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**LAW OFFICE OF MICHAEL W. RICHARDS LC  
7008 WESTMORELAND AVENUE • SUITE E8  
TAKOMA PARK, MD 20912**

TEL. 202.657.5780 • EMAIL: MICHAEL@MICHAELRICHARDS.US • FAX 206.984.4204

March 20, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9050 Junction Drive  
Annapolis Junction, MD 20701

*Attn: Audio Division, Media Bureau*

**RE: Interference Complaint  
FM Translator K223CW, Houston, Texas (Facility ID No. 148239)**

Dear Ms. Dortch:

Iglesia Centro de Liberacion, Inc. ("Iglesia Centro"), the licensee of KJJG-LP, South Houston, Texas (Facility ID No. 191681), through counsel, hereby submits the attached INTERFERENCE COMPLAINT against FM Translator K223CW, Houston, Texas (Facility ID No. 148239).

This complaint is submitted for relief pursuant to 47 C.F.R. Section 74.1203.

This submission supplements a prior filing to provide listener interference declarations – and, for ease of reference, includes re-submission of a copy of an original Interference Complaint submitted on Jan. 28, 2019.

An additional copy is enclosed. *Kindly date-stamp and return in the self-addressed stamped envelope provided.*

Please contact the undersigned with any questions.

Sincerely,



Michael W. Richards  
*Counsel to Iglesia Centro de Liberacion, Inc.*

MAR 26 2019

FCC Mailroom

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

In the Matter of )  
 )  
CENTRO CRISTIANO DE VIDA ETERNA )  
FM Translator Station K223CW ) Facility Identification No. 148239

To: The Secretary  
Attn: Media Bureau, Audio Division

**INTERFERENCE COMPLAINT**

1. Iglesia Centro de Liberacion, Inc. ("Iglesia Centro"), by counsel, pursuant to 47 C.F.R. Sections 1203(a)(3) and 74.1203(b), seeks immediate remediation of interference caused by the FM Translator Station, K223CW (Facility Identification Number 148239), Houston, Texas ("Translator"), which is harming reception of Iglesia Centro's KJJG-LP (Facility Identification Number 191681), South Houston, Texas ("KJJG"). At least 10 *bona fide* regular listeners have provided statements, under penalty of perjury, attesting to such Translator interference to their regular reception of KJJG, as discussed further, below.

**Discussion**

4. The Translator Must Mitigate Interference or Halt Transmission Pursuant to 47 C.F.R. Section 74.1203. As demonstrated in listener declarations,<sup>1</sup> executed pursuant to 47 C.F.R. Section 1.16. and *attached hereto at Exhibit A*, the Translator is causing prohibited harmful interference. This interference is mapped out graphically in the supplemental technical data chart *also attached at Exhibit A*.

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<sup>1</sup> Due to the urgent nature of this pleading, Iglesia Centro has not completed its efforts to gather interference declarations from its listeners. It reserves its rights to submit additional declarations and engineering analyses as required to protect its listeners from the Translators' harmful interference.

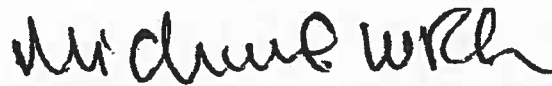
5. As stated by each and every listener submitting the Interference Complaint Declarations at Exhibit A, the Translator's interference hinders these listeners' regular reception of KJJG. FCC rules require that the interfering Translator mitigate interference or shut down " whenever reception of a regularly used signal is impaired by the signals radiated by the FM translator . . . ." 47 C.F.R. Section 74.1203(a)(3). The Translator must remain silent until effective and full interference mitigation each and every complaint. 47 C.F.R. Section 74.1203(b).

6. Relief Sought. Iglesia Centro seeks an immediate Commission Order to the Translator licensee to mitigate interference for each and every listener or shutdown, FCC Rules require. Such Commission Order must include a definite deadline for full and complete. Given the serious and ongoing harm the Translator interference is causing to KJJG and its listeners, the Commission should act with all deliberate speed.

#### Conclusion

7. For all the reasons stated, the Commission should ORDER immediate Translator Interference mitigation or a Translator shutdown if "application of suitable techniques"<sup>2</sup> fail.

Respectfully Submitted,



Michael W. Richards  
*Counsel for Iglesia Centro de Liberacion, Inc.*

LAW OFFICE OF MICHAEL W. RICHARDS LC  
PO Box 5842  
Takoma Park, MD 20913  
Tel. 202.657.5780

January 28, 2019

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<sup>2</sup> 47 C.F.R. Sec. 74.1203(b).

## **EXHIBIT A**

### **Listener Interference Declarations and Related Geographic and Engineering Data**

# Engineering Statement

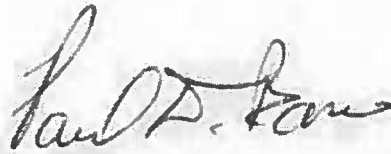
This engineering statement supports the complaints by listeners of KJJG-LP, licensed to Iglesia Centro de Liberacion, of interference from translator K223CW.

K223CW currently operates as authorized by license BLFT-20170406ACJ<sup>1</sup>, 16 kilometers Northwest of co-channel KJJG-LP<sup>23</sup>. Despite K223CW specifying a sharply directional antenna pointed away from KJJG-LP, listeners are experiencing interference even within the service contour of KJJG-LP.

The accompanying map shows the sites of reported interference by number, corresponding the numbered interference complaints in a separate attachment. If both a residence<sup>4</sup> and a separate location<sup>5</sup> are mentioned, letters are appended, for example 2a, 2b.

Service contours for both stations are shown, and two additional contours for KJJG-LP<sup>6</sup>.

I affirm that this statement is true and accurate to the best of my knowledge.



Paul Bame, Engineering Director  
Prometheus Radio Project

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<sup>1</sup> K223CW holds an uncovered construction permit BPFT-20170407AAY which proposes operation from the same location but with a substantially different antenna pattern and pointing direction. A license to cover has not been filed for this permit.

<sup>2</sup> KJJG-LP's construction permit application BPL-20170130AAE, proposing to relocate further from K223CW, is blocked by a petition from Centro Cristiano de Vida Eterna, licensee of K223CW.

<sup>3</sup> In §73.807, the Commission specifies that the minimum separation distance between an LPFM station and a co-channel translator with this contour distance based on HAAT and ERP, is 39 kilometers.

<sup>4</sup> All residences have clearly-distinguishable driveways or adjacent parking areas.

<sup>5</sup> Where multiple roadways were named, the point of intersection is marked. Multiple adjacent neighborhoods or zip codes are represented by a single location along their common border.





<sup>6</sup> At the time of this writing, the Commission is evaluating an NPRM which might result in new rules specifying an FM translator interference-complaint signal-strength cutoff.

# KJJG-LP Interference from K223CW



## Interference Locations

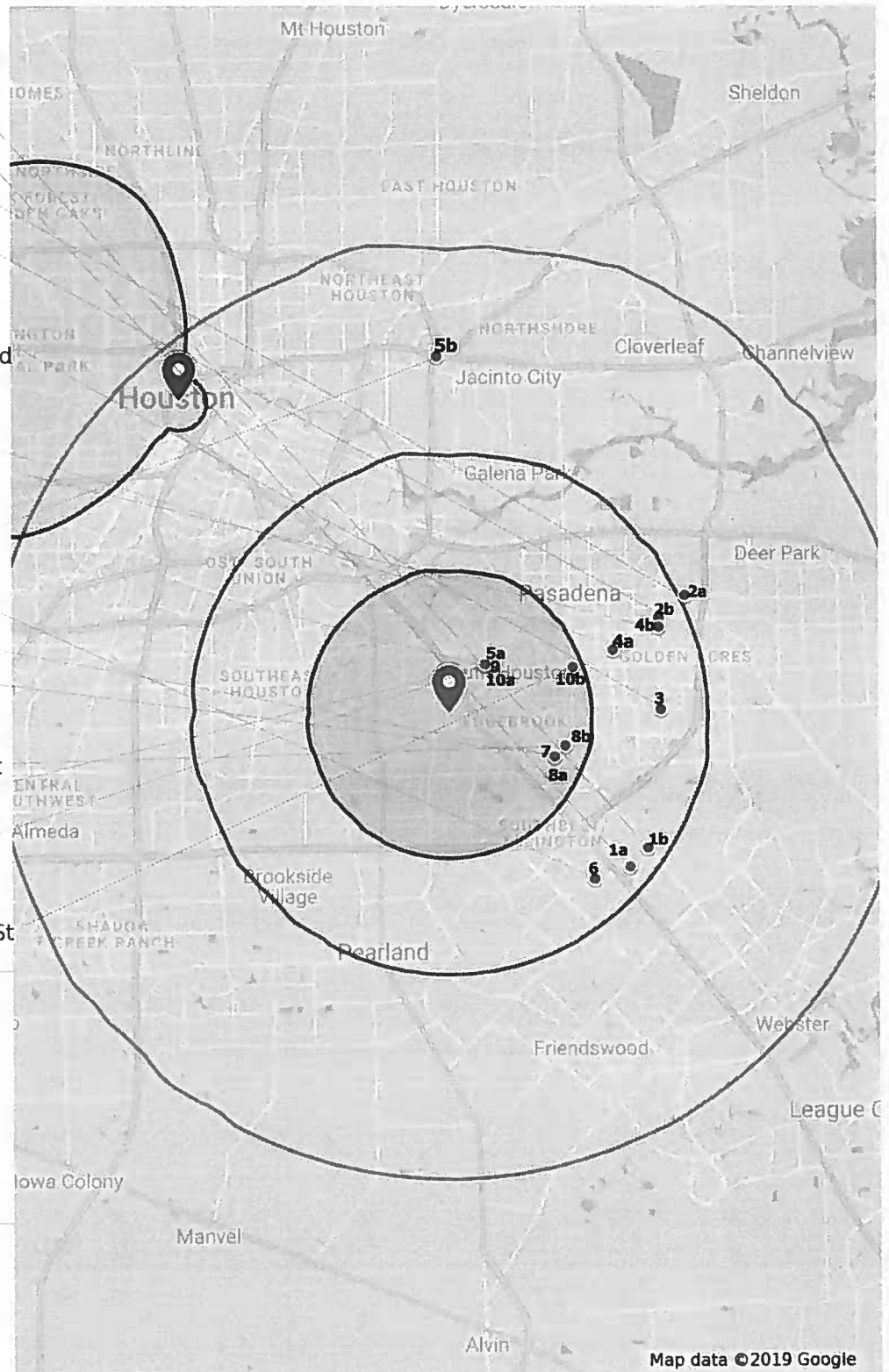
- 1a. 706 Leicester Ln
- 1b. Texas 3 & Dixie Farm Rd
- 2a. 1407 Glenmore Dr
- 2b. Preston Rd & Pasadena Blvd
- 3. Fairmont Pkwy & Preston Rd
- 4a. 2714 Dewberry Ln
- 4b. Harriette St & Preston Rd
- 5a. 716 Nebraska St
- 5b. US 90 and I-610
- 6. 12542 Sandy Hook Dr
- 7. 8810 Iron Springs Dr
- 8a. 8822 Iron Springs Dr
- 8b. Galveston Rd & Shaver St
- 9. 716 Nebraska St
- 10a. 716 Nebraska St
- 10b. Spencer Hwy & Shaver St

## KJJG-LP 223L1 South Houston

-  KJJG-LP
-  60dBu f(50,50)
-  50dBu f(50,50)
-  40dBu f(50,50)

## K223CW 223D Houston, TX

-  60dBu f(50,50)
-  K223CW



1

## INSTRUCTIONS

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***The legal declaration is the equivalent of testifying in court, so it is really important to be truthful, as there are potential federal penalties for false statements. After completing the information on this page, kindly fill out the Declaration, on the next page, sign and date it, and then return it to us.***

### Information for the Radio Station

Your Name Miguel Hernandez

Your Email Miguel29hd2@yahoo.com


Your Phone 413-297-1567

①

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Miguel Hernandez.
2. I live at 706 Leicester Ln  
Houston, TX 77034.
3. I regularly listen to radio station KJJG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
I listen all the time.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
I listen both the car and at home.
6. Before the date of Oct 4, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
I live off of Dixie Farm Rd and Gulf Freeway  
and when I drive home on Hwy 3 the interference is  
bad. Sometimes I can hear clear and then I can't.
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

  
Signature of Declarant

12/9/18  
Date



2

## INSTRUCTIONS

***This form has two parts: (1) information for our station to contact you if any follow up is required before submitting your interference complaint to the FCC and (2) a legal declaration for the FCC.***

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### **Information for the Radio Station**

Your Name Joelly Gonzalez

Your Email gonzalezjoelly@yahoo.com

Your Phone (832) 503 - 5039

2

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Jocilly Gonzalez.
2. I live at 1407 Glenmore Dr.  
Pasadena, Tx 77503.
3. I regularly listen to radio station KJJG-LP, South Houston, Texas ("Radio Station").  
yes
4. I listen under the following circumstances:  
I listen at home,  
I listen while driving, all the time.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
home, and  
on the road.
6. Before the date of Oct. 4, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
I would listen at home and in my  
vehicle in Pasadena, Tx 77503-77502, on Oct. 4  
the interference from another station began.
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

Jocilly Gonzalez  
Signature of Declarant

12/10/18  
Date

3

3

## INSTRUCTIONS

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### **Information for the Radio Station**

Your Name Christina Hernandez

Your Email chriscar08@aol.com

Your Phone 832 - 390 - 8770

3

3

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Christina Hernandez.
2. I live at 5019 Park Meadow ct.  
Ho Pasadena, TX 77504.
3. I regularly listen to radio station KJIG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
I always listen.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
Usually in the car.
6. Before the date of Oct 08, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
When I'm driving down Fairmont and Preston.
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

Christina Hernandez  
Signature of Declarant

12/09/18  
Date

4

## INSTRUCTIONS

***This form has two parts: (1) information for our station to contact you if any follow up is required before submitting your interference complaint to the FCC and (2) a legal declaration for the FCC.***

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### Information for the Radio Station

Your Name Jesus Ramirez

Your Email jesusramirez284.jr@gmail.com

Your Phone 713-382-3658

4

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Jesus Ramirez.
2. I live at 2714 Dewberry LN  
Pasadena, TX 77502.
3. I regularly listen to radio station KJJG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
YES  
I listen all the time when I'm driving.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
Car and when I'm home.
6. Before the date of Oct 4, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows: I use to  
hear this radio all over Pasadena, TX 77502 and 77503 area code.  
And on Oct 4 another radio started to interfere.
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

  
Signature of Declarant

12/9/18  
Date

5

## INSTRUCTIONS

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### Information for the Radio Station

Your Name Joan Anaya

Your Email Anaya 191@gmail.com

Your Phone 832)853-0925

5

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Joan Anaya.
2. I live at 716 Nebraska St  
77587 South Houston Tx.
3. I regularly listen to radio station KJIG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
I listen to Shalom Radio on my way to  
work and free time
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
I listen at work sometimes but most car and  
home
6. Before the date of \_\_\_\_\_, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
yes I drive 610 east and 90 east but  
I get interference from other radio station  
like tropical music... and restaurant commercials...
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

  
\_\_\_\_\_  
Signature of Declarant

12/3/18  
\_\_\_\_\_  
Date



6

## INSTRUCTIONS

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### Information for the Radio Station

Your Name Belen Ramirez

Your Email ramirezbelen147@gmail.com

Your Phone 832-870-1775

⑥

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Belen Ramirez.
2. I live at 12542 Sandhock Dr.  
Houston Tx 77089.
3. I regularly listen to radio station KJIG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
I try to listen while on my way to work.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
Moving Vehicle
6. Before the date of Sept 07, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
I always put my radio station, but whenever I do another station is in the background.
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

Belen Ramirez  
Signature of Declarant

12/14/18  
Date

7

## INSTRUCTIONS

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### Information for the Radio Station

Your Name marisol hernandez

Your Email solhdz07@yahoo.com

Your Phone 713-397-0441

7

## INTERFERENCE COMPLAINT DECLARATION

1. My name is marisol hernandez.
2. I live at 8810 Iron Springs Drive Houston,  
Tx 77034.
3. I regularly listen to radio station KJIG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
I listen when I am in the car  
going to work.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
- I listen regularly at my house
6. Before the date of September 27, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
When I am listening to the radio  
it interferes with commercials and tropical music.
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

M. Hernandez  
Signature of Declarant

12/23/2018  
Date

8

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Maribel Hernandez.
2. I live at 8822 Iron Springs Dr.  
Houston Texas 77034.
3. I regularly listen to radio station KJJG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
Anytime
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
I listen at home (77034) and when  
I drive down shaver and old galveston.
6. Before the date of September 15, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
It interferes with tropical music, and restaurant/furniture  
commercials.
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

Maribel Hernandez  
Signature of Declarant

12/23/18  
Date

8

## INSTRUCTIONS

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### Information for the Radio Station

Your Name Maribel Hernandez

Your Email M4hernandez@hotmail.com

Your Phone 713) 210-9736

9

## INSTRUCTIONS

***This form has two parts: (1) information for our station to contact you if any follow up is required before submitting your interference complaint to the FCC and (2) a legal declaration for the FCC.***

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### Information for the Radio Station

Your Name Vanessa Anaya

Your Email VanessaA383@gmail.com

Your Phone 832-348-6364

⑨

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Vanessa Anaya.
2. I live at 7116 Nebraska St  
South Houston Tx 77587.
3. I regularly listen to radio station KJIG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
I try to listen while on the way to work  
or on the road in my area.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
I try to listen regularly in my vehicle.
6. Before the date of Aug 30, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
I try to listen to the station but there is  
always interference from another station
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

Vanessa Anaya  
Signature of Declarant

12/10/18  
Date



10

## INSTRUCTIONS

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### Information for the Radio Station

Your Name Martina Campos

Your Email \_\_\_\_\_

Your Phone 340-970-6750

(10)

## INTERFERENCE COMPLAINT DECLARATION

1. My name is Martina Campis.
2. I live at 7116 Nebraska St #A  
South Houston TX 77587.
3. I regularly listen to radio station KJJG-LP, South Houston, Texas ("Radio Station").
4. I listen under the following circumstances:  
Cuando manejo mi troca y tengo tiempo de  
esouchar.
5. I listen regularly at the following places (please note if fixed address or moving vehicle).  
Esoucho manejando a la tienda o mandados en el  
area de Pasadena y South Houston.
6. Before the date of October, 2018, my listening in these places and under these circumstances was not troubled by interference.
7. I describe the new interference as follows:  
Interfiere otra estacion con otro tipo de musica  
que no es Cristiana
8. This new interference hinders my ability to listen to the Radio Station, as described above.
9. I have no economic interest or control interest in the Radio Station or its licensee and I am not an employee of the Radio Station or its licensee.

Pursuant to 47 C.F.R. Section 1.16, I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct. Executed on the date indicated below.

Martina Campis  
Signature of Declarant

12/09/18  
Date

## CERTIFICATE OF SERVICE

I, Michael W. Richards, counsel for Iglesia Centro de Liberacion, Inc., hereby state that a true copy of the foregoing **INTERFERENCE COMPLAINT** was mailed first class, postage prepaid, this 20th day of March, 2019 to:

Dan J. Alpert, Esq.,  
*Counsel to Centro Cristiano de Vida Eterna*  
Law Office of Dan J. Alpert  
2120 N. 21<sup>st</sup> Rd.  
Arlington, VA 22201

Michael W. Richards