

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In re Application of	)	
	)	
Mountain Community Translators, LLC	)	File No. 0000112257
	)	
For Minor Modification of	)	
FM Translator K294CW	)	Fac. ID No. 148238
Phoenix, Arizona	)	

To: Office of the Secretary  
ATTN: Media Bureau (Audio)

REQUEST TO DEFER APPLICATION PROCESSING IN ORDER TO FILE A  
SUPPLEMENT TO INFORMAL OBJECTION

Rocket Radio Corporation (“Rocket”), licensee of FM Translator Station K247CF, by its attorney, hereby respectfully requests the Commission to defer processing the above-captioned application and allow additional time for Rocket to supplement its Informal Objection filed April 26, 2020, to the above-captioned application filed by Mountain Community Translators, LLC (“MCT”).

In support thereof, the following is shown.

MCT proposes co-channel operation to Rocket’s licensed translator K247CF. As shown in the pending Informal Objection, the preliminary investigation indicates that MCT’s proposed facilities will cause significant co-channel interference within station K247CF’s licensed 45 dBu contour. Pursuant to Section 74.1204 of the Commission’s rules, Rocket is preparing to supplement its Informal Objection with information detailing the interference which the proposed facilities will cause to K247CF listeners.

The Commission will accept informal objections any time before the staff processes the subject application.<sup>1</sup> Rocket respectfully requests sufficient time during the instant fluid and challenging situation created by the novel coronavirus pandemic to identify listeners who will be adversely affected by MCT's proposed facilities and to prepare a compelling showing why the subject application does not comply with the Commission's FM translator interference protection requirements.

During the coronavirus pandemic, Rocket is under fluid and challenging conditions beyond the normal course of business as it prepares to supplement its pending Informal Objection while working to maintain broadcast operations. Rocket and its sister company, 1TV.com, Inc.,<sup>2</sup> have temporarily closed their broadcast offices and studios to the public in conformance with the recommendations of public health and elected officials calling for stay-at-home and social distancing precautions to protect the health and welfare of station staff and the public. With limited irregular exceptions, radio station staff is working off-site for the same reason. On April 29, 2020, Arizona Governor Douglas Ducey extended the Arizona stay-at-home order until May 15. The U.S. Center for Disease Control and Prevention recommends that before a community reopens, it should experience a decrease in new coronavirus cases for 14 straight days.

Rocket has learned that it takes time to explain FCC processes to its listeners. Meeting listeners face-to-face is normally the most efficient means to explain predicted interference and how station listeners might be involved to prevent such interference

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<sup>1</sup> 47 CFR 73.3587

<sup>2</sup> Licensee of K247CF's commonly-owned parent station KBSZ(AM)

from occurring. Most listeners desire to help. However, the additional personal touch of one-on-one interaction facilitates the process. The station would normally explain the type of predicted interference as exists in this case to its listeners with a remote broadcast at different locations within the predicted interference area. However, while people are afraid to gather as a matter of personal safety or in violation of government stay-at-home and social distancing guidelines during the coronavirus, it is difficult to have face-to-face discussions or remote broadcasts for such purposes. Therefore, Rocket must develop alternate means which will require additional time to identify and advise listeners of their rights and enlist their participation in this matter. Time is also required to engage with consulting engineers who may also have their routines and availability disrupted with novel work and/or home challenges presented by the coronavirus pandemic.

The Commission has shown that it is amenable to “giv[ing] broadcasters flexibility” due to the “the fluid and challenging situation caused by the novel coronavirus.”<sup>3</sup> The Commission has also acknowledged the nationwide “economic disruptions” caused by the coronavirus,<sup>4</sup> and that “the pandemic is a rapidly evolving situation and information and market conditions are changing quickly” which justifies certain relief to broadcasters until “more ordinary conditions are restored.”<sup>5</sup>

Accordingly, due to the rapidly evolving, fluid and challenging situation disrupting normal station business operations, the Commission is respectfully requested to defer processing the above-captioned application for at least six weeks in order to

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<sup>3</sup> See, Public Notice DA 20-353 released March 27, 2020, extending the filing deadline for Children’s Television Programming Reports and Quarterly Issues/Programs lists by approximately 3 months.

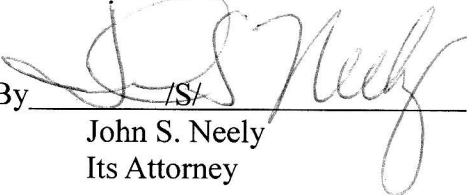
<sup>4</sup> See Order DA 20-398, released April 9, 2020, waiving license renewal prefiling announcement rule

<sup>5</sup> See Public Notice DA 20.335, released March 25, 2020, relaxing certain political advertising rules during the coronavirus pandemic.

permit time for Rocket to prepare and file a complete supplemental record concerning the interference which will be caused to K247CF by the above-captioned proposed facilities and assist the Commission in a better informed decision in all respects in this matter.

Respectfully Submitted,

ROCKET RADIO CORPORATION

By  /s/ John S. Neely  
Its Attorney

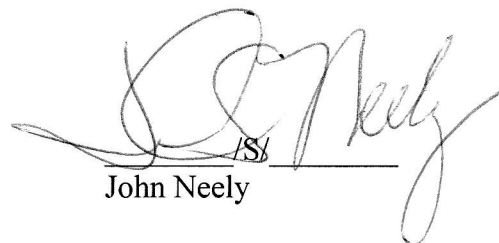
30 APRIL, 2020

Miller and Neely, P.C.  
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Kensington, MD 20895  
301-933-6304

#### CERTIFICATE OF SERVICE

I certify that on 30 APRIL, 2020, a copy of the foregoing document was placed in the United States mail, first class postage prepaid, addressed to the following:

Victor Michael  
Mountain Community Translators, LLC  
87 Jasper Lake Road  
Loveland, CO 80537

 /s/ John Neely