

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0423 (November 2005)	FOR FCC USE ONLY
Informal Objection / Petition to Deny / Petition for Reconsideration / Application for Review / Opposition / Reply / Supplement Read Instructions/FAQ before filling out form		FOR COMMISSION USE ONLY FILE NO.

Section I - General Information

1.	Party Filing Pleading or Appeal LKCM RADIO LICENSES, L.P. Mailing Address 115 W. 3RD STREET <table border="1"> <tr> <td>City FT. WORTH</td> <td>State or Country (if foreign address) TX</td> <td>Zip Code 76102 - 4116</td> </tr> </table> <table border="1"> <tr> <td>Telephone Number (include area code) 8173323235</td> <td>E-Mail Address (if available) LICENSEE@THERANCHRADIO.COM</td> </tr> </table>			City FT. WORTH	State or Country (if foreign address) TX	Zip Code 76102 - 4116	Telephone Number (include area code) 8173323235	E-Mail Address (if available) LICENSEE@THERANCHRADIO.COM
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2.	Contact Representative GERRY SCHLEGEL Mailing Address 115 W. 3RD STREET <table border="1"> <tr> <td>City FORT WORTH</td> <td>State or Country (if foreign address) TX</td> <td>ZIP Code 76102 -</td> </tr> </table> <table border="1"> <tr> <td>Telephone Number (include area code) 8173320959</td> <td>E-Mail Address (if available) GERRY@THERANCHRADIO.COM</td> </tr> </table>			City FORT WORTH	State or Country (if foreign address) TX	ZIP Code 76102 -	Telephone Number (include area code) 8173320959	E-Mail Address (if available) GERRY@THERANCHRADIO.COM
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3.	Purpose: <input type="radio"/> Informal Objection <input checked="" type="radio"/> Petition to Deny <input type="radio"/> Petition for Reconsideration <input type="radio"/> Application for Review <input type="radio"/> Opposition <input type="radio"/> Reply <input type="radio"/> Supplement							
4.	<table border="1"> <tr> <td> [Enter File Number] File Number: BNPFT - 20180125AFJ File Number: BNPFT - 20180423ABH </td> <td>Pleading Filed Date :</td> <td>Pleading Filer Name:</td> </tr> </table>			[Enter File Number] File Number: BNPFT - 20180125AFJ File Number: BNPFT - 20180423ABH	Pleading Filed Date :	Pleading Filer Name:		
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5.	Attach pleadings	[Exhibit 1]						

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing GERRY SCHLEGEL	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date 5/8/2018

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 1

Description: PETITION TO DENY LETTER OF SUPPORT

Attachment 1

Description
Petition to Deny statement of support
Attachment 1 Declaration of KTFW Listeners and map

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of:

Mortenson Broadcasting Company of Texas, Inc.
Application for Construction Permit FM Translator(FX)
for Channel 221, New 92.1 FM
Fort Worth, TX

File # BNPFT-20180423ABH
Facility ID – 202298

To: Office of the Secretary
Federal Communications Commission
Attn: Chief, Audio Division, Media Bureau

PETITION TO DENY

LKCM Radio Licenses, L. P. licensee of KTFW, Facility 65314, Glen Rose, TX (LKCM), hereby respectfully submits and timely files its Petition to Deny the above referenced application for a construction permit for operation on Channel 221 to serve Fort Worth, TX.

Section 74.1204(f) of the Commission rules states:

An application for an FM translator station will not be accepted for filing even though the proposed operation would not involve overlap of field strength contours with any other station, as set forth in paragraph (a) of this section, if the predicted 1 mV/m field strength contour of the FM translator station will overlap a populated area already receiving a regularly used, off-the-air signal of any authorized co-channel, first, second or third adjacent channel broadcast station, including Class D (secondary) noncommercial educational FM stations and grant of the uthorization will result in interference to the reception of such signal.

The Commission stated that “it will not grant an application if an objecting party provides convincing evidence that the proposed translator station would be likely to interfere with the reception of a regularly received off-the-air service, even if there is no predicted overlap.”

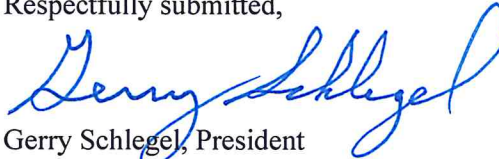
The proposed Mortenson (FX) operates on co-channel Channel 221. Although the applicant does not predict overlap of the existing 60 dBu contours of the NEW Translator and the contour of KTFW, in actuality there are numerous listeners served by KTFW within the newly proposed 60 dBμ contour of Mortenson’s proposed application. These existing listeners will be subject to co-channel interference once the proposed station begins operation.

Attached as Attachment 1 are Declarations from listeners demonstrating that they are listeners to KTFW. The listeners have provided addresses from which that listening occurs. As seen in Exhibit 1 of that Attachment, those addresses have been plotted on a map containing the proposed translator’s 60 dBu contour. If such translator were to be granted and commence operations, listeners to KTFW will receive destructive interference from that proposed translator.

Therefore, under Section 74.1204(f), that application should not remain accepted for filing, and may not be approved. To avoid the grant of an application that will adversely affect existing Station KTFW listeners and service, it is respectfully requested that the application be denied and dismissed.

WHEREFORE, as of May 8, 2018, it is requested that this Petition to Deny be granted, and the pending application for issuance of a construction permit for Channel 221 be denied.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Gerry Schlegel", is written over the printed name and title.

Gerry Schlegel, President
LKCM Radio Licenses, L.P.

CERTIFICATE OF SERVICE

I, Gerry Schlegel, hereby certify that the forgoing "Petition to Deny" is being served by first-class US Mail (and email where noted) to the following:

Albert Shuldiner
Chief, Audio Division, Media Bureau
Federal Communications Commission
445 12th St. SW
Washington, DC 20554
audiodivisionpleadings@fcc.gov

Jack Mortenson
Mortenson Broadcasting Company of Texas, Inc.
Financial Center- Key Bank Square
Suite 141
960 West State Street
Alliance, OH 44601

Jerrold Miller, ESQ
Miller and Neely, P.C.
Suite 203
3750 University Blvd., West
Kensington, MD 20895
mandnlaw@gmail.com

Kathleen A. Kirby
Wiley Rein, LLP
1776 K Street NW
Washington, DC 20006



Gerry Schlegel
President
LKCM Radio Licenses, LP
115 West Third St.
Fort Worth, TX 76102

DECLARATION

I Amberlee Medar no declare under penalty of perjury, as follows:

1. My address is 172, Oak, Hurst, Dr^W, Hurst 76053
2. I am a regular listener of Station KTFW-FM (Hank 92.1) at that address and in my car.
3. I have been informed that a new FM translator is planning to go on the air on the same frequency, 92.1, as the station I listen to in the general vicinity of my residence or work and that the station may interfere with my reception of KTFW-FM on 92.1 in the area where I listen to the station. I do not want my reception to be interfered with.
4. Neither I nor any member of my family is an employee or volunteer with the owner of KTFW-FM.
5. I understand that this Declaration may be filed with the FCC to support an objection to the FM translator application.

Executed this 5 day of May, 2018

Amberlee Medar no

DECLARATION

I LeAnne Northern declare under penalty of perjury, as follows:

1. My address is 1209 Potogrande Blvd #224 Euler, TX
76040

2. I am a regular listener of Station KTFW-FM (Hank 92.1) at that address and in my car.

3. I have been informed that a new FM translator is planning to go on the air on the same frequency, 92.1, as the station I listen to in the general vicinity of my residence and that the station may interfere with my reception of KTFW-FM on 92.1 in the area where I listen to the station. I do not want my reception to be interfered with.

4. Neither I nor any member of my family is and employee or volunteer with the owner of KTFW-FM.

5. I understand that this Declaration may be filed with the FCC to support an objection to the FM translator application.

Executed this 2 day of March, 2018

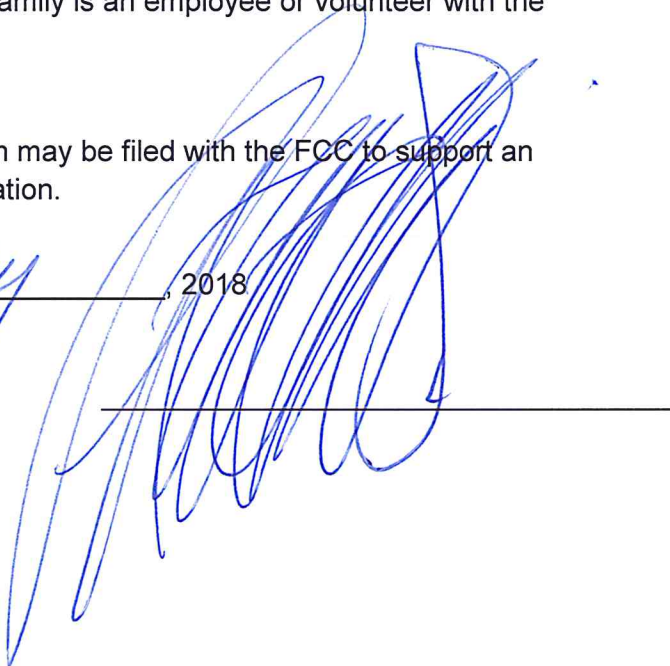
LeAnne Northern

DECLARATION

I TAMELA BRINS declare under penalty of perjury, as follows:

1. My address is 8017 MYSTIC TRAIL
2. I am a regular listener of Station KTFW-FM (Hank 92.1) at that address and in my car.
3. I have been informed that a new FM translator is planning to go on the air on the same frequency, 92.1, as the station I listen to in the general vicinity of my residence or work and that the station may interfere with my reception of KTFW-FM on 92.1 in the area where I listen to the station. I do not want my reception to be interfered with.
4. Neither I nor any member of my family is an employee or volunteer with the owner of KTFW-FM.
5. I understand that this Declaration may be filed with the FCC to support an objection to the FM translator application.

Executed this 7 day of May, 2018

A large, stylized handwritten signature in blue ink, consisting of many overlapping loops and flourishes, is written over a horizontal line.

DECLARATION

I Andy Luna declare under penalty of perjury, as follows:

1. My address is 2964 Timber Creek Trail
2. I am a regular listener of Station KTFW-FM (Hank 92.1) at that address and in my car.
3. I have been informed that a new FM translator is planning to go on the air on the same frequency, 92.1, as the station I listen to in the general vicinity of my residence or work and that the station may interfere with my reception of KTFW-FM on 92.1 in the area where I listen to the station. I do not want my reception to be interfered with.
4. Neither I nor any member of my family is an employee or volunteer with the owner of KTFW-FM.
5. I understand that this Declaration may be filed with the FCC to support an objection to the FM translator application.

Executed this 7 day of may, 2018

Andy Luna

DECLARATION

I David Govez declare under penalty of perjury, as follows:

1. My address is 2408 W. ABRAM ARLINGTON TX 76013
2. I am a regular listener of Station KTFW-FM (Hank 92.1) at that address and in my car.
3. I have been informed that a new FM translator is planning to go on the air on the same frequency, 92.1, as the station I listen to in the general vicinity of my residence or work and that the station may interfere with my reception of KTFW-FM on 92.1 in the area where I listen to the station. I do not want my reception to be interfered with.
4. Neither I nor any member of my family is an employee or volunteer with the owner of KTFW-FM.
5. I understand that this Declaration may be filed with the FCC to support an objection to the FM translator application.

Executed this 7 day of MAY, 2018

David Govez

DECLARATION

I Anthony Romero declare under penalty of perjury, as follows:

1. My address is 501 S. Dupre Dr apt 207
Arlington TX 76013
2. I am a regular listener of Station KTFW-FM (Hank 92.1) at that address and in my car.
3. I have been informed that a new FM translator is planning to go on the air on the same frequency, 92.1, as the station I listen to in the general vicinity of my residence or work and that the station may interfere with my reception of KTFW-FM on 92.1 in the area where I listen to the station. I do not want my reception to be interfered with.
4. Neither I nor any member of my family is an employee or volunteer with the owner of KTFW-FM.
5. I understand that this Declaration may be filed with the FCC to support an objection to the FM translator application.

Executed this 7 day of May, 2018

Anthony Romero

DECLARATION

I CURTIS MEADORS declare under penalty of perjury, as follows:

1. My address is 712 SCOTT DR ARL TX 76012
2. I am a regular listener of Station KTFW-FM (Hank 92.1) at that address and in my car.
3. I have been informed that a new FM translator is planning to go on the air on the same frequency, 92.1, as the station I listen to in the general vicinity of my residence or work and that the station may interfere with my reception of KTFW-FM on 92.1 in the area where I listen to the station. I do not want my reception to be interfered with.
4. Neither I nor any member of my family is an employee or volunteer with the owner of KTFW-FM.
5. I understand that this Declaration may be filed with the FCC to support an objection to the FM translator application.

Executed this 7 day of MAY, 2018

Curtis Meadors

[illegible]

P1 172 W Oak Dr
Hurst, TX 76053

P2 1209 Sotogrande
Blvd, Euless, TX
76040

P3 8617 Mystic Trail
Fort Worth, TX
76118

P4 2964 Timber Creek
Trail Fort Worth,
TX 76118

P5 2408 W Abram St
Arlington, TX 76013

P6 501 Sandpiper Dr
Arlington, TX 76013

P7 712 Scott Dr
Arlington, TX
76012