



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

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

Joan Stewart
202.719.7438
JStewart@wileyrein.com

Re: Second Interference Complaint and Reply to Opposition
W295CG (FID 141545), Lake Bluff, Illinois
Ref. 1800B3-PPD

Ms. Dortch,

Polnet Communications, Ltd. ("Polnet"), by its counsel, hereby files this second interference complaint against W295CG, Lake Bluff, IL (FID 141545) ("Second Complaint") and replies to the Opposition dated April 21, 2017 ("Opposition") filed by MB Capital Management, LLC's ("MBCM") counsel. Polnet is the licensee of W296DA, Vernon Hills, IL (FID 157668) (the "Station"). MBCM is the licensee of W295CG.

Polnet filed its initial interference complaint against W295CG on March 27, 2017 (the "First Complaint"). In the First Complaint, Polnet explained that W295CG's unlicensed operations on 107.1 were causing actual interference to Polnet's listeners. Section 74.1203(a)(3) of the Commission's rules provide that "an authorized FM translator...will not be permitted to continue to operate if it causes any actual interference to... [t]he direct reception by the public of the off-the-air signals of...previously authorized and operating FM translators." The Station was authorized and operating prior to W295CG.

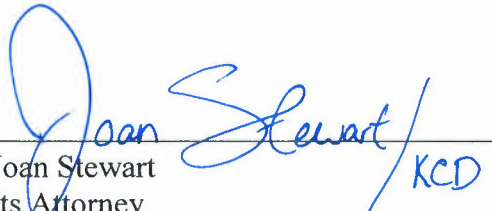
On April 20, 2017, the Audio Division issued a letter to MBCM requiring it to resolve the interference W295CG is causing to Polnet's listeners. Polnet now files this Second Complaint to provide additional complaints from viewers that continue to receive interference from W295CG's operations on 107.1. Statements from these listeners are attached at Exhibit 1. Polnet respectfully requests that the Audio Division direct MBCM to resolve these additional interference complaints or immediately cease operating on 107.1. Polnet notes that MBCM has at long last—and over a month after Polnet documented its operation on this frequency—filed a license application to cover its construction permit for 107.1 (FCC File No. BLFT-



20170414AAC). Polnet will file an objection to this license application based on the interference its operations are causing to the Station's listeners.

Polnet, by this letter, also responds to the nonsensical Opposition filed by MBCM's counsel on April 21, 2017. In the Opposition, MBCM notes that Polnet has filed an application to modify the Station, and therefore MBCM considers Polnet's complaint moot. MBCM is flatly wrong as a matter of law. W295CG is causing actual interference to the Station's licensed operations. Whether Polnet modifies the Station in the future has no bearing on whether MBCM must resolve the current interference. Polnet's complaints are not moot and MBCM must resolve the interference caused by its station immediately or cease operating.

POLNET COMMUNICATIONS, LTD.


Joan Stewart
Its Attorney
Wiley Rein LLP
1776 K Street NW
Washington D.C. 20006
(202) 719-7438

Dated: April 25, 2017

EXHIBIT 1

COMPLAINT

Name:	SYLVIA KUZDZAL
Email:	SYLVUSH@3BCGLOBAL.NET
Main Contact Number:	847-401-6047
Address:	1121 DAWSON LN
City:	ALGONQUIN
State:	IL
Zip Code:	60102
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	S MAIN ST / EDGEWOOD ALGONQUIN
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	176 / 60 MUNDELEIN
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed: _____

Sylvia Kuzdzal

Date: _____

04-20-2017

COMPLAINT

Name:	ANNA CLAUDE
Email:	ANIA.CLAUDE@GMAIL.COM
Main Contact Number:	224-875-1870
Address:	904 W. SURREY
City:	ALGONQUIN
State:	IL
Zip Code:	60102
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1).	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	HANSON / EDGEWOOD DR.
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	DUNDEE RD. / 14 BARRINGTON
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed: Anna Claude

Date: 4-19-17

COMPLAINT

Name:	JAN MARCINKOWSKI
Email:	
Main Contact Number:	847-356-1389
Address:	38610 N. EDGEWOOD
City:	LAKE VILLA
State:	IL
Zip Code:	60046
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	W 2ND / DEEP LAKE RD.
Are you experiencing interference while at work?	W 2ND N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	GURNEE 94
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed:

Jan Marcinkowski

Date:

04/22/17

COMPLAINT

Name:	JACK KRUPKA
Email:	POLISHJOKER 2004 VANCE
Main Contact Number:	224 944 7444
Address:	21920 W 3RD ST
City:	LAKE VILLA
State:	ILLINOIS
Zip Code:	60046
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	3RD / DEEP LAKE
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	GURNEE 1-94
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

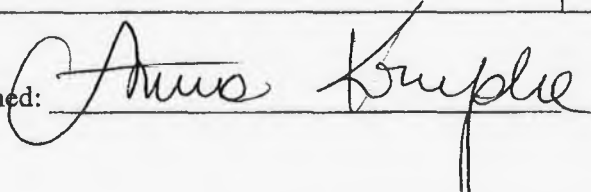
Signed: 

Date: 04/22/17

COMPLAINT

Name:	ANNA KRUPKA
Email:	
Main Contact Number:	847-767-4577
Address:	21920 3rd Ave
City:	LAKE VILLA
State:	IL
Zip Code:	60046
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	3RD / DEEP LAKE
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	GURNEE H94
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	No
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed:



Date:

04/22/17

COMPLAINT

Name:	Ela Lielonka
Email:	
Main Contact Number:	844 909-7852
Address:	LAKE VILLA
City:	38610 N. Edgewood
State:	Ill
Zip Code:	60046
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	1st / Deep LAKE
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	LIBERTYVILLE I-94
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	No

Signed: _____

Ela Lielonka

Date: _____

22 November /

17

COMPLAINT

Name:	Teresa Nawrocka
Email:	
Main Contact Number:	847 721 4629
Address:	889 W SENECA TR.
City:	ROUND LAKE HTS
State:	IL
Zip Code:	60073
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	SENECA / NIAGARA
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	ROUND LAKE RD/45
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed:

Teresa Nawrocka

Date:

4.22.12.

COMPLAINT

Name:	PAWEŁ NAURECK,
Email:	
Main Contact Number:	224-374-6840
Address:	889 W SENECA TR
City:	ROUND LAKE HTS
State:	IL
Zip Code:	60073
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	SENECA / NIAGARA
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	ROUND LAKE RD/45
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed: Paweł Naurek

Date: 4.22.17

COMPLAINT

Name: <u>Monch Namreth</u>	
Email:	
Main Contact Number: <u>630 890 5544</u>	
Address: <u>889 W. SENECA TR.</u>	
City: <u>Round Lake Hills</u>	
State: <u>IL</u>	
Zip Code: <u>60073</u>	
Are you a regular listener to WNVR(107.1)	<u>YES</u>
Are you experiencing interference when tuning into WNVR(107.1)	<u>YES</u>
Are you experiencing interference while at home?	<u>YES</u>
IF YES, please specify your home location (cross streets and town).	<u>SENECA / NIAGARA</u>
Are you experiencing interference while at work?	<u>N/A</u>
IF YES, please specify your location (cross streets and town).	<u>N/A</u>
Are you experiencing interference while driving?	<u>YES</u>
IF YES, please specify your location, (cross streets and town).	<u>ROUND LAKE RD / 45</u>
Would you like the station to take action to fix this interference?	<u>YES</u>
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	<u>NO</u>
Do you understand that your complaint will be submitted to the Federal Communications Commission?	<u>YES</u>
Do you have any additional comments to share with us regarding the interference?	<u>NO</u>

Signed: Monch Namreth

Date: 04.22.17

COMPLAINT

Name:	PAULINA NOWAK
Email:	
Main Contact Number:	224 805 6219
Address:	1224 KNOTTINGHAM CT 1A
City:	SEAHAMBURG
State:	IL
Zip Code:	60193
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	S RAND RD / DARRINGTON RD.
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	12/134 MCMENRY
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed: _____

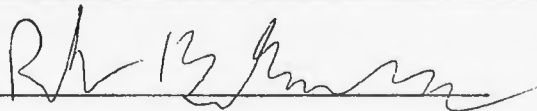
Nowak

Date: 04/22/17

COMPLAINT

Name:	PIOTR BALAWENDER
Email:	
Main Contact Number:	773 934 3931
Address:	2622 REGNER RD
City:	MC HENRY
State:	IL
Zip Code:	60051
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	REGNER RD. / BAY RD. MC HENRY
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	BIL MOLLOW RD. / 12 MC HENRY
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed:



Date:

04/22/17

COMPLAINT

Name:	ANNA KRUKOWSKA
Email:	
Main Contact Number:	773-450-3334
Address:	2622 REGNER RD
City:	MC HENRY
State:	IL
Zip Code:	60051
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	BAY RD./ REGNER RD MC HENRY
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	WILSON RD./13th LONG LAKE
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed: _____

Anna Krukowska

Date: _____

04/22/17

COMPLAINT

Name:	EWA ZARAKOWSKI
Email:	
Main Contact Number:	847 226 2490
Address:	36588 MARY DR
City:	LAKE VILLA
State:	IL
Zip Code:	60046
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	83/ W. PARK DR. LAKE VILLA
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	GRAND AVE / 45
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed:

Ewa Zarakowski

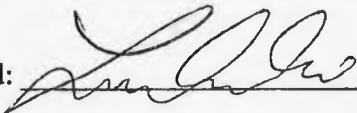
Date:

04/22/17

COMPLAINT

Name:	TOMASZ ZARAKOWSKI
Email:	
Main Contact Number:	847 226 5082
Address:	36588 MARY DR.
City:	LAKE VILLA
State:	IL
Zip Code:	60046
Are you a regular listener to WNVR(107.1)	YES
Are you experiencing interference when tuning into WNVR(107.1)	YES
Are you experiencing interference while at home?	YES
IF YES, please specify your home location (cross streets and town).	83 / W SARAH DR. LAKE VILLA
Are you experiencing interference while at work?	N/A
IF YES, please specify your location (cross streets and town).	N/A
Are you experiencing interference while driving?	YES
IF YES, please specify your location, (cross streets and town).	132 / GRAND AVE
Would you like the station to take action to fix this interference?	YES
Do you have any personal or business connection of any kind with WNVR (107.1), management or employees?	NO
Do you understand that your complaint will be submitted to the Federal Communications Commission?	YES
Do you have any additional comments to share with us regarding the interference?	NO

Signed: _____



Date: _____

04/21/17

Certificate of Service

I, Jackie Martin, a secretary in the law firm of Wiley Rein LLP, hereby certify that on this 25th day of April 2017, I caused copies of the foregoing Second Complaint and Reply to Opposition to be mailed via first-class postage prepaid mail to the following:


MB Capital Management, LLC
5801 N. Broadway Ext.
Oklahoma City, OK 73118

Copies were sent via email to:

Scott Woodworth, Esq.
Edinger Associates PLLC
1875 I Street NW
Suite 500
Washington D.C. 20006
Counsel to MB Capital Management, LLC

Jim Bradshaw, FCC, Media Bureau, Audio Division

Parul Desai, FCC, Media Bureau, Audio Division



Jackie Martin