



Signal Wiz
Broadcast Technical Services
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San Diego, California 92122
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6/3/2019

Hossein Hashemzadeh
Federal Communications Commission
Washington, DC 20554

RE: FCC File Number 0000071772
K28MO-D Gila River Indian Community, AZ, Facility ID 187710

Dear Mr. Hashemzadeh,

Your letter of May 6, 2019, states that the application to modify the construction permit for K28MO-D, held by Gila River Telecommunications, Inc. (GRTI), should be dismissed in light of potential interference to analog LPTV station KCOS-LP, Channel 28 in Phoenix, Arizona (BLTTL-19990325JD). GRTI respectfully submits that K28MO-D cannot create interference to KCOS-LP since the latter station is not currently operational and has not transmitted a signal for several years. Since KCOS-LP has not been operating for over eight years, its license should be canceled and the K28MO-D modification application granted.

On 5/31/2019, I traveled to the licensed location of KCOS-LP, FCC facility ID 8988, at coordinates 33-29-39.1 N 111-38-30.4 W, near Mesa, AZ. I was accompanied by Bart Hendershott, the owner of Action Tower Sites, LLC, which owns the tower on which KCOS-LP is licensed to operate. Mr. Hendershott's phone number is 480-695-4460, and his e-mail address is Actiontowersites@gmail.com.

Mr. Hendershott told GRTI that the KCOS-LP owners discontinued transmitting on channel 28 in 2011. "Their lease expired on January 31 2011, and a renewal was sent out to them but was not signed or returned so they did not continue broadcasting." The transmit antennas were subsequently removed from the 60-foot AGL on the tower at its aforementioned licensed coordinates. We confirmed the lack of UHF transmit antennas on this tower (photo, Exhibit 1). We found an analog TV transmitter Mr. Hendershott identified as having been used to transmit

KCOS-LP in the past (photo, Exhibit 2). This transmitter had nothing attached to its output (photo, Exhibit 3).

At the KCOS-LP transmission site, I took a measurement of RF spectrum that included UHF-TV Channels 24 through 33 (see annotated screenshot, Exhibit 4). This exhibit shows the 6 MHz of UHF-TV channel 28 from 554 - 560 MHz was unoccupied by any significant signal at the licensed KCOS-LP site.

GRTI asserts that the licensee of KCOS-LP has violated Section 73.1740 of the FCC Rules, with regard to the minimum hours of required operation, by remaining silent for more than one year with no known notification to the FCC. Since K28MO-D could create no interference to a signal that does not exist, we respectfully request that the Commission grant GRTI's application for modification of construction permit (LMS-0000071772) to move its transmitter location.

I declare, under penalty of perjury, that the foregoing statements and attached exhibits, which were prepared by me, are true and correct to the best of my knowledge and belief.

Sincerely,

A handwritten signature in cursive script that reads "Gary L. Stigall".

Gary L. Stigall
Signal Wiz Broadcast Contract Engineer
GRTI Technical Representative

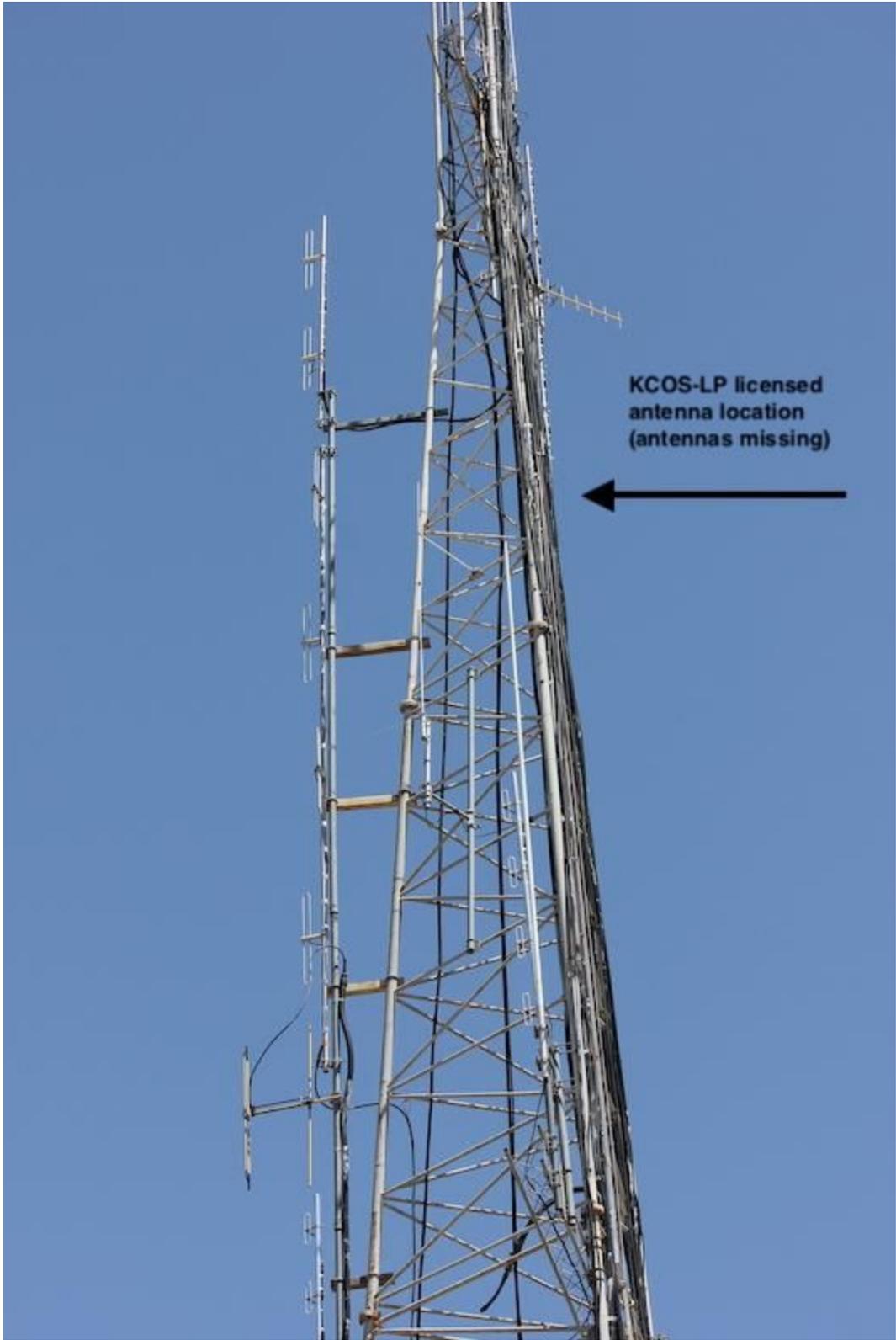


Exhibit 1 - Usery Mountain tower, site of removed KCOS-LP UHF panel antennas



Exhibit 2 - KCOS-LP Inoperative Analog UHF Channel 28 TV Transmitter



Exhibit 3 - KCOS-LP Transmitter Output Port

Ref Lvl
-20.0 dBm

Input Atten
0.0 dB

Detection
Peak

RBW
100 kHz

VBW
30 kHz

Sweep Time
50 ms

Traces
A: Max Hold

Sweep (Fast)
Continuous

Freq Ref
Int Std Accy

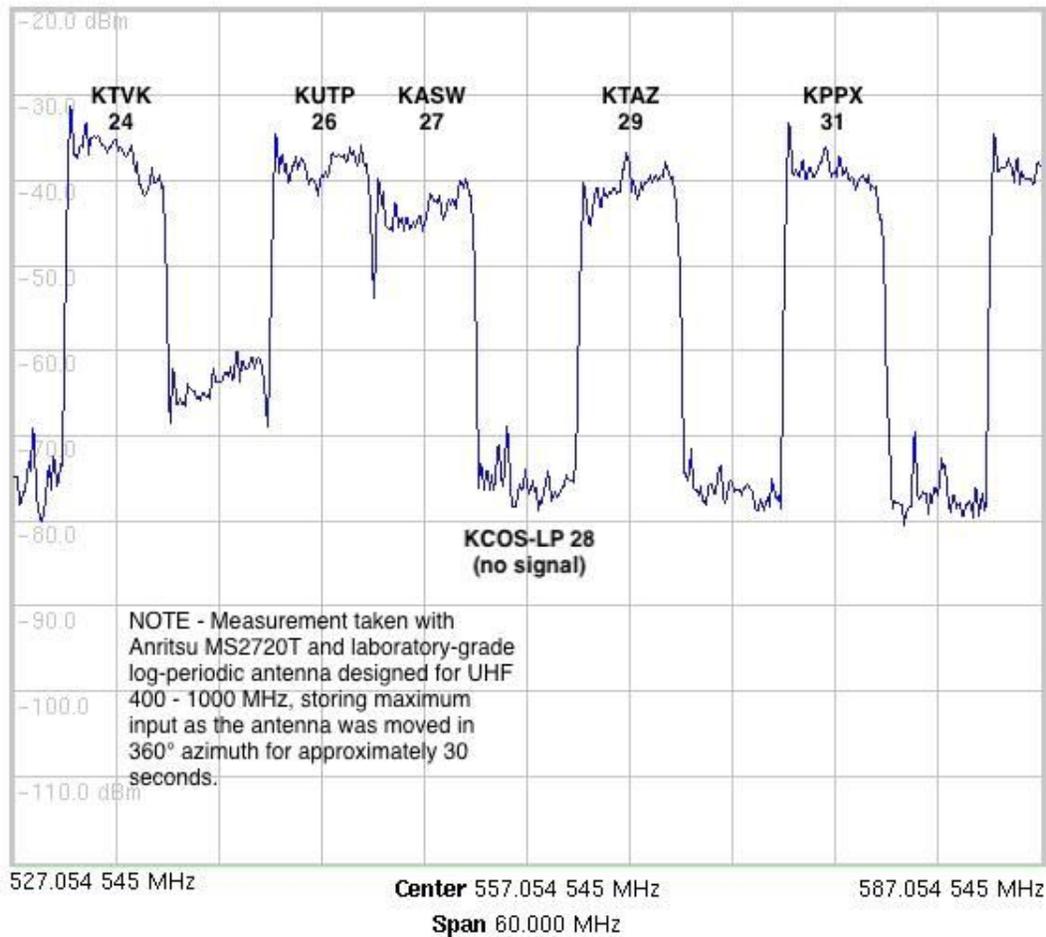


Exhibit 4 - Usery Mountain, AZ UHF-TV Spectrum, Channels 24 through 33