



Federal Communications Commission
Washington, D.C. 20554

August 27, 2019

In Reply Refer to:
1800B3-KV

Hall Communications, Inc.
c/o Anne Goodwin Crump, Esq.
Fletcher, Heald & Hildreth, P.L. C.
1300 N. 17th Street
Eleventh Floor
Arlington, VA 22209

In Re: W248CA, St. Petersburg, FL
NIA Broadcasting, Inc.
Facility ID No. 156011
File Nos. BLFT-20170815AAH and
BPFT-20180117ACJ

Interference Complaints

Dear Counsel:

This letter refers to the pending "Interference Complaint" (Complaint) filed on September 29, 2017, by Hall Communications, Inc., licensee of Station WPCV(FM), Winter Haven, Florida (Hall or Complaining Station); the March 27, 2018, "Update to Interference Complaint and Request for Immediate Suspension of Authority to Broadcast" (Supplemental Complaint); and the June 4, 2018, Informal Objection (License Objection-Complaint)¹ alleging interference from FM Translator W248CA, St.

¹ The initial September 29, 2017, interference complaint was filed in connection with W284CA's (Translator) operation pursuant to BLFT-20170815AAH, granted on August 18, 2017. Thereafter, subsequent to discussion between the parties, NIA filed a modification application for the Translator, BPFT-20180117ACJ, that was granted and eventually licensed on April 11, 2018 (BLFT-2010328 AAW).

NIA then filed another modification application, BPFT-20180517AEU, against which Complaining Station filed an Informal Objection (Modification Objection), alleging among other things improved, but continuing interference conditions and the lack of a mutually agreeable date for signal testing. The modifications and licenses are all located on the same tower site, but with adjustments to the antenna height and pattern. Regarding the latest application, the Complaining Station claims that the Translator is essentially seeking to return to the 2017 License facilities that caused interference.

Collectively, the Complaint, the Supplemental Complaint, Modification-Objection, and the License Objection-Complaint will be referred to as the Complaints.

Petersburg, Florida, licensed to NIA Broadcasting, LLC (NIA).²

Recently, the Commission adopted certain changes to the FCC's rules (Rules) relating to the translator interference complaint resolution process.³ The Commission stated that, once effective, all pending complaints would be decided under the new Rules. The Commission further stated that parties involved in pending proceedings would be given an opportunity to submit supplemental material to address the changes.⁴

Our initial review of the Complaints under the revised interference standards reveals that additional information is required. Specifically, in order to continue processing the Complaints the items marked below must be submitted:⁵

1. Listener Complaints:

- X Detailed information on the Complaining Station's protected contour and the population located therein;
- X Minimum Number of Listener Complaints as determined by the population located within the Complaining Station's protected contour;⁶
- X Signed and dated (within one year of Complaint and all other listener complaints) by Listener;

² Because this letter is limited to Hall's interference showings and not an all-inclusive list of Hall's filings in this proceeding, we only referenced those filings which contain this information.

³ See *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Report and Order, FCC 19-40, 34 FCC Rcd ____ (2019) (*Translator Interference Order*).

⁴ *Id.* at ¶ 49.

⁵ An item will be marked as missing the required information if it is missing from one or more listener complaints.

⁶ See 47 CFR § 74.1203 Table 1.

Population within Protected Contour	Minimum Listener Complaints Required for Interference Claim
1-199,999	6
200,000-299,999	7
300,000-399,999	8
400,000-499,999	9
500,000-999,999	10
1,000,000-1,499,999	15
1,500,000-1,999,999	20
2,000,000 or more	25
LPFM stations with fewer than 5,000	3

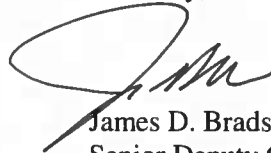
- X Listener's full name, address and phone number;
- X Clear, concise, and accurate description of the location where interference is alleged;⁷
- X Statement that Listener listens over-the-air to the desired station at least twice a month;
- X Statement that Listener has no legal, financial, employment, or familial affiliation or relationship with desired station.

2. Technical Interference Showing:

- X Map plotting the specific location of the alleged interference in relation to the Complaining Station's 45dBu contour;
- X Statement that the Complaining Station is operating within its licensed parameters;
- Statement that the Complaining Station licensee has used commercially reasonable efforts to inform the relevant translator licensee of the claimed interference and attempted private resolution;
- Undesired/Desired data demonstrating that at each listener location the ratio of undesired to desired signal strength exceeds -20 dB for co-channel situations, -6 dB for first-adjacent channel situations or 40 dB for second- or third- adjacent channel situations, calculated using the Commission's standard contour prediction methodology.

Within thirty (30) days of this letter, Hall must submit the above information and any other information not referenced above that might be required by the Rules. Further action on the Complaints will be withheld for a period of 30 days from the date of this letter to provide Hall an opportunity to respond. Failure to submit the required information will result in the dismissal of the Complaints.

Sincerely,



James D. Bradshaw
Senior Deputy Chief
Audio Division
Media Bureau

cc: NIA Broadcasting, LLC (by email)

⁷ In the *Translator Interference Order*, the Commission noted that "[a]ppropriate descriptions include map coordinates, street addresses, street intersections, or other descriptions such as 'along Route XX near mile marker XX' or 'between Exits 1 and 2 on Route XX.' Unacceptable descriptions would include 'on my way to work' or 'downtown,' as they do not inform . . . [if] within its 45 dBu contour or . . . provide sufficient information to resolve the compliant." *Id.* at note 65.