaratory ruling, as well as the consequences of trying to evade the foreign ownership rules. *Id.* at 1.5004(e)-(f).

⁹⁵ See *id.* § 1.5004(f)(1). If, for example, a foreign individual or entity should invest in Univision above the specific approval threshold without Commission approval or if any entity breaches its 49.99% specific approval, Univision, as licensee, is obligated to follow the steps set out in 47 CFR § 1.5004(f). Subsequent actions taken by or on behalf of Univision to remedy non-compliance shall not relieve it of the obligation to notify the Commission of the circumstances (including duration) of non-compliance.

⁹⁶ *Id.*; but see *id.* § 1.5004(f)(3) (detailing certain circumstances in which "the Commission does not expect to take enforcement action related to . . . non-compliance.").

⁹⁷ 47 U.S.C. § 154(i).

⁹⁸ 47 CFR §§ 0.61, 0.283.

meet a condition of the underlying authorizations and licenses and thus grounds for declaring the authorizations and licenses terminated without any further action on the part of the Commission. Failure to meet a condition on the licenses may also result in monetary sanctions or other enforcement actions by the Commission.

39. **IT IS FURTHER ORDERED** that the informal objections filed by the League of Latin American Voters; MANA, A National Latina Organization; the New York and California Attorney Generals; and the National Hispanic Foundation for the Arts **ARE DISMISSED AS MOOT**.

40. **IT IS FURTHER ORDERED** that the informal objections filed by Mijente and Free Press; and the Media Research Council **ARE DENIED**.

41. **IT IS FURTHER ORDERED** that this Declaratory Ruling **SHALL BE EFFECTIVE** upon release.

42. **IT IS FURTHER ORDERED** that should no petitions for reconsideration or petitions for judicial review be timely filed, MB Docket Nos. 20-122 and 20-123 **SHALL BE TERMINATED** and their dockets closed.

43. These actions are taken pursuant to section 0.61 and 0.283 of the Commission's rules, 47 CFR §§ 0.61, 0.283, and sections 4(i) and 310(d) of the Communications Act of 1934, as amended, 47 U.S.C. § 154(i) 310(d).

FEDERAL COMMUNICATIONS COMMISSION

Michelle M. Carey
Chief, Media Bureau

APPENDIX

UNIVISION HOLDINGS, INC. LICENSES AND AUTHORIZATIONS TO BE TRANSFERRED

Television Stations to be Transferred

Call Sign	Facility ID No.	Community of License	Licensee	Application File Nos.
KAKW-DT	148	Killeen, TX	KAKW LICENSE PARTNERSHIP, L.P.	20200325AAJ
KTFO-CD	35882	Austin, TX	KAKW LICENSE PARTNERSHIP, L.P.	20200325AAK
KDTV-DT	33778	San Francisco, TX	KDTV LICENSE PARTNERSHIP, G.P.	20200325AAL
KDTV-CD	18148	Santa Rosa, TX	KDTV LICENSE PARTNERSHIP, G.P.	20200325AAM
KFTV-DT	34439	Hanford, CA	KFTV LICENSE PARTNERSHIP, G.P.	20200325AAN
KMEX-DT	35123	Los Angeles, CA	KMEX LICENSE PARTNERSHIP, G.P.	20200325AAO
KTVW-CD	29464	Phoenix, AZ	KTVW LICENSE PARTNERSHIP, G.P.	20200325AAQ
KTVW-DT	35705	Flagstaff/Doney Park, AZ	KTVW LICENSE PARTNERSHIP, G.P.	20200325AAP
KUVI-DT	7700	Bakersfield, CA	KUVI LICENSE PARTNERSHIP, G.P.	20200325AAT
KUVN-CD	5319	Fort Worth, TX	KUVN LICENSE PARTNERSHIP, L.P.	20200325AAV
KUVN-DT	35841	Garland, TX	KUVN LICENSE PARTNERSHIP, L.P.	20200325AAU
KUVS-DT	58609	Modesto, CA	KUVS LICENSE PARTNERSHIP, G.P.	20200325AAW
KWEX-DT	35881	San Antonio, TX	KWEX LICENSE PARTNERSHIP, L.P.	20200325AAX
KXLN-DT	53847	Rosenberg, TX	KXLN LICENSE PARTNERSHIP, L.P.	20200325AAY
KCEC	57219	Boulder, CO	SPANISH TELEVISION OF DENVER, INC.	20200325ACU
KLUZ-TV	57220	Albuquerque, NM	UNIMAS ALBUQUERQUE LLC	20200325ABO
KBTF-CD	34438	Bakersfield, CA	UNIMAS BAKERSFIELD LLC	20200325ABL
WUNI	60551	Marlborough, MA	UNIMAS BOSTON LLC	20200325ABP
WXFT-DT	60539	Aurora, IL	UNIMAS CHICAGO LLC	20200325ABS
WFDC-DT	69532	Arlington, VA	UNIMAS D.C. LLC	20200325ABU
KSTR-DT	60534	Irving, TX	UNIMAS DALLAS LLC	20200325ABY
KTFF-DT	35512	Porterville, CA	UNIMAS FRESNO LLC	20200325ACN

KFTH-DT	60537	Alvin, TX	UNIMAS HOUSTON LLC	20200325ACP
WWJE-DT	14682	Derry, NH	UNIVISION LOCAL MEDIA INC.	20200325AFJ
WMGM-TV	61111	Wildwood, NJ	UNIVISION LOCAL MEDIA INC.	20200325AFK
KXLK-CD	48836	Austin, TX	UNIVISION LOCAL MEDIA INC.	20200325AFM
WRCF-CD	10549	Orlando, FL	UNIVISION LOCAL MEDIA INC.	20200325AFN
KFTR-DT	60549	Ontario, CA	UNIMAS LOS ANGELES LLC	20200325ACT
WAMI-DT	60536	Hollywood, FL	UNIMAS MIAMI LLC	20200325ACY
WVEN-TV	5802	Melbourne, FL	UNIMAS ORLANDO, INC.	20200325ACZ
KFTU-DT	81441	Douglas, AZ	UNIMAS PARTNERSHIP OF DOUGLAS	20200325ADD
KFPH-DT	41517	Flagstaff, AZ	UNIMAS PARTNERSHIP OF FLAGSTAFF	20200325ADF
KFPH-CD	2739	Phoenix, AZ	UNIMAS PARTNERSHIP OF PHOENIX	20200325ABV
KFTU-CD	53004	Tucson, AZ	UNIMAS PARTNERSHIP OF TUCSON	20200325ACV
KCOR-CD	48837	San Antonio, TX	UNIMAS PARTNERSHIP OF SAN ANTONIO	20200325ACQ
KNIC-DT	125710	Blanco, TX	UNIMAS PARTNERSHIP SAN ANTONIO	20200325ACR
KEZT-CD	52891	Sacramento, CA	UNIMAS SACRAMENTO LLC	20200325ADC
KTFK-DT	20871	Stockton, CA	UNIMAS SACRAMENTO LLC	20200325ADB
KFSF-DT	51429	Vallejo, CA	UNIMAS SAN FRANCISCO LLC	20200325ADE
WVEA-TV	60559	Tampa, FL	UNIMAS TAMPA LLC	20200325AEY
WUVG-DT	48813	Athens, GA	UNIVISION ATLANTA LLC	20200325AFI
KABE-CD	18747	Bakersfield, CA	UNIVISION BAKERSFIELD LLC	20200325AFP
WQHS-DT	60556	Cleveland, OH	UNIVISION CLEVELAND LLC	20200325AFJ
WFTY-DT	60553	Smithtown, NY	UNIVISION NEW YORK LLC	20200325AEZ
WFUT-DT	60555	Newark, NJ	UNIVISION NEW YORK LLC	20200325AFA

WUVP-DT	60560	Vineland, NJ	UNIVISION PHILADELPHIA LLC	20200325AFO
KUTH-DT	81451	Provo, UT	UNIVISION SALT LAKE CITY LLC	20200325ADA
KUVE-CD	78036	Tucson, AZ	UNIVISION TUCSON LLC	20200325ACX
KUVE-DT	63927	Green Valley, AZ	UNIVISION TUCSON LLC	20200325ACW
WGBO-DT	12498	Joliet, IL	WGBO LICENSE PARTNERSHIP, G.P.	20200325ACS
WLTV-DT	73230	Miami, FL	WLTV LICENSE PARTNERSHIP, G.P.	20200325ABT
WUVC-DT	16517	Fayetteville, NC	WUVC LICENSE PARTNERSHIP, G.P.	20200325ABQ
WFPA-CD	74216	Philadelphia, PA	WXTV LICENSE PARTNERSHIP, G.P.	20200325ABN
WXTV-DT	74215	Paterson, NJ	WXTV LICENSE PARTNERSHIP, G.P.	20200325ABM
K21GC	128900	Safford, AZ	UNIMAS PARTNERSHIP OF PHOENIX	20200325ABX
KTFF-LD	23272	Fresno, CA	UNIMAS FRESNO LLC	20200325ACO
KZOL-LP	128896	Safford, AZ	KTVW LICENSE PARTNERSHIP, G.P.	20200325AAR
KDOS-LD	129078	Globe, AZ	KTVW LICENSE PARTNERSHIP, G.P.	20200325AAS
WTNC-LD	70112	Durham, NC	WUVC LICENSE PARTNERSHIP, G.P.	20200325ABR
K18NN-D	127930	Globe, AZ	UNIMAS PARTNERSHIP OF PHOENIX	20200325ABW
WLII-DT*	19777	Caguas, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACF
WOLE-DT*	71725	Aguadilla, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACG
WSTE-DT	60341	Ponce, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACH
WSUR-DT*	19776	Ponce, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACI
W21CX-D	71730	Mayaguez, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACB

* = Stations to be divested.

Radio Stations to be Transferred

Call Sign	Facility ID No.	Community of License	Licensee	Application File Nos.
KAMA-FM	57806	Deer Park, TX	TICHENOR LICENSE CORPORATION	20200325ABC
KBTQ	67072	Harlingen, TX	TICHENOR LICENSE CORPORATION	20200325ABI

KESS	21599	Benbrook, TX	TICHENOR LICENSE CORPORATION	20200325ABA
KGBT	67067	Harlingen, TX	TICHENOR LICENSE CORPORATION	20200325ABF
KGBT-FM	6662	McAllen, TX	TICHENOR LICENSE CORPORATION	20200325AAZ
KLAT	67063	Houston, TX	TICHENOR LICENSE CORPORATION	20200325ABD
KQBU-FM	25583	Port Arthur, TX	TICHENOR LICENSE CORPORATION	20200325ABB
KROM	67071	San Antonio, TX	TICHENOR LICENSE CORPORATION	20200325ABH
KVBH	67064	San Antonio, TX	TICHENOR LICENSE CORPORATION	20200325ABE
KXTN	67069	San Antonio, TX	TICHENOR LICENSE CORPORATION	20200325ABG
WOJO	67073	Evanston, IL	TICHENOR LICENSE CORPORATION	20200325ABJ
KFLC	34298	Benbrook, TX	UNIVISION RADIO SAN FRANCISCO, INC.	20200325AFC
KFZO	7040	Denton, TX	UNIVISION RADIO SAN FRANCISCO, INC.	20200325AFd
KSOL	70032	San Francisco, CA	UNIVISION RADIO SAN FRANCISCO, INC.	20200325AFE
KSOL-FM2	70028	Sausalito, CA	UNIVISION RADIO SAN FRANCISCO, INC.	20200325AFH
KSOL-FM3	14485	Pleasanton, CA	UNIVISION RADIO SAN FRANCISCO, INC.	20200325AFG
KSQL	70033	Santa Cruz, CA	UNIVISION RADIO SAN FRANCISCO, INC.	20200325AFF
KDXX	57376	Lewisville, TX	UNIVISION RADIO SAN FRANCISCO, INC.	20200325AFB
KBBT	3075	Schertz, TX	UNIVISION RADIO STATIONS GROUP	20200325ADG
KBRG	68839	San Jose, CA	UNIVISION RADIO STATIONS GROUP	20200325ADH
KHOT-FM	59422	Paradise Valley, AZ	UNIVISION RADIO STATIONS GROUP	20200325ADI
KHOT-FM1	136351	Glendale, AZ	UNIVISION RADIO STATIONS GROUP	20200325ADJ
KHOV-FM	29021	Wickenburg, AZ	UNIVISION RADIO STATIONS GROUP	20200325ADK
KHOV-FM1	77422	Constellation, AZ	UNIVISION RADIO STATIONS GROUP	20200325ADL

KISF	28893	Las Vegas, NV	UNIVISION RADIO STATIONS GROUP	20200325ADM
KLJA	55475	Georgetown, TX	UNIVISION RADIO STATIONS GROUP	20200325ADN
KLLE	31716	North Fork, CA	UNIVISION RADIO STATIONS GROUP	20200325ADO
KLNO	41380	Fort Worth, TX	UNIVISION RADIO STATIONS GROUP	20200325ADP
KLNV	51515	San Diego, CA	UNIVISION RADIO STATIONS GROUP	20200325ADQ
KLQB	63201	Taylor, TX	UNIVISION RADIO STATIONS GROUP	20200325ADR
KLQV	51164	San Diego, CA	UNIVISION RADIO STATIONS GROUP	20200325ADS
KLSQ	36694	Whitney, NV	UNIVISION RADIO STATIONS GROUP	20200325ADT
KLTN	65310	Houston, TX	UNIVISION RADIO STATIONS GROUP	20200325ADU
KLVE	35086	Los Angeles, CA	UNIVISION RADIO STATIONS GROUP	20200325ADV
KLVE-FM1	190825	Santa Clarita, CA	UNIVISION RADIO STATIONS GROUP	20200325ADW
KMYO	25469	Comfort, TX	UNIVISION RADIO STATIONS GROUP	20200325ADX
KOMR	55913	Sun City, AZ	UNIVISION RADIO STATIONS GROUP	20200325ADY
KOND	26266	Hanford, CA	UNIVISION RADIO STATIONS GROUP	20200325ADZ
KOVE-FM	19091	Galveston, TX	UNIVISION RADIO STATIONS GROUP	20200325AEA
KQMR	22977	Globe, AZ	UNIVISION RADIO STATIONS GROUP	20200325AEB
KRCD	1025	Inglewood, CA	UNIVISION RADIO STATIONS GROUP	20200325AEC
KRCV	19088	West Covina, CA	UNIVISION RADIO STATIONS GROUP	20200325AED
KRDA	39567	Clovis, CA	UNIVISION RADIO STATIONS GROUP	20200325AEE
KRGT	11614	Sunrise Manor, NV	UNIVISION RADIO STATIONS GROUP	20200325AEF
KRGT-FM1	136175	Las Vegas, NV	UNIVISION RADIO STATIONS GROUP	20200325AEG
KSCA	24548	Glendale, CA	UNIVISION RADIO STATIONS GROUP	20200325AEH
KSCA-FM1	190827	Santa Clarita, CA	UNIVISION RADIO STATIONS GROUP	20200325AEI
KTNQ	35673	Los Angeles, CA	UNIVISION RADIO STATIONS GROUP	20200325AEJ
KVVF	19532	Santa Clara, CA	UNIVISION RADIO STATIONS GROUP	20200325AEK

KVVZ	40136	San Rafael, CA	UNIVISION RADIO STATIONS GROUP	20200325AEL
WADO	70684	New York, NY	UNIVISION RADIO STATIONS GROUP	20200325AEM
WAMR-FM	61658	Miami, FL	UNIVISION RADIO STATIONS GROUP	20200325AEN
WAQI	37254	Miami, FL	UNIVISION RADIO STATIONS GROUP	20200325AEO
WPPN	25053	Des Plaines, IL	UNIVISION RADIO STATIONS GROUP	20200325AEP
WQBA	73912	Miami, FL	UNIVISION RADIO STATIONS GROUP	20200325AEQ
WQBU-FM	30573	Garden City, NY	UNIVISION RADIO STATIONS GROUP	20200325AER
WQBU-FM1	189412	New York, NY	UNIVISION RADIO STATIONS GROUP	20200325AES
WQBU-FM2	189382	Brooklyn, NY	UNIVISION RADIO STATIONS GROUP	20200325AET
WRTO	11196	Chicago, IL	UNIVISION RADIO STATIONS GROUP	20200325AEU
WRTO-FM	37253	Goulds, FL	UNIVISION RADIO STATIONS GROUP	20200325AEV
WVIV-FM	48449	Lemont, IL	UNIVISION RADIO STATIONS GROUP	20200325AEW
WXNY-FM	29022	New York, NY	UNIVISION RADIO STATIONS GROUP	20200325AEX
WKAQ	19099	San Juan, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACA
WKAQ-FM	19098	San Juan, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACC
WKAQ-FM1	19100	Juana Diaz, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACD
WKAQ-FM2	179635	Fajardo, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACE
WUKQ	9352	Ponce, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACJ
WUKQ-FM	54818	Mayaguez, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACK
WUKQ-FM1	127832	Ponce, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACL
WYEL	70686	Mayaguez, PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.	20200325ACM