

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

In re Application of:)	
)	
RADIO.COM, LLC)	File No. 0000111980
)	Facility ID No. 157726
For Construction Permit)	Pleading File No. 0000112863
FM Translator W260DU (aka W229CG))	
Cleveland, OH)	
)	
)	
To: Secretary)	
Attn: Chief Audio Division, Media Bureau)	

SUPPLEMENT TO INFORMAL OBJECTION

Media-Com, Inc. (“Media-Com”), by its attorneys and acting pursuant to § 73.3587 of the Commission Rules hereby submits to the Media Bureau (“Bureau”) this Supplement to its Informal Objection (this “Objection”) to the above-captioned application (the “Application”) filed by Radio.com, LLC (“Radio.com”) for FM translator W260DU, which is presently licensed as W229CG (the “Translator”) originally filed April 29, 2020 and bearing Pleading File Number 000012863.

The basic facts regarding the subject application were set forth in the Informal Objection. As stated therein, all the condition precedent requirements of Section 74.1204(f) have been met. Radio.com seeks a first adjacent channel to WNIR which would result in substantial interference to regular listeners of WNIR at locations within WNIR's 45 dBu contour. This supplement provides the additional required materials to perfect its objection and to have the Application dismissed.

Commercially Reasonable Efforts

Section 74.1204(f) requires Media-Com to use “. . . commercially reasonable efforts to inform the relevant translator licensee of the claimed interference and attempt private resolution

of the issues.” As documented and submitted with its Informal Objection, on April 17, 2020, counsel for Media-Com sent a letter to Dale Edwards, the principal of Radio.Com, advising Radio.com of the claimed interference and inviting discussions for a private resolution. That effort generated telephone discussions between the parties and their engineering consultants, but failed to produce any progress toward a useful resolution. On April 23, 2020, counsel for Media-Com send a second letter to Mr. Edwards addressing telephone discussions between the parties and detailing the attempts for a private resolution. That letter was also submitted with the Informal Objection. Media-Com received no response to the second letter or any other communication from Radio.com. Accordingly, Media-Com has met its burden under Section 74.1204(f)(4).

Required Minimum Number of Valid Listener Complaints

Using Table 1 to §74.1203(a)(3) and defined in §74.1201(k), Media-Com has calculated that it must produce ten listener complaints in the interference zone. Media-com identified twenty-three regular listeners, well more than the required number, within the area of predicted interference. Attached as Exhibit “A” hereto is an Engineering Study prepared by Carl E. Smith, Consulting Engineers (the “Engineering Study”). The Twenty-three listeners are identified by name and location on Table 1.1 of the Engineering Study. Their listener surveys are attached as Attachment “1”.

Specific Location of The Alleged Interference

The second required showing under §74.1204(f)(2) is a map plotting the specific location of the alleged interference in relation to the complaining station's 45 dB μ contour. Engineering Study Figure 1.1 identifies each of the listener by number on a map that depicts their listening location, showing them all to be within the WNIR 45 dBu contour.

WNIR Is Operating Within Its Licensed Parameters

Attached as Exhibit "B" is the declaration of William B. Klaus, Chief Operating Officer of Media-Com stating that WNIR is operating within its licensed parameters.

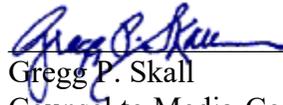
Undesired to desired signal strength exceeds -6 dB

The fifth and final requirement of §74.1204(f) is that each listener location the undesired to desired signal strength exceeds -6 dB for first-adjacent channel situations. The application proposes a first-adjacent channel to WNIR. For each of the listeners identified on Table 1.1, the Engineering Study provides a summary of the desired (WNIR) and undesired (W229CG) signals and the resulting undesired to desired ("U/D") signal ratio at each location. As shown by this data, the predicted WNIR signal strength at each of these locations exceeds 45 dBμ and the undesired to desired signal ratio at each location exceeds -6 dB, meeting the required standard at subsection (f)(5). And confirming that interference is predicted to WNIR at each of these locations.¹

¹ See Statement of Roy P. Stype, Consulting Engineer at page 2.

WHEREFORE, having met all the requirements of §74.1204(f) of the Commission's rules as required to protect its station WNIR from predicted adjacent channel interference, Media-Com respectfully requests that the Bureau deny the above captioned application of Radio-Com for a change of channel for FM translator W260DU.

Respectfully submitted,



Gregg P. Skall
Counsel to Media-Com, Inc.

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Suite 500
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2028574441
gregg.skall@wbd-us.com

May 6, 2020

CERTIFICATE OF SERVICE

I, Gregg P. Skall hereby certify that on this 6th day of May, 2020, a copy of the foregoing Supplement to Informal Objection was served on the following parties by first-class mail, postage pre-paid (except as otherwise indicated below) and by e-mail:

James Bradshaw*
Senior Deputy Chief Audio Division Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
James.bradshaw@fcc.gov

Mr. Robert Gates, Engineer*
Audio Division Media Bureau
Federal Communications Commission
445 12th Street, SW, Room 2-A230
Washington, DC 20554
robert.gates@fcc.gov

Mr. Dale Edwards **
P.O. BOX 221343
Beachwood, OH 44122
DEJAN1@MSN.COM

* via e-mail

** via e-mail and first-class mail



Gregg P. Skall

Exhibit "A"

ENGINEERING STATEMENT
IN SUPPORT OF INFORMAL OBJECTION
W229CG - CLEVELAND, OH (0000111980)

For Media-Com, Inc.

Carl E. Smith Consulting Engineers

ENGINEERING STATEMENT IN
SUPPORT OF INFORMAL OBJECTION
W229CG - CLEVELAND, OH (0000111980)

Media-Com, Inc.

Kent, OH

May 4, 2020

Prepared For: Mr. William Klaus
Media-Com, Inc.
P.O. Box 2170
Akron, OH 44309-2170

CARL E. SMITH CONSULTING ENGINEERS

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ENGINEERING STATEMENT

This engineering statement is prepared on behalf of Media-Com, Inc., licensee of Radio Station WNIR(FM) - Kent, Ohio. WNIR operates on Channel 261A with an effective radiated power of 4.2 kilowatts at 120 meters above average terrain. On April 9, 2020, the licensee of FM translator W229CG - Cleveland, Ohio, which presently operates on Channel 229 and is authorized to rebroadcast KHRI(FM) - Hollister, California as relayed by W215BS - Hinckley, Ohio¹, filed an application (0000111980) for a construction permit to modify the W229CG operating facilities. This application proposes to move W229CG to Channel 260 (99.9 MHz), purportedly to overcome interference presently being received on Channel 229 from cochannel stations WQGR(FM) - North Madison, Ohio and WQIO(FM) - Mount Vernon, Ohio. It also proposes to increase the translator's effective radiated power from 19 watts to 99 watts and change its primary station to a digital subchannel of WKDD(FM) - Munroe Falls, Ohio, as relayed by W224CD - Parma, Ohio. Although it appears to propose no change in the presently licensed W229CG antenna, it does specify a one meter reduction in antenna height and recharacterizes this existing antenna from nondirectional to directional.

Section 74.1204(f)(5) of the FCC Rules defines the signal ratios for determining the presence of interference in the FM translator service. In this particular case, interference will be predicted to WNIR in any area where the predicted WNIR F(50,50) signal does not exceed the predicted F(50,10) signal for the proposed W229CG facilities by at least 6 dB. Studies were conducted to evaluate the area in which interference

¹W215BS ceased operation on Channel 215 on September 19, 2017 as the result of an interference problem and moved to Channel 269 in August of 2018. Although it appears to have recently moved back to Channel 215 to attempt to overcome interference to WHOF(FM), W229CG appears to have been rebroadcasting a station other than the one authorized by their license since at least September of 2017.

would be predicted to WNIR from these proposed translator facilities. The signal calculations in these studies for WNIR utilized terrain data extracted from the NGDC 30 second terrain database and the F(50,50) curves. Those for the proposed translator facilities utilized terrain data extracted from the NGDC 30 second terrain database and the F(50,10) curves. The results of these studies, along with the predicted 60 dBu contour for these proposed translator facilities and the predicted 45 dBu contour for WNIR's presently licensed facilities, are shown in Figure 1.0. As can be seen from an examination of this figure, these proposed translator facilities are predicted to cause interference to WNIR over an extensive area.

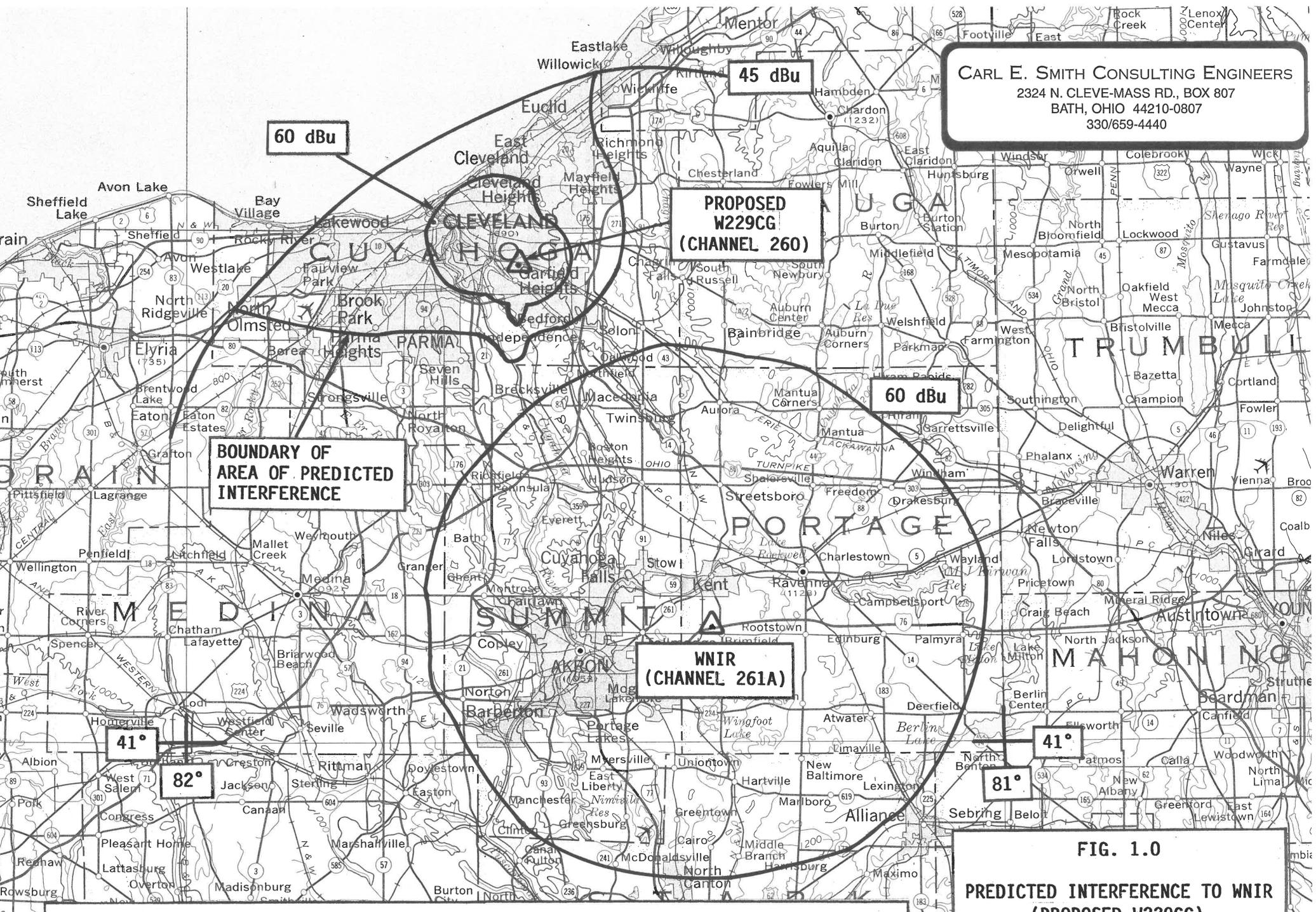
It is recognized that this predicted interference lies entirely outside the predicted WNIR 60 dBu contour, the contour at which WNIR would normally be entitled to protection from other FM broadcast stations. Pursuant to Section 74.1204(f) of the FCC Rules, however, since the proposed facility is a translator, the location of this interference relative to the WNIR 60 dBu contour is immaterial, so long as it is located within WNIR's 45 dBu contour and WNIR can document that it has at least ten regular listeners within this area of predicted interference.²

The licensee of WNIR has been able to specifically identify at least 23 regular listeners to WNIR within this area of predicted interference. Figure 1.1 is a detailed map exhibit depicting the locations of these regular listeners in relation to this area of predicted interference. Table 1.1 is a tabulation of the names and addresses of these 23 regular listeners, as well as a summary of the desired (WNIR) and undesired (W229CG) signals at each location and the resulting undesired to desired ("U/D") signal

²Based on 2010 census data, WNIR's 60 dBu contour encompasses 762,689 people. As a result, Section 74.1203(a)(3) of the FCC Rules requires a minimum of ten bona fide listeners within the area of predicted interference.

ratio at each location. As shown by this data, the predicted WNIR signal strength at each of these locations exceeds 45 dBu and the undesired to desired signal ratio at each location exceeds -6 dB, which confirms that interference is predicted to WNIR at each of these locations. Thus, pursuant to Section 74.1204(f) of the FCC Rules, the W229CG application must be denied since it is obvious that the proposed translator facilities will result in interference to at least 23 regular listeners of WNIR at locations within the predicted WNIR 45 dBu contour.

CARL E. SMITH CONSULTING ENGINEERS
 2324 N. CLEVE-MASS RD., BOX 807
 BATH, OHIO 44210-0807
 330/659-4440



**PROPOSED
 W229CG
 (CHANNEL 260)**

**WNIR
 (CHANNEL 261A)**

**BOUNDARY OF
 AREA OF PREDICTED
 INTERFERENCE**

41°

82°

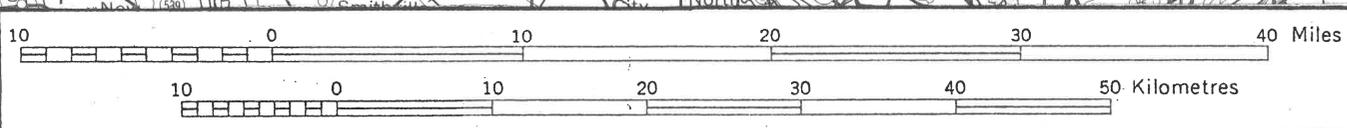
60 dBu

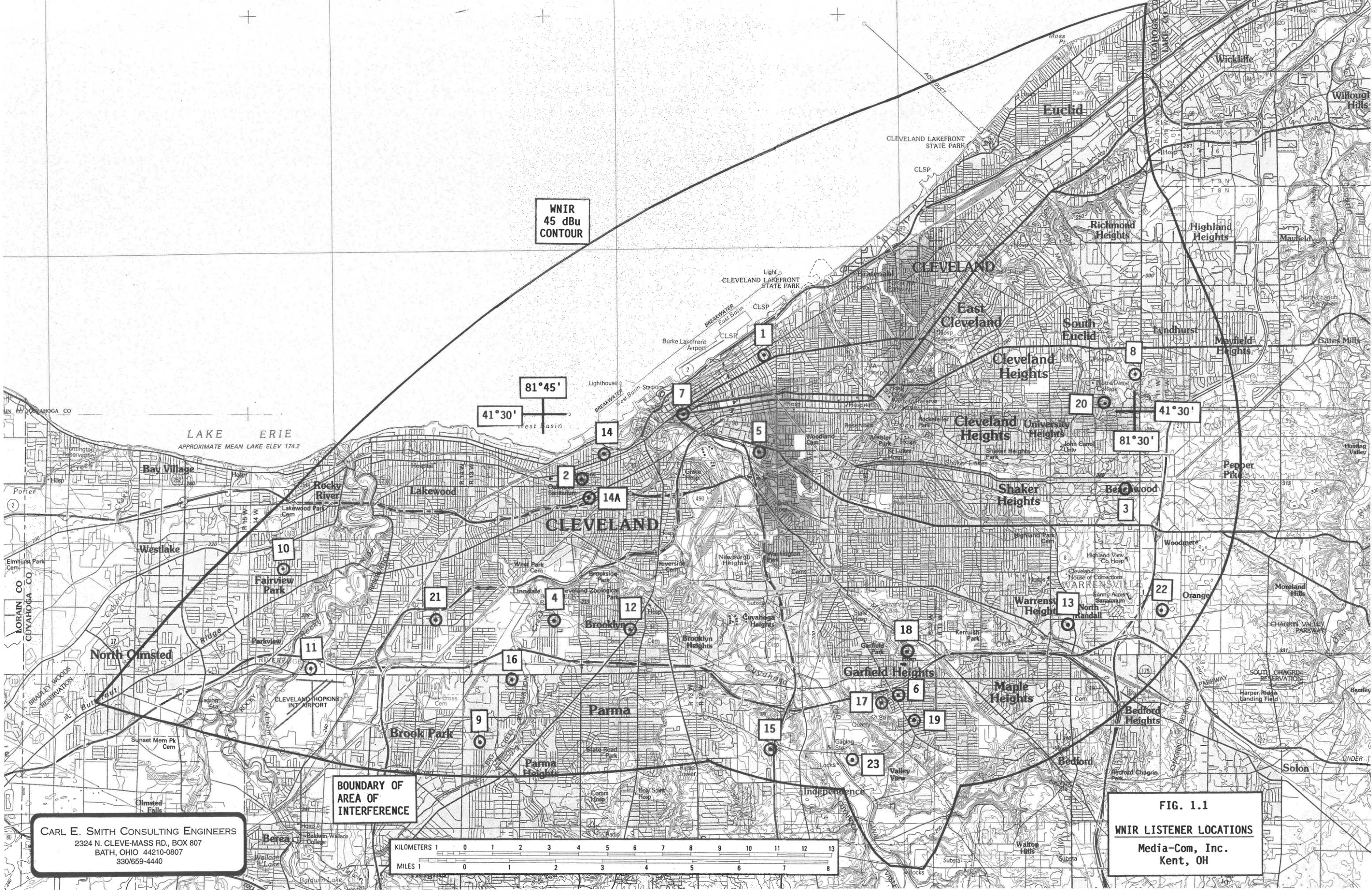
45 dBu

41°

81°

FIG. 1.0
PREDICTED INTERFERENCE TO WNIR
(PROPOSED W229CG)
Media-Com, Inc.
Kent, OH



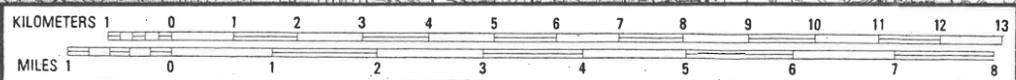


WNIR
45 dBu
CONTOUR

81°45'
41°30'

41°30'
81°30'

BOUNDARY OF
AREA OF
INTERFERENCE



CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

FIG. 1.1
WNIR LISTENER LOCATIONS
Media-Com, Inc.
Kent, OH

TABLE 1.1

LISTENER LOCATION DATAMedia-Com, Inc.
Kent, OH

	<u>Name</u>	<u>Location</u>	<u>Address</u>	<u>Coordinates</u>	<u>WNIR Signal (dBu)</u>	<u>Translator Signal (dBu)</u>	<u>U/D Ratio (dB)</u>
1	Robert Fitzgerald	Work	1374 East 51 st Street, Cleveland	41-31-06.1 81-39-25.4	47.9	61.1	13.2
2	Carol Hoffman	Home/Work	6109 Bridge Ave., Cleveland	41-28-49.4 81-43-42.7	48.2	56.5	8.3
3	Suzanne Utley	Home	24616 Duffield Road, Beachwood	41-28-35.3 81-30-15.7	52.4	54.1	1.7
4	William Carl Loepp	Home	8604 Ansonia Avenue, Brooklyn	41-26-07.1 81-49-41.9	49.6	52.6	3.0
5	Jeremy T. Kolt	Work	2700 East 40 th Street, Cleveland	41-29-13.9 81-39-37.6	49.3	66.1	16.8
6	John J. Marks	Work	5555 Turney Road, Garfield Heights	41-24-41.3 81-36-05.4	54.3	64.2	9.9
7	Doug Benjamin	Work	127 Public Square, Cleveland	41-30-01.9 81-41-39.0	48.1	59.8	11.7
8	Joseph Lanese	Work	5000 Clubside Drive, Lyndhurst	41-30-46.1 81-29-57.0	50.5	49.1	-1.4
9	Scott Rowland	Work	12222 Plaza Drive, Parma	41-23-50.4 81-46-33.9	50.1	46.1	-4.0
10	Heather Johnston	Home	3875 River Lane, Rocky River	41-27-06.4 81-51-43.3	45.7	44.9	-0.8
11	David Hull	Work	21000 Brookpark Road, Cleveland	41-25-11.2 81-51-10.6	47.1	44.0	-3.1

TABLE 1.1 (cont'd)

	<u>Name</u>	<u>Location</u>	<u>Address</u>	<u>Coordinates</u>	<u>WNIR Signal (dBu)</u>	<u>Translator Signal (dBu)</u>	<u>U/D Ratio (dB)</u>
12	Fredric Hodges	Home	4532 Pearl Road, Cleveland	41-25-56.6 81-42-45.8	50.6	56.3	5.7
13	David Camp	Work	21500 Emery Road, North Randall	41-26-05.2 81-31-41.6	54.3	59.1	4.8
14	Eugene R. Ramm, III	Home	5608 Herman Avenue, Cleveland	41-29-14.8 81-43-31.9	48.1	57.1	9.0
14A	Eugene R. Ramm, III	Work	6709 Lorain Avenue, Cleveland	41-28-24.9 81-43-55.3	48.4	55.8	7.4
15	Jim Evilsizer	Work	4500 Rockside Road, Independence	41-23-51.6 81-39-34.8	53.6	50.3	-3.3
16	Tom Reed	Work	10901 Brookpark Road, Cleveland	41-25-03.3 81-45-47.7	49.7	49.0	-0.7
17	Kevin Franks	Home	5581 Saxon Drive, Garfield Heights	41-24-37.2 81-36-24.9	54.2	60.4	6.2
18	Sherryl Rasmusen	Home	4968 Henry Street, Garfield Heights	41-25-34.3 81-35-55.0	53.6	72.8	19.2
19	Patricia Bakula	Home	12807 Orme Road, Garfield Heights	41-24-13.3 81-35-40.2	54.8	63.9	9.1
20	Joanne Rinella	Home	4613 Mackall Road, South Euclid	41-30-13.6 81-30-49.6	50.8	51.9	1.1
21	Ronald C Naelitz	Home	4401 West 146 th Street, Cleveland	41-26-04.6 81-47-48.5	48.2	48.5	0.3
22	Michelle Nigrin	Home	4475 Du Sable Court, Warrensville Heights	41-26-17.0 81-29-18.5	54.8	51.7	-3.1
23	Carmen Carpinelli	Work	9301 Allen Drive, Valley View	41-23-31.3 81-37-13.1	54.9	52.4	-2.5

Attachment “1”

WNIR Listener Surveys

ID	Start time	Completion time	What is your full name?	What is your phone num	What is your email addr	What is your full HOME	Do you listen t	If employed what is you	Do you listen to WNIR's	Do you have a legal, fina	I hereby declare under p
7	4/28/20 8:08:41	4/28/20 8:09:55	Jeremy T Kolt	216-780-9699	jkolt@chefko.com	7567 White Oak Drive, St	Yes	2700 East 40th Street, Cl	Yes	No	Jeremy T Kolt
8	4/28/20 8:18:00	4/28/20 8:24:14	John J Marks	330-467-9040	jmarks015@roadrunner.	105 Heights Ave Northfie	Yes	5555 Turney RdGarfield	Yes	No	John J Marks
9	4/28/20 8:55:12	4/28/20 8:56:41	Doug Benjamin	216-571-5124	doug.benjamin@brookfi	3141 Bartlett Road Mant	Yes	127 Public Square, Clevel	Yes	No	Douglas Benjamin
10	4/28/20 9:46:13	4/28/20 9:49:23	Joseph Lanese	4402236536	laneseja@adelphia.net	15068 Woodsong Drive	Yes	5000 Clubside Drive Lync	Yes	No	Joseph Lanese
12	4/28/20 10:11:27	4/28/20 10:13:00	Scott Rowland	(216)313-0184	scrowl11@hotmail.com	2041 Forest Edge Dr. Cuy	Yes	12222 Plaza Dr. Parma O	Yes	No	Scott Rowland
13	4/28/20 10:39:58	4/28/20 10:41:51	Heather Johnston	440-331-4951	heatherjohnston111@gr	3875 River LaneRocky Riv	Yes	26900 Lorain RdNorth Ol	No	No	Heather Johnston
15	4/28/20 10:50:38	4/28/20 10:53:21	david hull	216-695-1460	drhull@zoominternet.ne	6471 spieth rdmedina oh	Yes	21000 brookpark rdcleve	Yes	No	david hull
16	4/28/20 13:27:11	4/28/20 13:30:42	Fredric Hodges	2163923877	Chromefin20@gmail.con	4532 Pearl Rd Cleveland,	Yes	Taxi driver Americab 338	Yes	No	Fredric Hodges
17	4/28/20 15:06:18	4/28/20 15:09:33	David Camp	330 968-3313	dxcamp555@gmail.com	7525 Ferguson Road Ken	Yes	21500 Emery Road North	Yes	No	David Camp
18	4/28/20 19:23:05	4/28/20 19:27:51	Eugene R Ramm III	216-281-2016	cobra1979@netzero.net	5608 Herman Ave.Clevel	Yes	6709 Lorain Ave.Cleveland	Yes	No	Eugene R Ramm III
19	4/28/20 19:32:18	4/28/20 19:34:56	Jim Evilsizer	4408623080	jim2714@hotmail.com	4555 Fishcreek Rd, Stow,	Yes	4500 Rockside Rd, Indep	Yes	No	Jim Evilsizer
21	4/28/20 21:53:14	4/28/20 21:55:51	TOM REED	330-338-9525	treed@valley1.com	1994 North Revere Road.	Yes	10901 Brookpark RoadPe	Yes	No	tom reed
23	4/29/20 19:24:36	4/29/20 19:26:30	Kevin Franks	2166457979	kevinfrans216@gmail.co	5581 saxon dr. garfield h	Yes	188 solon rd, chagrin fall	Yes	No	yes
24	4/29/20 21:08:26	4/29/20 21:10:20	Sherryl Rasmusen	216-475-8476	rasmusen5@copper.net	4968 Henry StreetGarfiel	Yes	5600 Hudson Industrial F	Yes	No	Sherryl Rasmusen
25	4/30/20 16:37:27	4/30/20 16:43:29	Patricia Bakula	2165811128	Pbgrams@roadrunner.cc	12807 orme road garfiel	Yes			No	Patricia Bakula
26	5/1/20 13:38:35	5/1/20 13:39:45	Joanne Rinella	216-382-7869	jmr4613@gmail.com	4613 Mackall Road, Sout	Yes		Yes	No	Joanne Rinella
2	4/30/20 7:51:42	4/30/20 7:54:34	Robert Fitzgerald	330-691-1634	crownn1@aol.com	9967 sterling road rittma	Yes	1374 e. 51st street clevel	Yes	No	robert fitzgerald
10	4/30/20 12:08:35	4/30/20 12:11:51	Carol hoffman	216-651-8075	Carolhoffy@yahoo.com	6109 Bridge Ave, Clevela	Yes	Same	Yes	No	Carol Hoffman
12	4/30/20 14:59:39	4/30/20 15:02:35	Suzanne Utley	216-650-6534	sutley@ttti.org	24616 Duffield Rd BEACI	Yes		No	No	Suzanne Utley
13	4/30/20 15:36:01	4/30/20 15:39:05	William Carl Loepp	440-221-2035	wlopp@yahoo.com	8604 Ansonia Avenue Br	Yes	30250 Bruce Industrial Pl	Yes	No	William Carl Loepp
15	4/30/20 17:46:06	4/30/20 17:49:22	Ronald C Naelitz	216-252-5844	Rabbitgetter@aol.com	4401 w 146th st, Clevela	Yes	1570 Ravenna rd, Kent, C	Yes	No	Ronald Naelitz
16	4/30/20 19:10:31	4/30/20 19:14:57	Michelle Nigrin	330-646-8810	Shelln21@aol.com	4475 Du Sable Ct, Warre	Yes	Chevy Blvd. Parma, Ohio	Yes	No	Michelle A. Nigrin
18	4/30/20 21:04:36	4/30/20 21:07:15	Carmen Carpinelli	4406232336	ccarpinelli2@yahoo.com	7440 Edgerton rd. North	Yes	9301 Allen dr. Valley Vie	Yes	No	Carmen Carpinelli

Respondent



7

Anonymous



01:14
Time to complete



1. What is your full name? *

Jeremy T Kolt

2. What is your phone number? (Include area code.) *

216-780-9699

3. What is your email address? *

jkolt@chefko.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

7567 White Oak Drive, Solon, Ohio 44139

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

2700 East 40th Street, Cleveland, Ohio 44115

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Jeremy T Kolt

Respondent



8

Anonymous



06:14
Time to complete



1. What is your full name? *

John J Marks

2. What is your phone number? (Include area code.) *

330-467-9040

3. What is your email address? *

jmarks015@roadrunner.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

105 Heights Ave Northfield Village, Ohio 44067

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

5555 Turney Rd Garfield Hts, Ohio 44125

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

John J Marks

Respondent



9

Anonymous



01:29
Time to complete



1. What is your full name? *

Doug Benjamin

2. What is your phone number? (Include area code.) *

216-571-5124

3. What is your email address? *

doug.benjamin@brookfieldpropertiesfc.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

3141 Bartlett Road Mantua, Ohio 44255

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

127 Public Square, Cleveland, OH 44113

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Douglas Benjamin

Respondent



10

Anonymous



03:10
Time to complete



1. What is your full name? *

Joseph Lanese

2. What is your phone number? (Include area code.) *

4402236536

3. What is your email address? *

laneseja@adelphia.net

4. What is your full HOME street address? (Street, City, State and Zip Code) *

15068 Woodsong Drive Middlefield Ohio 44062

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

5000 Clubside Drive Lyndhurst Ohio 44124

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Joseph Lanese

Respondent



12

Anonymous



01:33
Time to complete



1. What is your full name? *

Scott Rowland

2. What is your phone number? (Include area code.) *

(216)313-0184

3. What is your email address? *

scrowl11@hotmail.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

2041 Forest Edge Dr. Cuyahoga Falls, Oh 44223

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

12222 Plaza Dr. Parma Oh 44130

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Scott Rowland

Respondent



13

Anonymous



01:53
Time to complete



1. What is your full name? *

Heather Johnston

2. What is your phone number? (Include area code.) *

440-331-4951

3. What is your email address? *

heatherjohnston111@gmail.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

3875 River Lane Rocky River, OH 44116

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

26900 Lorain Rd North Olmsted, OH 44070

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Heather Johnston

Respondent



15

Anonymous



02:43
Time to complete



1. What is your full name? *

david hull

2. What is your phone number? (Include area code.) *

216-695-1460

3. What is your email address? *

drhull@zoominternet.net

4. What is your full HOME street address? (Street, City, State and Zip Code) *

6471 spieth rd medina oh 44256

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

21000 brookpark rd cleveland oh 44135

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

david hull

Respondent



16

Anonymous



03:31
Time to complete



1. What is your full name? *

Fredric Hodges

2. What is your phone number? (Include area code.) *

2163923877

3. What is your email address? *

Chromefin20@gmail.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

4532 Pearl Rd Cleveland, Ohio 44109

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

Taxi driver Americab 3380 w137th Cleveland Ohio 44111

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Fredric Hodges

Respondent



17

Anonymous



03:15
Time to complete



1. What is your full name? *

David Camp

2. What is your phone number? (Include area code.) *

330 968-3313

3. What is your email address? *

dxcamp555@gmail.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

7525 Ferguson Road Kent, OH 44240

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

21500 Emery Road North Randall, OH 44128

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

David Camp

Respondent



18

Anonymous



04:46
Time to complete



1. What is your full name? *

Eugene R Ramm III

2. What is your phone number? (Include area code.) *

216-281-2016

3. What is your email address? *

cobra1979@netzero.net

4. What is your full HOME street address? (Street, City, State and Zip Code) *

5608 Herman Ave. Cleveland , Ohio 44102

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

6709 Lorain Ave. Cleveland , Ohio 44102

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Eugene R Ramm III

Respondent



19

Anonymous



02:38

Time to complete



1. What is your full name? *

Jim Evilsizer

2. What is your phone number? (Include area code.) *

4408623080

3. What is your email address? *

jim2714@hotmail.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

4555 Fishcreek Rd, Stow, OH 44224

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

4500 Rockside Rd, Independence, OH 44131

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Jim Evilsizer

Respondent



21

Anonymous



02:37
Time to complete



1. What is your full name? *

TOM REED

2. What is your phone number? (Include area code.) *

330-338-9525

3. What is your email address? *

treed@valley1.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

1994 North Revere Road Akron, Ohio 44333

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

10901 Brookpark Road Parma, Ohio 44130

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

tom reed

Respondent



23

Anonymous



01:54
Time to complete



1. What is your full name? *

Kevin Franks

2. What is your phone number? (Include area code.) *

2166457979

3. What is your email address? *

kevinfrans216@gmail.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

5581 saxon dr. garfield hts oh 44125

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

188 solon rd, chagrin falls oh 44202

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

yes

Respondent



24

Anonymous



01:54
Time to complete



1. What is your full name? *

Sherryl Rasmusen

2. What is your phone number? (Include area code.) *

216-475-8476

3. What is your email address? *

rasmusen5@copper.net

4. What is your full HOME street address? (Street, City, State and Zip Code) *

4968 Henry Street Garfield Heights, Ohio 44125

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

5600 Hudson Industrial Parkway Suite 200 Hudson, Ohio 44236

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Sherryl Rasmusen

Respondent



25

Anonymous



06:02
Time to complete



1. What is your full name? *

Patricia Bakula

2. What is your phone number? (Include area code.) *

2165811128

3. What is your email address? *

Pbgrams@roadrunner.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

12807 orme road garfield hts. Ohio 44125

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Patricia Bakula

Respondent



26

Anonymous



01:10
Time to complete



1. What is your full name? *

Joanne Rinella

2. What is your phone number? (Include area code.) *

216-382-7869

3. What is your email address? *

jmr4613@gmail.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

4613 Mackall Road, South Euclid, OH 44121

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Joanne Rinella

Respondent



2

Anonymous



02:52
Time to complete



1. What is your full name? *

Robert Fitzgerald

2. What is your phone number? *

330-691-1634

3. What is your email address? *

crownn1@aol.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

9967 sterling road rittman ohio 44270

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

1374 e. 51st street cleveland, oh 44103

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

robert fitzgerald

Respondent



10

Anonymous



03:16
Time to complete



1. What is your full name? *

Carol hoffman

2. What is your phone number? *

216-651-8075

3. What is your email address? *

Carolhoffy@yahoo.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

6109 Bridge Ave, Cleveland, OH 44102

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

Same

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Carol Hoffman

Respondent



12

Anonymous



02:56
Time to complete



1. What is your full name? *

Suzanne Utley

2. What is your phone number? *

216-650-6534

3. What is your email address? *

sutley@ttti.org

4. What is your full HOME street address? (Street, City, State and Zip Code) *

24616 Duffield Rd BEACHWOOD, OH 44122

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Suzanne Utley

Respondent



13

Anonymous



03:04
Time to complete



1. What is your full name? *

William Carl Loepp

2. What is your phone number? *

440-221-2035

3. What is your email address? *

wloep@yahoo.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

8604 Ansonia Avenue Brooklyn Ohio 44144

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

30250 Bruce Industrial Pkwy Solon, Ohio 44139

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

William Carl Loepp

Respondent



15

Anonymous



03:16
Time to complete



1. What is your full name? *

Ronald C Naelitz

2. What is your phone number? *

216-252-5844

3. What is your email address? *

Rabbitgetter@aol.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

4401 w 146th st, Cleveland Ohio 44135

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

1570 Ravenna rd, Kent, Ohio 44240

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Ronald Naelitz

Respondent



16

Anonymous



04:26
Time to complete



1. What is your full name? *

Michelle Nigrin

2. What is your phone number? *

330-646-8810

3. What is your email address? *

Shelln21@aol.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

4475 Du Sable Ct, Warrensville Heights, Ohio 44128

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

Chevy Blvd. Parma, Ohio 44130

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Michelle A. Nigrin

Respondent



18

Anonymous



02:39
Time to complete



1. What is your full name? *

Carmen Carpinelli

2. What is your phone number? *

4406232336

3. What is your email address? *

ccarpinelli2@yahoo.com

4. What is your full HOME street address? (Street, City, State and Zip Code) *

7440 Edgerton rd. North Royalton Ohio 44133

5. Do you listen to WNIR's over-the-air signal at this HOME address at least twice a month? *

Yes

No

6. If employed what is your full WORK street address? (Street, City, State and Zip Code)

9301 Allen dr. Valley View Ohio 44125

7. Do you listen to WNIR's over-the-air signal at this WORK address at least twice a month?

Yes

No

8. Do you have a legal, financial, employment or familial affiliation or relationship with WNIR? *

Yes

No

9. I hereby declare under penalty of perjury that the facts I have provided in this statement are true. I am signing this declaration by typing my name below. *

Carmen Carpinelli

Exhibit "B"

Licensed Parameters Declaration

Declaration Under Penalty of Perjury

The undersigned, William B. Klaus declares under penalty of perjury that:

My name is William B. Klaus. I am the CEO of radio station WNIR, Fac. Id. 41077.

I have examined the current operation of WNIR and confirm that it is operating at its licensed parameters.

A handwritten signature in black ink, appearing to read 'W. B. Klaus', written over a horizontal line.

Dated: May 6, 2020