



Federal Communications Commission
Washington, D.C. 20554

August 22, 2019

In Reply Refer to:
1800B3-KV

Calvary Chapel Miami
c/o Dan J. Alpert, Esq.
The Law Office of Dan J. Alpert
2120 N. 21st Rd.,
Arlington, VA 22201

In Re: W284CT, Miami, FL
Star Over Orlando, Inc.
Facility ID No. 156649
File No. BLFT-20180719ABC

Interference Complaints

Dear Counsel:

This letter refers to the pending "Informal Objection" (Objection-Complaint) filed on August 3, 2018, by Calvary Chapel Miami, licensee of LPFM Station WAYG-LP, Miami, Florida (Calvary or Complaining Station) and the September 12, 2018, "Supplement to Informal Objection" (First Supplemental Complaint) and the November 13, 2018,¹ "Further Supplement to Informal Objection" (Second Supplemental Complaint)² alleging interference from FM Translator W284CT, Miami, Florida, licensed to Star Over Orlando, Inc.

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

¹ On June 26, 2019, Calvary filed a "Further Informal Objection and Request for Cancellation of Construction Permit" which did not contain additional listener interference complaints. This letter concerns only Calvary's interference allegations.

² Collectively, the Complaint and First and Second Supplemental Complaints will be referred to as the Complaints.

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*).

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:

- ☒ Detailed information on the Complaining Station's protected contour and the population located therein;
- ☒ Minimum Number of Listener Complaints as determined by the population located within the Complaining Station's protected contour;⁶
- ☐ Signed and dated (within one year of Complaint and all other listener complaints) by Listener;
- ☐ Listener's full name, address and phone number;
- ☐ Clear, concise, and accurate description of the location where interference is alleged;⁷

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

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 dBμ contour or . . . provide sufficient information to resolve the complaint.” *Id.* at note 65.

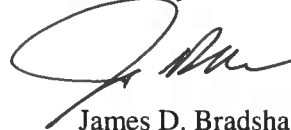
- X Statement that Listener listens over-the-air to the desired station at least twice a month;
- X Statement that Listener has no legal, financial, employment, or familial affiliation or relationship with desired station.

2. Technical Interference Showing:

- X Map plotting the specific location of the alleged interference in relation to the Complaining Station's 45dBμ contour;
- X Statement that the Complaining Station is operating within its licensed parameters;
- X 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;
- X 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, Calvary 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 Calvary an opportunity to respond. Failure to submit the required information will result in the dismissal of the Complaints.⁸

Sincerely,



James D. Bradshaw
Senior Deputy Chief
Audio Division
Media Bureau

cc: Star Over Orlando, Inc. (by email)

⁸ This action is without prejudice to any other issues raised in the Objection-Complaint as supplemented by Calvary.