



Federal Communications Commission
Washington, D.C. 20554

November 10, 2022

Juneau Alaska Communications, LLC
3161 Channel Drive
Juneau, AK 99801

In re: K272FV, Sitka, AK
Facility ID: 824
License File No.: 0000193970
Interference Complaint

Dear Licensee:

This letter is in reference to the attached interference complaint filed by Becky Meiers, General Manager for KCAW-FM, Sitka, Alaska. Raven Radio Foundation, Inc. is the licensee of KCAW-FM. This letter provides notice of this complaint and explains the station's responsibilities under the blanketing interference provisions of section 73.318 of our rules.¹

Background

The type of interference described by the complainant may be attributable to "blanketing" interference, which can occur to receivers that are in close proximity to an FM transmitter.² To give the station guidance in applying the Blanketing Rule we have formulated a list of the five most common blanketing interference situations. The situations vary depending on the following:

- **Whether or not the complaint was filed within the first year of operation.** Pursuant to section 73.318, complaints filed prior to **October 17, 2020** will be considered to be filed within the first year of operation since the station began program tests on October 17, 2019.
- **Whether the complainant is located inside or outside the blanketing contour.** The distance to the station's blanketing contour is **0.197 km** (0.1225 miles).³

¹ 47 CFR § 73.318 (Blanketing Rule).

² 47 CFR § 73.318 states that licensees "...must satisfy all complaints of blanketing interference which are received by the station during a one year period. The period begins with the commencement of program tests.... These requirements specifically do not include interference complaints resulting from malfunctioning or mistuned receivers, improperly installed antenna systems, or the use of high gain antennas or antenna booster amplifiers. Mobile receivers and non-RF devices such as tape recorders or hi-fi amplifiers (phonographs) are also excluded." Car radios fall under the category of mobile receivers.

³ 47 C.F.R. § 73.318 states that areas adjacent to the transmitting antenna that receive a signal with a strength of 115 dBu (562 mV/m) or greater will be assumed to be blanketed. In determining the blanketed area, the 115 dBu contour is

· **Whether the device experiencing interference is covered under the Blanketing Rule.**

Situation # 1

The station is financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 if the complaint is filed within the first year of program test authority and is located **inside** the station's blanketing contour.⁴

Situation # 2

The station is not financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 if the complaint is filed within the first year of program test authority and is located **outside** of the station's blanketing contour. However, the station is expected to cooperate with the complainant by providing effective technical assistance in determining the cause of the problem and advice on corrective measures.⁵

Situation # 3

The station is not financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 if the complaint is filed **after** the first year of program test authority and is located **inside** the station's blanketing contour. The station is required to provide effective technical assistance to the complainant. This entails the providing of information on the cause of the interference and also providing information on proper corrective measures.⁶

Situation # 4

The station is not financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 if the complaint is filed **after** the first year of program test authority and is located **outside** of the station's blanketing contour. However, in similar past cases, to promote goodwill within the station's community, licensees have taken steps to assist in alleviating interference complaints.

Situation # 5

The station is not financially responsible for resolving complaints of interference to electrical devices not covered under section 73.318. However, in similar past cases, to promote goodwill within the station's community, licensees have taken steps to assist in alleviating interference complaints.

determined by calculating the inverse distance field using the effective radiated power of the maximum radiated lobe of the antenna without considering its vertical radiation pattern or height. The distance to the 115 dBu blanketing contour is determined as follows:

$$\text{Distance (km)} = 0.394\sqrt{\text{ERP}}; \text{Distance (miles)} = .245\sqrt{\text{ERP}} \text{ (ERP in kilowatts).}$$

⁴ See *FM Broadcast Station Blanketing Interference*, FCC 84-514, 57 RR 2d 126 (1984) at para 15.

⁵ *Id.* at para 17.

⁶ *Id.* at para 20.

Television Interference - High gain antennas or antenna booster amplifiers

The following information is provided to help everyone involved understand the Commission's rules and policies regarding TV interference. Section 73.318(b) states, in pertinent part, that FM stations are required to resolve blanketing interference except "[t]hese requirements specifically do not include interference complaints resulting from malfunctioning or mistuned receivers, improperly installed antenna systems, or the use of high gain antennas or antenna booster amplifiers."⁷ A high-gain antenna is any antenna that has been altered (i.e. stacked) to achieve an extraordinarily high gain that is used to receive a distant TV station's signal. Any antenna bought over the counter and not modified is not considered a high-gain antenna. As noted above, the Commission's rules do not protect installations employing booster amplifiers from interference since booster amplifiers may become sources of interference in the presence of a strong FM signal. However, it may be possible to reduce the interference by inserting an FM filter between the antenna and the booster amplifier or if the booster amplifier is equipped with an internal FM filter, switching this filter on. Alternatively, another brand of amplifier may be less susceptible to blanketing interference from the FM signal. Please note that, if any of the complainants are using antenna boosters or high gain antennas, the affected equipment is not protected from interference. Therefore, if a high gain antenna or antenna booster amplifier is used in any of the complainants TV reception systems, the station is not financially responsible for resolving these complaints, whether the complainants are located inside or outside of the station's blanketing contour. However, in similar past cases, to promote goodwill within the station's community, licensees have taken steps to assist in alleviating interference complaints.

Effective Technical Assistance

Section 73.318(d) states, "[f]ollowing the one year period of full financial obligation to satisfy blanketing complaints, licensees shall provide technical information or assistance to complainants on remedies for blanketing interference." The rule requires that the station provide information and assistance sufficiently specific to enable the complainant to eliminate all blanketing interference and not simply that the station attempt to correct the problems.⁸ Effective technical assistance entails providing specific details about proper corrective measures to resolve the blanketing interference.⁹ For example, providing complainants with diagrams and descriptions which explain how and where to use radiofrequency chokes, ferrite cores, filters, and/or shielded cable. In addition, effective technical assistance also includes the recommendation on replacement equipment that would work better in the high radiofrequency fields. Also, effective technical assistance does not mean referring the complainant to the equipment manufacturer.

Complaint Report

The Commission intends that broadcast stations take very seriously their responsibility to resolve blanketing interference. Accordingly, the station must respond to **all** the complaints that have been filed and must submit a detailed report of the steps taken to resolve the complaints **within 30 days from the date of this letter**. The report can be submitted to audiofilings@fcc.gov and copied to Robert.Gates@fcc.gov. The report must be signed by an officer of Juneau Alaska Communications,

⁷ 47 CFR § 73.318(b).

⁸ See *Calvary Educational Broadcasting Network, Inc.*, 7 FCC Rcd 4040 (1992).

⁹ See *FM Broadcast Station Blanketing Interference*, FCC 84-514, 57 RR 2d 126 (1984).

LLC and contain the following information for each complaint:

1. The affected devices (i.e., the manufacturer, model number and serial number);
2. Whether or not the complainant is within the blanketing contour;
3. The dates and description of the assistance provided; and
4. Whether or not the interference has been resolved.

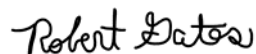
The report must include a map showing the following:

1. The station's transmitter site;
2. The 115 dBu blanketing contour; and
3. The locations of the complainants.

The station must determine which of the five situations described above apply and take the appropriate actions required by section 73.318 to fulfill its obligations. The complainant will be expected to cooperate fully with the station's efforts to resolve the interference problems; their failure to do so could lead to a finding that the station has fulfilled its obligations pursuant to section 73.318. Excessive postponements of appointments by either party will be viewed as an obstructive tactic in delaying the resolution of the blanketing interference. These requirements are in place to insure that all parties cooperate fully and immediately. Any further complaints received by the FCC will be forwarded to the station for investigation. We will respond separately to the station's report, which explains how each individual complaint was resolved.

Further action on this matter will be withheld for a period of 30 days from the date of this letter to provide the station an opportunity to reply.

Sincerely,



for James D. Bradshaw
Senior Deputy Chief
Audio Division
Media Bureau

cc: Becky Meiers, Becky@kcaw.org and generalmanager@kcaw.org
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