

SIGA BROADCASTING, INC.
1302 N. SHEPHERD DR. 3RD FLOOR
HOUSTON, TEXAS 77008
sigabroadcasting@gmail.com

Received & Inspected

July 26, 2017

JUL 28 2017

Mr. James Bradshaw, Deputy Chief
Audio Division, Media Bureau
c/o Marlene Dortch, Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S.W.TW-A325
Washington, D.C. 20554

FCC Mailroom

**RE: REPLY TO KEPH-LP SUPPLEMENTAL RESPONSE TO INTERFERENCE
COMPLAINT AGAINST K237GS**

Dear Mr. Bradshaw:

Submitted herewith is the response of SIGA Broadcasting Corporation ("SIGA") to the letter that was submitted by consul for Calvary Chapel South Houston ("CCSH"), licensee of Station KEHP-LP, Friendswood, Texas, for the purported purpose of "supplementing the record" relating to CCSH's complaint that SIGA's FM Translator K237GS is causing impermissible interference to the reception of KEPH-LP.

SIGA's attached response consists of a Declaration Under Penalty of Perjury from Charles Staples, (Exhibit A) SIGA's consulting engineer, which explains why there is no merit to CCSH's allegation that the antenna used by K237GS is "unauthorized" and a Statement Under Penalty of Perjury by SIGA's President, Gabriel Arango, which addresses CCSH's wholly unsubstantiated allegations to the effect that CCSH is receiving continuing complaints concerning interference to KEPH-LP from K237GS and that SIGA has not been responsive to such complaints.

Regarding, the July 13th, 2017 supplemental response by the attorney Garziglia, this is my response:

A. Regarding the claim that "in a show of apparent bad faith" it is quite true that we lost audio for a few days. Losing audio is nothing new in the radio broadcasting world. It just doesn't make it, "a show of apparent bad faith". It is clear to anyone in the radio world that if interference exists, it does not abate by broadcasting without audio.

B. Regarding the other alleged interference issues as per Mr. Sylvester's Declaration, this is all hearsay as I have not received any other complaints from these complainants. Once again Mr. Sylvester is responding on behalf of the complainants.

Below are my specific communications with each of the latest, alleged additional, complaints by Mr. Adam Sylvester.

1. **PAUL RYDING:** The last time I heard from him was on June 19, 2017. Please see below email detailed correspondence.

Are you still experiencing any interference?
Will be in Friendswood again tomorrow morning meeting with someone else at 9:30. Can we meet at 10:15 in area of interference?
Gabriel Arango

SIGA Broadcasting Corporation
www.sigabroadcasting.com
sigabroadcasting@gmail.com
Direct: 832-860-9586

There is still minor variances in signal. Yes I'll be available.

Paul Ryding

From: SIGA Broadcasting [mailto:sigabroadcasting@gmail.com]

Sent: Monday, June 05, 2017 10:19 AM

To: pryding@sbcglobal.net

Subject: Revive.

SIGA Broadcasting <sigabroadcasting@gmail.com>

Jun 17

Good morning. I will be available this afternoon or Monday 6-20-2017 for meeting so we can drive and listen to any interference which may be caused by us.

Will you be available this afternoon?

Gabriel Arango

Direct: 713-868-5559

Paul Ryding

Jun 19

Thank you for emailing but for the last few days there has been no interference so I don't think we will need to go out as during my travels around my immediate area the signals are fine, crisp and like it was before all this began.

From: SIGA Broadcasting [mailto:sigabroadcasting@gmail.com]

Sent: Saturday, June 17, 2017 9:49 AM

To: Paul Ryding <pryding@sbcglobal.net>

Subject: Re: Revive.

2. **TOMMY THOMPSON.** In your files you will find the original letters sent to him. He has not responded. Please see attached Exhibit B.

3. **MARIA CASTILLO:** In your files you will find the original letters sent to her. She has not responded. Please see attached . Exhibit B.

4. **EMMANUEL MATEL:** In your files you will find the original letters sent to him. He has not responded. Please see attached Exhibit B.

5. **DEREK THOMPSON:** Please see below final response of June 19, 2017.

SIGA Broadcasting <sigabroadcasting@gmail.com>

Jun 19

Please let me know if you are still experiencing interference from SIGA Broadcasting FM translator K237GS. If so I would like to meet with you this afternoon 6/19/2017, at the site of complaint.

Gabriel Arango

SIGA Broadcasting Corporation

www.sigabroadcasting.com

sigabroadcasting@gmail.com

Direct: 713-868-5559

Please let me know if you are still experiencing interference from SIGA Broadcasting FM translator K237GS. If so I would like to meet with you this afternoon 6/19/2017, at the area of complaint.

Gabriel Arango

SIGA Broadcasting Corporation

www.sigabroadcasting.com

sigabroadcasting@gmail.com

Direct: 713-868-5559

Derek Thompson

Jun 19

Actually I have noticed much improvement to the signal area. Thanks. Derek

6. **JOHN MARINOS:** On June 19th, 2017 I ask him if he could meet with me the next day. He never responded. Please see below.

SIGA Broadcasting <sigabroadcasting@gmail.com>

Jun 19

Please let me know if you are still experiencing interference from SIGA Broadcasting FM translator K237GS. If so I would like to meet with you this afternoon 6/19/2017, at the area of complaint.

Gabriel Arango--
SIGA Broadcasting Corporation

John_Louis Marinos

Jun 19

Things have improved. Please give me more notice if you want to meet with me in the future.Thank you.

From: SIGA Broadcasting <sigabroadcasting@gmail.com>

Sent: Monday, June 19, 2017 10:24 AM

To: John Marinos

Subject: REVIVE 95.3

Please let me know if you are still experiencing interference from SIGA Broadcasting FM translator K237GS. If so I would like to meet with you this afternoon 6/19/2017, at the area of complaint.

Gabriel Arango

SIGA Broadcasting Corporation

www.sigabroadcasting.com

sigabroadcasting@gmail.com

Direct: 713-868-5559

How about tomorrow after 11 am?

Thanks.

G.A.

7. **ALETA CHAPMAN:** In your files you will find the original letters sent to her on 4-17, 2017. She has not responded. Mr. Sylvester has responded on her behalf. Please see attached Exhibit B.

8. **NORA BASQUEZ:** Please see below email correspondence. Since then Mr. Sylvester has responded on her behalf.

Nora Gonzalez <nora@bestoilfieldsupply.com>

Apr 17

Mr. Arango, please see attached returned letter requested.

Thank you for contacting me in regards to the 95.3 FM radio station interference. It would be greatly appreciated if the problem would be corrected as we listen to it on our way to church every Sunday morning and during the week as well. This is the area where there is the most high interference.

Thank you and have a Blessed week!

Nora A. Gonzalez-Basquez

Best Oilfield Supply, LLC.

P.O.Box 2006

League City, Tx. 77574

Shipping address: 1314 FM 646 W

Suite#11

Dickinson, Tx. 77539

Phone: 281-309-9890

Fax: 281-614-1620

Email: nora@bestoilfieldsupply.com

“Lord with you by my side I can do all things, for with you all things are possible and without you I am nothing”

“I can do all things through Christ who gives me strength” Phillipians 4:13

“I will say of The LORD, “He is my strength, my refuge and my fortress, my God in whom I trust”. Psalm 91:2

C. Mr. Garziglia states that “The assertion appears to stem, in part, from the fact the some of the complainants have had contact with KEPH-LP over the course of the interference complaints.”

This should all be considered double hearsay. The complainants could have just as easily complained directly to us as we had opened all lines of communication via internet and/or telephone. They chose not to do so.

D. Regarding CESH’s contention that, notwithstanding the fact that LPFM stations are “equal in status,” SIGA’s translator is required to eliminate interference to the reception of KEHP-LP beyond that station’s protected service contours, SIGA submits that such a contention is directly at odds with the concept of “equal status.” Unlike a primary station’s signal which is entitled to protection from interference from secondary services wherever it might have established listenership, the signals of stations of “equal status” are only Protected from interference from one another within their protected contours.

1. On Nov. 14, 2016, after we filed a similar complaint of interference on an LPFM in the Dallas area which was interfering with our FM translator and this is the

email communication that I received from Irene Bleiweiss of the Media bureau, Audio division:

Irene Bleiweiss <Irene.Bleiweiss@fcc.gov>

11/14/16

Dear Mr. Arango,

Thank you for writing to the FCC about the operations of KRQP-LP. I've checked the station's records and see that we licensed its new facilities on October 20, 2016.

The Commission would not generally take further action on interference between a translator and LPFM station. That's because FM translators and LPFM stations are considered "co-equal" and must accept any interference caused or received. This is quite different than the primary/secondary relationship between translators and full-service FM stations, with which I'm sure you are familiar. If there were evidence that a translator or LPFM station operates with facilities other than those authorized that would be a violation the FCC could look into. But I don't think that is what is going on here--the recent license grant would seem to indicate that the station is operating with authorized facilities.

LPFM stations must, as you know, operate noncommercially. So if there are truly "commercials" on the station that would be a concern. I suggest that you file a complaint with the FCC's Enforcement Bureau about the commercials. In order for them to determine that an announcements goes beyond what is permitted as underwriting, they would need to have a recording and/or transcript of the announcements. In this case, I would suggest including recording and a translated transcript both because the station broadcasts in a language other than English. There is more information about filing a complaint against a broadcast station on the FCC's web site, fcc.gov.

Irene Bleiweiss Media Bureau, Audio Division

On June 14, 2017, I also received the following email from her after we asked her for her source of the above opinion:

Irene Bleiweiss

Jun 14 (7 days ago)

This is from the Local Community Radio Act of 2010. I've highlighted the co-equal provision that LPFM and translator stations are equal to each other, even though they are secondary to full power FM stations.

SEC. 5. ENSURING AVAILABILITY OF SPECTRUM FOR LOW-POWER FM STATIONS.

The Federal Communications Commission, when licensing new FM translator stations, FM booster stations, and low-power FM stations, shall ensure that--

- (1) licenses are available to FM translator stations, FM booster stations, and low-power FM stations;
- (2) such decisions are made based on the needs of the local community; and
- (3) FM translator stations, FM booster stations, and low-power FM stations remain equal in status and secondary to existing and modified full-service FM stations.

2. Furthermore, In the Matter of Creation of Low Power Radio Service MM Docket No. 99-25, RM-9208, RM-9242 Report and Order, Adopted: January 20, 2000; Released: January 27, 2000, the FCC ordered the following:

I. Introduction

2. In establishing this new service, we are determined to preserve the integrity and technical excellence of existing FM radio service, and **not to impede its transition to a digital future.**

4. Finally, in proposing the creation of a new LPFM service, we made clear that we will not compromise the integrity of the FM spectrum. **We are committed to creating a low power FM radio service only if it does not cause unacceptable interference to existing radio service.** We recognize that the elimination of restrictions on both the 2nd- and 3rd- adjacent channels would create many more opportunities for community-based LPFM stations, but, given the ambiguity in the record on this issue and our commitment to **ensure that the new LPFM service does not unacceptably interfere with existing radio services or impede a digital future for radio broadcasting,** we must proceed cautiously.

KLVL has been licensed since May 5, 1950 and SIGA Broadcasting, Inc. was granted a license in 1997. KEPH 95.3 LPFM is unacceptably interfering with our existing radio services and is impeding the future of our radio broadcasting.

3. Furthermore, under MM Docket No. 99-25 RM-9208 RM-9242 REPORT AND ORDER Adopted: January 20, 2000 Released: January 27, 2000: Page 60.

LPFM Spectrum Rights and Responsibilities.

We sought comment on whether LP100 stations should be permitted to select channels without regard to interference received and on the extent to which **LP100 stations should protect FM translator and booster stations.**

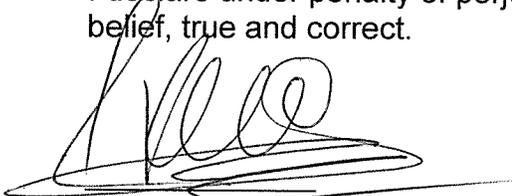
Page 60. **Decision:** First and foremost, we must require that new LPFM stations protect radio reception within the service areas of existing full-service stations, as well

as the existing services of FM translator and booster stations. Second, LPFM stations, with their much smaller service areas and fewer service regulations, should not prevent FM stations from modifying or upgrading their facilities, nor should they preclude opportunities for new full-service stations. **Additionally, LPFM applications will be required to protect vacant FM allotments.**

K233GS was a vacant FM allotment until our license was granted on December 12, 2016, now KEPH 95.3 LPFM must protect K233GS and not the other way around. To achieve this the license for KEPH 95.3 LPFM should be dismissed or they should move their transmitter site.

Since the Local Community Radio Act of 2010, Section 5 (3) states that “FM translator stations, FM booster stations, and low power FM stations remain equal in status and secondary to existing and modified full-service FM stations and since it has been the opinion of the FCC (as per above email from Irene Bleiweiss) that “FM translators and LPFM stations are considered “co-equal” and must accept any interference caused or received.” , then, I respectfully ask the commission to invalidate and dismiss this complaint and grant our license as previously requested.

I declare under penalty of perjury that this response is, to the best of my knowledge and belief, true and correct.



Gabriel Arango
Pres. SIGA Broadcasting, Inc.
Cc: Rebecca E. Jacobs
rjacobs@wcsr.com

EXHIBIT A

Statement of Charles W. Staples

Case: 1800B3-PPD

I, Charles W. Staples, do state:

I am a technical consultant working on behalf of Gabriel Arango of SIGA Broadcasting.

I am a graduate of Texas Christian University.

I am President of CS Broadcast Technical Services, Inc.

I hold a General Class Lifetime Radiotelephone Operator License with a ship radar endorsement, which was previously a First Class Radio Operator License.

I have worked in the broadcast industry for over 45 years. My qualifications are a matter of record with the Commission.

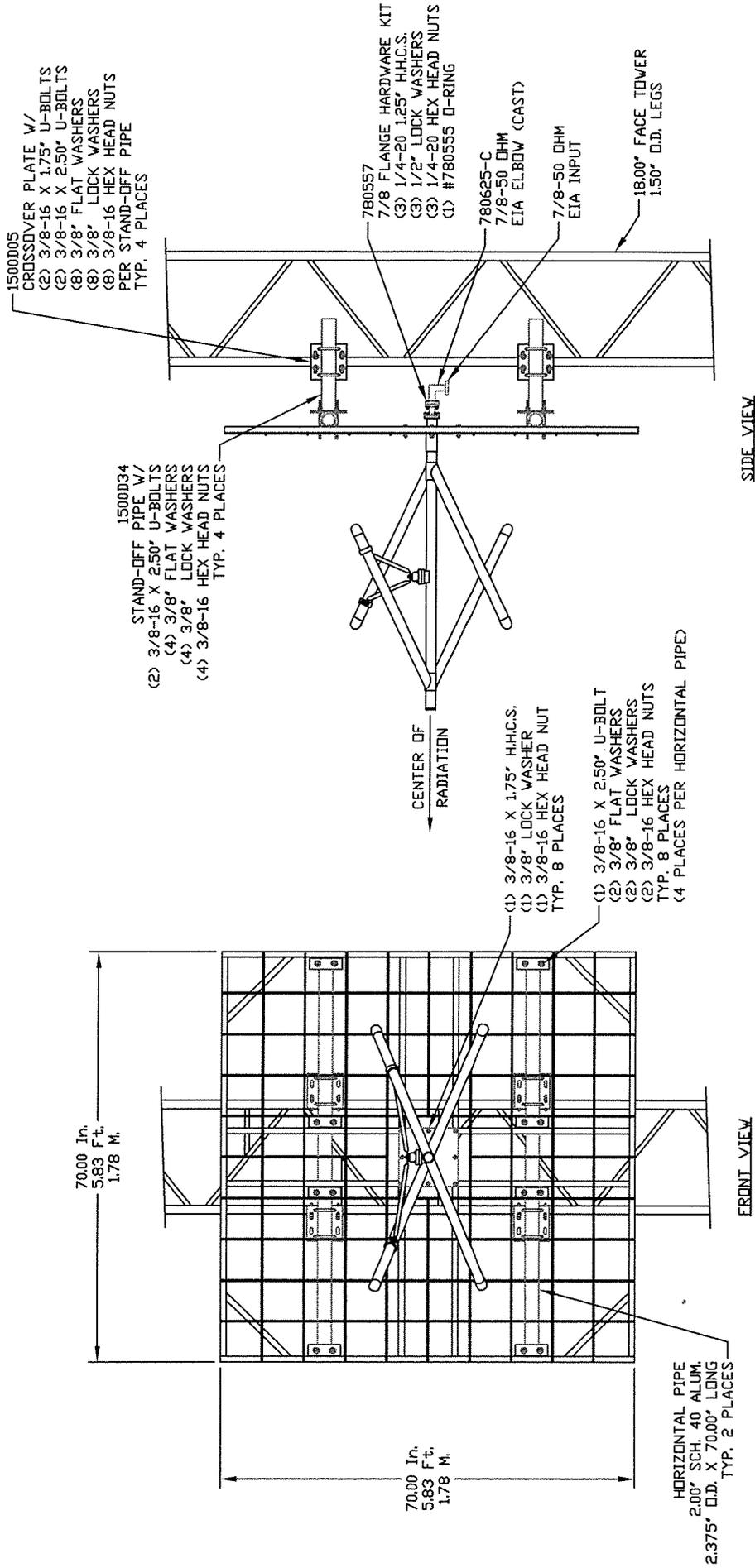
I have examined the informal objections filed by James B. Davis in behalf of Calvary Chapel Southeast Houston against SIGA and K237GS, and the testimony of their counsel, John F. Garziglia. The statements made in the objection that allege the antenna utilized was not the proper antenna and did not achieve the proper pattern to protect interference to the two co-channel LP FM facilities is both unfounded and inaccurate. This antenna is a "double V" type that is virtually identical to the FMEC 2 antenna specified in the construction permit. The 70" X 70" screen behind the radiating elements is the parasitic element that achieves the directional pattern. As for the difference between one and two bays, the 2 bay was not required as the vertical or downward radiation pattern has no bearing on protection to the two co-channel LP FM facilities. The previously specified 2 bay antenna, is only for protection of the second adjacent, KKHH which is adequately protected by the one bay SWR FMPCV antenna utilized. SIGA's previous filings demonstrate that the translator more than adequately protects KEPH. After this filing Garziglia filed a further statement stating that the two antennas are not the same. Mr. Garziglia obtained a picture of the SWR FMP antenna from the Internet and compared it to the FMEC antenna. He stated the two are not the same. I would agree with Mr. Garziglia as to this and only this part of the statement, as the FMP is *NOT* the antenna represented to me by SIGA and the manufacturer, SWR, Inc., that was utilized. The FMP antenna in the picture from the Garziglia exhibit is a screen with both horizontal and vertical dipoles mounted in front of it. It is a horizontally and vertically polarized antenna with two separate radiating elements. It is fed with dual feeds usually from a power divider. The FMPCV antenna is a circularly polarized antenna as it is a "double vee" type exactly like the FMEC, FM3, and FM10, Illuminator lines of SWR antenna. The FMPCV is a panel with a circular

"double vee" as the radiating elements and is in this case an off the shelf directional antenna that achieves more protection than that of the minima described in the construction permit. If SIGA had chosen to buy a directional FMEC antenna, it would undoubtedly have carried a different name, such as "FMECDASpecial", it is highly likely that Mr. Garziglia would be making this same argument. In any event, either the FMP or FMPCPV should achieve more than adequate protection to KEPH. The difference between circular polarity and horizontal and vertical polarity is irrelevant with respect to protection of KEPH from interference. Since Garziglia found this picture, SWR has updated the design of the FMP antenna to that of an "arrowhead" antenna. This antenna is also a circularly polarized antenna with a radiating element similar to, but not the same as the FMEC. This newly updated design of the FMP antenna would also achieve protection of KEPH when utilized in the "typical one around tower" pattern. This is however, definitely NOT the antenna that was utilized. See attachments of the FMPCV antenna represented to me by SIGA that was utilized. This diagram came from the manufacturer, SWR who represented to me this is the antenna sold to SIGA for K237GS. Also see attachments of the FMEC antenna and the newly updated FMP antenna.

This statement is true and correct to the best of my knowledge and is made under the penalty of perjury.



Charles W. Staples
July 21, 2017

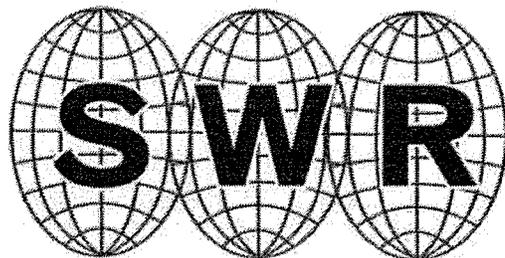


S.O. #16563		DRAWING NUMBER: 2068D00	
TITLE: FMPCV/1, FREQ. 95.3 SIGA BROADCASTING		ENGINEER: NTS	DATE: 1/12/17
MATERIAL: SYSTEMS WITH RELIABILITY, LP 619 INDUSTRIAL PARK ROAD EBENSBURG, PENNSYLVANIA 15831		SCALE: NTS	SHEET: 1 OF 1
SIZE: C	REV. APPROVAL DATE	REV. APPROVAL DATE	REV. APPROVAL DATE



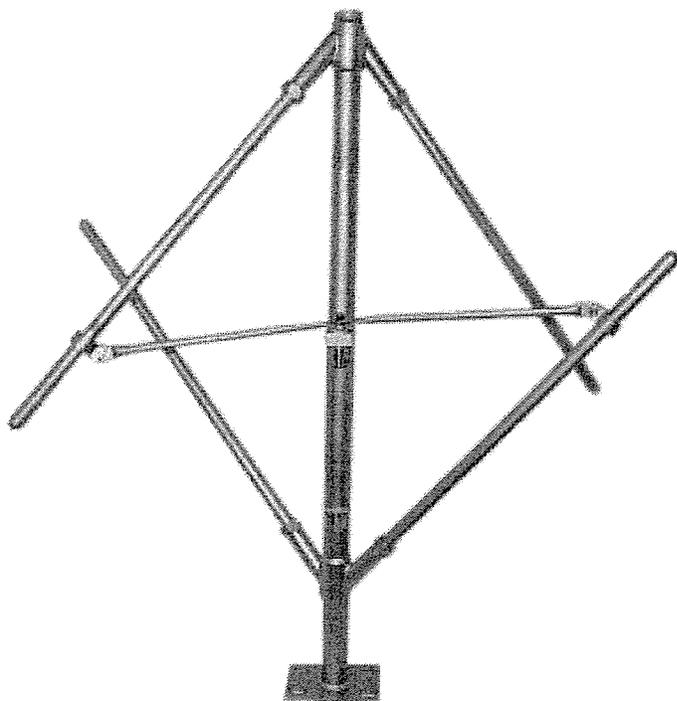
SYSTEMS WITH RELIABILITY, LP.

Broadcast Antennas & Transmission Systems

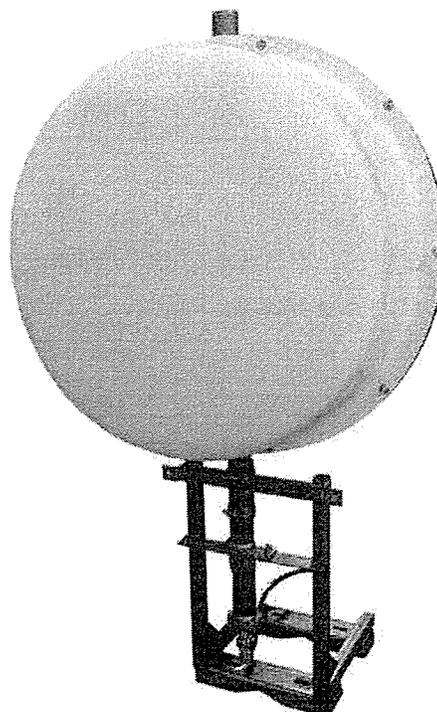


FMEC Specifications

Standard Model



Radome Model

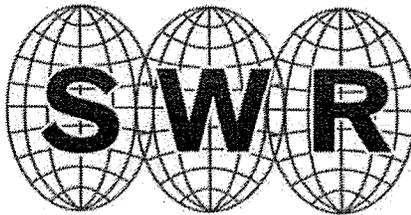


SYSTEMS WITH RELIABILITY, LP.

619 Industrial Park Rd. Ebensburg, PA 15931 phone: 814-472-5436 fax: 814-472-5552 web: www.swr-rf.com

Table of Contents

Tech Sheet.....	1
Dimensions.....	2
Single Bay Installation.....	3
2 Bay Installation.....	4
3 or More Odd Bays (3, 5, 7, etc.).....	5
4 or More Even Bays (4, 6, 8, etc.).....	6
Full Wave Spaced Specifications.....	7
1/2 Wave Spaced Specifications.....	8
3/4 Wave Spaced Specifications.....	9
Warranty Information.....	10



SYSTEMS WITH RELIABILITY, LP.

619 Industrial Park Rd. Ebensburg, PA 15931 phone: 814-472-5436 fax: 814-472-5552 web: www.swr-rf.com

FMEC SERIES CIRCULAR POLARIZED LOW POWER FM ANTENNAS

Product Specifications:

Frequency Range	88 – 108 MHz
Polarization	Circular
Power Rating	500 Watts per bay
System Input	Type N Male
VSWR	1.3:1 ± 150 kHz
Bay Dimensions	H 43.50" / W 38.5" / D 19"

Features:

•**BUILT WITH LOW POWER BROADCASTERS IN MIND.** Stations or translators that require circular, horizontal, or vertical polarizations.

•**POWER RATING.** Each bay is rated at 500 watts with a maximum power of 2 kW for four bays.

•**RUGGED CONSTRUCTION.** Each bay is constructed from rugged, heavy wall copper and naval brass. All joints are tig-welded.

•**PRESSURIZATION NOT REQUIRED.**

•**CUSTOM DIRECTIONAL PATTERNS.** FM directional antennas designed to the customer's specified mounting structure and FCC filing documentation are available.

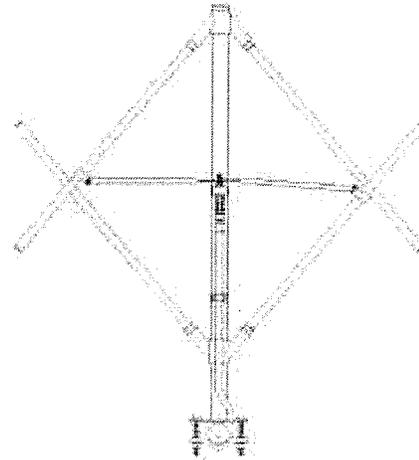
•**WEATHERIZATION (OPTIONAL).** Radomes or electrical heaters available for areas that experience periods of heavy icing and/or snow conditions.

•**STANDARD MOUNTING BRACKETS.** Fits up to 4" tower leg or pipe. Supplied with antenna.

•**WARRANTY.** 2-year limited warranty on defects and workmanship to the original purchaser.

Notes:

1. Power rating is based on 40 degrees Celsius. Degeneration occurs above 2000 ft.
2. Antenna weight, windload, aperture and dimensions are based on mid-band operation (98.1 MHz).
3. Antennas with 3 or more bays come with input power divider.
4. SWR, Inc. maintains a continuous program of product improvement and therefore reserves the right to change specifications without notice.



**Full Wave Spaced
Electrical and Mechanical Specifications**

Bays	Power Rating (watts)	Power Gain	dB Gain	Net Weight (lbs)	Windload (lbs)
1	500	0.441	-3.558	15	35
2	1000	0.959	-3.162	35	85
3	1500	1.405	-1.746	50	120
4	2000	2.044	3.118	65	155
5	2500	2.569	4.133	80	190
6	3000	3.160	4.907	95	225
8	3000	4.311	6.340	110	260
10	3000	5.456	7.369	130	295

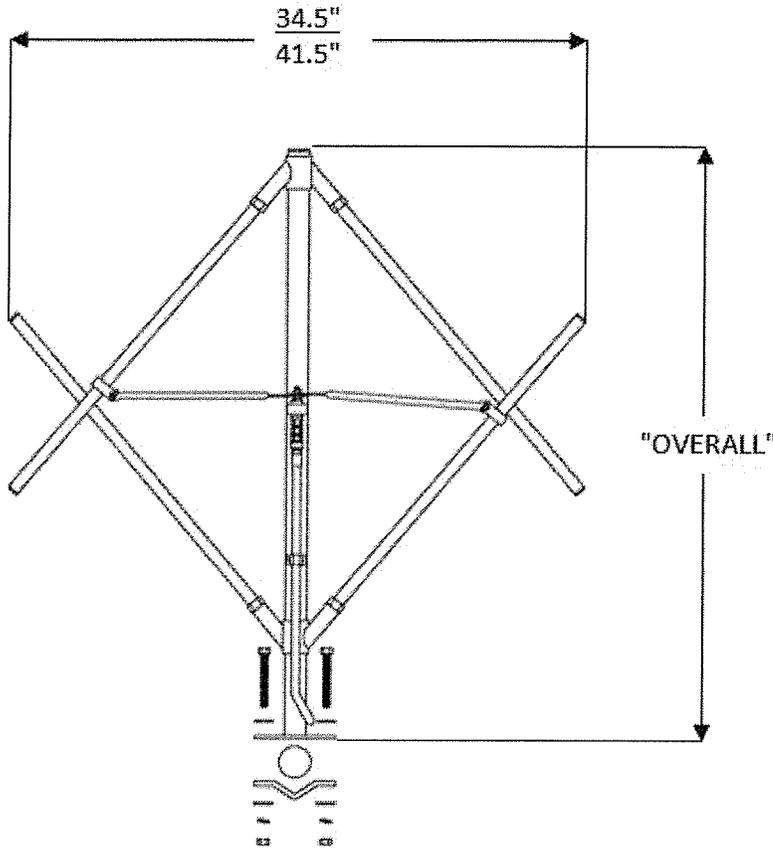
**Half Wave Spaced
Electrical and Mechanical Specifications**

Bays	Power Rating (watts)	Power Gain	dB Gain	Net Weight (lbs)	Windload (lbs)
1	500	0.441	-3.558	15	35
2	1000	0.695	-1.560	35	85
3	1500	1.012	0.052	50	120
4	2000	1.313	1.163	65	155
5	2500	1.623	2.163	80	190
6	3000	1.924	2.642	95	225
8	3000	2.529	4.020	110	260
10	3000	3.129	4.954	125	295

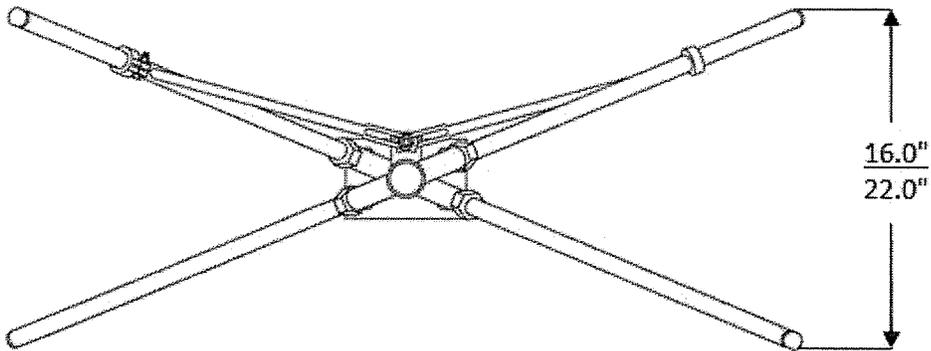
**3/4 Wave Spaced
Electrical and Mechanical Specifications**

Bays	Power Rating (watts)	Power Gain	dB Gain	Net Weight (lbs)	Windload (lbs)
1	500	0.441	-3.558	15	35
2	1000	0.935	-0.292	35	85
3	1500	1.396	1.443	50	120
4	2000	1.845	2.660	65	155
5	2500	2.301	3.819	80	190
6	3000	2.756	4.453	95	225
8	3000	3.604	5.640	110	260
10	3000	4.500	6.818	125	295

Dimensions



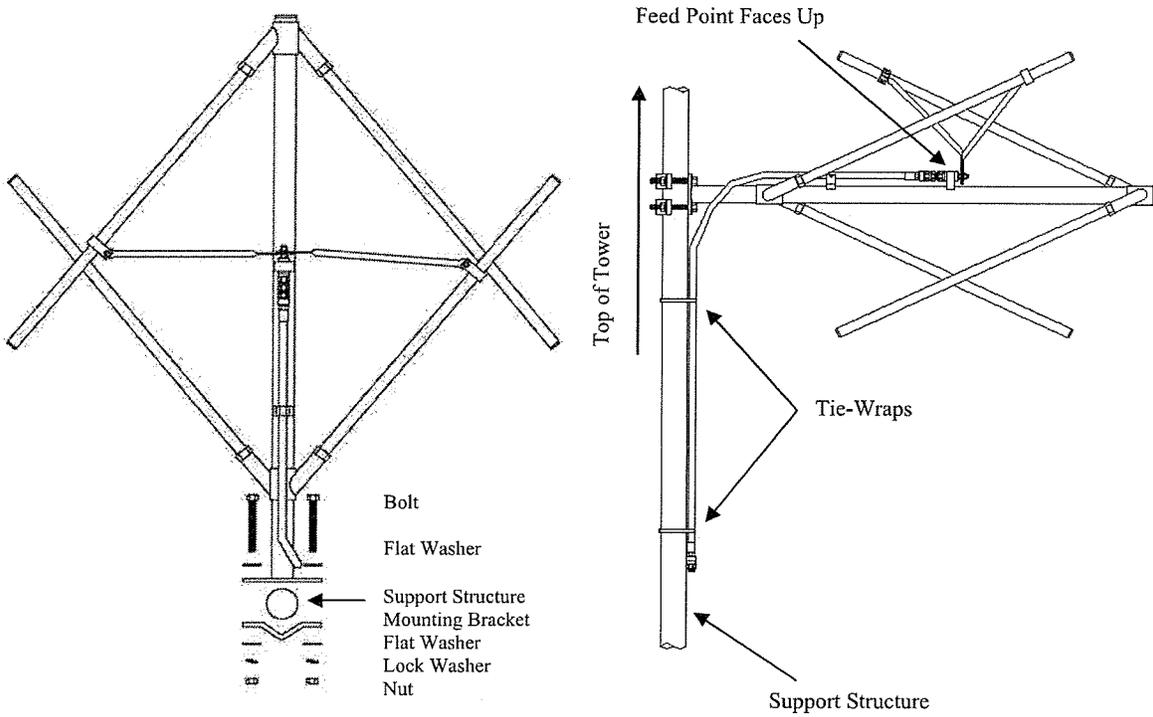
"OVERALL"	
88.1-91.9	47.00"
92.1-94.7	45.50"
94.9-97.7	44.50"
97.9-100.9	43.50"
101.1-104.3	42.50"
104.5-107.9	41.25"



Single Bay Installation

Considerations:

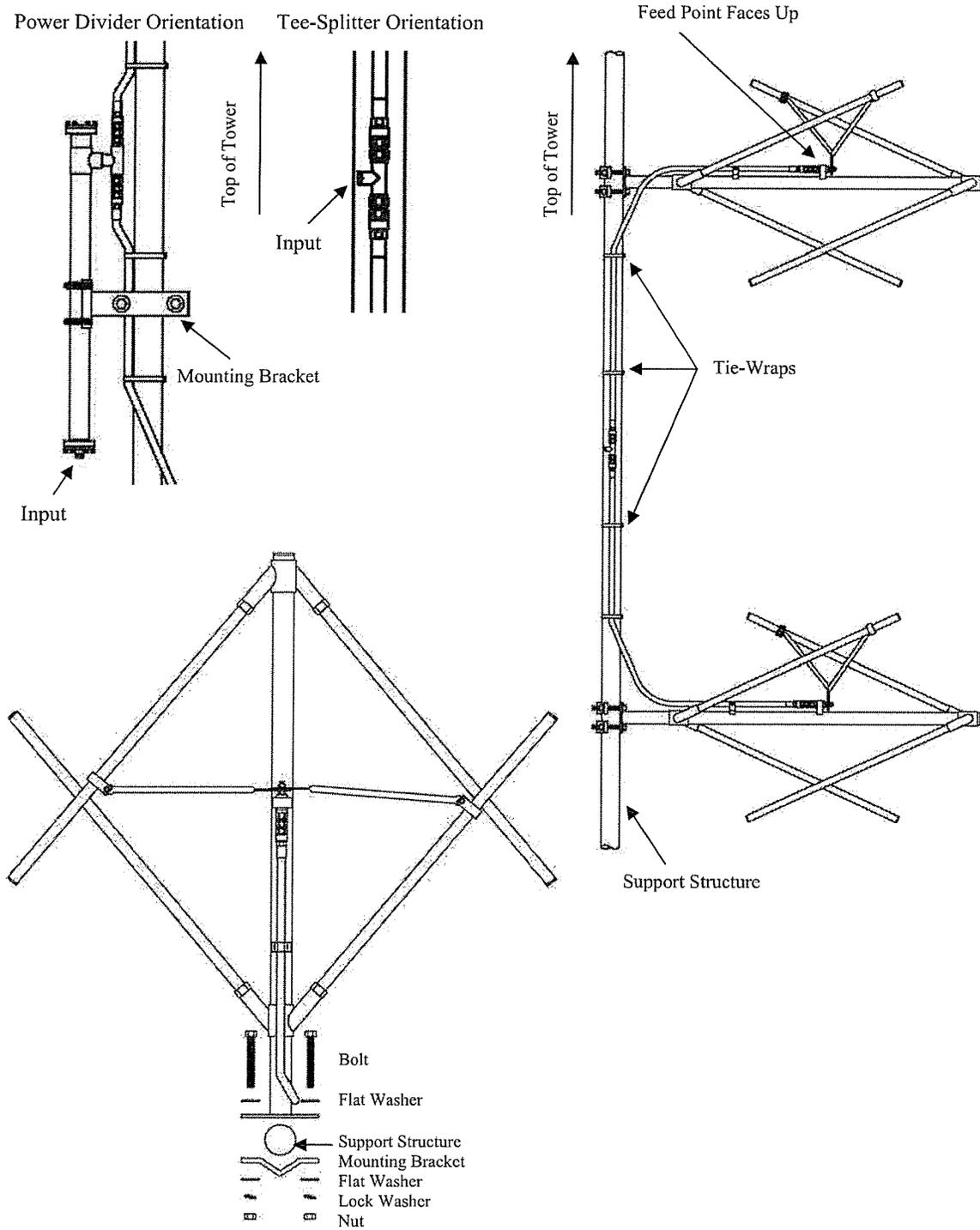
1. Your single bay FMEC antenna includes a jumpers, tie-wraps, and weatherproofing kit.
2. Note the direction and orientation of feed point, feed arms, hardware, and jumper.
3. Standard mounting bracket fits from 1" to 4" tower leg or pole.
4. SWR, LP. reserves the right to change product specifications at any time.



2 Bay Installation

Considerations:

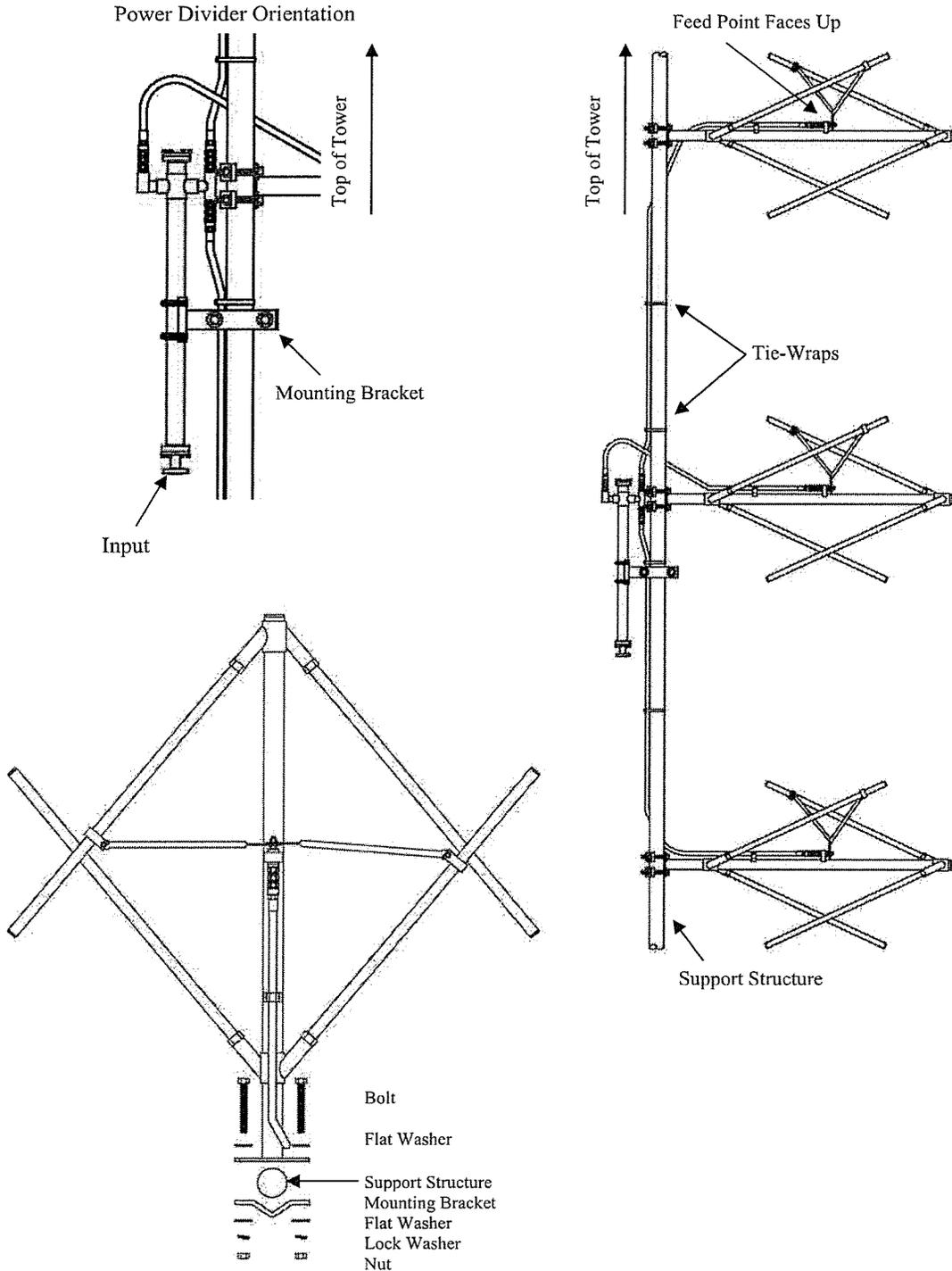
1. Your FMEC two bay antenna includes jumpers, tie-wraps, and weatherproofing kit.
2. Your FMEC two bay antenna may be fed with either a Tee-Splitter or Power Divider.
3. Note the direction and orientation of feed points, feed arms, power divider, hardware, and jumpers.
4. Standard mounting bracket fits from 1" to 4" tower leg or pole.
5. SWR, LP. reserves the right to change product specifications at any time.



3 Or More Odd Bays (3, 5, 7, etc.)

Considerations:

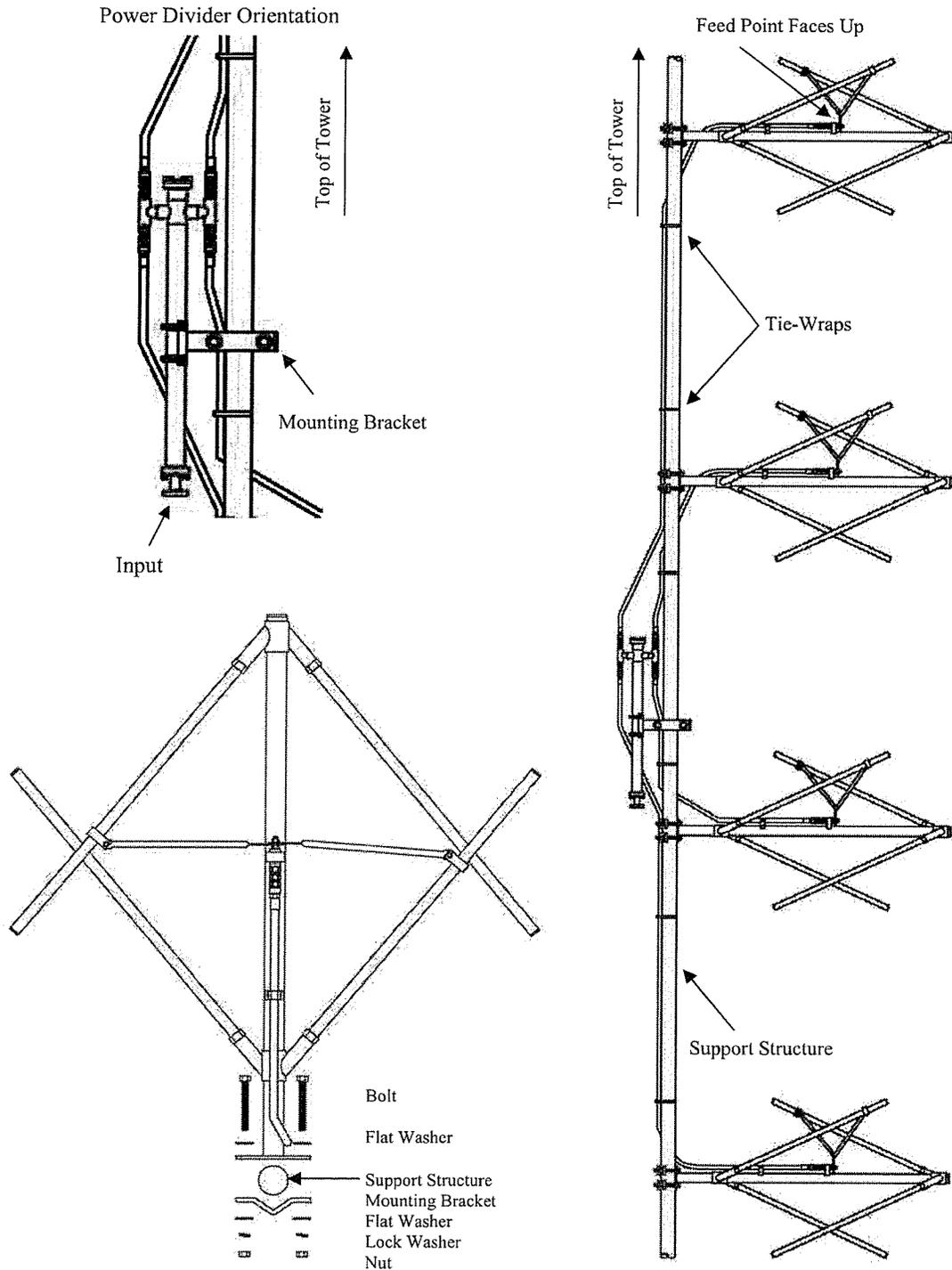
1. Your FMEC three bay antenna includes jumpers, tie-wraps, and weatherproofing kit.
2. Your FMEC three bay antenna will be fed with a three-way power divider.
3. Note the direction and orientation of feed points, feed arms, power divider, hardware, and jumpers.
4. Standard mounting bracket fits from 1" to 4" tower leg or pole.
5. SWR, LP. reserves the right to change product specifications at any time.



4 Or More Even Bays (4, 6, 8, etc.)

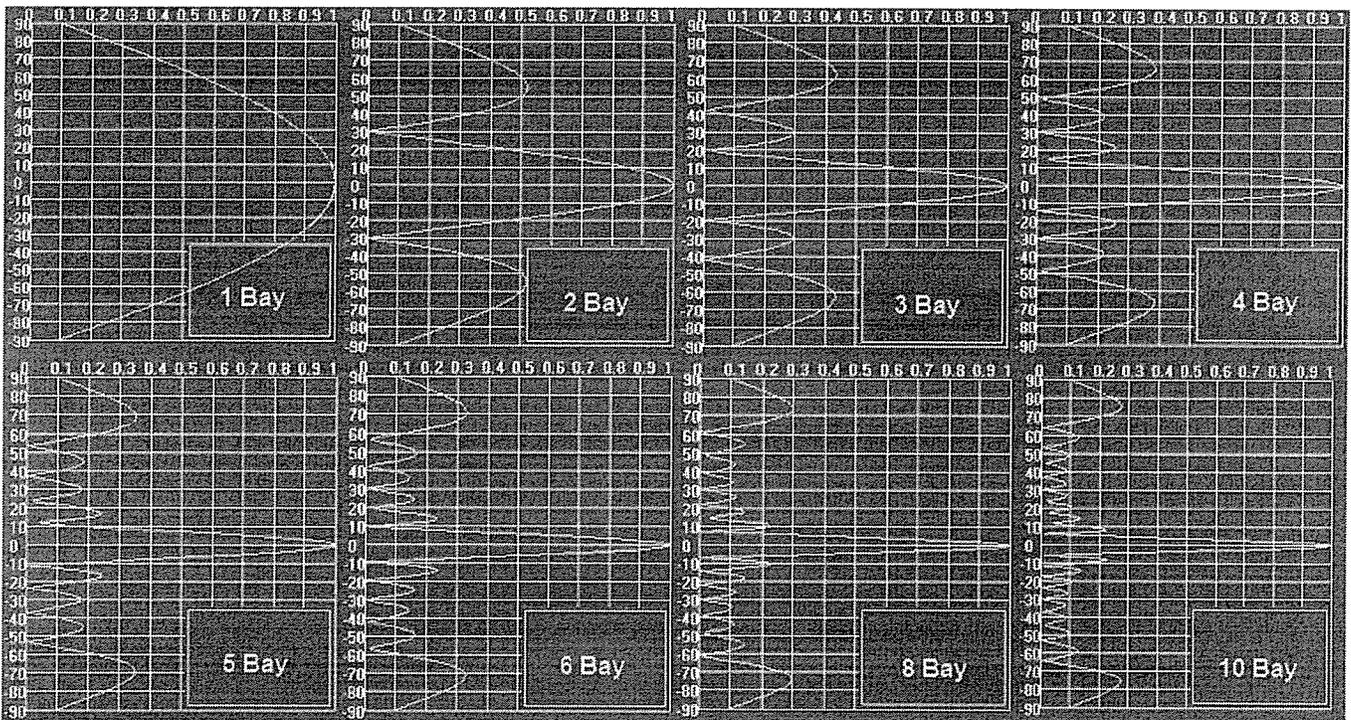
Considerations:

1. Your FMEC four bay antenna includes jumpers, tie-wraps, and weatherproofing kit.
2. Your FMEC four bay antenna will be fed with a four-way Power Divider.
3. Note the direction and orientation of feed points, feed arms, power divider, hardware, and jumpers.
4. Standard mounting bracket fits from 1" to 4" tower leg or pole.
5. SWR, LP. reserves the right to change product specifications at any time.



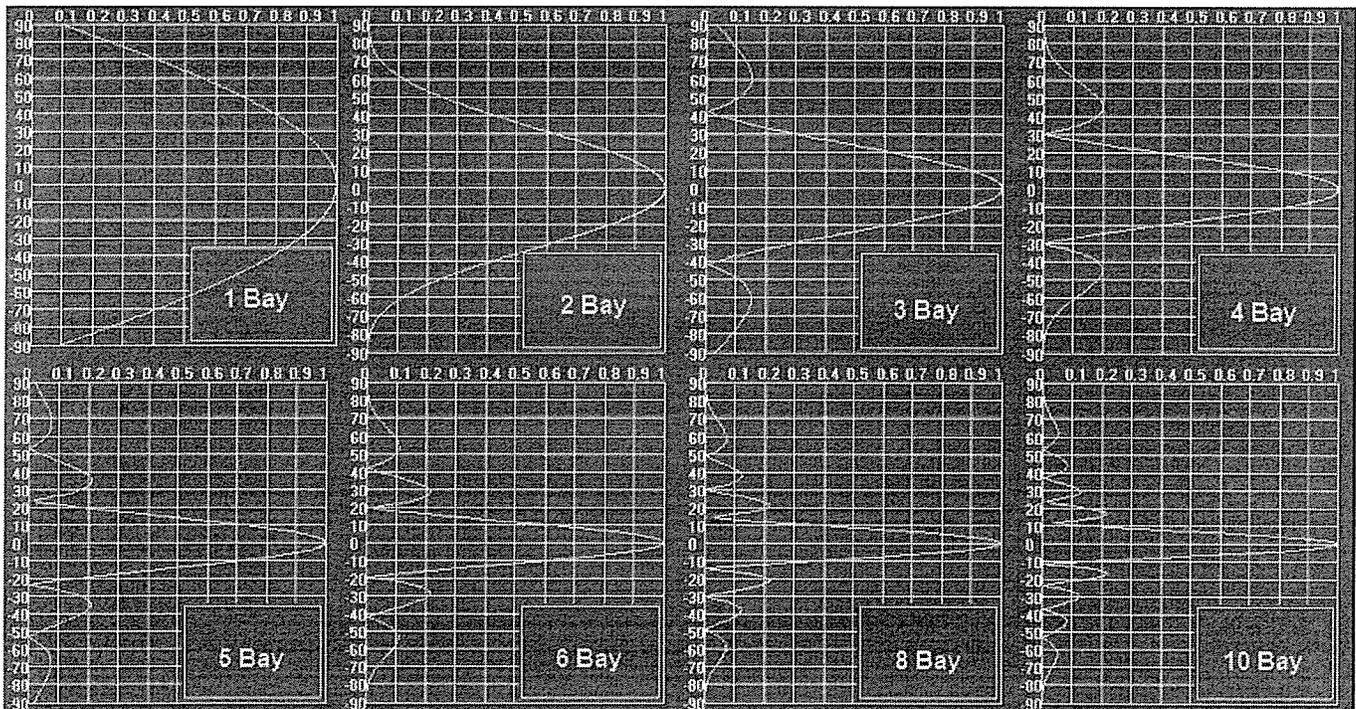
Full-Wave Spaced Specifications

Bays	Power Rating (watts)	Power Gain	dB Gain	Net. Weight (lbs)	Windload (lbs)
1	500	0.441	-3.556	15	35
2	1000	0.959	-0.182	35	85
3	1500	1.495	1.746	50	120
4	2000	2.044	3.105	65	155
5	2000	2.590	4.133	80	190
6	2000	3.160	4.997	95	225
8	2000	4.311	6.346	110	260
10	2000	5.456	7.369	130	295



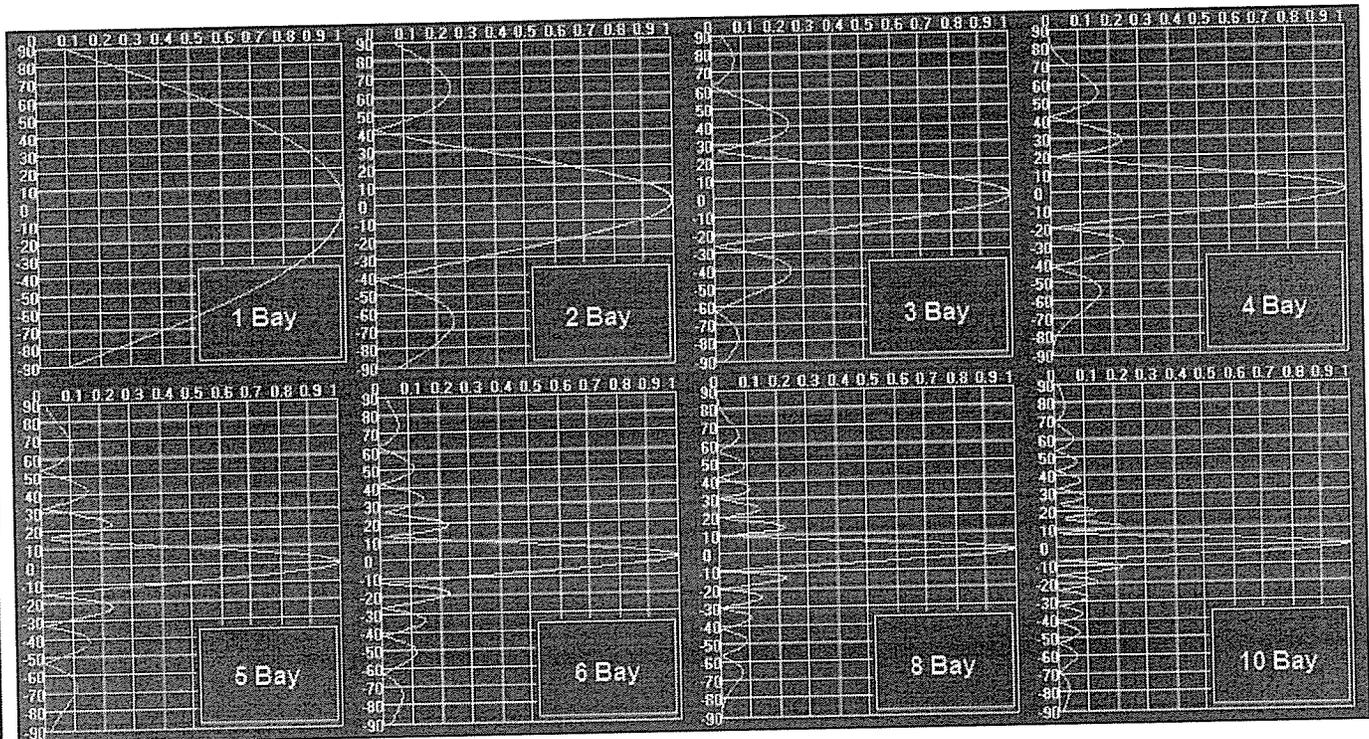
1/2 Wave Spaced Specifications

Bays	Power Rating (watts)	Power Gain	dB Gain	Net. Weight (lbs)	Windload (lbs)
1	500	0.441	-3.556	15	35
2	1000	0.695	-1.580	35	85
3	1500	1.012	0.052	50	120
4	2000	1.313	1.183	65	155
5	2000	1.623	2.103	80	190
6	2000	1.924	2.842	95	225
8	2000	2.528	4.028	110	260
10	2000	3.129	4.954	125	295



3/4 Wave Spaced Specifications

Bays	Power Rating (watts)	Power Gain	dB Gain	Net. Weight (lbs)	Windload (lbs)
1	500	0.441	-3.556	15	35
2	1000	.935	-0.292	35	85
3	1500	1.396	1.449	50	120
4	2000	1.845	2.660	65	155
5	2000	2.301	3.619	80	190
6	2000	2.756	4.403	95	225
8	2000	3.664	5.640	110	260
10	2000	4.590	6.618	125	295



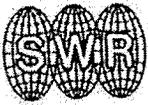
Limited Warranty and Limitation of Liability

Unless otherwise specified in writing, the Seller warrants its product to be free of defects in materials and workmanship for three years from the date of shipment, and to conform to the specifications included in the Owner's Manual provided with the product. Broadcast antenna systems purchased with Site Specific Engineering and installed in accordance with the Owner's Manual instructions will also meet the terms of the customer's specifications, station license, and/or construction permit in effect at the time of delivery.

In the event of any failure within the first six months, replacement parts will be couriered to at the expense of SWR, LP. The Seller agrees to service, adjust, and/or replace (at their option) any defective equipment parts returned to its Ebensburg, Pennsylvania plant, freight pre-paid, within three years from the date of original shipment from its plant.

This warranty is subject to the following conditions: 1.) Notice of any defect must be received by the Seller in writing within 30 days of initial discovery. 2.) Notice of any defect must fall within the warranty period. 3.) Seller's inspection of the returned equipment must substantiate (to Seller's satisfaction) the claimed defect. 4.) Seller is not liable for warranty work if notice of defect is given after the warranty period, even if the buyer deems the defect to have occurred during the warranty period.

David Edmiston
Vice-President of Sales
Systems With Reliability, LP



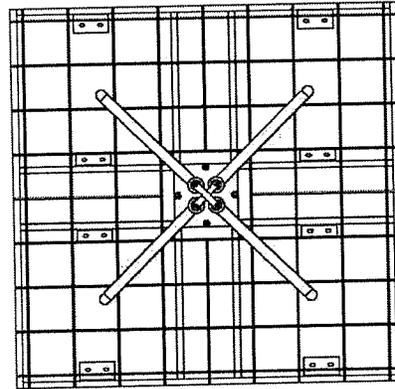
Broadcast Antennas & Transmission Systems

SYSTEMS WITH RELIABILITY, LP
 619 Industrial Park Road, Ebensburg, PA 15931
 Phone 814-472-5436 Fax 814-472-5552 www.swr-t.com

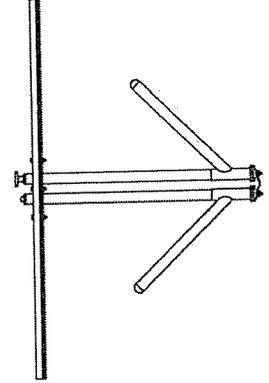
FMP20 SERIES MEDIUM POWER FM PANEL ANTENNA

Product Specifications:

Frequency Range	88.1 – 107.9 MHz
Polarization	Circular
Circularity	+/- 2 dB (6 ft. face)
Channels	Multi
VSWR	1.1:1, +/- 200 kHz
System Input	3-1/8" or 6-1/8" E.I.A.
Half Power Beam-Width	6 dB / 120 Degrees
Power Rating	5 or 10 kW per bay
Impedance	50 Ohm
Bay Spacing	0.9 to 1 λ
Mounting Pipes Included	Specified



Front View



Side View

Features:

•**IDEAL FOR MULTI-STATION OPERATION.** The high power capability and wide VSWR bandwidth make it an excellent choice for multiplexing multiple FM stations.

•**PRESSURIZED AND GROUNDED.** The antenna system is pressurized to the feed point of each bay and each bay is DC grounded.

•**RUGGED CONSTRUCTION.** Each panel is constructed of heavy gauge stainless or mild galvanized steel. The elements are made of heavy wall copper and naval brass.

•**BEAM TILT AND/OR NULL FILL STANDARD.** Custom elevation patterns are available for multi-element arrays.

•**CUSTOM DIRECTIONAL ANTENNA PATTERNS.** Directional horizontal plane patterns based on the customers mounting structure are available.

•**WEATHERIZATION (OPTIONAL).** Radomes or electrical heaters available for areas that experience periods of heavy icing and/or snow conditions.

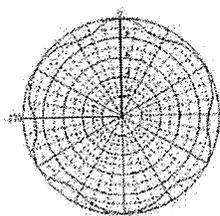
•**WARRANTY.** 2-year limited warranty on defects in materials and workmanship to the original purchaser.

Notes:

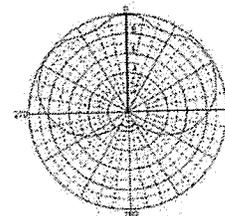
- Wind load and ratings are based on 50/33 psf, and are representative only.
- Panel reflector is typically 72" square flat panel (welded mesh over structural tube members – stainless or galvanized).
- Power rating is based on 40 degrees C ambient. Degeneration occurs above 2000 ft. Special high power designs available.
- Antenna aperture is based on 98 MHz operation.
- All antennas are supplied with custom mounting brackets, power dividers and cabling required for a complete functional array.
- SWR, Inc. maintains a continuous program of product improvement and reserves the right to change specifications without notice.

Electrical and Mechanical Specifications

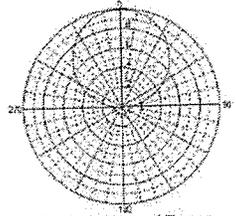
# of Bays	Panels Per Bay	Gain (times)	Gain (dBd)	Antenna Height (ft.)	Net Weight (lbs.)	Wind load (lbs.)
1	1	1.80	2.55	6	145	302
	2	0.80	-0.97		310	539
	3	0.50	-3.01		460	748
2	1	3.80	5.80	10	310	597
	2	1.80	2.55		615	1073
	3	1.10	0.41		945	1495
4	1	8.20	9.14	30	615	1193
	2	3.80	5.80		1235	2144
	3	2.30	3.62		1865	2972
6	1	12.60	11.00	50	945	1785
	2	5.90	7.71		1865	3208
	3	3.80	5.56		2810	4455
8	1	17.20	12.36	70	1235	2386
	2	8.00	9.03		2620	4276
	3	4.90	6.90		3730	5940



Typical 3-Around Tower



Typical 2-Around Tower



Typical 1-Around Tower

EXHIBIT B

SIGA Broadcasting Corporation
1302 North Shepherd Drive
Houston, TX 77008

04-11-2017

VIA: E-MAIL tommy2thompson@yahoo.com

Tommy Thompson – 830 Mills Creek Lane, La Marque, TX 77568

Dear Tommy Thompson,

We have received your complaint of interference to KEPH-LP.
In order to resolve your complaint, the Federal Communications Commission has required us to obtain the following information from you:

1. name and address of complainant (if not correct on letter)
2. specific devices receiving the interference, including
 - a. device manufacturer's name
 - b. device model number
 - c. serial number of device

In addition, we need specific location(s) where interference is being received in order to resolve the complaints, and a description of the type and source of the interference.

We look forward to receiving the above information so that we may resolve your complaint.

Sincerely,

Gabriel Arango
President of SIGA Broadcasting Corporation
832-860-9586
sigabroadcasting@gmail.com

SIGA Broadcasting Corporation
1302 North Shepherd Drive
Houston, TX 77008

04-11-2017

VIA: E-MAIL marivera01@yahoo.com

Maria Castillo – 9655 Tierra Mountain Ct., Houston TX 77034

Dear Maria Castillo,

We have received your complaint of interference to KEPH-LP. In order to resolve your complaint, the Federal Communications Commission has required us to obtain the following information from you:

1. name and address of complainant (if not correct on letter)
2. specific devices receiving the interference, including
 - a. device manufacturer's name
 - b. device model number
 - c. serial number of device

In addition, we need specific location(s) where interference is being received in order to resolve the complaints, and a description of the type and source of the interference.

We look forward to receiving the above information so that we may resolve your complaint.

Sincerely,

Gabriel Arango
President of SIGA Broadcasting Corporation
832-860-9586
sigabroadcasting@gmail.com

SIGA Broadcasting Corporation
1302 North Shepherd
Houston, TX 77008

4-13-2017

VIA: kmcarole@hotmail.com

Emmanuel Metah
3900 Sunset Meadow Dr.
Pearland, Texas 77581

Dear Emmanuel

We have received your complaint of interference to KEPH-LP. In order to resolve your complaint, the Federal Communications Commission has required us to obtain the following information from you:

1. name and address of complainant (if not correct on letter)
2. specific devices receiving the interference, including
 - a. device manufacturer's name
 - b. device model number
 - c. serial number of device

In addition we need specific location(s) where interference is being received in order to resolve the complaints, and a description of the type and source of the interference.

We look forward to receiving the above information so that we may resolve your complaint.

Sincerely,

Gabriel Arango
President

SIGA Broadcasting Corporation
1302 North Shepherd Drive
Houston, TX 77008

04-17-2017

VIA: E-MAIL aleta.chipman@yahoo.com 713-591-3914

Aleta Chipman – 10003 Sage Orchard Ln., Houston TX 77089

Dear Aleta Chipman,

We have received your complaint of interference to KEPH-LP.
In order to resolve your complaint, **the Federal Communications Commission has required us to obtain the following information from you:**

1. name and address of complainant (if not correct on letter)
2. specific devices receiving the interference, including
 - a. device manufacturer's name
 - b. device model number
 - c. serial number of device

In addition, we need specific location(s) where interference is being received in order to resolve the complaints, and a description of the type and source of the interference.

We look forward to receiving the above information so that we may resolve your complaint.

Sincerely,

Gabriel Arango
President of SIGA Broadcasting Corporation
832-860-9586
sigabroadcasting@gmail.com