

Before the
Federal Communications Commission
Washington, D.C. 20554

2019 OCT 16 PM 2:10

In re Application of

Centro Cristiano de Vida Eterna

FM Translator Station K287BQ
Facility ID No. 148244
Houston, Texas

)
)
) File No. BLFT-20190219AAC
) File No. BPFT-20181101ABB
) File No. BPFT-20190221ABD
)
)
)
)

Accepted / Filed

To: Marlene Dortch, Secretary
Federal Communications Commission
Attn: Audio Division

OCT 15 2019

Federal Communications Commission
Office of the Secretary

RESPONSE TO REQUEST FOR INFORMATION

Comes now, Roy E. Henderson, ("Henderson"), Licensee of Radio Station KTWL (FM), Todd Mission, Texas (FAC# 21204) ("KTWL" or "Station"), by his counsel, hereby respectfully submits its Response to the September 16, 2019, reference 1800B3-KV (the "FCC Letter") in connection with complaints and a Petition for Reconsideration filed by Henderson with regards to the above captioned applications and translator. With respect thereto, the following is submitted¹.

As is previously on record with the Commission, Henderson has complained regarding the operations of FM Translator Station K287BQ (FX), Houston, Texas by Centro Cristiano de Vida Eterna ("Centro"). On numerous occasions Henderson has discussed the interference issue with Centro, but to no avail. Because of this continuous interference problem, Henderson has submitted numerous complaints and is now doing so again.

¹ This Response is being submitted within the time set forth in the FCC Letter and is therefore timely submitted.

As part of this submission, please find attached hereto Declarations of seven (7) regular listeners of KTWL (FM) whom have no legal, familial, employment or business financial interest with the Station².

Also attached hereto are the Technical Comments (the “Study”) prepared by Clifton G. Moor of Bromo Communications, Inc³. This Study indicates that that the Centro facility and proposed facilities cause objectional interference to these listeners, as the undesired to desired signal exceed -20 dB for all of the listeners⁴. The Study depicts the KTWL 45 dBu contour, the area of predicted interference and the location of the complainants⁵. Additionally, the study shows that the population within the KTWL 60 dBu contour is 159,430 persons⁶. At that population count, the minimum complainants required is six (6). Lastly, Engineer Moor has confirmed that the KTWL transmitter plant is operating with its licensed paraments⁷.

Henderson has met the new Commission requirements⁸ relating to the translator interference complaint process. Having met the new standard, Henderson respectfully requests the dismissal of Centro’s applications BPFT-20181101ABB and BPFT-20190221ABD pursuant to 47 C.F.R. Section 74.1204(f). Futher Henderson, requests that Centro be required to immediately address the current licensed operations under BLFT-20190219ACC and its

² See Exhibit 1 Declarations

³ See Exhibit 2 Engineering

⁴ *Id*

⁵ *Id*

⁶ *Id*

⁷ *Id*

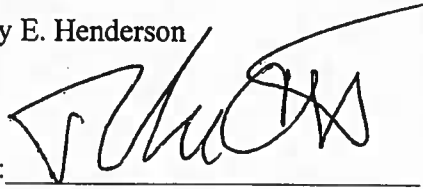
⁸ See *Amendment of Part 74 of the Commission’s Rules Regarding FM Translator Interference*, Report and Order, FCC 19-40, 34 FCC Rcd ____ (2019).

continued interference with KTWL pursuant to 47 C.F.R. Section 74.1203((a)(3).

Respectfully submitted,

Roy E. Henderson

By:

A handwritten signature in black ink, appearing to read 'John C. Trent', written over a horizontal line.

John C. Trent, Esquire
Its Counsel

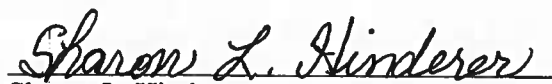
October 15, 2019
Putbrey Hunsaker & Trent, P.C.
200 S. Church Street
Woodstock VA 22661

CERTIFICATE OF SERVICE

I, Sharon L. Hinderer, a legal assistant in the law offices of Putbrey Hunsaker & Trent, P.C., do hereby certify that copies of the "Response to Request for Information" have been sent via E-mail only, this 15th day of October 2019, to the following:

James D. Bradshaw, Senior Deputy Chief*
Robert Gates, Engineer*
Kim Varner, Attorney*
Audio Division, Media Bureau
Federal Communications Commission
445-12th St., S.W.
Room 2-A360
Washington, DC 20554

Dan J. Alpert, Esquire. *
Law Office of Dan J. Alpert
2120 North 21st Road
Arlington, VA 22201


Sharon L. Hinderer

*By E-mail Only

Exhibit 1 Declarations

Listener Declaration

I am a regular listener to radio station **KTWL "Texas Mix"** which broadcasts on 105.3 FM, to listeners in Harris county.

I have become aware that **K287BQ** has returned to broadcasting on 105.3 FM and since I live in Harris County, this station is causing interference with my ability to listen to my regular listening of radio station **KTWL Texas Mix**. I often listen to radio station **KTWL Texas Mix** in my home and while driving in my car. The devices (i.e. Sony clock radio, Ford car radio, etc.) on which I listen to are:

car

I am providing this Declaration to ask the Federal Communications Commission in Washington, D.C. to take action to keep this interference from occurring. Other than being a regular listener, I have no business or employment connections with radio station **KTWL Texas Mix**.

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Date: 6-28-19

Signed



Victor Peña

(Printed Name)

13202 Vernon Rd Cypress TX
(Home Address, City, State, Zip)

713-557-3066

(Phone Number)

MTS Art @ yahoo.com

(Email Address)

Listener Declaration

I am a regular listener to radio station **KTWL "Texas Mix"** which broadcasts on 105.3 FM, to listeners in WASHINGTON county.

I have become aware that **K287BQ** has returned to broadcasting on 105.3 FM from HOUSTON, TX, and since I live in WASHINGTON County, this station is causing interference with my ability to listen to my regular listening of radio station KTWL Texas Mix. I often listen to radio station KTWL Texas Mix in my home and while driving in my car. The devices (i.e. Sony clock radio, Ford car radio, etc.) on which I listen to are:

2019 FORD F-150, 2017 FORD EXPLORER

I am providing this Declaration to ask the Federal Communications Commission in Washington, D.C. to take action to keep this interference from occurring. Other than being a regular listener, I have no business or employment connections with radio station KTWL Texas Mix.

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Date: 9-17-19

Signed

JUSTIN W. PAULER

(Printed Name)

Detailed Observation:

K287BQ begins to interfere with KTWL "Texas Mix" on Interstate 10 in the town of Hockley (77447).

2309 PARKER CT., BRENHAM, TX
(Home Address, City, State, Zip) 77833

KTWL "Texas Mix" becomes completely overridden by K287BQ at the Grand Parkway (TX-99)/Interstate 10 interchange near the town of Cypress (77410).

979-551-0606
(Phone Number)

justin@pauler.org
(Email Address)

From the town of Cypress (77410) southeasterly to the town of Houston (77001), K287BQ is the only signal that can be heard on 105.3 FM.

Until recently, I have been able to clearly hear KTWL "Texas Mix" at my office on the north side of the city of Houston (77001).

Thank-you for your support!

Please return via email to Texasmix1053@gmail.com

Mail to: 530 W. Main St. Brenham, Tx 77833

Or Fax to (979) 836-9435

**UPDATED INTERFERENCE
COMPLAINT**

Full Name: Theodore Bashinski Jr **Phone:** 832-256-4649
Address: 10748 Jones Wilke Rd., Chappell Hill, TX 77426

On or about February 27, 2019, a new radio station began broadcasting on **105.3 FM** in Houston, TX. This station, which I understand is licensed to CENTRO CRISTIANO DE VIDA ETERNA identifies its call letters as **K287BQ**, and broadcasts mainly foreign language programming and is causing interference to my regular over-the-air listening to **KTWL** on **105.3 FM**.

The interference which has been identified originating from **K287BQ** is/was occurring at the following locations (check as appropriate):


☒ **x** My residence at the address shown above
☒ **x** In My Vehicle Commute To/From
my work once I get east of Hockley, TX on HWY 290
☒ **x** At my work at 9745 Bent Oak Dr. Houston, TX 77040

*Appropriate 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 provide information with sufficient information to resolve the complaint.*

I am providing this declaration to ask the Federal Communications Commission to take action to stop/prevent this interference from **K287BQ**.

I am a regular listener to the desired station **KTWL 105.3 FM** using an over-the-air signal at least twice a month, I have no legal, employment, financial, or familial affiliation or relationship with the desired station.

I declare under penalty of perjury that the information in this form is true and correct to the best of my knowledge and belief. I understand that this complaint may be made publicly available.

Name (Print): Theodore Bashinski Jr
Signature: 
Date: _____ **Email:** tbashin@hotmail.com

Thank-you for your support! Please return via email to Texasmix1053@gmail.com Mail to: 530 W. Main St. Brenham, Tx 77833 Or Fax to (979) 836-9435

**UPDATED INTERFERENCE
COMPLAINT**

Full Name: Garret Ballam Phone: 361-648-4475
Address: 11915 Stillmeadow Drive, Houston, TX 77070

On or about February 27, 2019, a new radio station began broadcasting on **105.3 FM** in Houston, TX. This station, which I understand is licensed to CENTRO CRISTIANO DE VIDA ETERNA identifies its call letters as **K287BQ**, and broadcasts mainly foreign language programming and is causing interference to my regular over-the-air listening to **KTWL** on **105.3 FM**.

The interference which has been identified originating from **K287BQ** is/was occurring at the following locations (check as appropriate):

☒ My residence at the address shown above
☒ In My Vehicle Commute To/From
On Hwy 249 from Beltway 8 to Exit for 2920

Appropriate 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 provide information with sufficient information to resolve the complaint.

I am providing this declaration to ask the Federal Communications Commission to take action to stop/prevent this interference from **K287BQ**.

I am a regular listener to the desired station **KTWL 105.3 FM** using an over-the-air signal at least twice a month, I have no legal, employment, financial, or familial affiliation or relationship with the desired station.

I declare under penalty of perjury that the information in this form is true and correct to the best of my knowledge and belief. I understand that this complaint may be made publicly available.

Name (Print): Garret Ballam
Signature: [Signature]
Date: 9-20-19 Email: gballam15@gmail.com

Thank-you for your support! Please return via email to Texasmix1053@gmail.com Mail to: 530 W. Main St. Brenham, Tx 77833 Or Fax to (979) 836-9435

**UPDATED INTERFERENCE
COMPLAINT**

Full Name: MARK Rekieta Phone: 832-248-8411
Address: 3506 Postwood Dr. Spring, Tx. 77388

On or about February 27, 2019, a new radio station began broadcasting on **105.3 FM** in Houston, TX. This station, which I understand is licensed to **CENTRO CRISTIANO DE VIDA ETERNA** identifies its call letters as **K287BQ**, and broadcasts mainly foreign language programming and is causing interference to my regular over-the-air listening to **KTWL** on **105.3 FM**.

The interference which has been identified originating from **K287BQ** is/was occurring at the following locations (check as appropriate).

☒ My residence at the address shown above

☒ In My Vehicle Commute To/From

From my residence to I-10 + Barker Cypress

Interference is in all of the Northwest part of Harris Co.
Appropriate 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 provide information with sufficient information to resolve the complaint.

I am providing this declaration to ask the Federal Communications Commission to take action to stop/prevent this interference from **K287BQ**.

I am a regular listener to the desired station **KTWL 105.3 FM** using an over-the-air signal at least twice a month. I have no legal, employment, financial, or familial affiliation or relationship with the desired station.

I declare under penalty of perjury that the information in this form is true and correct to the best of my knowledge and belief. I understand that this complaint may be made publicly available.

Name (Print): MARK Rekieta

Signature: Mark Rekieta

Date: 10-2-19 Email: mrekieta@live.com

Thank-you for your support! Please return via email to Texasmix1053@gmail.com Mail to: 530 W. Main St. Brenham, Tx 77833 Or Fax to (979) 836-9435

**UPDATED INTERFERENCE
COMPLAINT**

Full Name: James B Davis **Phone:** 713-510-0772

Address: 21227 Rosehill Ch Rd. Tomball, TX 77377-5853

On or about February 27, 2019, a new radio station began broadcasting on 105.3 FM in Houston, TX. This station, which I understand is licensed to CENTRO CRISTIANO DE VIDA ETERNA identifies its call letters as K287BQ, and broadcasts mainly foreign language programming and is causing interference to my regular over-the-air listening to KTWL on 105.3 FM.

The interference which has been identified originating from K287BQ is/was occurring at the following locations (check as appropriate):

☒ My residence at the address shown above

☒ In My Vehicle Commute To/From

249A Beltway. 290 & 610. 249 at Louetta. Vintage Park at Louetta.

I-99 & Cypress Rosehill. old huffmister & Cypress Rosehill & 290.

290 & Spring Cypress. 290 & Skinner. 290 & Eldridge. 290 & Beltway

Appropriate 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 provide information with sufficient information to resolve the complaint.

I am providing this declaration to ask the Federal Communications Commission to take action to stop/prevent this interference from K287BQ.

I am a regular listener to the desired station KTWL 105.3 FM using an over-the-air signal at least twice a month, I have no legal, employment, financial, or familial affiliation or relationship with the desired station.

I declare under penalty of perjury that the information in this form is true and correct to the best of my knowledge and belief. I understand that this complaint may be made publicly available.

Name (Print): James B Davis

Signature: James B Davis

Date: 9-11-2019 **Email:** k5goh@aol.com

Thank-you for your support! Please return via email to Texasmix1053@gmail.com Mail to: 530 W. Main St. Brenham, Tx 77833 Or Fax to (979) 836-9435

**UPDATED INTERFERENCE
COMPLAINT**

Full Name: Rick Calvert **Phone:** 832-878-7425

Address: 16814 N Swirling Cloud Ct, Cypress TX 77433

On or about February 27, 2019, a new radio station began broadcasting on 105.3 FM in Houston, TX. This station, which I understand is licensed to CENTRO CRISTIANO DE VIDA ETERNA identifies its call letters as K287BQ, and broadcasts mainly foreign language programming and is causing interference to my regular over-the-air listening to KTWL on 105.3 FM.

The interference which has been identified originating from K287BQ is/was occurring at the following locations (check as appropriate):

☒ **My residence at the address shown above**

☒ **In My Vehicle Commute To/From Work throughout Houston**

Traveling along 290 in both directions, continuous interference at 290 and Fairbanks N Houston, 290 & beltway 8, 290 & Gesner, 290 & Senate, 290 & Jones

Altex 18870 Northwest FWY, Along 249 & Antoine near CVS, 249 & west road, 249 & Sammet North Houston near Jack in the box, beltway6 & Veterans Memorial

Shell station @ 6751 Fairbanks N Houston Rd, Houston, TX 77040, Shell @ 4402 W Sam Houston PKWY N, all along beltway 8 & clay rd, beltway8 & 249, Beltway 8 & 290

Appropriate 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 provide information with sufficient information to resolve the complaint.

I am providing this declaration to ask the Federal Communications Commission to take action to stop/prevent this interference from K287BQ.

I am a regular listener to the desired station KTWL 105.3 FM using an over-the-air signal at least twice a month, I have no legal, employment, financial, or familial affiliation or relationship with the desired station.

I declare under penalty of perjury that the information in this form is true and correct to the best of my knowledge and belief. I understand that this complaint may be made publicly available.

Name (Print): Rick Calvert

Signature: 

Date: 10/08/2019 **Email:** RCALVERT@TEXAS.NET

Thank-you for your support! Please return via email to Texasmix1053@gmail.com Mail to: 530 W. Main St. Brenham, Tx 77833 Or Fax to (979) 836-9435

Exhibit 2 Engineering

Technical Comments
KTWL Listener Complaints
Houston, Texas Area
October 2019

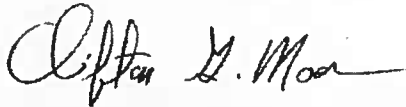
KTWL (FM) Radio Station, Brenham, TX has been plagued with interference from co-channel K287BQ. KTWL has forwarded the complaints to Bromo Communications for analysis .

Population within the KTWL licensed 60 dBu contour is 159,430 persons. Therefore a minimum of 6 listener complaints are required.

KTWL continuously ascertains that its transmitter plant is operating within its licensed parameters.

Attached is the map "KTWL Listener Complaint Locations". These are the locations that listener complaints pass the Undesired-Desired ratio. At each of these locations the K287BFQ translator signal is greater than the -20 dB ratio required for no interference. That tabulation is also attached.

All statements and calculations are sworn to be accurate to the knowledge of the undersigned.

A handwritten signature in black ink, appearing to read "Clifton G. Moor". The signature is fluid and cursive, with the first name "Clifton" being more prominent.

Clifton G. Moor, President
Bromo Communications, Inc.

October 15, 2019

**KTWL Listener Declaration
Tabulation**

<u>#</u>	<u>Name</u>	<u>Date</u>	<u>Coordinates</u>	<u>Location</u>	<u>Undesired K287BQ</u>	<u>Desired KTWL</u>	<u>Ratio</u>
8	Victor Pena	6-28-19	29 56 58 95 37 15	13202 Vernon Road Cypress, TX	31.42	51.34	-19.92
31	Justin W. Pauler	09-17-19	29 47 05.0 95 46 40.3	TX-99 and I-10 Cypress, TX	38.4	47.8	-9.4
33	Theodore Bashinski, Jr.	09-20-19	29 52 30 95 32 40	9745 Bent Oak Dr. Houston, TX	35.5	46.3	-10.8
34	Garred Bollam	9-20-19	29 56 13.1 95 30 58.6	Hwy 249 at Sam Houston Fwy	31.5	47.4	-15.9
37	Mark Pekieta	10-02-19	30 02 54 95 28 20.7	3506 Postwood Dr. Spring, TX	41.8	46.3	-4.5
46	James B. Davis	9-11-19	29 52 24.9 95 33 21.2	Hwy 290 & Sam Houston Pkwy.	35.8	46.5	-10.7
47	Rick Calvert	10-09-19	29 51 55 95 31 29	6751 Fairbanks N. Houston Rd. Houston, TX	35.9	45.4	-9.5

Bromo Communications, Inc.