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August 2, 2017

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AUG -2 2017

Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: FM Translator Station K248BD
Houston, Texas
FIN: 147130
Complaint of Interference by FM Translator Station to Full-Service Station

Dear Ms. Dortch:

We are counsel to Gow Media, LLC (“Gow”). Gow is the licensee of full-service FM Station KFNC(FM) (97.5 MHz), Mont Belvieu, Texas (FIN: 52407).

Gow is hereby filing this Complaint against FM Translator Station K248BD, Hockley, Texas (the “Translator Station” or K248BD), which is licensed to Aleluya Broadcasting Network (“ABN”) and operates, on a co-channel basis, on Output Channel 248 (97.5 MHz).

This Complaint arises from what Gow submits is a clear and uncontested violation of Section 74.1203(a) of the Commission’s Rules. That provision requires that an FM translator “will not be permitted to continue to operate if it causes any actual interference to: (1) the transmission of any authorized broadcast station....” KFNC has, since the Translator Station commenced operations, been receiving actual interference from K248BD and has no recourse but to bring its concerns to the Commission’s attention for prompt resolution and remediation.

The Translator Station has operated on Output Channel 248. However, the Translator Station has served the community of Hemphill, Texas, far from the Houston area, for more than ten years, with a 40 watt output signal at the low height of five meters above ground level.¹ In File No. BPFT-20160610AAA, ABN applied to modify the transmitter site to a location closer to Houston, serving Hockley, Texas, on a multi-user tower with a significantly increased level of service: 240 watts output at 136 meters.

¹ See File No. BLFT-20070629CCB.

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Gow has been monitoring the status of K248BD in the Commission's data base in order to determine, upon commencement of operations, whether the Translator Station would cause interference to KFNC. It recently became aware of interference on Channel 248 that appears to result from the relocated operations of K248BD. However, Gow's efforts to confirm this have been frustrated by the absence of a license to cover application (FCC Form 350) on file for K248BD in File No. BPFT-20160610AAA. In the absence of such an application, which is required by Section 74.14(a) of the Commission's Rules, Gow is not certain as to what type of antenna is being used and where the antenna is actually located. The failure to file a license to cover application at the same time that the Translator Station commenced operations, alone, is reason for action to be taken by the Commission.

In that FM translator stations are secondary services, they have no absolute right to continue to broadcast under any circumstances. Section 74.1203(a) teaches us that FM translator stations must protect full-service stations. *The Association for Community Education, Inc.*, 19 FCC Rcd 12682 (2004). When it is evidenced, by listener communications or otherwise, that an FM translator is interfering with a full-service station, the FM translator licensee must shut down its operations or the Commission will shut down the FM translator in order to protect the full-service station, as provided for in Sections 74.1203(e) and 74.1232(h). *Id.* at 12688.

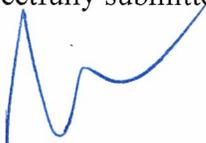
Attached hereto, as Exhibit A, are the Declarations of Gow listeners who have been detrimentally affected by the interference being suffered. In addition, Gow is aware of at least one advertiser that has withdrawn its business from KFNC owing to the inability to reach listeners who are impacted by the interference. This is causing harm to KFNC that cannot be easily or quickly resolved and gets worse by the day.

Considering these factors, Gow requests that the Commission issue a Section 74.1203(e) notice to ABN mandating that the operation of Station K248BD, from any site other than the currently licensed one, "be suspended within three minutes and shall not be resumed until the interference has been eliminated or it can be demonstrated that the interference is not due to spurious emissions by the FM translator."

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Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,



Barry A. Friedman

Enclosures

cc: Mr. James Bradshaw, FCC Audio Division
296458

EXHIBIT A

DECLARATION

I, Adam Alvarez, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 5018 Kleinway Dr. My place of employment is located at 11000 Richmond Ave.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 4 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Houston, Texas on the 31 day of July, 2017.

Signature: 

Printed Name: Adam Alvarez

DECLARATION

I, Michael Gonzalez, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at Cypress, TX

My place of employment is located at 13000 Emmett E.
Houston TX, 77041

I have been a listener of Radio Station KFNC on 97.5 MHz, for 5 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Cypress, Texas on the 31 day of July, 2017.



Signature:

Michael Gonzalez

Printed Name:

DECLARATION

I, Blane Wisdom, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 22803 State Hwy 249, Tomball, TX 77375. My place of employment is located at 25025 I-45 North, Spring, TX 77380.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 10+ years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/**both** home and office **and**/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Spring, Texas on the 31st day of July, 2017.

Signature:  _____

Printed Name: Blane Wisdom

DECLARATION

I, **Michael Patton**, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at **14319 Spyglen Lane, in Cypress TX 77429**. My place of employment is located at **12340 Jones Road, in Houston TX 77070**.

I have been a listener of Radio Station KFNC on 97.5 MHz, for the past ten years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Houston, Texas on the 31st day of July, 2017.

Signature: Michael T. Patton

Printed Name: Michael T. Patton

DECLARATION

I, Chris Dyer, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 18811 Mesa Oaks Magnolia, Texas 77355. My place of employment is located at 9346 Telge Rd. Houston, Texas 77095.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 1.5 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Houston, Texas on the 31st day of July, 2017.

Signature: Chris Dyer

Printed Name: Chris Dyer

DECLARATION

I, Rodney Dominguez, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

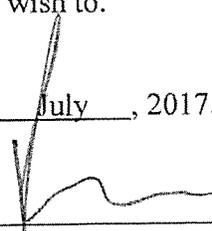
I reside at 10502 Wayward Wind Lane Hou, Tx 77064. My place of employment is located at Higman Barge Lines 16530 Peninsula BLVD Hou, TX 77015.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 8-9 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at 1:12pm, Texas on the 31 day of July, 2017.

Signature:  _____

Printed Name: Rodney Dominguez

DECLARATION

I, Gerald Shiflet, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 24403 Sandusky Dr, Tomball, Texas. My place of employment is located at 8686 New Trails Dr, The Woodlands, Texas 77381.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 7 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at 8686 New Trails Dr. The Woodlands, Texas on the 31st day of July, 2017.

Signature: 

Printed Name: Gerald Shiflet

DECLARATION

I, Ryan Moran, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

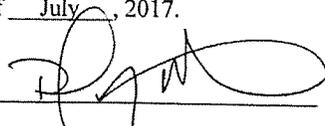
I reside at 2331 Elmgate Drive, Houston, Texas 77080. My place of employment is located at 616 FM 1960 W. Suite 675, Houston, Texas 77090.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 6 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Houston, Texas on the 31st day of July, 2017.

Signature: 

Printed Name: RYAN J. MORAN

DECLARATION

I, Monique Jackson declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

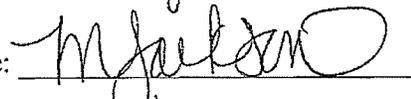
I reside at 15807 Mission View Ct. My place of employment is located at 1553 South Mason

I have been a listener of Radio Station KFNC on 97.5 MHz, for 3 and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Katy, Texas on the 1 day of August, 2017.

Signature: 

Printed Name: Monique Jackson

DECLARATION

I, Allix Hunter, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 5501 Lacy St.. My place of employment is located at 1553 S. Max Rd.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 1 year and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Katy, Texas on the 1st day of August, 2017.

Signature: _____

Printed Name: _____

Allix Hunter
Allix Hunter

DECLARATION

I, Yliana Brooks, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

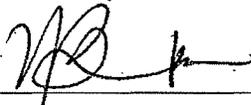
I reside at 3930 Micah Lane Rosenberg, TX 77471. My place of employment is located at 1553 S. Mason Rd Katy, TX 77480

I have been a listener of Radio Station KFNC on 97.5 MHz, for 2 yrs and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Katy, Texas on the 1 day of August, 2017.

Signature: 

Printed Name: Yliana Brooks

DECLARATION

I, Cornelius Brooks, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 5930 Micah Lane Rosenberg, TX 77471. My place of employment is located at Rosenberg Fire Dept.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 2.5 yrs and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Rosenberg, Texas on the 1st day of August, 2017.

Signature: Cornelius Brooks

Printed Name: Cornelius Brooks

DECLARATION

I, Jennifer Muller, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

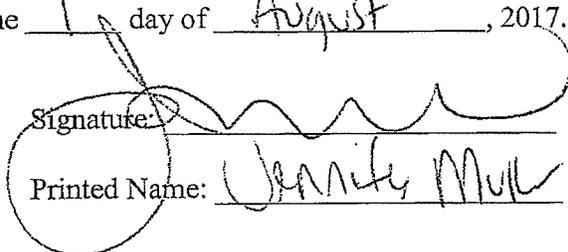
I reside at 2411 Fonchen #1547 77063. My place of employment is located at 1553 S. Mason Katy 77450.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 3 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Katy, Texas on the 1 day of August, 2017.

Signature: 

Printed Name: Jennifer Muller

DECLARATION

I, Keeley Bell, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 5903 Verde Place Ln., Katy, Texas 77493. My place of employment is located at 12550 Reed Road, Sugar Land, Texas 77478.

I have been a listener of Radio Station KFNC on 97.5 MHz, for 6 Years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Katy, Texas on the 31st day of July, 2017.

Signature: _____

Printed Name: Keeley Bell

DECLARATION

I, Matt Young , declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 31706 Cattail Park Ct, Conroe, TX 77385 . My place of employment is located at 7909 Parkwood Circle Drive, Houston, TX 77036 .

I have been a listener of Radio Station KFNC on 97.5 MHz, for 4 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Houston , Texas on the 1st day of August , 2017.

Signature: Matt Young

Printed Name: Matt Young

DECLARATION

I, Max Mueller, declare, under penalty of perjury, that the following is true and correct, to the best of my information, knowledge and belief:

I reside at 5415 Knoll Terrace Dr. My place of employment is located at 17825 North Fwy

I have been a listener of Radio Station KFNC on 97.5 MHz, for 2 years and I listen to and value the sports-related programming that it provides for its listeners. I listen to KFNC at my home/office/both home and office and/or in driving between my home and office.

Since approximately July 20, 2017, my ability to listen to KFNC has been detrimentally affected by interference from what appears to be another Station's programming. Prior to approximately July 20, 2017, I was able to listen to KFNC, from the same location(s) without any interference whatsoever.

I ask that the Federal Communications Commission take such actions as are necessary in order to allow me to listen to an interference-free KFNC where I wish to.

Executed at Houston, Texas on the 31st day of July, 2017.

Signature: 

Printed Name: Max Mueller