

STATEMENT

I am John Low, President of Rocket Radio Corp, licensee of FM translator station K246CH (K275CL) (“Rocket Radio”) and President of 1TV.com, Inc., licensee of station KIKO-FM (“1TV”).

Station KRDE/Linda Corso’s September 2016 Informal Objection and Petition submitted in File No. BLFT-20160519ABI to revoke K259AS/K230BT Program Test Authority alleges that Rocket Radio misrepresented that station K230BT was constructed as authorized.

I instructed its local contract engineer, (Doug Pelley) to construct K230BT facilities authorized in FCC File No. BPFT-20160129AWZ. In April 2016, Mr. Pelley told me that the K230BT facilities were properly constructed and ready to commence equipment test operations. In May 2016, Mr. Pelley advised that K230BT was constructed as authorized, all CP conditions were satisfied, and the station was ready to commence automatic program test operation.

Based on my prior relationship with Doug Pelley, I did not feel at that time that I had any reason to doubt these representations. I asked Mr. Pelley to supply required information to Rocket Radio’s consulting broadcast engineer, Joseph DiPietro, to enable him to prepare the necessary technical specifications for the broadcast license application to cover the construction permit. I relied on my consultants to construct and maintain FCC-compliant facilities.

At all times, I desired to construct and operate station K230BT compliant with its construction permit and had no motive to misrepresent K230BT construction. I reside in California and had no occasion to visit the tower site to personally view K230BT construction or facilities prior to certifying the subject Form 350 application submitted in File No. BLFT-20160519ABI. I certified in good faith that statements contained in the K230BT application (FCC File No BLFT-20160519ABI) were true, complete and correct based on my consultant’s representations. I had no reason to believe that the subject facilities were not constructed as authorized. There was no imminent deadline or time pressure to construct as the CP was not set to expire until 2019.

On February 28, 2017, Rocket Radio voluntarily surrendered the Globe FMX CP File No. BPFT-20160129AWZ for cancellation and withdrew the pending license application BLFT-20160519ABI. FCC granted the request on March 2, 2017, which action is now a final order.

Station KRDE/Linda Corso’s September 2016 Informal Objection and Petition submitted in File No. BLFT-20160404ACM to revoke K246CH/K275CL Program Test Authority raises multiple issues and consists of a 30+ page pleading plus well more than that in exhibits. Rocket Radio’s initial investigation of the allegations confirmed the unauthorized K275CL antenna, height and

orientation which technical parameters were corrected to authorized values by October 7, 2016.

By Letter dated, October 28, 2016, Rocket Radio advised that additional time was required to carefully review and consider the voluminous material submitted and matters raised by KRDE and it encountered some difficulty accessing exhibits stored on the cloud. Some aspects of that review and related investigation ultimately proved fruitless. As indicated by the July 2017 K246CH/K275CL Form 350 amendment (File No. BLFT-20160404ACM), the overall review included an internal housekeeping review of the facts and circumstances surrounding the K275CL construction, preparing/filing the Form 350 license application, and understanding how it came to be that the antenna had been moved. This comprehensive review and investigation continued beyond October 28, 2016.

In addition, as referenced in the July 2017 Form 350 application amendment (File No. BLFT-20160404ACM), Rocket Radio's tower site landlord and facilities manager, Action Tower Sites, LLC, spent time developing and implementing remedial training with regard to FCC licensing procedures to assure adequate and more careful management responsibility and supervision for Rocket Radio's installations at the tower site and to avoid recurrence of similar events.

Rocket Radio and Action Tower Sites, LLC, worked to develop a process whereby the landlord's principal, Bart Hendershott, will more closely supervise all Rocket Radio facilities modification and provide written verification, including photographic evidence to document and confirm any installation or moving of equipment.

On March 19, 2018, 1TV filed two listener complaints dated, respectively, October and November 2017 concerning signal interference caused by FM Translator Station K243BP (K271CR) to primary station KIKO-FM, See FCC File Nos. BMPFT-20170718AGR and BLFT-20180418AIA. Both listener complaints report hearing undesired Christian format programming mixing with the KIKO-FM signal; one listener complaint mentions the call sign KLOV.

1TV's interference complaint identifies that K271CR was authorized to operate in close geographic proximity to co-channel KIKO-FM. The complaint also expressly acknowledged (at p. 3 of 4) that the FM translator held an STA to remain silent and surmises that, given the co-channel operation, K271CR was causing the subject interference when operating intermittently on or about the dates of the complaints.

1TV voluntarily withdrew its interference complaint seven days later: March 26, 2018, and prior to K243BP/K271CR filing its related April 6, 2018, Opposition to Informal Objection.

In Letter to Brad C Deutsch, Esquire, dated July 13, 2018, (File No. BLFT-20180418AIA), denying a K271CR interference complaint filed by a third party, the Media Bureau acknowledged that K243BP/K271CR was rebroadcasting primary radio station KLVA(FM) licensed to Educational Media Foundation ("EMF"). EMF has a well-established record of Christian format programming using the marketing term "K-Love" which is similar to the K-LOV and Christian-format mentioned in a KIKO-FM listener complaint and the KLVA referenced by the Commission. At footnote 1, the Commission letter acknowledges that 1TV

had withdrawn its interference complaint and states that 1TV's complaint would not be considered further.

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

SIGN:

DATE:: 12-6-2019

John Low
Rocket Radio Inc.

A handwritten signature in blue ink, appearing to be "John Low", written on a light-colored background.