



## Fletcher, Heald & Hildreth

2019 OCT 31 PM 2:26

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October 30, 2019

Accepted / Filed

OCT 30 2019

Federal Communications Commission  
Office of the Secretary

**VIA HAND DELIVERY & EMAIL**

Marlene Dortch,  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554  
Attn: James D. Bradshaw, Senior Deputy Chief  
Audio Division, Media Bureau

**RE: *In the Matter of Gary M. Cocola, Licensee of FM Translator, K259CF,  
South Fresno, California (Facility ID No. 144742)  
Third Supplement to Interference Complaint***

Dear Ms. Dortch:

Bott Communications, Inc. ("Bott"), licensee of full power FM broadcast station, KCIV, Mount Bullion, California (Facility ID No. 6504) (Channel 260/99.9 MHz) ("KCIV"), by its undersigned counsel, hereby responds to the Media Bureau – Audio Division's ("Division") letter, dated September 30, 2019 ("Letter"),<sup>1</sup> requesting that Bott update its interference complaint ("Interference Complaint")<sup>2</sup> against FM translator, K259CF, South Fresno, California (Facility ID No. 144742) (Channel 259/99.7 MHz) ("K259CF"), licensed to Gary M. Cocola. In

<sup>1</sup> See generally Letter from James D. Bradshaw, Senior Deputy Chief, Audio Division, Media Bureau, FCC, to Bott Communications, Inc., 1800B3-KV (Sept. 30, 2019) ("Letter").

<sup>2</sup> See Bott Communications, Inc., Interference Complaint (filed Jul. 18, 2018); Bott Communications, Inc., Reply to Response of Gary M. Cocola to Interference Complaint and Supplement to Interference Complaint (filed Sept. 17, 2018); Bott Communications, Inc., Opposition to Request for Waiver of Gary M. Cocola (filed Sept. 17, 2018); Bott Communications, Inc., Request for Expedited Consideration (filed Nov. 21, 2018); Bott Communications, Inc., Second Supplement to Interference Complaint (filed Nov. 21, 2018); Bott Communications, Inc., Amended Second Supplemental Interference Complaint (filed Nov. 26, 2018) (collectively, "Interference Complaint").

the Letter, the Division requested that Bott supplement its Interference Complaint to comply with the Commission's new FM translator interference complaint rules by October 30, 2019.<sup>3</sup>

As requested in the Letter, attached are:

- (1) Twenty (20) listener complaints which comply with the FCC's new FM translator interference complaint rules (**Attachment A**);<sup>4</sup>
- (2) An Engineering Statement which includes (a) a map plotting the specific location of the alleged interference in relation to KCIV's 45 dB $\mu$  contour and (b) data demonstrating that the U/D ratio exceeds -6 dB at each location (**Attachment B**);<sup>5</sup> and
- (3) A declaration attesting (a) to the truth of and accuracy of the information provided in this response and (b) that KCIV is operating within its licensed parameters (**Attachment C**).<sup>6</sup>

Although not requested in the Letter, Bott states that it has attempted to resolve the interference issue with Cocola directly through private resolutions to no avail.<sup>7</sup> To resolve the interference to KCIV, Cocola agreed to move K259CF from Channel 259/99.7 MHz to Channel 272/102.3 MHz. On August 13, 2019, Cocola filed an application for displacement of K259CF to Channel 272, which was granted on September 10, 2019.<sup>8</sup> On September 23, 2019, Cocola's counsel informed Bott counsel that upon implementing the Channel 272 facility, the FM translator immediately ran into objectionable incoming interference and that efforts were being made to find a resolution. No further follow-up has been provided to Bott.

Bott hereby incorporates its previous allegations and declarations made in its Interference Complaint into this response, and states that K259CF is continuing to cause interference to the reception of KCIV by its listeners in violation of Section 74.1203 of the Commission's rules.<sup>9</sup> Bott requests that the Commission order K259CF to cease operations immediately.

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<sup>3</sup> Letter at 1, 3. *See also Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Report and Order, 34 FCC Rcd. 3457 (2019) ("Translator Interference Order").

<sup>4</sup> Letter at 2-3. *See also Translator Interference Order*, 34 FCC Rcd. at 3466, ¶ 17.

<sup>5</sup> Letter at 3. *See also Translator Interference Order*, 34 FCC Rcd. at 3469, ¶ 23.

<sup>6</sup> Letter at 3. *See also Translator Interference Order*, 34 FCC Rcd. at 3469, ¶ 23.

<sup>7</sup> *See* Letter at 3. *See also Translator Interference Order*, 34 FCC Rcd. at 3469, ¶ 23.

<sup>8</sup> File No. BPFT-20190813AAX.

<sup>9</sup> 47 C.F.R. § 74.1203.

Should you have any questions regarding this transmission, please contact the undersigned.

Respectfully submitted,



Kathleen Victory  
Keenan P. Adamchak

*Counsel to Bott Communications, Inc.*

Enclosures

October 30, 2019

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cc: Kimberly Varner ([kim.varner@fcc.gov](mailto:kim.varner@fcc.gov))\*  
Albert Shuldiner, Chief, Audio Division ([albert.shuldiner@fcc.gov](mailto:albert.shuldiner@fcc.gov))\*  
James Bradshaw, Assistant Chief, Audio Division ([james.bradshaw@fcc.gov](mailto:james.bradshaw@fcc.gov))\*  
Michael Couzens, Esq., Counsel to Gary M. Cocola ([cuz@well.com](mailto:cuz@well.com))\*\*  
Gary M. Cocola, Licensee of K259CF, South Fresno, California\*\*\*

\* via email

\*\* via email and U.S. First Class Mail

\*\*\* via U.S. First Class Mail

**Attachment A**

**Listener Complaints**

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Mr. and Mrs. Leon and Dianne Molina

ADDRESS 2080 W. Palo Alto Avenue

CITY Fresno STATE California ZIP CODE 93711

TELEPHONE NUMBER (559-447-8448)

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM daily, many times day and night, 24/7. (check all that apply):

At my home X ;

In my office n/a , which is located at \_\_\_\_\_ ;

In my vehicle X , typically while traveling in the vicinity of Northwest, Central, & downtown Fresno, on Herndon Avenue, Palm Ave. and Bullard Ave. from Fresno to Clovis, as far west as Marks Ave. Most of Fresno.

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): Early in 2018. My first interference report was in June of 2018. Unexpectedly after many years of good reception.
3. The interference is occurring when I try to listen to KCIV-FM at all hours, from morning, through the day, and many nights at midnight and later. Wherever I drive in my local area every day. As far west as Marks Ave., as far south as downtown Fresno, as far east as the city of Clovis, up and down Palm Ave
4. The interfering station was playing (describe programming): Very loud "music", loud commercials, various types of music , so loud that it bleeds into my station.
5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: Really annoying because I can't adjust my digital radio in my car. I also have a problem when I'm in my home. Difficulty with tuning my analog radio too. Sometimes I cannot hear KCIV at all especially around Palm Ave. and Bullard Ave.

SIGNED Mr. and Mrs. Leon and Dianne Molina

DATE October 16, 2019

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Joshua Yrene

ADDRESS 285 W Pinedale AVE

CITY Fresno STATE CA ZIP CODE 93650

TELEPHONE NUMBER 559-725-0786

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home Yes ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle \_\_\_\_\_, typically while traveling in the vicinity of \_\_\_\_\_

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate \_\_\_\_\_ date):

10-20-17

3. The interference is occurring when I try to listen to KCIV-FM at Times it's  
a combination of mornings and (evening) than at other \_\_\_\_\_ times it's a  
constant interference. \_\_\_\_\_

4. The interfering station was playing (describe programming): 99.7 KKDJ

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

SIGNED Josh Y

DATE 10-7-2019

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME DIXIE KUDER  
ADDRESS 950 WOODWORTH AVE.  
CITY CLOVIS STATE CALIF. ZIP CODE 93612  
TELEPHONE NUMBER 559-297-5050

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒ ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle ☒, typically while traveling in the vicinity of city of Clovis and part of city of Fresno

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): April, 2018

3. The interference is occurring when I try to listen to KCIV-FM at my home in the house, outside in front and back of house. In my car especially at several intersections.

4. The interfering station was playing (describe programming):

ROCK MUSIC

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: There were times when the interference so bad I just had to turn off the radio or change stations

SIGNED Dixie Kuder

DATE 10-10-19

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Bruce F. Armstrong

ADDRESS 6040 N. Augusta St., Apt. 101

CITY Fresno STATE CA ZIP CODE 93710

TELEPHONE NUMBER 559-432-2730

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒ ;

In my vehicle ☒ , typically while traveling in the vicinity of Fresno, California, in an area within the following boundaries: to the north, Nees Avenue; to the west, Blackstone Avenue; to the east, Sunnyside Avenue; to the south, Clinton Avenue.

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): April 1, 2018
3. The interference is occurring when I try to listen to KCIV-FM at any time of day or night, in my car or at home (on four different radios, in different locations, and with different sources of power.
4. The interfering station was playing (describe programming): Varied - music, Grizzlies baseball games, general interference which could not be clearly understood.

Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: I have received no communication from 99.7 FM with regards to resolving this complaint.

Bruce F. Armstrong  
SIGNED

4 October 2019  
DATE

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Janet Hardy \_\_\_\_\_

ADDRESS 3570 W. Cornell Ave. \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP CODE Fresno, CA 93722 \_\_\_\_\_

TELEPHONE NUMBER (559)320-6661 \_\_\_\_\_

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home \_\_\_\_\_ ; 3570 W. Cornell Ave.

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle \_car\_\_\_\_\_, typically while traveling in the vicinity of Between Ashlan and Bullard Ave. And between Palm Ave. and Cedar Ave. \_\_\_\_\_

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): \_\_\_\_\_ approximately 10/01/17 \_\_\_\_\_

3. The interference is occurring when I try to listen to KCIV-FM at \_\_\_\_\_ other people's homes where I do In-Home Care. And when I drive in Central north Fresno. \_\_\_\_\_

4. The interfering station was playing (describe programming): \_\_\_\_\_ mostly music \_\_\_\_\_.

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: \_\_\_\_\_

**INTERFERENCE COMPLAINT**

SIGNED \_\_\_\_\_  
10/04/2019 \_\_\_\_\_

DATE Janet Hardy

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Kathleen Berry  
ADDRESS 4558 N. Maple Ave  
CITY Fresno STATE CA ZIP CODE 93726  
TELEPHONE NUMBER 559-292-5019

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home X ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle X, typically while traveling in the vicinity of Fresno - Clovis metro area

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): May 2018

3. The interference is occurring when I try to listen to KCIV-FM at \_\_\_\_\_  
sometimes in my home (I live in Central Fresno)  
sometimes while driving my car - especially when stopped at traffic lights around  
the area of Fresno State campus  
from May 2018 - Sept 2018 many times I could not tune KCIV on my radio - the  
interference was very bad

4. The interfering station was playing (describe programming):  
oldies/rockroll

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: reception of KCIV has greatly improved in the last 8 months, but  
the station still does not come in as clearly as before 2018. Occasionally I hear  
the other station bleeding in, but not as badly as before. Also, I must now use  
an antenna with my radio to receive 99.9 clearly, which I didn't have to do before 2018

SIGNED

Kathleen Berry

DATE 10-10-2019

**INTERFERENCE COMPLAINT**

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Linda M Jensen

ADDRESS 6489 N Constance Ave

CITY Fresno STATE CA ZIP CODE 93722

TELEPHONE NUMBER (559) 277-1611

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒ ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_.

In my vehicle ☒, typically while traveling in the vicinity of Central + northeast Fresno + South on Freeway 99 toward Kingsburg <sup>Clovis</sup>

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date):  
At least since May 2018

3. The interference is occurring when I try to listen to KCIV-FM at my residence above + driving in Fresno/Clovis areas as well as south on Freeway 99 toward Kingsburg. Also I drive mom back/forth from my home to her adult daycare near Blackstone/Dakota from Feb-May 2019 + experienced interference near/on Blackstone. I had to switch to AM radio until I could get a better signal driving westward again.

4. The interfering station was playing (describe programming):

I heard static, voices, music at various times. Major static!

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments:

Pls feel free to contact me again. It's been very frustrating to be in the middle of a great BOTT radio program only to have it interrupted by so much static/muddled voices/music. BOTT radio rocks!

SIGNED

Linda M. Jensen

DATE

10/15/19

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME MYRA M. SMITH

ADDRESS 1310 N. THORNE AVE.

CITY FRESNO STATE CA ZIP CODE 93728

TELEPHONE NUMBER 559.917.3597

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home X ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle X, typically while traveling in the vicinity of HWY 180 from FRESNO TO CLOVIS, CA

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date):

JUNE 8, 2018

3. The interference is occurring when I try to listen to KCIV-FM at 5:30 am - 7:15 am then again from 4pm.

4. The interfering station was playing (describe programming):

I was trying to listen to Rick Warren early in the morning, but the static terrible, unable to focus on one station.

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: My family moved to this area June 2018, since then we have not received clear sound from this station.

SIGNED 

DATE 10-7-19

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Sarah Eld

ADDRESS 2520 E Indianapolis Ave

CITY Fresno STATE CA ZIP CODE 93726

TELEPHONE NUMBER (559) 668-9448

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home X ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle X, typically while traveling in the vicinity of Hwy 41 From Home in Fresno to Work in North Fork

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date):

6/25/2018

3. The interference is occurring when I try to listen to KCIV-FM at my home in Fresno. Also while travelling in the vicinity of Home - about a mile square area, First St to Marpa, and from Barstow to Ashlan Ave, in Fresno.

4. The interfering station was playing (describe programming):

I could definately hear classic Rock at times, but mostly An Annoying Strong Pulsing of Static.

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: I live right in the center of this Area of interference. I hope this can be fixed.

SIGNED

Sarah Eld

DATE 10/14/2019

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME STACE GARCIA

ADDRESS 7394 N. THORNE AVE.

CITY FRESNO STATE CA ZIP CODE 93711

TELEPHONE NUMBER 559.250.5312

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home X ;

In my office X, which is located at 1111 VAN NESS AVE. | FRESNO, CA 93721;

In my vehicle X, typically while traveling in the vicinity of FRESNO, CA

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date):

06/29/2018

3. The interference is occurring when I try to listen to KCIV-FM at WHILE DRIVING IN MY CAR TO WORK. I COME FROM HERNDON & FRUIT AVES AND DRIVE SOUTH ON HWY 41. ROUGHLY SOUTH OF SHAW AVE THE INTERFERENCE BEGINS. I GET OFF THE FREEWAY AT VAN NESS AVE. AND HEAD WEST. I PARK AT VAN NESS AVE AND FRESNO STREET. THERE IS INTERFERENCE THE ENTIRE TIME I AM DOWNTOWN. ENOUGH TO THE POINT THAT I TURN MY RADIO OFF.

4. The interfering station was playing (describe programming): NO STATION IS COMING THROUGH, JUST STATIC.

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments:

SIGNED STACE ANN GARCIA

DATE 10/07/2019

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Victoria Medina

ADDRESS 2670 E. New Avenue

CITY Fresno STATE CA ZIP CODE 93720

TELEPHONE NUMBER (559) 213-3636

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒ ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle ☒, typically while traveling in the vicinity of Fresno County

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): January 2018

3. The interference is occurring when I try to listen to KCIV-FM at home

4. The interfering station was playing (describe programming):

KKDJ 99.7, Classic Rock

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: KKDJ 99.7 seems to also overpower station 98.9 FM KJOY

SIGNED Victoria Medina

DATE 10-16-19

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME RUDY ROJAS

ADDRESS 2055 E SHAW AVE. #G

CITY FRESNO STATE CA ZIP CODE 93710

TELEPHONE NUMBER 650-283-5208

- I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home X ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle \_\_\_\_\_, typically while traveling in the vicinity of \_\_\_\_\_.

- I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): 6-19-2018 \_\_\_\_\_
- The interference is occurring when I try to listen to KCIV-FM at \_\_\_\_\_ between 1:00PM and 1:00AM plus volume levels are messing up ie. creating up highest setting and my constant lowering the volume \_\_\_\_\_
- The interfering station was playing (describe programming):  
Rock \_\_\_\_\_
- Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor. YES

Additional Comments: \_\_\_\_\_

SIGNED  DATE 10/23/19

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME David E Combs  
ADDRESS 551 E Wrenwood Ave, Apt 101  
CITY Fresno STATE CA ZIP CODE 93710  
TELEPHONE NUMBER 559-225-7846

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒ ;

In my office ☐ , which is located at \_\_\_\_\_ ;

In my vehicle ☒ , typically while traveling in the vicinity of Fresno County

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): April 2018

3. The interference is occurring when I try to listen to KCIV-FM at Every where

4. The interfering station was playing (describe programming):

Classic Rock 99.7 FM - KFIG

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments:

I would appreciate the return of a clear broadcast of KCIV as before.

SIGNED

David E. Combs

DATE

11/04.2019

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Robert Davis

ADDRESS 12294 Cranberry Rd

CITY Madera STATE CA ZIP CODE 93636

TELEPHONE NUMBER ~~559-645-1314~~ 559-803-3034

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home \_\_\_\_\_ ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle ☒, typically while traveling in the vicinity of home address above  
to and from CMC, 1140 "T" Street, Fresno CA. 93721 Ave 12 and Freeway 41

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): I don't recall, but it has been too long.

3. The interference is occurring when I try to listen to KCIV-FM at on Freeway 41 between  
Shields and Bullard. Also from Freeway 41 on Ashlan to Fresno street,  
north to Shaw and back to Freeway 41, as I shop at Fresno Ag Hardware

4. The interfering station was playing (describe programming):  
Mostly it just garbles 99.9, but occasionally sounds of a station briefly pop in.

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: This very much needs to be resolved. It gets  
quite difficult to understand what is being said on 99.9 in this  
area of Fresno

SIGNED Robert Davis

DATE 10/24/2019

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Linda Dudley

ADDRESS 5629 W. Fir Ave.

CITY Fresno STATE CA ZIP CODE 93722

TELEPHONE NUMBER (559) 696-1760

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒ ;

In my office ☒ , which is located at 5151 N. Palm Ave, Fresno ;

In my vehicle ☒ , typically while traveling in the vicinity of Fresno to Firebaugh + the Fresno City area

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): Approximately March 2019

3. The interference is occurring when I try to listen to KCIV-FM at 99.9 fm anytime of day. I mostly listen between 7 to 8 Am and 4:30 to 6 pm. But no matter the time, the audio is garbled and difficult to understand.

4. The interfering station was playing (describe programming):  
I am unsure what the interference is.

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SIGNED Linda Dudley

DATE 10/25/19

## INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Karen Reyes

ADDRESS 458 E Lester Ave

CITY Fresno STATE CA ZIP CODE 93720

TELEPHONE NUMBER 559-860-9844

1. I am a regular listener of KCIV-FM on 99.9 MHz, I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home X ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle X, typically while traveling in the vicinity of all the time

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): It's been awhile July 2019

3. The interference is occurring when I try to listen to KCIV-FM at Home, work, on my way to work

4. The interfering station was playing (describe programming):

Static, you can't hear

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments:

Please fix it. So we could hear the word of the Lord - Amen

SIGNED

Karen Reyes

DATE

10-23-2019

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Barbara Harden  
ADDRESS 10772 N. Purdue Ave  
CITY Clouis STATE CA ZIP CODE 93619  
TELEPHONE NUMBER 559-392-1219

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒

In my office ☒ which is located at home office

In my vehicle ☒ typically while traveling in the vicinity of Fresno & Clouis

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): 2018

3. The interference is occurring when I try to listen to KCIV-FM at Willow Ave & Copper, Sierra & Bullard, Fresno St & Nees, Herndon Downtown Clouis, Shaw Ave across from mall between Clouis Ave & N. Armstrong

\* anywhere in town.

4. The interfering station was playing (describe programming):

Ads - talk - music - hard to hear but can hear them say Station #'s 99.7

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor. yes - no connection - just a listener

#### Additional Comments

This has been going on for over a year / Very frustrating because I listen to 99.9 all day & am in town for hours. Use to be more limited areas but now has expanded to further North of town(s)!!

SIGNED Barbara Harden

DATE 10-27-19

## INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Patricia Kibby

ADDRESS 3138 W Dakota # 191

CITY FRESNO STATE CA ZIP CODE 93722

TELEPHONE NUMBER 559-478-3116

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒;

In my office ☒, which is located at 3138 W. Dakota;

In my vehicle ☒, typically while traveling in the vicinity of FRESNO

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): 2018 & IS STILL NOT ALLOWING ME TO HEAR WITHOUT STATIC
3. The interference is occurring when I try to listen to KCIV-FM at Many Times of the Day

4. The interfering station was playing (describe programming):

David Jeremiah

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments:

I am not able to hear 99.9 on my Radio without constant interference.

SIGNED

Patricia Kibby

DATE

10/28/19

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Janean Wolfe

ADDRESS 7039 N Marks Ave, St 105

CITY Fresno STATE Ca ZIP CODE 93711

TELEPHONE NUMBER 559-432-6392

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home \_\_\_\_\_;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle ☒, typically while traveling in the vicinity of Highway 41 in Fresno

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): June 6, 2018

3. The interference is occurring when I try to listen to KCIV-FM at the worst reception is Highway 41 from McKinley to Bullawa & beyond.  
then there are pockets of no reception & static in other locations of Fresno.

4. The interfering station was playing (describe programming):

Rock & roll music

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor. true.

Additional Comments: I've listened to Bull radio since 2001 & it's frustrating to be listening to a program and then miss the message because you are traveling in a dead zone.

SIGNED Janean Wolfe

DATE 10-14-19

### INTERFERENCE COMPLAINT

I believe that FM translator station K259CF, 99.7 MHz, South Fresno, CA is causing interference to my reception of station KCIV-FM, 99.9 MHz, Mount Bullion, CA.

NAME Patti Cota

ADDRESS 861 E. Pinedale Ave

CITY Fresno STATE CA ZIP CODE 93720

TELEPHONE NUMBER (559) 261-1766

1. I am a regular listener of KCIV-FM on 99.9 MHz. I listen to the over-the-air signal of KCIV-FM at least twice a month (check all that apply):

At my home ☒ ;

In my office \_\_\_\_\_, which is located at \_\_\_\_\_;

In my vehicle ☒, typically while traveling in the vicinity of Shaw Ave. and Maple Ave (in Fresno), and South Chestnut Ave and Freeway 180

2. I first noticed interference to my reception of KCIV-FM, 99.9 MHz on (give date or approximate date): more than a year ago - probably early 2018

3. The interference is occurring when I try to listen to KCIV-FM at driving seems to be the worst; I usually drive in mid-afternoons; many times I have to change the station because it is so irritatingly fuzzy (other stations are not fuzzy)

4. The interfering station was playing (describe programming):  
I can't tell, it makes everything so fuzzy.

5. Neither I nor any member of my immediate family is an officer, director, or employee of the KCIV-FM licensee, or otherwise have any connection with KCIV-FM except as a listener and an occasional donor.

Additional Comments: In my home it's not as bad - I listen mornings 7:30 to 9:30.

SIGNED Patricia A. Cota

DATE 10-15-19

**Attachment B**

**Engineering Statement of Jeremy Ruck**

**EXHIBIT B**  
**ENGINEERING STATEMENT**

The following engineering statement and attached exhibits have been prepared for **Bott Communications, Inc.** ("Bott"), licensee of FM broadcast station KCIV at Mount Bullion, California, and provide further information concerning an interference complaint filed with the Commission on July 18, 2018.<sup>1</sup> Related to this complaint are subsequent filings provided to the Commission in September and November of 2018. This engineering statement and attached exhibits seek to provide information requested of Bott by letter dated September 30, 2019. This referenced letter identifies several areas where additional information is required. These additional requirements are a result of changes to the Commission's Rules relating to the translator interference complaint resolution process.<sup>2</sup>

KCIV is a class B station. As a result, the protected contour for KCIV is the 54 dBu F(50,50) service contour. Exhibit E-1 illustrates this contour based on a sample of the Commission's 30-meter terrain database. The resident population within the contour is determined to be 423,354 persons by a sample of the 2010 US Census data. Table 1 in Section 74.1203 of the Commission's Rules requires at least nine (9) complaints to be valid in this instance. It should be noted that all maps in this Exhibit are based on the use of the NAD 83 datum.

Exhibit A contains the complaints received by Bott regarding interference from K259CF to the reception of KCIV. Although many more complaints were received by Bott, Exhibit A contains twenty complaints from unique individuals. Complaints from individuals or families were based on

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<sup>1</sup> The Facility ID for KCIV at Mount Bullion, California is 6504.

<sup>2</sup> See *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Report and Order, FCC 19-40, 34 FCC Rcd 3457(2019) (*Translator Interference Order*).

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residential, business, and mobile locations, or combinations thereof. Each of the complaints utilized in Exhibit A contain the full name, address, and phone number of the individual making the complaint, as well as a clear, concise, and accurate description of the location where interference was observed. Each complainant also attested to lack of affiliation with Bott and KCIV and affirmed that they listen to KCIV at least twice a month. The following table summarizes the complaints, their respective complainant, and at which locations the interference was observed.

| ID | Complainant | Residence | Business | Mobile |
|----|-------------|-----------|----------|--------|
| A  | Molina      | X         |          |        |
| B  | Yrene       | X         |          |        |
| C  | Kuder       | X         |          |        |
| D  | Armstrong   | X         |          |        |
| E  | Hardy       | X         |          | X      |
| F  | Berry       | X         |          |        |
| G  | Jensen      | X         |          |        |
| H  | Smith       | X         |          |        |
| I  | Eld         | X         |          |        |
| J  | Garcia      | X         | X        |        |
| K  | Medina      | X         |          |        |
| L  | Rojas       | X         |          |        |
| M  | Combs       | X         |          |        |
| N  | Davis       |           | X        | X      |
| O  | Dudley      | X         | X        |        |
| P  | Reyes       | X         |          |        |
| Q  | Harden      | X         |          | X      |
| R  | Kibby       | X         |          |        |
| S  | Wolfe       |           |          | X      |
| T  | Cota        |           |          | X      |

The analysis of each these locations will be performed by groups, considering the residential locations, business locations, and mobile locations separately. The following table summarizes the residential locations and provides the geographic coordinates and physical address of each location. Each of these residential locations is plotted in Exhibit E-2 relative to the location of the KCIV 45 dBu F(50,50) contour. As this map demonstrates, each of these locations is located within this contour.

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| ID | Complainant | Address                | City   | ZIP   | Latitude     | Longitude     |
|----|-------------|------------------------|--------|-------|--------------|---------------|
| A  | Molina      | 2080 W. Palo Alto Ave. | Fresno | 93711 | 36-50-00.6 N | 119-49-41.4 W |
| B  | Yrene       | 285 W. Pinedale Ave.   | Fresno | 93650 | 36-50-36.0 N | 119-47-48.8 W |
| C  | Kuder       | 950 Woodworth Ave.     | Clovis | 93612 | 36-49-06.7 N | 119-42-13.6 W |
| D  | Armstrong   | 6040 N. Augusta St.    | Fresno | 93710 | 36-49-25.2 N | 119-46-43.5 W |
| E  | Hardy       | 3570 W. Cornell Ave.   | Fresno | 93722 | 36-46-38.3 N | 119-51-26.2 W |
| F  | Berry       | 4558 N. Maple Ave.     | Fresno | 93726 | 36-48-02.1 N | 119-44-42.0 W |
| G  | Jensen      | 6489 N. Constance Ave. | Fresno | 93722 | 36-49-53.1 N | 119-53-11.2 W |
| H  | Smith       | 1310 N. Thorne Ave.    | Fresno | 93728 | 36-45-35.2 N | 119-48-46.4 W |
| I  | Eld         | 2520 Indianapolis Ave. | Fresno | 93726 | 36-47-56.2 N | 119-46-51.0 W |
| J  | Garcia      | 7394 N. Thorne Ave.    | Fresno | 93711 | 36-50-41.2 N | 119-48-49.9 W |
| K  | Medina      | 2670 E. Ness Ave.      | Fresno | 93720 | 36-51-11.5 N | 119-44-06.8 W |
| L  | Rojas       | 2055 E. Shaw Ave.      | Fresno | 93710 | 36-48-29.7 N | 119-45-10.8 W |
| M  | Combs       | 551 E. Wrenwood Ave.   | Fresno | 93710 | 36-49-02.4 N | 119-46-39.6 W |
| O  | Dudley      | 5629 W. Fir Ave.       | Fresno | 93722 | 36-50-18.8 N | 119-53-35.6 W |
| P  | Reyes       | 458 E. Lester Ave.     | Fresno | 93720 | 36-51-44.4 N | 119-42-29.4 W |
| Q  | Harden      | 10772 N. Purdue Ave.   | Clovis | 93619 | 36-53-35.4 N | 119-41-24.7 W |
| R  | Kibby       | 3138 W. Dakota #191    | Fresno | 93722 | 36-47-22.4 N | 119-50-50.0 W |

In addition to being located within the 45 dBu F(50,50) service contour of KCIV, each location must also comply with the U/D ratio requirements. KCIV operates on FM channel 260, while the offending translator, K259CF is licensed on FM channel 259. As a result, it is necessary to demonstrate that at each location a U/D ratio of -6 dB would be exceeded. The following table summarizes the KCIV and K259CF field strength at each of the residential locations, and the calculated U/D ratio.<sup>3</sup>

<sup>3</sup> There is no residential location assigned the designation of "N" as the complainant there has a residence that is located within the 45 dBu contour, but does not fail the -6 dB U/D ratio. As a result, the Bob Davis residence was removed from consideration, however, his complaints for his business and mobile locations are valid.

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| ID    | Complainant | KCIV FS | K259CF FS | U/D Ratio |
|-------|-------------|---------|-----------|-----------|
| RES A | Molina      | 50.42   | 57.25     | +6.83     |
| RES B | Yrene       | 50.70   | 61.35     | +10.65    |
| RES C | Kuder       | 48.50   | 56.33     | +7.80     |
| RES D | Armstrong   | 49.70   | 72.00     | +22.30    |
| RES E | Hardy       | 48.38   | 55.60     | +7.22     |
| RES F | Berry       | 48.35   | 68.00     | +19.65    |
| RES G | Jensen      | 51.10   | 47.55     | -3.55     |
| RES H | Smith       | 47.00   | 63.45     | +16.45    |
| RES I | Eld         | 48.59   | 100+      | +51.41    |
| RES J | Garcia      | 50.75   | 57.50     | +6.75     |
| RES K | Medina      | 50.42   | 56.30     | +5.88     |
| RES L | Rojas       | 48.80   | 70.30     | +21.50    |
| RES M | Combs       | 49.41   | 76.70     | +27.29    |
| RES O | Dudley      | 51.46   | 46.00     | -5.46     |
| RES P | Reyes       | 50.43   | 52.00     | +1.57     |
| RES Q | Harden      | 51.33   | 46.50     | -4.83     |
| RES R | Kibby       | 48.77   | 59.00     | +10.23    |

The contour map in Exhibit E-3 is the basis for the field strengths and calculated U/D ratios in the above table. The contours on this map are spaced in increments of 1 dBu, with their colors according to the key. The contour values and ratios tabulated above were determined by adjusting the field strength of one of the contours for the respective facility until it intersected the alleged interference location. As this table and the related map demonstrate, each of the residential locations experiences a U/D ratio in excess of the 1<sup>st</sup> adjacent threshold.

Of the complaints received, three were found to be valid regarding business or office locations. These three locations are identified as J, N, and O, and respectively represent the Garcia, Davis, and Dudley complaints. These three locations are summarized in the table below and are illustrated in Exhibit E-4 relative to the KCIV 45 dBu F(50,50) service contour.

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| ID | Complainant | Address            | City   | ZIP   | Latitude     | Longitude     |
|----|-------------|--------------------|--------|-------|--------------|---------------|
| J  | Garcia      | 1111 Van Ness Ave. | Fresno | 93721 | 36-50-41.2 N | 119-46-51.0 W |
| N  | Davis       | 1140 T Street      | Fresno | 93721 | 36-44-34.5 N | 119-46-52.9 W |
| O  | Dudley      | 5151 N. Palm Ave.  | Fresno | 93704 | 36-48-39.8 N | 119-48-32.1 W |

The three locations specified in the table above are located both within the 45 dBu F(50,50) service contour for KCIV as well as being in compliance with the U/D ratio requirements. Exhibit E-5 illustrates these three locations along with the family of contours depicted as in Exhibit E-3. As this map demonstrates, each of these locations falls within the interference region defined by the locus of contour intersections bounded by the KCIV F(50,50) service contour. The KCIV and K259CF field strengths along with the calculated U/D ratio at each of these three locations are summarized in the following table.

| ID    | Complainant | KCIV FS | K259CF FS | U/D Ratio |
|-------|-------------|---------|-----------|-----------|
| BUS J | Garcia      | 45.73   | 58.80     | +13.07    |
| BUS N | Davis       | 45.90   | 61.00     | +15.10    |
| BUS O | Dudley      | 49.24   | 73.20     | +23.96    |

The final grouping of complaints to be considered is the mobile grouping. There are five complaints that specify interference was observed while in vehicles. Hardy and Harden also indicate interference at their respective residences, while Davis also alleges interference at a business location. The Wolfe and Cota complaints, despite providing additional information, are only considered under this engineering statement for the mobile portion of their complaints.

The mobile complaint locations will necessarily require a different format to depict than the residential and business locations. The residences and businesses are discrete point locations that can easily be plotted. In the case of the mobile complaints, while the Harden and Cota complaints are based on point locations, the complaints of Hardy, Davis, and Wolfe specify a

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region in which interference was observed. All mobile complaints are also compliant with the revised Rules.

Janet Hardy Mobile Complaint

The complaint submitted by Janet Hardy indicates that she observes interference between Ashlan and Bullard Avenues and between Palm and Cedar Avenues. Ashlan and Bullard run east-west, while Palm and Cedar run north-south. Thus, this description creates a rectangular region in which interference is observed. The geographic coordinates of the four intersections are summarized in the table below.

| Designation | Intersection    | Latitude     | Longitude     |
|-------------|-----------------|--------------|---------------|
| MOB 1       | Cedar & Ashlan  | 36-47-38.7 N | 119-45-15.2 W |
| MOB 2       | Cedar & Bullard | 36-49-23.3 N | 119-45-15.2 W |
| MOB 3       | Palm & Bullard  | 36-49-22.5 N | 119-48-29.7 W |
| MOB 4       | Palm & Ashlan   | 36-47-38.9 N | 119-48-31.2 W |

In Exhibit E-6, this region is plotted along with the KCIV family of curves previously depicted. As is demonstrated, this region is located both within the KCIV 45 dBu service contour, and in proximity to the K259CF licensed transmitter site. Additionally, the K259CF 66.8 dBu and 100 dBu F(50,10) interference contours are depicted on this map. Within the interference region, the K259CF field strength ranges from a minimum of 66.8 dBu to well above 100 dBu F(50,10). By way of contrast, the KCIV field strength ranges from approximately 48 dBu to approximately 50 dBu F(50,50). Thus, within this interference region, the calculated U/D ratio varies from approximately +16.8 dB on the low end, to well in excess of 51.5 dBu on the high end.

Bob Davis Mobile Complaint

The complaint provided by Bob Davis specified residential, business, and mobile locations. The residential address provided while located within the KCIV 45 dBu service contour, was not at

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a location that complied with the U/D ratio requirements. As a result, the residential component of his complaint was discounted. The business location portion of his complaint was addressed in the previous section.

The mobile portion of his complaint specifies multiple regions in which interference was observed. The most clearly described region is that along Freeway 41 between Shields and Bullard avenues. The study for this region is depicted in the contour map that is Exhibit E-7, with geographic coordinate information for these two intersections summarized in the following table.

| Designation | Intersection         | Latitude     | Longitude     |
|-------------|----------------------|--------------|---------------|
| MOB 5       | Freeway 41 & Shields | 36-46-47.0 N | 119-47-04.7 W |
| MOB 6       | Freeway 41 & Bullard | 36-49-23.0 N | 119-47-06.4 W |

As Exhibit E-7 demonstrates, the KCIV field strength within the region ranges from approximately 47.8 dBu F(50,50) to approximately 49.7 dBu F(50,50). The K259CF field strength ranges from approximately 73 dBu F(50,10) at the north end of the region, through 80 dBu F(50,10) at the south end of the region, and greater than 100 dBu F(50,10) in the midsection. Thus, the U/D ratio within the region identified where interference occurs ranges from approximately +25.3 dB to in excess of +51.5 dBu.

#### Barbara Harden Mobile Complaint

The complaint submitted by Barbara Harden listed her residence and mobile locations as places where interference was observed. Her residence location was already considered and depicted in the first section of this report. Her complaint listed three specific intersections that could easily be identified. They are the intersections of Willow and Copper, Sierra and Bullard, and Fresno and Nees. These three locations, along with their geographic coordinates, are summarized in the following table.

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| Designation | Intersection     | Latitude     | Longitude     |
|-------------|------------------|--------------|---------------|
| MOB 7       | Willow & Copper  | 36-53-45.8 N | 119-43-47.9 W |
| MOB 8       | Sierra & Bullard | 36-51-06.9 N | 119-47-01.6 W |
| MOB 9       | Fresno & Nees    | 36-50-14.8 N | 119-46-41.6 W |

These three locations along with the contour families for both KCIV and K259CF are depicted in Exhibit E-8. As this map demonstrates, each of these three intersections is located within the U/D contour-based interference region. The following table summarizes the field strength for both KCIV and K259CF at these three locations, along with the calculated U/D ratio at each. All three discrete locations are within the KCIV 45 dBu F(50,50) service contour and have a calculated U/D ratio in excess of that necessary to cause interference to the reception of KCIV.

| ID    | Intersection     | KCIV FS | K259CF FS | U/D Ratio |
|-------|------------------|---------|-----------|-----------|
| MOB 7 | Willow & Copper  | 52.10   | 48.35     | -3.75     |
| MOB 8 | Sierra & Bullard | 51.00   | 59.45     | +8.45     |
| MOB 9 | Fresno & Nees    | 50.34   | 64.75     | +14.41    |

#### Janean Wolfe Mobile Complaint

The mobile portion of the Janean Wolfe complaint is very similar to the Bob Davis mobile complaint, and indeed covers essentially the same area. Janean Wolfe did not specify received interference at either a residential or business location.

Her complaint indicates that interference is along Highway 41 from McKinley to Bullard. This covers a little larger region than the region specified by Bob Davis. Exhibit E-9 illustrates the intersections of Freeway 41 and McKinley and Freeway 41 and Bullard. These locations are summarized in the following table.

| Designation | Intersection          | Latitude     | Longitude     |
|-------------|-----------------------|--------------|---------------|
| MOB 10      | Freeway 41 & McKinley | 36-45-54.2 N | 119-46-37.1 W |
| MOB 11      | Freeway 41 & Bullard  | 36-49-23.0 N | 119-47-06.4 W |

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The approximate region along Freeway 41 where Wolfe is alleging interference is depicted in Exhibit E-9, along with the KCIV contour family. As this map demonstrates, the KCIV field strength varies from approximately 47.2 dBu to 49.7 dBu F(50,50). The K259CF field strength varies from approximately 73 dBu F(50,10) through 100 dBu F(50,10). Thus, as is demonstrated, within this region, the U/D ratio is no less than +25.5 dB and increases to over +52.5 dB.

Patti Cota Mobile Complaint

The complaint submitted by Patti Cota is similar in nature to that of Barbara Harden. Cota provides two intersections where interference was significantly observed. These locations are summarized in the following table and are plotted on the Exhibit E-10 map along with the related contour families, and the interference region.

| Designation | Intersection   | Latitude     | Longitude     |
|-------------|----------------|--------------|---------------|
| MOB 12      | Shaw & Maple   | 36-53-45.8 N | 119-43-47.9 W |
| MOB 13      | Chestnut & 180 | 36-51-06.9 N | 119-47-01.6 W |

Similar to the method previously described, the field strength from each facility was determined, and the U/D ratio calculated. The following table summarizes these locations, the relevant field strengths, and the calculated U/D ratios. Similar to previous complaints, the calculated U/D ratios significantly exceed the interference threshold.

| ID     | Intersection   | KCIV FS | K259CF FS | U/D Ratio |
|--------|----------------|---------|-----------|-----------|
| MOB 12 | Shaw & Maple   | 48.70   | 67.40     | +18.70    |
| MOB 13 | Chestnut & 180 | 46.23   | 58.90     | +12.67    |

It is therefore respectfully submitted that based on the complaints submitted, and the analysis contained herein, that K259CF is causing interference to the reception of KCIV over a wide swath of area. Additionally, the complaints and the analysis contained within this engineering statement are in compliance with the new rules and procedures established by the Commission.

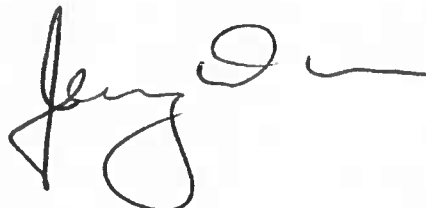
JEREMY RUCK & ASSOCIATES, INC.

P.O. Box 415  
221 S. 1st Avenue  
Canton, IL 61520

Tel: 309.647.1200  
Fax: 855.332.9537  
jeremyruck.com

10.30.2019

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2021

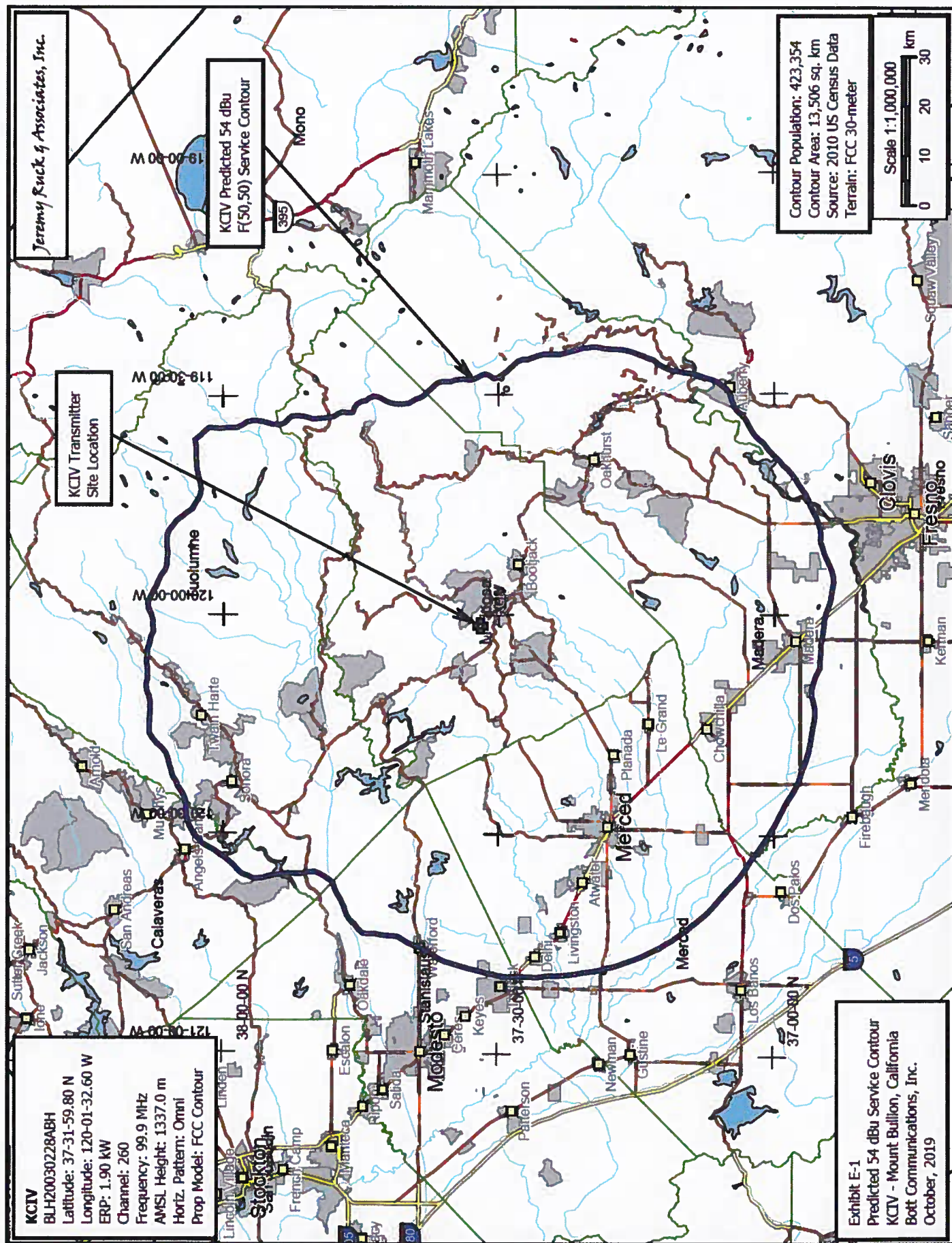
Jeremy D. Ruck, PE  
October 29, 2019

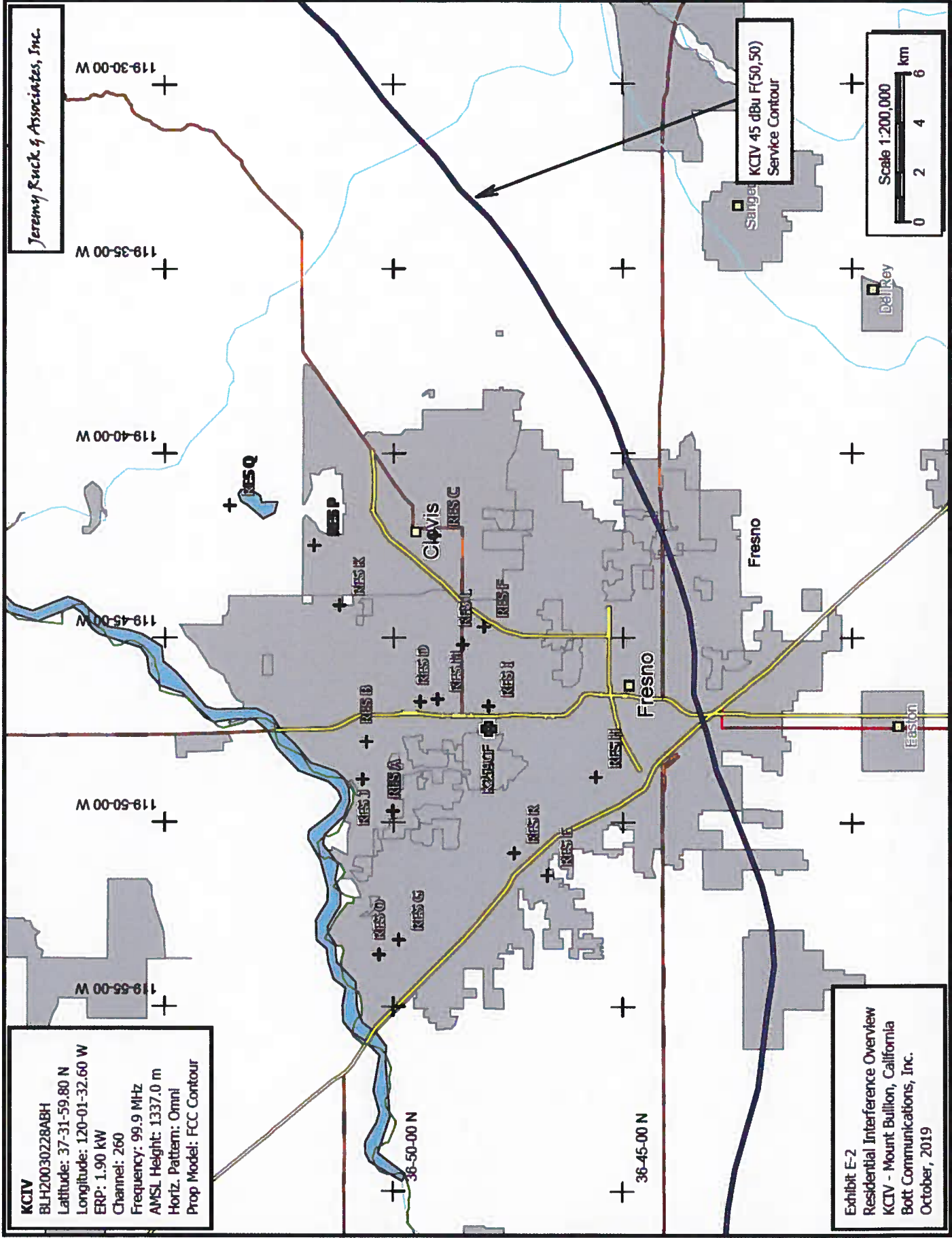
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jeremyruck.com

**10.30.2019**





**KCTV**  
BLH20030228ABH  
Latitude: 37-31-59.80 N  
Longitude: 120-01-32.60 W  
ERP: 1.90 kW  
Channel: 260  
Frequency: 99.9 MHz  
AMSL Height: 1337.0 m  
Horiz. Pattern: Omni  
Prop Model: FCC Contour

Jeremy Ruck & Associates, Inc.

KCTV 45 dBu F(50,50)  
Service Contour

Exhibit E-2  
Residential Interference Overview  
KCTV - Mount Bullion, California  
Bott Communications, Inc.  
October, 2019

Scale 1:200,000  
0 2 4 6 km

**KCTV**

BLH20030228ABH

Latitude: 37-31-59.80 N

Longitude: 120-01-32.60 W

ERP: 1.90 kW

Channel: 260

Frequency: 99.9 MHz

AMSL Height: 1337.0 m

Horiz. Pattern: Omni

Prop Model: FCC Contour

36-55-00 N

36-50-00 N

36-45-00 N

36-40-00 N

*Jeremy Ruck & Associates, Inc.*

**Field Strength Color Key**

KCIV / K259CF

45.0 / 39.0

46.0 / 40.0

47.0 / 41.0

48.0 / 42.0

49.0 / 43.0

50.0 / 44.0

51.0 / 45.0

52.0 / 46.0

53.0 / 47.0

KCIV Field Strength F(50,50)

K259CF Field Strength F(50,10)

U/D Ratio interference  
area created by locus  
of service and interference  
contour intersections  
bounded by 45 dBu  
F(50,50) KCIV contour.

Scale 1:250,000  
0 3 6 9 km

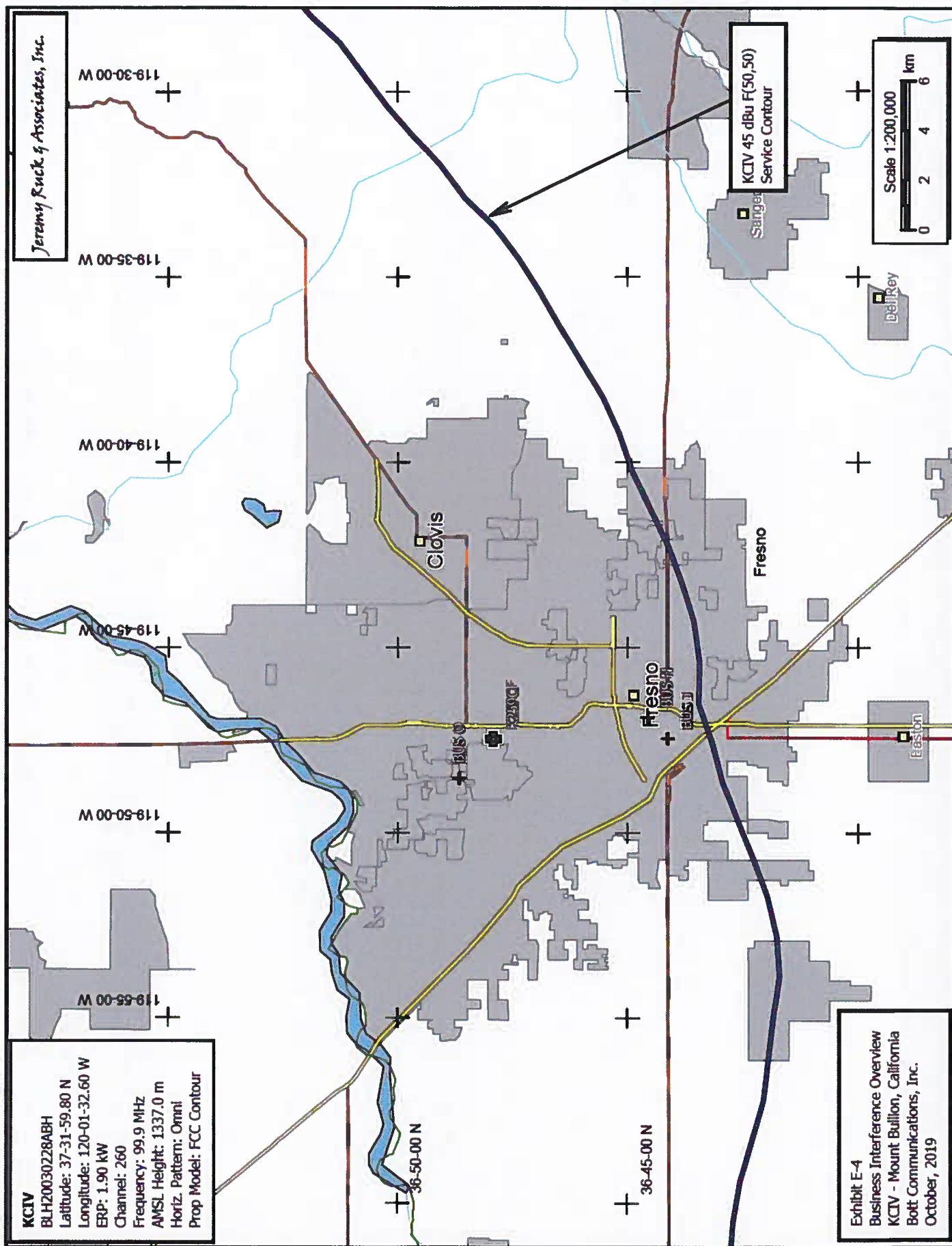
Exhibit E-3

Contour Interference Study

KCTV - Mount Bullion, California

Bot Communications, Inc.

October, 2019



KCTV

BLH20030228ABH

Latitude: 37-31-59.80 N

Longitude: 120-01-32.60 W

ERP: 1.90 kW

Channel: 260

Frequency: 99.9 MHz

AMSL Height: 1337.0 m

Horiz. Pattern: Omni

Prop Model: FCC Contour

38-55-00 N

38-50-00 N

38-45-00 N

38-40-00 N

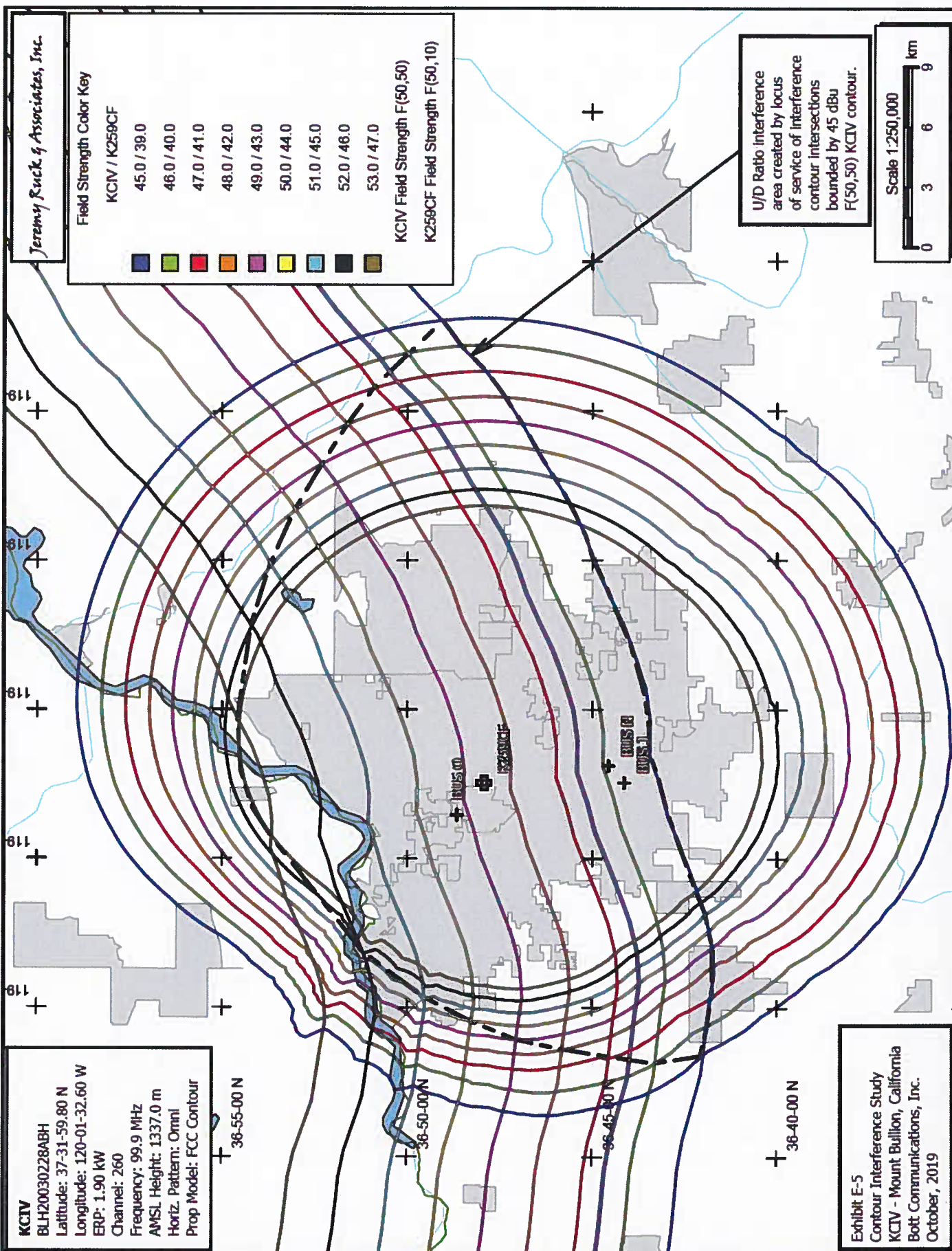


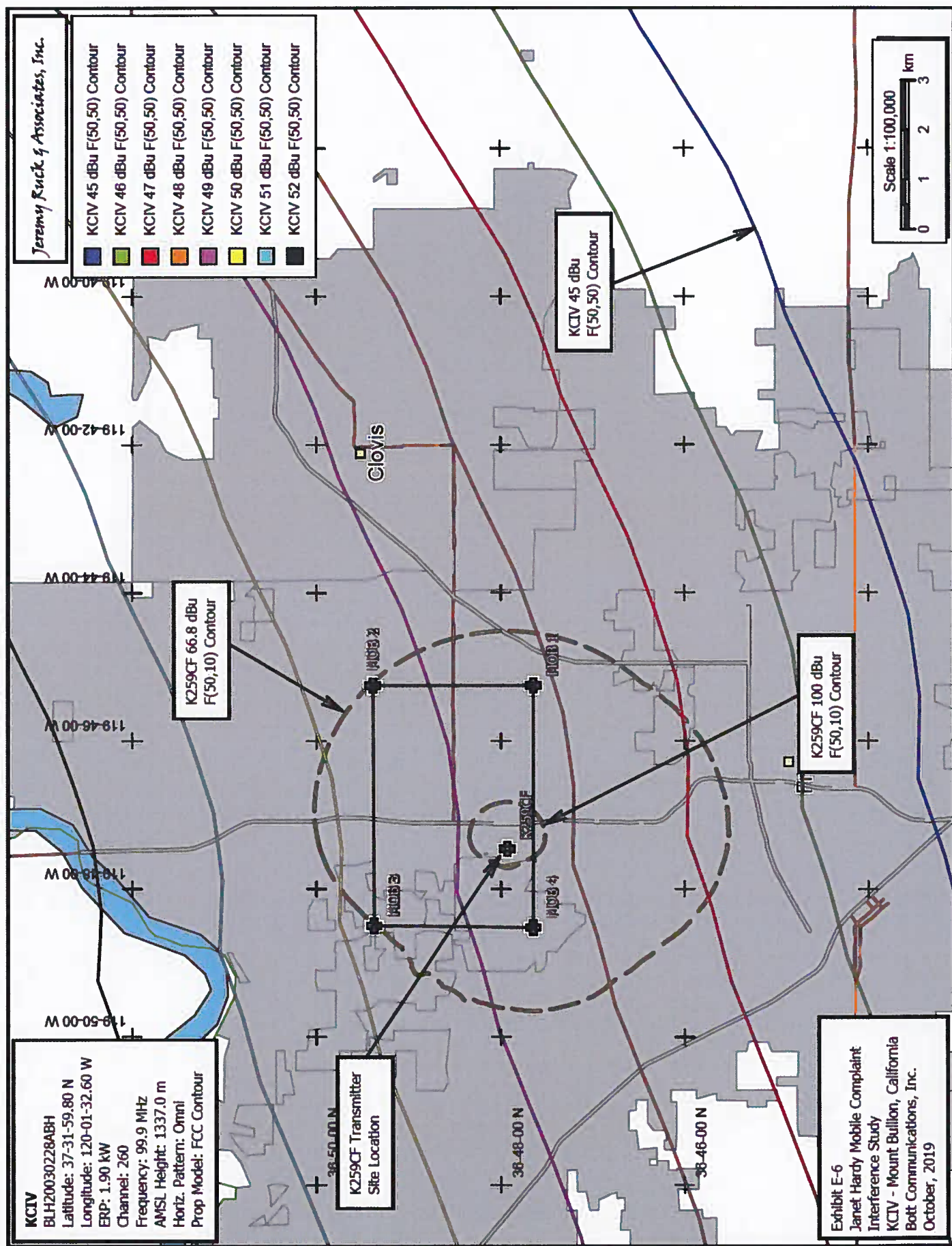
Exhibit E-5

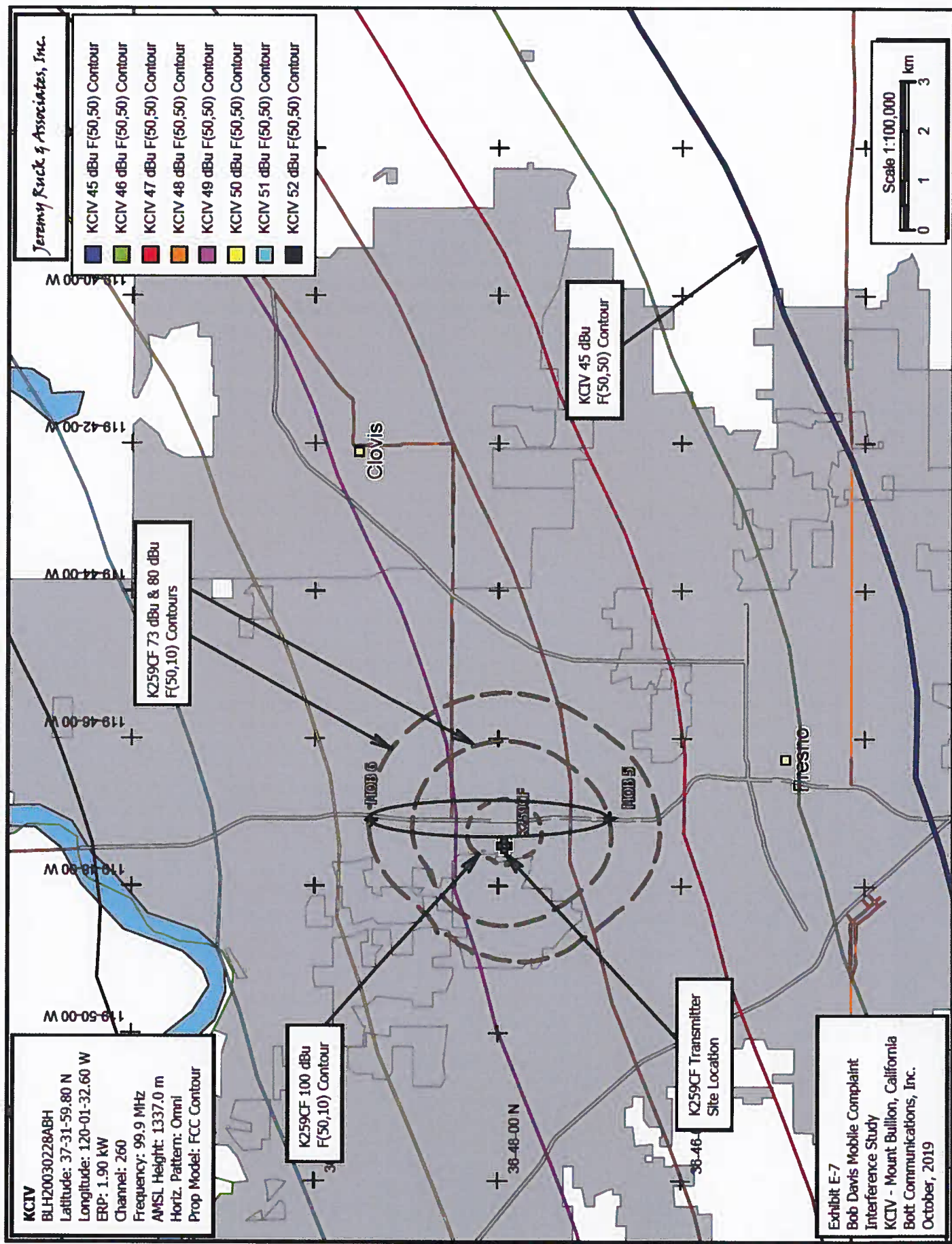
Contour Interference Study

KCTV - Mount Bullion, California

Boit Communications, Inc.

October, 2019





KCTV

BLH20030228ABH

Latitude: 37-31-59.80 N

Longitude: 120-01-32.60 W

ERP: 1.90 kW

Channel: 260

Frequency: 99.9 MHz

AMSL Height: 1337.0 m

Horiz. Pattern: Omni

Prop Model: FCC Contour

U/D Contour Based  
Interference Region

Jeremy Ruck & Associates, Inc.

Field Strength Color Key

KCIV / K259CF

45.0 / 39.0

46.0 / 40.0

47.0 / 41.0

48.0 / 42.0

49.0 / 43.0

50.0 / 44.0

51.0 / 45.0

52.0 / 46.0

53.0 / 47.0

KCIV Field Strength F(50,50)

K259CF Field Strength F(50,10)

Exhibit E-8

Barbara Harden Mobile Complaint

Interference Study

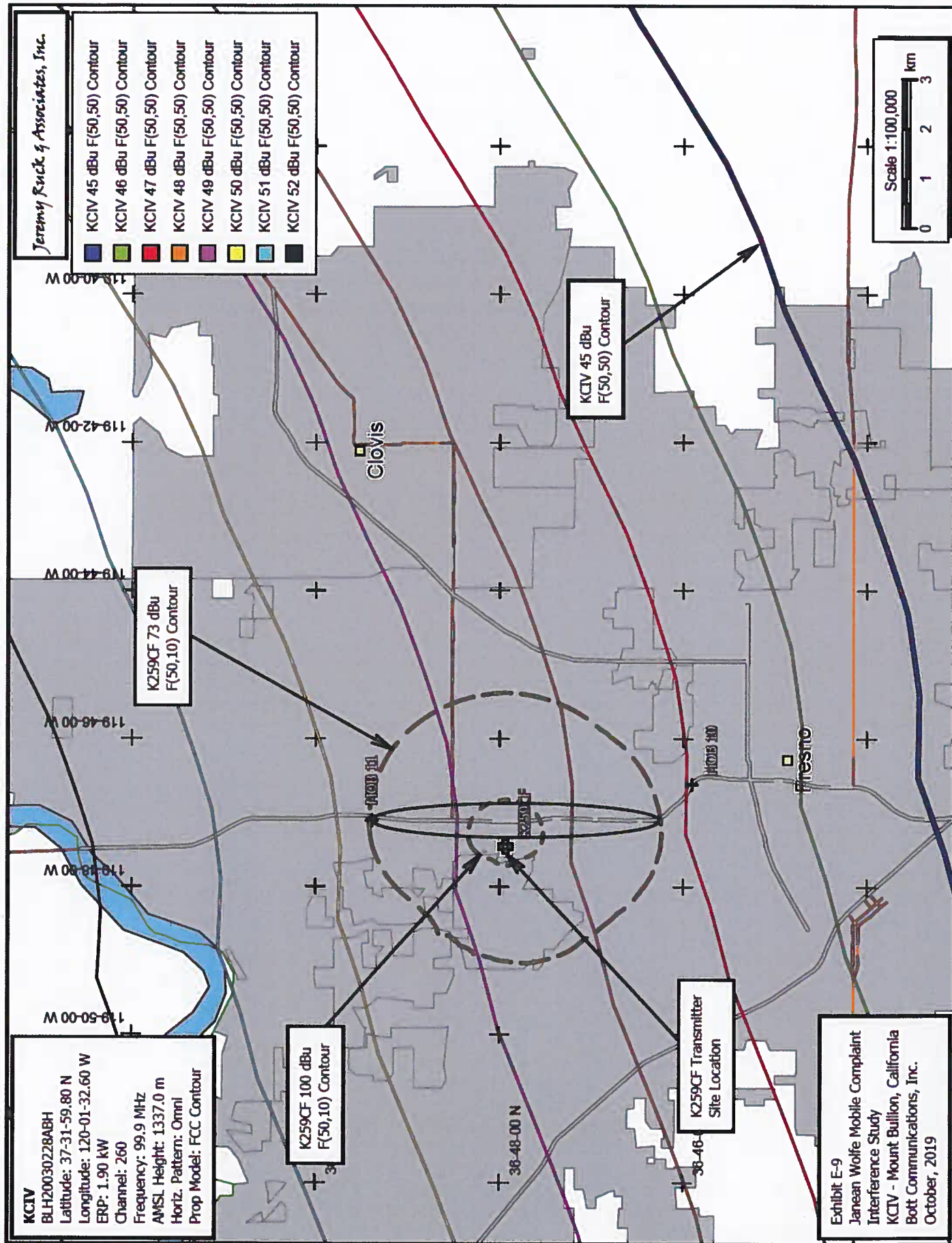
KCTV - Mount Bullion, California

Bott Communications, Inc.

October, 2019

Scale 1:150,000

0 2 4 6 km



**KCTV**

BLH20030228ABH  
Latitude: 37-31-59.80 N  
Longitude: 120-01-32.60 W  
ERP: 1.90 kW  
Channel: 260  
Frequency: 99.9 MHz  
AMSL Height: 1337.0 m  
Horiz. Pattern: Omni  
Prop Model: FCC Contour

U/D Contour Based  
Interference Region

*Jeremy Ruck & Associates, Inc.*

**Field Strength Color Key**

KCNV / K259CF

45.0 / 39.0  
46.0 / 40.0  
47.0 / 41.0  
48.0 / 42.0  
49.0 / 43.0  
50.0 / 44.0  
51.0 / 45.0  
52.0 / 46.0  
53.0 / 47.0

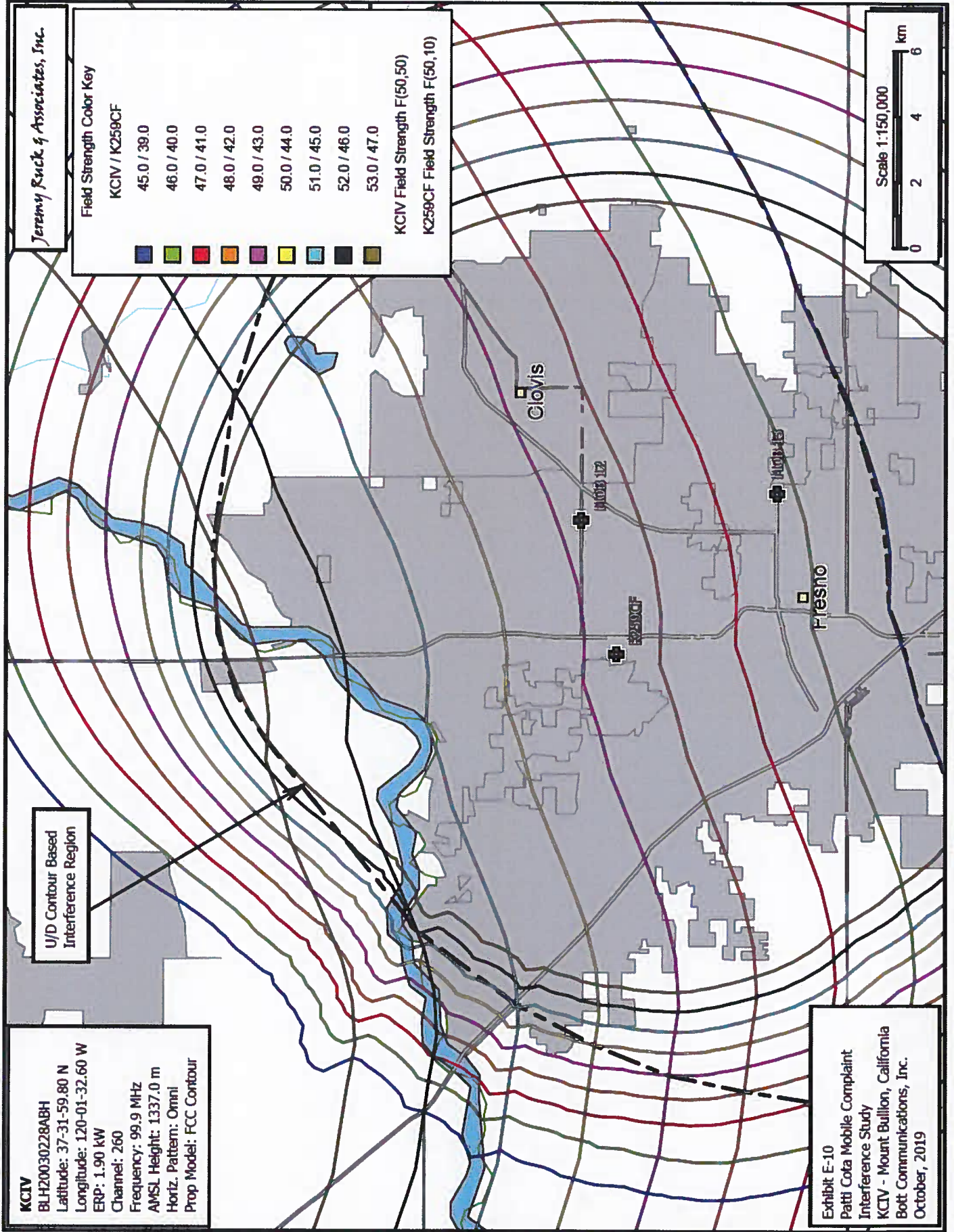
KCNV Field Strength F(50,50)

K259CF Field Strength F(50,10)

Exhibit E-10

Patti Cota Mobile Complaint  
Interference Study  
KCTV - Mount Bullion, California  
Bott Communications, Inc.  
October, 2019

Scale 1:150,000



**Attachment C**

**Declaration of Richard P. Bott, II**

### **DECLARATION**

I, **Richard P. Bott, II**, hereby attest to the following:

1. I am the Vice President of Bott Communications, Inc. ("Bott")
2. I have personal knowledge of the facts set forth in the foregoing Third Supplement to Bott's Interference Complaint ("Third Supplement").
3. I have read the Third Supplement, and the statements therein are truthful and correct to the best of my knowledge, information, and belief.
4. Bott is the licensee of FM broadcast station, KCIV, Mount Bullion, California (Facility ID No. 6504) ("KCIV").
5. To my knowledge, KCIV is currently operating within its licensed parameters.

I hereby certify that to the best of my knowledge, information, and belief, under penalty of perjury, the foregoing statements are true and correct.

  
**Richard P. Bott, II**

Dated: October 30, 2019

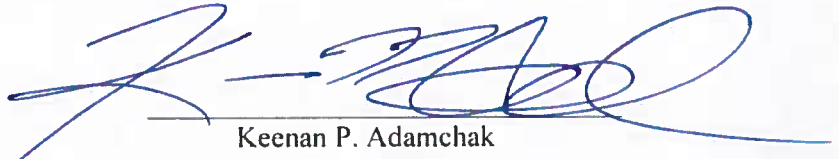
**CERTIFICATE OF SERVICE**

I, Keenan P. Adamchak, counsel for Fletcher, Heald & Hildreth, PLC, hereby certify that I caused a true copy of the foregoing Third Supplement to Interference Complaint to be sent this 30th day of October, 2019, via U.S. First Class Mail, postage prepaid, and via email, where indicated, to the following individuals:

Michael Couzens, Esq.\*  
P.O. Box 3642  
Oakland, CA 94609  
cuz@well.com

Gary M. Cocola  
225 Crossroads Blvd., Suite 183  
Carmel, CA 93923

\* via email

  
Keenan P. Adamchak