

MOUNTAIN COMMUNITY TRANSLATORS, LLC

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September 18, 2020

James D. Bradshaw
Senior Deputy Chief
Audio Division
Media Bureau
Federal Communications Commission
Washington, DC 20554

1TV.com, Inc.
c/o John Neely, Esq.
Miller and Neely, PC
3750 University Blvd.m West
Suite 203
Kensington, MD 20895

In re: 1800B3-KV
Mountain Community Translators, LLC
Facility ID No. 92373
File No. BLFT-20171211AAV

**Interference Complaint – Response
Required**

Dear Mr. Bradshaw and Mr. Neely,

This letter is in response to the above referenced letter received from the Commission in response to an Interference Complaint filed by 1TV.com, Inc. (“1TV”) against Mountain Community Translators, LLC (“MCT”)’s FM translator station K243BN Laveen, Arizona, facility ID No. 92373.

The letter requires MCT within 30 days of the letter to file a remediation plan to address the listener interference complaints accompanied with the 1TV interference complaint.

MCT has filed a minor change application for K243BN, file number 0000121878, to change channels of operation from its currently licensed operation on 243D to 220D. Channel 220D is the only available channel available for use at the currently license K243BN transmitter site. There are no alternate non-reserved band channels available at the K243BN tower site. While a non-reserved band change to a reserved band change is not allowed under the

Commissions recent rulings regarding FM translator interference complaint requirements under MB Docket No. 18-119, released May 9th, 2019, a waiver of that rule is being requested with the minor change application. Mainly since it is documented with that application that K243BN Laveen, AZ was originally licensed as K204DR Laveen, AZ under the processing requirements for a new NCE FM reserved band FM translator. In 2012, K204DR filed a displacement application because of new primary interference on channel 204D to change to channel 243D.

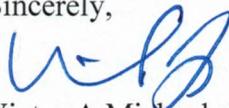
The Commissions primary concern under the rulings with Docket 18-119, paragraph 7, is that a "Band-hop" should not be allowed as a remediation resolution since the processing of application between a reserved band translator and a non-reserved band translator are dramatically different. While MCT agrees with that conclusion, this is a unique situation where this non-reserved band translator was awarded under the NCE FM reserved band translator process. Thus, it should be allowed to relocate back to a reserved band channel without setting any new major precedent. K204DR (now K243BN) has always rebroadcast a non-commercial FM station, now KLVK (FM) Fountain Hills, AZ on channel 206C1. MCT is proposing to continue to rebroadcast KLVK with a new operation on channel 220D.

In the meantime, until action is taken on the pending K243BN minor change application, MCT would be willing to temporarily lower its currently authorized ERP from 250 watts to 50 watts or cease operation altogether by Commission request to help alleviate any interference issue to KIKO-FM Claypool, AZ on channel 243C.

MCT is diligently seeking a mutually acceptable solution to resolve any interference issues being caused to KIKO-FM, but it should be noted that K243BN has been licensed to operate on channel 243D prior to the operation of KIKO-FM on channel 243. KIKO-FM has been operating with its currently licensed facilities since November 2018. The Interference Complaint was filed by 1TV in July, 2020, or approximately 20 months after its new operation on channel 243C. The currently licensed operation of K243BN predicted 40 dB μ interference contour does not overlap with the currently licensed protected primary 60 dB μ contour of KIKO-FM as required under as required under 47 CFR § 74.1204.

MCT respectfully requests any expedited processing it might be afforded with it pending minor change application for K243BN, 0000121878. MCT certifies that it will promptly construct any Construction Permit the Commission may grant for the continued operation of its K243BN on channel 220D.

Sincerely,



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