

FEDERAL COMMUNICATIONS COMMISSION

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Washington, DC 20554

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AMFM Radio Licenses, LLC
2625 S. Memorial Drive
Suite A
Tulsa, OK 74129

NOV 15 2013

In re: INTERFERENCE COMPLAINT
W232CB, Frederick, MD
BLFT-20130805ACZ
BPFT-20130807AAB
Facility ID # 31140

Dear Licensee:

This refers to interference complaints filed by Red Zebra Broadcasting License, LLC filed September 16, 2013. The interference complaints are attached. The complaints allege that W232CB is interfering with the reception of WWXX(FM), Buckland, Virginia.


Pursuant to 47 C.F.R. § 74.1203, W232CB is required to eliminate any actual interference it causes. Therefore, it is necessary for W232CB to submit a detailed report on the attached complaint. For the complaint, the report must include: (1) the name and address of the complainant; (2) specific devices receiving the interference (i.e. type of device, manufacturer's name, model number, and serial number); and (3) any assistance provided by W232CB for each device allegedly receiving the interference and whether such interference persists. Each of the complaints must be addressed individually.

The Commission's Rules regarding FM translators restrict FM translator stations to operate strictly on a secondary basis and limit their service. Section 74.1203(a)(3) states that an FM translator station will not be permitted to continue to operate if it causes any actual radio signal interference to the direct reception by the public of the off-the-air signals of any authorized broadcast station.¹ Actual interference is based on listener complaints indicating that the signal they regularly receive is being impaired by the signal radiated by the FM translator station. Section 74.1203(b) states that if the interference cannot be properly eliminated by the application of suitable techniques, the

¹ An FM translator station creating actual radio signal interference to any authorized broadcast station is obligated to eliminate the interference, regardless of the location where the impaired signal reception occurs.

operation of the offending FM translator station shall be suspended and shall not be resumed until the interference has been eliminated.

Within thirty days of this letter, W232CB must take appropriate actions required by the provisions of 47 C.F.R. § 74.1203 to resolve all complaints of interference to fulfill its obligations. Further action on this complaint will be withheld for a period of thirty days from the date of this letter to provide W232CB an opportunity to respond. Failure to correct all complaints within this time may require W232CB to suspend operation pursuant to 47 C.F.R. §§ 74.1203(e) and 74.1232(h).

for 

James D. Bradshaw
Deputy Chief
Audio Division
Media Bureau

Attachment

CC: Troy Langham (via Email)
David O'Conner (via Email)

WILKINSON) BARKER) KNAUER) LLP

STAMP AND RETURN

2300 N STREET, NW
SUITE 700
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DAVID A. O'CONNOR
MICHAEL D. SULLIVAN

September 16, 2013

VIA COURIER

Peter Doyle, Esq.
Chief, Audio Division
Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RECEIVED - FCC

SEP 16 2013

Federal Communications Commission
Bureau / Office

Re: *Request that Materials Be Withheld for Public Inspection*

Dear Mr. Doyle:

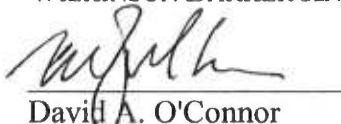
Red Zebra Broadcasting Licensee, LLC ("Red Zebra"), by its attorneys, hereby requests that the enclosed unredacted copy of our Interference Complaint and Informal Objection concerning FM Translator W232CB, licensed to AMFM Radio Licenses, LLC, and relating to File No. BPFT-20130807AAB, be withheld from public inspection pursuant to Section 0.459 of the Commission's Rules. A redacted version is being filed separately.

The information that Red Zebra seeks to withhold from public inspection consists of contact information concerning listeners who gave permission for the use of their names, and both names and contact information concerning listeners who have not affirmatively consented to use of their names. The Commission has recognized that a filer may request confidential treatment of identifying information concerning listeners. *See Association for Community Education, Inc.*, 19 FCC Rcd 12682, 12687 n.29 (2004).

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By:


David A. O'Connor
Michael D. Sullivan

Counsel for Red Zebra Broadcasting Licensee,
LLC

Enclosure

WILKINSON) BARKER) KNAUER) LLP

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September 16, 2013

VIA COURIER

Peter Doyle, Esq.
Chief, Audio Division
Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

NOT FOR PUBLIC INSPECTION

Re: *Interference Complaint*
AMFM Radio Licenses, LLC
W232CB

Informal Objection
AMFM Radio Licenses, LLC
W232CB, File No. BPFT-20130807AAB

Dear Mr. Doyle:

Red Zebra Broadcasting Licensee, LLC ("Red Zebra"), by its attorneys, submits this Interference Complaint and Informal Objection concerning interference caused by existing and proposed operations by FM translator W232CB, licensed to AMFM Radio Licenses, LLC ("AMFM"). Expedited consideration is requested because of the significant adverse effect that this interference is having on many listeners' ability to listen to Red Zebra's programming, especially given the start of the NFL football season.

Red Zebra operates WWXX(FM) on 94.3 MHz in Buckland, Virginia; its programming is simulcast with WTEM, 980 kHz AM, Washington, D.C., and WWXT(FM), 92.7 MHz, Prince Frederick, Maryland. Together, these three are known as ESPN 980, the flagship radio station for the Washington Redskins.

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Listeners in Northern Virginia and in Maryland who receive Red Zebra's signal on 94.3 MHz have recently informed the company that they have been receiving interference from a country station identified as WFRE. WFRE(FM), 99.9 MHz, located in Frederick, Maryland, has recently relocated an FM translator, W232CB, from Frederick to Germantown, Maryland, that appears to be the source of this interference. Accordingly, Red Zebra asked its listeners to email reports about any issues with reception resulting from recent "technical adjustments" on 94.3 MHz.

Interference Complaint

As noted above, AMFM recently relocated W232CB to Germantown. It currently has pending the captioned application to relocate W232CB from Germantown to a location near Shady Grove Road, in the Rockville/Gaithersburg area. Red Zebra respectfully requests that the Commission complete its consideration of the instant Interference Complaint, pursuant to Section 74.1203(e) of the Commission's rules, prior to acting on the relocation application. The new site will cover much of the same area as the existing Germantown site, but the relocation and power increase will extend its contours farther toward the South and Southwest. *See* Attached Declaration of Red Zebra's Director of Engineering, Patrick Malley, Exhibit E ("Malley Declaration"); *compare* Exhibit A (60 dBu contour of Germantown site) *with* Exhibit B (60 dBu contour of proposed Shady Grove Road site).

Section 74.1203(a)(3) of the Commission's rules constitutes a flat "prohibition on 'actual interference to . . . [t]he *direct* reception by the *public* of the *off-the-air signals* of any broadcast station.'"¹ AMFM's transmissions from its current Germantown location have caused actual interference to the reception of WWXX(FM) on 94.3 MHz by the public in numerous locations in Northern Virginia and Montgomery County, Maryland. Several of the listeners have authorized Red Zebra to use their names in its filing, while others (to date) have not specifically authorized this.² Accordingly, in the email correspondence attached as exhibits we have redacted personally identifying information about the listeners, except for the names of those who authorized inclusion of their names, with the unredacted version being filed pursuant to a request for confidentiality.

Most of the listener complaints came from Northern Virginia:

- Mark Fields, a longtime listener from Great Falls, Virginia, says that he is an "avid listener" and the signal "used to come in loud [and] clear, but over the summer [was] overwhelmed by a country station announcing it is broadcasting on

¹ *Radio Power, Inc.*, 26 FCC Rcd 14385, 14386 (MB 2011) (quoting Section 74.1203(a)(3)).

² None of the listeners cited are believed to have any connection to Red Zebra except as listeners. See Exhibit O.

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991.” Now he cannot receive the “transmission on 94.3.” When traveling daily to Reston, Sterling, and Herndon, Virginia, he “receive[s] a static ridden 92.7 [from Prince Frederick] better than 94.3.” He “can no longer receive the Redskin broadcast on my home receiver.” (Exhibit F)

- Jeff Hunter, also a longtime listener from Sterling/Great Falls, Virginia, “travel[s] to Tysons Corner for work every day” and “94.3 has become UNLISTENABLE.” He is listening to another station instead of WWXX(FM). (Exhibit G)
- Alex Iuculano, from the Herndon, Virginia area, has been listening to the station since 2006, but says “I am having problems at time[s] picking up 94.3. It seems like this country radio is mixing in and out. This is a relatively recent issue. Car reception seems to have more problems than home reception.” (Exhibit H)
- Bill Moeller, who lives in the Vienna/Reston, Virginia area and commutes to Herndon, Virginia, “used to listen to 94.3 on my drive and early in this summer I started to hear interference but in the last week or so it has gotten to the point of unlistenable.” He says he can “listen to 94.3 on the way home from Herndon for about ten minutes before I lose the station to interference.” (Exhibit I)
- Longtime listener Carl Tebell of Manassas, Virginia, has encountered interference recently; he says that when turning onto Frying Pan Road, “[s]tatic is prevalent and [in] fact sometime heavy enough to interfere with what is being said.” (Exhibit K)
- Longtime listener Tim Thomasberg, who lives and works in Herndon, Virginia, says that that “on 94.3 FM it does sound like ‘bleed over’ from another signal as well as static/interference.” He encounters the issue in Herndon, Reston, Sterling, and Ashburn. (Exhibit L)
- Gregg Van Voorhis, of Potomac Falls, Virginia, has been listening for at least three years and uses WWXX(FM) as “my wake up station on my clock radio.” He says that now “I don’t get the station at all. I get some country music station.” (Exhibit M)
- The listener in Exhibit N-3 says that “reception for 94.3 is awful” in Sterling, Virginia.
- The listener in Exhibit N-4 says that the reception “is terrible” during his commute between Annandale and Reston, Virginia.

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- The listener in Exhibit N-5 says he is “experiencing interference with reception on 94.3fm” in Oak Hill, Virginia.
- The listener in Exhibit N-6 says that the “signal quality for 94.3FM is noticeably poorer around Fairfax City, specifically along 122 between I-66 and GMU,” noting that “[t]here seems to be a country station bleeding into your station.”
- The listener in Exhibit N-7, from Great Falls, Virginia, says he has been “having problems receiving 94.3 FM in the Reston Virginia area around Reston Towncenter and down the Tollroad. I receive interference and bleed over from a country music station” on 99.1, which is WFRE’s frequency, “mak[ing] listening to 94.3 FM impossible.”
- The listener in Exhibit N-10 experiences “a severe degradation of the signal” during “morning and afternoon drive time via 94.3 FM,” between Stone Ridge and Dulles, Virginia.
- The listener in Exhibit N-11 has “[r]ecently . . . noticed significant static and station crossover on 94.3. I listen in Chantilly, Vienna, Fairfax City.” He says he doesn’t “want to have to switch sports radio stations.”
- The listener in Exhibit N-12 reports “noise/interference signals with 94.3 through all of Fairfax and near Vienna.”
- The listener in Exhibit N-13 reports “signal problems with 94.3 FM channel” in Fairfax, Virginia 22030.
- The listener in Exhibit N-14, from Herndon, Virginia, reports interference problems in Herndon.
- The listener in Exhibit N-15 says that “Your signal is the worst!,” saying it is “ridiculous anywhere in the NoVa area . . . the signal is always breaking up or is intermittently interrupted by country music!”
- The listener in Exhibit N-16 says that while the signal has been weak in the past, “[r]ecently the radio reception has gotten even worse. In McLean/Great Falls the 94.3 signal is now a country stations. It was almost impossible to find clear reception for the preseason game last night. It is unfortunate that a teal like the Redskins with thousands of fans can’t listen to their games and the wtem [sic] radio personalities with out [sic] static.”

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There were also listeners in Maryland and the District of Columbia affected by the signals from W232BC's Germantown operations:

- Robert Gallion notes that he used to be able to receive our signal on 94.3 MHz "in Gaithersburg and Germantown, but all I get now is a country station." *See* Exhibit C.
- Jack Toomey indicates that the WFRE signal carried by the translator "is overwhelming" WWXX(FM) from Poolesville to West Rockville, and on Seven Locks Road. *See* Exhibit D.
- The listener in Exhibit N-1 lives in Darnestown, Maryland and drives down River Road to work in Bethesda; he now gets a "country music station" on 94.3 MHz when he travels between home and work.
- The listener in Exhibit N-2 says there is "[n]ot a good signal at 3900 block of Fordham Road NW, DC."
- The listener in Exhibit N-9 lives in Laytonsville, Maryland says that "now all I hear is Country music on 94.3 with an infrequent blurb of 980 for a second or two."

Informal Objection

In addition to the fact that the new site will continue or increase the level of interference already being caused by the Germantown site to many listeners, the new site warrants disapproval because it will cause interference to WWXX(FM) listeners within the 60 dBu contours of the Shady Grove Road site, pursuant to Section 74.1203(f) of the Rules, to the extent that rule is applicable. Numerous regular listeners have experienced interference from the Germantown translator at locations falling within the 60 dBu service contour of the proposed Shady Grove Road translator:

- Robert Gallion notes that he used to be able to receive our signal on 94.3 MHz "in Gaithersburg and Germantown, but all I get now is a country station." *See* Exhibit C.
- Jack Toomey indicates that the WFRE signal carried by the translator "is overwhelming" WWXX(FM) from Poolesville to West Rockville, and on Seven Locks Road. *See* Exhibit D.

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- The listener in Exhibit N-1 lives in Darnestown, Maryland and drives down River Road to work in Bethesda; he now gets a “country music station” on 94.3 MHz when he travels between home and work.
- The listener in Exhibit N-9 lives in Laytonsville, Maryland says that “now all I hear is Country music on 94.3 with an infrequent blurb of 980 for a second or two.”

As indicated in the Malley Declaration (Exhibit E), the level of interference to WWXX(FM) reception within the 60 dBu contour of the Shady Grove Road translator is likely to increase if and when that location is activated.

Because this application is not for a new station, but is for the relocation of an existing station that is already causing interference, Red Zebra submits that the Commission should consider the already existing interference, as well as the increase in interference that will occur in deciding whether to grant the application, in connection with both the Interference Complaint and the pending application for the Shady Grove Road site. Accordingly the standards of Section 74.1203(e) — which require cessation of existing interference to regular listeners, wherever located — should be applicable, rather than Section 74.1204(f), which limits consideration to listeners located within the 60 dBu contour of the proposed facility and requires “convincing evidence” that such listeners will receive interference. But even under Section 74.1204(f), disapproval is warranted.

When the Commission addresses actual interference from FM translators, it acts on the basis of identified complaints from listeners. *See Radio Power, Inc.*, 26 FCC Rcd at 14385. That standard should be equally applicable in the case of actual interference from an FM translator that is being relocated; otherwise a translator could avoid the need to address actual interference simply by relocating, without regard to whether the interference will continue. Accordingly, “convincing evidence” should not be required, as it is when there are mere claims of predicted interference from a proposed translator, because there is *actual* interference, and all that is proposed is a “minor” change in the existing translator’s location and transmission characteristics.³ The burden should be on the interferor to disprove or eliminate actual interference.

³ Red Zebra notes, in this connection, that emails from listeners satisfy the requirement that “convincing evidence” include “some evidence, such as a declaration from each of the claimed listeners, that the person, in fact, listens to the full-service station at the specified location.” *Association for Community Education, Inc.*, 19 FCC Rcd 12682, 12687 (2004). Under this standard, a declaration is only one example of how the showing can be made. Thus, when the Commission is considering a petition to deny against a proposed translator based on interference claims, it considers evidence such as letters from listeners. *See Red Wolf Broadcasting*, 27 FCC Rcd 4780, 4873 (MB 2012).

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Because there is existing interference to WWXX(FM), the Commission should proceed based on the interference complaints from listeners — wherever they are located — who are likely to encounter continued or increased interference from the Shady Grove Road site, just as it considers such interference complaints with respect to the existing Germantown site. The fact that some of the complainants already receive interference in the area within the 60 dBu contour of the Shady Grove Road site makes it imperative that the Commission require cessation of interference, rather than authorize increased interference.

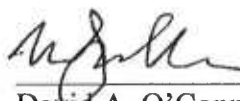
Given the Interference Complaint, and the prospect of continued or increased interference if the Shady Grove Road site is activated, at a minimum the Commission should defer processing of the pending Shady Grove Road translator application until the Interference Complaint has been resolved and the increased interference due to the relocation has been addressed. And in any event, the Commission should require AMFM to address the interference that its new proposed location will cause to Red Zebra's regular listeners' reception when they are within the 60 dBu contours of its proposed location.

Sports fans from throughout the Washington area rely on the ESPN 980 stations, including WWXX(FM), for Redskins and other sports programming. Red Zebra respectfully requests that the Commission act promptly to resolve the Interference Complaint and reserve action on the Shady Grove Road translator site until that has been completed, to avoid continued or increased interference to reception of WWXX(FM).

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By:



David A. O'Connor

Michael D. Sullivan

Counsel for Red Zebra Licensee, LLC

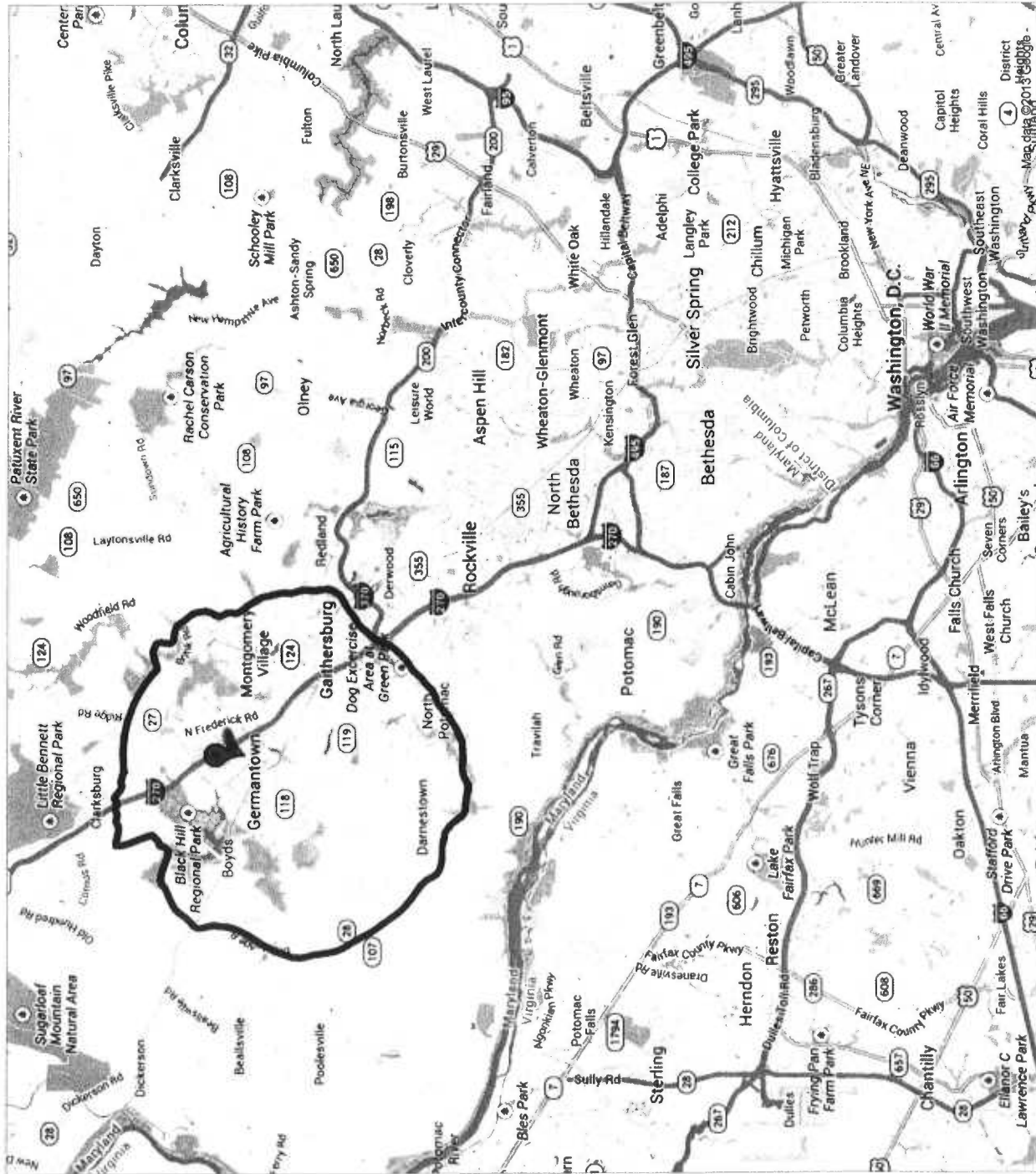
Enclosures

Exhibit A

**60 dBu Contours of W232BC Germantown Site
(from FCC Universal Licensing System)**

Google

To see all the details that are visible on the screen, use the "Print" link next to the map.



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The content displayed below and overlaid onto this map is provided by a third party, and Google is not responsible for it. Information you enter below may become available to the third party.

60 dBu Service Contour for W232CB, 94.3 MHz, Frederick, MD

☒ W232CB, Frederick, MD

☐ 94.3 MHz -- FCC File No. BLFT-20130805ACZ

☐ 60 dBu Service contour

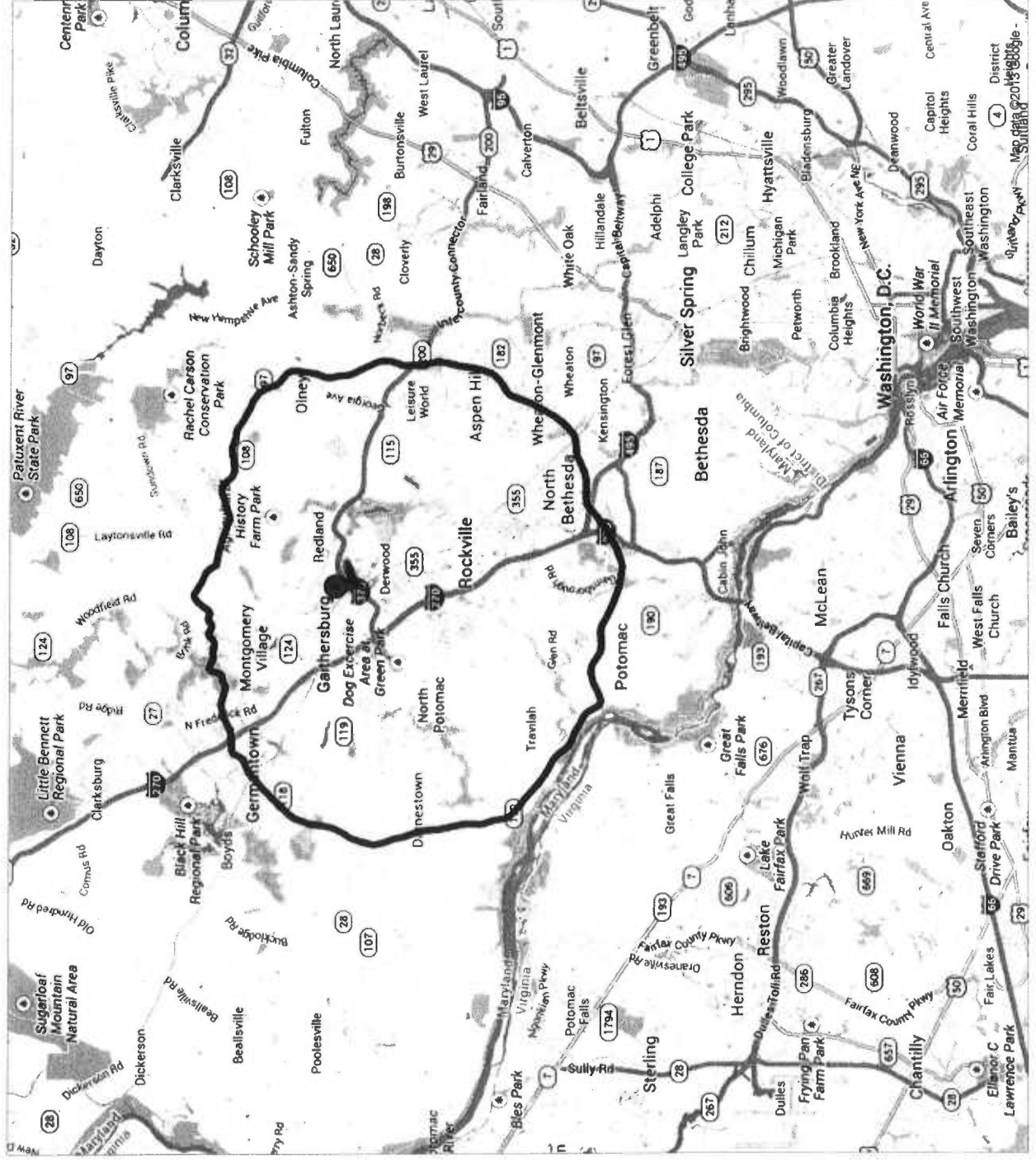
☒ 60 dBu Service contour (alternate color)

Exhibit B

**60 dBu Contours of W232BC Proposed Shady Grove Road Site
(from FCC Universal Licensing System)**

To see all the details that are visible on the screen, use the "Print" link next to the map.

Google



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60 dBu Service Contour for W232CB, 94.3 MHz, Frederick, MD

☒ W232CB, Frederick, MD

☐ 94.3 MHz -- FCC File No. BPFT-20130807AAB

☐ 60 dBu Service contour

☒ 60 dBu Service contour (alternate color)

Exhibit C

Robert Gallion

NOT FOR PUBLIC INSPECTION

From: Robert Gallion [REDACT][mailto:rgallion@msspos.com][END REDACT]

Sent: Wednesday, September 11, 2013 10:34 AM

To: Chip Ford

Subject: RE: 94.3

1. 2 years
2. About 2 or 3 weeks ago
3. [REDACT]11305 Halethorpe Terrace, [END REDACT] Germantown, MD 20876
4. Sure

Robert Gallion

Director of Operations

Microcomputer Systems Support

240-233-4357

410-963-9013

8608 Dakota Drive

Gaithersburg, MD 20877

From: Chip Ford [mailto:fordc@redskins.com]

Sent: Tuesday, September 10, 2013 9:30 AM

To: [REDACT]rgallion@msspos.com[END REDACT]

Subject: RE: 94.3

Rob,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM?
2. When did you start noticing the signal interference?
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below?
4. Would you be willing to allow us to use your name if we filed an objection with the FCC?

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: "Robert Gallion" [REDACT]<rgallion@msspos.com>[END REDACT]

Date: September 9, 2013, 1:57:46 PM EDT

To: <Management@espn980.com>

Subject: 94.3

Reply-To: [REDACT]<rgallion@msspos.com>[END REDACT]

NOT FOR PUBLIC INSPECTION

I used to be able to get 94.3 in Gaithersburg and Germantown, MD but now all I get is a country station.

Rob Gallion

Exhibit D

Jack Toomey

NOT FOR PUBLIC INSPECTION

From: Jack [REDACT][mailto:jackt21262@aol.com] [END REDACT]

Sent: Thursday, September 12, 2013 1:46 PM

To: Chip Ford

Subject: Re: Reception

Chip,

WFRE is overwhelming your signal all the way down MD route 28 from the Poolesville area to west Rockville. I get a little but of your station on Seven Locks Rd.

Of interest is that in the past I have listened to Pollin and Czaben on 94.3 all the way home up 28.

Jack Toomey

Sent from my iPhone

On Sep 11, 2013, at 12:28 PM, "Chip Ford" <fordc@redskins.com> wrote:

Thanks Jack. This is very helpful. Stay tuned for further developments and please feel free to reach out to me with more updates.

Chip

From: Jack [REDACT][mailto:jackt21262@aol.com] [END REDACT]

Sent: Wednesday, September 11, 2013 12:24 PM

To: Chip Ford

Subject: Re: Reception

Further info.

This morning I drove from Poolesville to Point of Rocks. I switched to 94.3 about every two minutes. The country music station was clearly dominant but I could hear Mr Tony talking underneath the music on a few occasions.

If you could send me your coverage/protected area I'd be happy to send back reports.

Jack Toomey

Sent from my iPhone

On Sep 11, 2013, at 9:05 AM, "Chip Ford" <fordc@redskins.com> wrote:

Jack

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM?
2. When did you start noticing the signal interference?
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below?
4. Would you be willing to allow us to use your name if we filed an objection with the FCC?

NOT FOR PUBLIC INSPECTION

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: Jackt21262 [REDACT]<jackt21262@aol.com>[END REDACT]

Date: September 10, 2013, 6:31:21 PM EDT

To: management@espn980.com

Subject: Reception

Hello,

I don't use the FM signal much because I am an AM guy but when I heard your request for assistance I used 94.3 for two days.

I noticed that when I got past Route 118 going west on Route 28 in Montgomery County that the signal starts to break up. When I am in the area of Poolesville or Boyds I get a country music station on 94.3 with occasional blips of sports talk radio from your station.

Jack Toomey

Poolesville

Exhibit E

Declaration of Patrick Malley

Declaration of Patrick Malley

1. My name is Patrick Malley. I am the Director of Engineering for Red Zebra Broadcasting, licensee of WWXX(FM), 94.3 MHz. I am familiar with the application of AMFM Radio Licenses, LLC to relocate its 94.3 MHz translator from its current location in Germantown to a location near Shady Grove Road in the Rockville/Gaithersburg area.

2. Attached as Attachments A and B are printouts of the 60 dBu contours of the Germantown translator and the proposed Shady Grove Road translator, produced from the Commission's Universal Licensing System. The proposed relocation of this translator will considerably enlarge the 60 dBu service contours of the translator on 94.3 MHz.

3. Red Zebra has received emails from listeners in Montgomery County concerning interference to reception of our signal on 94.3 MHz that appears to be caused by the signal of the Germantown translator.


4. One of these listeners, Robert Gallion, has stated, "I used to be able to get 94.3 in Gaithersburg and Germantown, MD but now all I get is a country station." See Attachment C. It is my understanding that Mr. Gallion has no affiliation with Red Zebra except as a listener. This regular listener has suffered actual interference in Gaithersburg, located within the 60 dBu contour of the proposed Shady Grove Road translator. This interference is likely to increase if the translator is moved from Germantown to Shady Grove Road as proposed.

5. Another regular listener, Jack Toomey, states that "WFRE is overwhelming your signal all the way down MD route 28 from the Poolesville area to west Rockville. I get a little but [sic] of your station on Seven Locks Road." See Attachment D. It is my understanding that Mr. Toomey has no affiliation with Red Zebra except as a listener. This regular listener has suffered actual interference in the west Rockville area and Seven Locks Road, located within the

60 dBu contour of the proposed Shady Grove Road translator. This interference is likely to increase if the translator is moved from Germantown to Shady Grove Road as proposed.

6. In addition, Red Zebra has received numerous complaints from listeners concerning interference to its signal on 94.3 MHz at locations in Virginia that appear to be caused by the Germantown translator. An interference complaint is being filed separately concerning this actual interference. While these listeners are outside the 60 dBu contour of the proposed Shady Grove Road translator, the signal of the latter translator will be considerably stronger to the south and southwest than that of the Germantown translator. Accordingly, it is very likely that interference to regular listeners in Virginia will increase if the translator is moved from Germantown to Shady Grove Road as proposed.

Under penalty of perjury, I declare the foregoing to be true and correct, based on personal knowledge, information, and belief.


Patrick Malley

Executed: September 13, 2013

Exhibit F

Mark Fields

NOT FOR PUBLIC INSPECTION

From: Mark Fields [REDACT] [mailto:mark@jobingf.com] [END REDACT]

Sent: Friday, September 06, 2013 5:19 PM

To: Chip Ford

Subject: RE: Lost signal

Mark Fields

[REDACT]Manager

United Real Estate Great Falls

737 Walker Road

Suite 2[END REDACT]

Great Falls, VA 22066

[REDACT]mfields@uredc.com

703-759-2600[END REDACT]

From: Chip Ford [mailto:fordc@redskins.com]

Sent: Friday, September 06, 2013 4:37 PM

To: [REDACT]mark@jobingf.com [END REDACT]

Subject: RE: Lost signal

Mark,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM? Since you began on that frequency. I am unsure how long. Prior to that I listened on AM.
2. When did you start noticing the signal interference? It seems to have gotten progressively worse throughout the summer. I believe it started in early June or late May.
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below? [REDACT]11436 Woolington Road, [END REDACT]Great Falls, VA 22066 [REDACT]703-759-2600 office, 301-385-5012 cell 703-404-0707 home [END REDACT]
4. Would you be willing to allow us to use your name if we filed an objection with the FCC? YES

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: "Mark Fields" [REDACT]<mark@jobingf.com>[END REDACT]

Date: September 6, 2013, 12:46:27 PM EDT

To: <management@espn980.com>

Subject: Lost signal

NOT FOR PUBLIC INSPECTION

To whom it may concern,

I live in Great Falls, VA and am an avid listener of your station but I can no longer receive your Virginia transmission on 94.3. Your station used to come in loud in clear but over the summer overwhelmed by a country station announcing it is broadcasting on 99.1. I travel to Reston, Sterling and Herndon, VA on a daily basis and receive a static ridden 92.7 better than 94.3. I also no longer receive the Redskin broadcast on my home receiver and left to the TV announcers. There I am left to listening online while in my office. Please let me know if anything will be done to resolve this issue.

Sincerely,

Mark Fields

[REDACT]Manager

United Real Estate Great Falls

737 Walker Road

Suite 2

Great Falls, VA 22066

mfields@uredc.com

703-759-2600**[END REDACT]**

Exhibit G

Jeff Hunter

NOT FOR PUBLIC INSPECTION

From: Jeff Hunter [REDACT] [mailto:jeffhunter327@yahoo.com] [END REDACT]

Sent: Friday, September 06, 2013 5:37 PM

To: Chip Ford

Subject: Re: Terrible Reception on 94.3

1. 10 years
2. About a week or two ago
3. [REDACT]10723 sugar meadow dr [END REDACT] great falls va 22066
4. Yes

Sent from my iPad

On Sep 6, 2013, at 4:17 PM, "Chip Ford" <fordc@redskins.com> wrote:

Jeff,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into Germantown, Maryland and is planning on moving again to Gaithersburg. As a result of this we may initiate further action to prevent any further degrading of the signal. Pursuant to this I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM?
2. When did you start noticing the signal interference?
3. Would you be willing to provide us with further contact information (i.e. address, telephone number)
4. Would you be willing to allow us to use your name if we filed an objection with the FCC?

Once again, thank you for the feedback and please feel to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: Jeff Hunter [REDACT] [mailto:jeffhunter327@yahoo.com] [END REDACT]

Sent: Friday, September 06, 2013 3:30 PM

To: management@espn980.com

Subject: Terrible Reception on 94.3

I heard the commercial on 980 regarding the transmission changes. I live in sterling and travel to Tysons Corner for work every day. 94.3 has become UNLISTENABLE. I prefer to listen to FM radio so I am listening to a lot more 106.7. Please fix this issue.

Jeff Hunter

Exhibit H

Alex Iuculano

NOT FOR PUBLIC INSPECTION

From: Alex Iuculano [REDACT] [mailto:alexiuculano@hotmail.com] [END REDACT]

Sent: Monday, September 09, 2013 10:47 AM

To: Chip Ford

Subject: RE: poor reception

1) Been listening since 2006

2) The signal interference is a recent thing, maybe a month or so

3) I could give you my data, but why is it needed?

4) you can use my name in any filing you have

Subject: RE: poor reception

Date: Fri, 6 Sep 2013 17:23:23 -0400

From: ford@redskins.com

To: [REDACT]alexiuculano@hotmail.com [END REDACT]

Alex,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM?
2. When did you start noticing the signal interference?
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below?
4. Would you be willing to allow us to use your name if we filed an objection with the FCC?

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: Alex Iuculano [REDACT]<alexiuculano@hotmail.com>[END REDACT]

Date: September 5, 2013, 5:30:49 PM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: poor reception

In the Herndon area I am having problems at time picking up 94.3. It seems like this country radio is mixing in and out. This is a relatively recent issue. Car reception seems to have more problems than home reception.

Exhibit I

Bill Moeller

NOT FOR PUBLIC INSPECTION

From: Bill Moeller [REDACT] [mailto:bill.moeller@gmail.com] [END REDACT]

Sent: Friday, September 06, 2013 6:38 PM

To: Chip Ford

Subject: Re: 94.3 Feedback

Chip,

Thanks for the explanation; I thought it was something you had done at 94.3 with your transmitter.

Please see responses below.

Bill

Sent from my iPhone

On Sep 6, 2013, at 4:45 PM, "Chip Ford" <fordc@redskins.com> wrote:

Bill,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM? About 6 years when I moved to NOVA from Boston.
2. When did you start noticing the signal interference? Within the last 2-3 weeks it has gotten really bad.
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below? Yes.
4. Would you be willing to allow us to use your name if we filed an objection with the FCC? Yes.

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: Bill Moeller [REDACT] <bill.moeller@gmail.com> [END REDACT]

Date: September 6, 2013, 12:24:35 AM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: 94.3 Feedback

I live on the Vienna/Reston line and commute to Park Center Road in Herndon (across from Dulles airport). I used to listen to 94.3 on my drive and early in this summer I started to hear interference but in the last week or so it has gotten to the point of unlistenable.

I'm now forced to listen to the Sports Junkies in the morning. I can listen to 94.3 on the way home from Herndon for about ten minutes before I lose the station to interference.

NOT FOR PUBLIC INSPECTION

Bill Moeller

Sent from my iPhone

Exhibit J

Domenico Sofia

NOT FOR PUBLIC INSPECTION

From: Domenico Sofia [REDACT] [mailto:dsofia928@yahoo.com] [END REDACT]

Sent: Wednesday, September 11, 2013 1:26 PM

To: Chip Ford

Subject: Re: 94.3 FM

comments below...

From: Chip Ford <fordc@redskins.com>

To: [REDACT]dsofia928@yahoo.com [END REDACT]

Sent: Wednesday, September 11, 2013 12:25 PM

Subject: RE: 94.3 FM

Domenico,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM? - Ever since ESPN980 moved to 94.3 FM
2. When did you start noticing the signal interference? - Its been quite a while - probably early Summer?
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below? - Yes
4. Would you be willing to allow us to use your name if we filed an objection with the FCC? - Yes

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: Domenico Sofia [REDACT][mailto:dsofia928@yahoo.com] [END REDACT]

Sent: Wednesday, September 11, 2013 11:46 AM

To: management@espn980.com

Subject: 94.3 FM

I have not been able to listen to espn980 on 94.3 FM for several weeks now...and still cannot.

I live on the border of (East) Germantown and Clarksburg in Maryland...zipcode 20876.

Thanks.

Domenico Sofia

Exhibit K

Carl Tebell

NOT FOR PUBLIC INSPECTION

From: Carl Tebell [REDACT] [mailto:Teb1@aol.com] [END REDACT]

Sent: Wednesday, September 11, 2013 1:03 PM

To: Chip Ford

Subject: Re: Signal Strength

Chip,

I'd be happy to help. I got your email while out at lunch so on the way back I thought I'd record what I'm hearing as an example. This was recorded today during Coach K's interview segment with Kevin and Thom started while coming off the Rt 28 north exit and turning onto Frying Pan Road. Don't know if this is any help or not as it's not totally clear but I think you can definitely get the gist. Static is prevalent and if fact sometime heavy enough to interfere with what is being said during the interview (missing words here and there). I also scanned 94.1 and 94.5 and did not notice any particular crossover but did find extremely strong signal on 94.7.

If there's anything else I can do, please let me know. I generally listen during both my morning and afternoon commutes as well as often call from the office to listen in to Mr Tony's show. And as a huge Orioles fan, it affects that broadcast too.

Carl Tebell

From: Chip Ford

Sent: Wednesday, September 11, 2013 11:49 AM

To: [REDACT] teb1@aol.com [END REDACT]

Subject: RE: Signal Strength

Carl,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM? probably 10+ years
2. When did you start noticing the signal interference? I would guess during the last 30 days
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below? [REDACT]11421 Donnington Court, [END REDACT]Manassas, Va 20111 [REDACT]Phone: 703-932-7805 [END REDACT]
4. Would you be willing to allow us to use your name if we filed an objection with the FCC? Yes

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

Exhibit L

Tim Thomasberg

From: Tim Thomasberg [REDACT] [mailto:Tim.Thomasberg@cwhotels.com] [END REDACT]

Sent: Friday, September 06, 2013 5:19 PM

To: Chip Ford

Subject: 94.3 signal issues

Chip-

Glad to help. Thank you for your reply. Yes, on 94.3 FM it does sound like "bleed over" from another signal as well as static/interference. Often, I now have to switch to the AM980 signal during the day, but at night that doesn't help. And, 92.7 FM doesn't come out this far...probably don't get that very strong until I head east toward Falls Church.

To answer your questions:

1. How long have you been listening to our station on 94.3 FM?
 - Ever since the station began relaying on 94.3....back to the Triple X days (wasn't that the beginning?)
2. When did you start noticing the signal interference?
 - Wish I could pinpoint it exactly, but it has been an issue for several months (maybe back to the Spring?)
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below?
 - Sure thing. I live and work in Herndon. My work contact information is below. [REDACT] My cell phone is (703) 901-1010. My home address is 801 Spring Knoll Drive, Herndon, VA 20170. [END REDACT]
 - FYI – the areas I frequent are Herndon, Reston, Sterling and sometimes Ashburn. Signal issue seems to affect each of these areas on 94.3 FM.
4. Would you be willing to allow us to use your name if we filed an objection with the FCC?
 - Sure thing. If it helps to hopefully solve the situation, I'm happy to help.

Chip, let me know if I can be of further assistance. As a loyal listener for many, many years (back to the AM570 days in the 90's), I appreciate the product that your station puts on the air and I appreciate your attempt to resolve the unfortunate signal issues that have recently hindered my ability, and the ability of other listeners in Western Fairfax County/Eastern Loudoun County, to listen daily on a clear signal.

Best Regards,

Tim

TIM THOMASBERG, CMP
[REDACT]CROWNE
MEETINGS Director

E: tim.thomasberg@cwhotels.com

T: 703-674-0448 F: 703-471-8284

Crowne Plaza Dulles Airport

2200 Centreville Road, Herndon, VA 20170

(703) 471-6700 www.cpdulles.com [END REDACT]

NOT FOR PUBLIC INSPECTION

From: Chip Ford [mailto:fordc@redskins.com]
Sent: Friday, September 06, 2013 5:00 PM
To: Tim Thomasberg
Subject: 94.3 signal issues

Tim,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM?
2. When did you start noticing the signal interference?
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below?
4. Would you be willing to allow us to use your name if we filed an objection with the FCC?

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,
Chip Ford
Chief Financial Officer
Red Zebra Broadcasting, LLC

From: Tim Thomasberg [REDACT]<Tim.Thomasberg@cwhotels.com> [END REDACT]
Date: August 30, 2013, 11:31:49 AM EDT
To: "management@espn980.com" <management@espn980.com>
Subject: 94.3 signal issues

I just heard the radio advertisement regarding signal adjustments on 94.3 FM. I wanted to share with you that recently I have had intermittent interference with the signal in Herndon and Sterling, Virginia. As a long time loyal listener, I hope that this signal interference issue can be fixed soon.

If you have any questions, feel free to email me or call me at [REDACT]703-901-1010. [END REDACT]

Regards,

Tim Thomasberg

Sent from my iPhone

Exhibit M

Gregg Van Voorhis

From: Gregg Van Voorhis [REDACT][mailto:gkvanvoorhis@gmail.com] [END REDACT]
Sent: Friday, September 06, 2013 5:09 PM
To: Chip Ford
Subject: Re: Interference on 94.3

Here are my responses:

How long have you been listening to our station on 94.3 FM?

It's my wake up station on my clock radio. I've been listening for 3 years at least (980 much longer than that).

When did you start noticing the signal interference?

A few weeks ago. I woke up terrified that you guys were replaced and I wouldn't be able to listen to Czabe on the way home from work each night.

Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below?

Sure: [REDACT]20542 Meadow Island Place, [END REDACT] Potomac Falls, VA 20165. It's basically across the street from Velocity 5 in Sterling, where the Sports reporters have broadcast from for the past couple years.

Would you be willing to allow us to use your name if we filed an objection with the FCC?
Certainly.

Thanks again! Good luck with the FCC.

Gregg

On Fri, Sep 6, 2013 at 4:52 PM, Chip Ford <fordc@redskins.com> wrote:

Gregg,

Thanks for your feedback. It's very important to us. We recently became aware that one of the local radio stations has moved an FM translator into our listening area and that this is the reason for the interference. We have also become aware that they are planning to move again which may cause further obstruction to our signal and interference to our listeners.

To prevent the further degrading of the signal, we may file an objection with the Federal Communications Commission. Pursuant to this, I was wondering if you would assist us in answering the following questions:

1. How long have you been listening to our station on 94.3 FM?
2. When did you start noticing the signal interference?
3. Would you be willing to provide us with further contact information (i.e. address, telephone number) if different than below?
4. Would you be willing to allow us to use your name if we filed an objection with the FCC?

Once again, thank you for your feedback and please feel free to send your response to the above questions directly to me.

Best Regards,

Chip Ford

Chief Financial Officer

Red Zebra Broadcasting, LLC

From: Gregg Van Voorhis [REDACT]<gkvanvoorhis@gmail.com>[END REDACT]

Date: September 5, 2013, 5:38:59 PM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: Interference on 94.3

Just heard the ad. I live in Potomac Falls, VA and when I tune to 94.3 I don't get the station at all. I get some country music station. Please fix it as soon as you can.

Thanks!

Gregg

Sent from my iPhone

Exhibit N

Additional Listener Complaints

Exhibit N-1

From: [REDACT]"Andrew Blake" <asblake1@verizon.net>[END REDACT]

Date: September 4, 2013, 9:50:03 PM EDT

To: <management@espn980.com>

Subject: Can't get 94.3 anymore

To whom it may concern,

When I tune to 94.3 I get some country music station. I live in Darnestown Maryland (20874).

This is also a problem when I travel to and from work. I drive Esworthy to River Road, past Falls Road, Congressional Country Club, and down in to Bethesda. Please fix!!

[REDACT]Andrew Blake[REDACT]

Exhibit N-2

From: [REDACT]Tom Brooks <tbrooks@royerbrooks.com>[END REDACT]

Date: September 3, 2013, 5:31:53 PM EDT

To: management@espn980.com

Subject: 94.3 fm signal

Not a good signal at 3900 block of Fordham Road NW, DC.

[REDACT]Tom[END REDACT]

Exhibit N-3

From: [REDACT] Brian Carr <carrbc@gmail.com> [END REDACT]

Date: September 5, 2013, 5:32:59 PM EDT

To: "management@espn980.com" <management@espn980.com>

I live in Sterling, VA and reception for 94.3 is awful. 980 comes in just fine.

Sent from my iPhone

Exhibit N-4

From: [REDACT]Lloyd Cochran <lcochran@tenacitysolutions.com>[END REDACT]

Date: September 3, 2013, 9:00:39 PM EDT

To: management@espn980.com

Subject: Poor reception!

I live in Annandale , VA and work in Reston, VA. The reception from home to office is terrible.

Thanks,

[REDACT]Lloyd Cochran[END REDACT]

Exhibit N-5

From: [REDACT]"rich.kaye1" <rich.kaye1@verizon.net> [END REDACT]

Date: September 1, 2013, 10:16:22 AM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: Reception

Yes, we are experiencing interference with reception on 94.3fm.

[REDACT]Rich Kaye [END REDACT]

Oak Hill, VA 20171

Sent from my iPhone

Exhibit N-6

From: [REDACT] TJ Kozikowski <tj.kozikowski@gmail.com> [END REDACT]

Date: August 30, 2013, 1:44:23 PM EDT

To: Management@espn980.com

Subject: 94.3 Signal

The signal quality for 94.3FM is noticeably poorer around Fairfax City, specifically along 123 between I-66 and GMU. There seems to be a country station bleeding into your station.

Exhibit N-7

From: [REDACT]T Moore <tm.blackboard@gmail.com>[END REDACT]

Date: September 5, 2013, 5:18:31 PM EDT

To: management@espn980.com

Subject: Fwd: Coverage changes

Correction. The bleed over is from 99.9 FM, not 104.7 FM. It makes listening to 94.3 FM impossible.

[REDACT]-TM[END REDACT]

Begin forwarded message:

From: [REDACT]T Moore <tm.blackboard@gmail.com>[END REDACT]

Date: September 3, 2013, 5:44:30 PM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: Coverage changes

Recently, I've started having problems receiving 94.3 FM in the Reston Virginia area around Reston Towncenter and down the Tollroad. I receive interference and bleed over from a country music station (104.7 FM?).

Wanted to let you know since I heard an announcement that transmissions changes have happened and you wanted feedback.

[REDACT]-TM[END REDACT]

Exhibit N-8

From: [REDACT]"chris ramsay" <cramsay@cox.net>[END REDACT]

Date: September 2, 2013, 12:45:12 AM EDT

To: <management@espn980.com>

Subject: 94.3 fm

it seems to me I used to receive 94.3 fm better than I do know. I like to record the redskin games for my own use and have to use 92.7 fm because 94.3 does not give the best signal.

[REDACT]chris ramsay phone 703-750-3915

join me monday through wednesday afternoons on the world wide legend at <http://www.legend-oldies.com> for the ramsay oldies show[END REDACT]

Exhibit N-9

From: [REDACT]john schell <schell.johnc@gmail.com>[END REDACT]

Date: August 30, 2013, 12:52:40 PM EDT

To: management@espn980.com

Subject: 94.3

I don't know what has changed but I live in Laytonsville Md. just west of Olney and I don't usually get a strong signal from 94.3 but I do usually get a signal with Sports talk 980. However, something has changed and now all I hear is Country music on 94.3 with an infrequent blurb of 980 for a second or two.

[REDACT]John[END REDACT]

Exhibit N-10

From: [REDACT]Murray [mailto:shakennotstrrd56@verizon.net] [END REDACT]

Sent: Thursday, September 05, 2013 8:35 AM

To: management@espn980.com

Subject: Radio Coverage

Gents,

I listen during morning and afternoon drive time via 94.3 FM. Recently I noticed a severe degradation of the signal forcing me to switch to the AM980 band during my drive. The commute is from Stone Ridge, VA to Dulles, VA. I heard a notice that you were looking for feedback on recent "adjustments" that were made - so I'm responding. Looking forward to the being able to listen to FM again soon!

[REDACT]Murray Sewell[END REDACT]

Exhibit N-11

From: [REDACT] kevinshaw1@gmail.com [END REDACT]

Date: September 5, 2013, 5:36:38 PM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: 94.3 reception

Recently I've noticed significant static and station crossover on 94.3. I listen in Herndon, Chantilly, Vienna, Fairfax City. It's becoming a poor listening experience. Please fix it, don't want to have to switch sports radio stations.

Thanks

Exhibit N-12

From: [REDACT]Bret Svedberg <bcsvedberg@gmail.com>[END REDACT]

Date: September 4, 2013, 7:37:23 PM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: Interference issues

Still having noise/interference signals with 94.3 through all of Fairfax and near Vienna.

Sent from my iPhone

Exhibit N-13

From: [REDACT]Kiprian Tatusko <tatuskok@gmail.com>[END REDACT]

Date: September 3, 2013, 5:30:45 PM EDT

To: management@espn980.com

Subject: Signal problems

My radio has had signal problems with 94.3 FM channel.

My location is 22030 Fairfax, Virginia.

Exhibit N-14

From: [REDACT]Scott Todd <scott.todd@praevious.com>[END REDACT]

Date: September 3, 2013, 11:11:25 AM EDT

To: "management@espn980.com" <management@espn980.com>

Subject: 94.3 interference in Herndon, VA

Problems with interference on FM 94.3 this morning at 5:45 am and 6:45 am this morning in Herndon, VA.

[REDACT]S. Todd mobile: 303-319-4516 Scott.Todd@Praevius.com [END REDACT]

Sent from my iPhone

Exhibit N-15

From: [REDACT]Kerem Turkel <kturk127@gmail.com>[END REDACT]

Date: September 5, 2013, 5:36:14 PM EDT

To: management@espn980.com

Subject: Your signal is the worst!

Its ridiculous anywhere in the NoVa area! You have great content especially better in the AM over the Junkies. But the signal is always breaking up or is intermittently interrupted by country music! Great content, please fix signal ASAP!

Exhibit N-16

From: [REDACT]Todd Walmsley <toddwwalmsley@gmail.com>[END REDACT]

Date: August 30, 2013, 2:21:26 PM EDT

To: management@espn980.com

Subject: Radio Signal

Hello,

The radio signal strength for WTEM has always been weak even though I listen on am 980 and 94.3 just on the Virginia side of the river.

Recently the radio reception has gotten even worse.

In McLean/Great Falls the 94.3 signal is now a country station.

It was almost impossible to find clear reception for the preseason game last night.

It is unfortunate that a team like the Redskins with thousands of fans can't listen to their games and the wtem radio personalities with out static.

Is there any chance this can be improved?

I wouldn't listen to any other station with this poor reception quality.

Thanks for your time.

[REDACT]Todd[END REDACT]

Exhibit O

Declaration of Charles B. Ford, Jr.

Declaration of Charles B. Ford, Jr.

My name is Charles B. Ford, Jr. I am the Vice President-Finance of Red Zebra Broadcasting Licensee, LLC. In connection with the filing of the foregoing Interference Complaint and Informal Objection, after conferral with my colleagues I believe that the listeners whose interference complaints have been included with the filing are not affiliated with Red Zebra except as listeners.

I declare the foregoing to be true, under penalty of perjury, based on personal knowledge, information, and belief.

A handwritten signature in black ink, appearing to read 'CBF', is written over a horizontal line.

Charles B. Ford, Jr.

Executed: September 16, 2013

CERTIFICATE OF SERVICE

I, Vernell V. Garey, hereby certify that the "Interference Complaint and Informal Objection" document was served this 16th day of September 2013, via overnight courier, and addressed to the following:


Vernell V. Garey

AMFM Radio Licenses, LLC
2625 S. Memorial Drive
Tulsa, OK 74129