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FEDERAL COMMUNICATIONS COMMISSION**FCC Mailroom**

Before the
Washington, DC 20554

In re Interference Complaint

**MOUNTAIN COMMUNITY
TRANSLATORS, LLC**

FM Translator Station K275CP
Phoenix, Arizona

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File No. BLFT-20170719AAV

Facility Identification Number 138167

To: Secretary, Federal Communications Commission
Attn: Chief, Media Bureau (Audio Division)

ADDITIONAL K275CP INTERFERENCE COMPLAINT RESPONSE

Mountain Community Translators, LLC ("MCT") hereby files this Additional Interference Complaint Response. This Additional Response is filed in reference to the Reply Interference Complaint Under Section 74.1203 filed by Rocket Radio, Inc. ("Rocket") dated July 12th, 2018 and received by the Commission on July 19th, 2018. MCT filed an Objection to Interference Complaint on April 10th, 2018 to the initial Interference Complaint filed by Rocket on March 19th, 2018. In Rocket's Reply, it provides an alleged additional listener interference complaint by Betty Swanson.

First, Rocket falsely states that it is the "*licensee of translator K275CL 102.9 (FM), Channel 275.*" Rocket is the licensee of K246CH Tuba City, Arizona, facility ID 155722. K246CH was granted a Construction Permit ("CP") for operation on channel 275D with the proposed call sign of K275CL, BPFT-20160129AVI. Rocket has filed a license to cover this CP, BLFT-20160404ACM over two years ago, however this license application remains pending at the Commission. An Informal Objection was filed by Linda C. Corso on September 24th, 2016 to the K246CH license application. It basically asserts that the new operation by K246CH on

channel 275D was not properly constructed per the terms of its CP. Rocket's principle owner, John Low, much later admitted in a supplemental filing that indeed K246CH was not properly constructed on channel 275D. MCT would refer to its original Reply and Objection filed in regards to this matter on April 10th, 2018 for more details regarding the improper construction of K246CH. The fact remains that K246CH Tuba City, AZ to date has not yet been licensed to operate on channel 275D.

Rocket continues to state that MCT's K275CP is causing interference to its K246CH, which was operating under program test authority as K275CL on co-channel channel 275D until May 7th, 2018 when K246CH filed to go silent (BLSTA-20180508ACH), ironically with its excuse being that it is receiving interference from K275CP. This filing by Rocket included a third new listener complaint. Upon inspection of this new interference complaint submitted by Betty Swanson of Mesa, AZ, it is dated May 9th, 2018 or two days after K246CH went silent on channel 275D. Ms. Swanson's comments are "I was enjoying the station but now I am getting the Catholic station". Obviously she was receiving K246CH quite fine until it went silent on May 7th and then filed a complaint on May 9th, 2018 after K246CH went silent. Rocket likely failed to note the dates of its own STA filing and the date of the listener complaint. Rocket's STA filing under BLSTA-20180508ACH for K246CH reason for going silent is also quite disingenuous. Rocket states its reason for going silent with K246CH on May 7th, 2018 "*while dealing with interference issues from FM Translator Station K275CP*". While the Commission granted this STA request, it was likely because the Commission staff processing the STA request would review this and assume that K246CH (or K275CL) was causing interference to K275CP. MCT has not filed any Interference Complaints against K246CH or any other translator owned by Rocket. But in this case, Rocket has filed Interference Complaints against MCT's K275CP.

MCT begs to ask the question, why would K246CH go silent because of interference allegedly being caused to it by K275CP? The timing is very unusual as well. K246CH commenced program tests on channel 275D as K275CL on April 4th, 2016, albeit with un-authorized and improperly constructed facilities by its own admission. K275CP commenced broadcasting on channel 275D as correctly noted by Rocket after K246CH on channel 275D, on December 16th, 2016. MCT made a small modification of its operation of K275CP at its original transmitter site on July 19th, 2017. Once again, why would Rocket take K246CH silent after K275CP had been operating on channel 275D for a year or more? MCT believes that its more likely that K246CH went silent so that it could move its co-owned primary station being rebroadcast, KIKO(AM), to its other translator at the same site as K246CH, or K247CF without having duplicate coverage as K246CH. The Commission should consider rescinding the silent STA authority for K246CH (BLSTA-20180508ACH) since allegedly receiving interference from another FM translator should not be a valid reason for taking K246CH silent. Especially considering that no interference from K275CP to K246CH has been ever been proven to date. MCT has previously documented that any possible interference to K246CH on channel 275 would more likely be caused by the newly constructed operation of co-channel KDIF-LP Phoenix, AZ, facility ID 195405, on channel 275. The KDIF-LP transmitter site is located much closer to K246CH's transmitter site than K275CP's transmitter site and has a primary contour closer to K246CH's primary contour than K275CP's primary contour. Rocket continues to ignore this fact.

If K246CH was operational, it would be in violation of duplicating the same primary station with its co-owned K247CF. Rocket even admits to this violation in its most recent amendment of BMPFT-20180706ABB, dated July 17th, 2018, and simply states that it will switch to a new primary station to be rebroadcast with co-owned K247CF once K246CH begins

broadcasting again. Rocket amended its application only after MCT highlighted this fact in its Informal Objection that Rocket had falsely certified in two minor change form 349 applications for K246CH that it didn't own any other translators with the same or duplicate coverage area.

Rocket has recently filed multiple applications to yet again attempt to modify the operation (K246CH has filed no less than 10 form 349 applications since 2008, or on average one per year) for K246CH Tuba City, AZ, BPFT-20180625ABP, and BMPFT-20180706ABB. As noted, MCT has filed an Informal Objection against these two modification applications based on several issues with these applications and are included herein by reference. In summary, MCT documented that Rocket filed the first application (BPFT-20180625ABP) under the wrong licensee, or co-owned 1TV.COM, Inc., and seeks to modify a presumed licensed operation on 275D (K275CL) despite never being licensed on channel 275D by the Commission. The second application, BMPFT-20180706ABB, this time filed by the correct licensee or Rocket, was filed as a modification of Construction Permit, BPFT-20160129AVI, for K246CH. If this application were to be processed, Rocket should have been required to dismiss its pending form 350 license application, BLFT-20160404ACM, to cover CP BPFT-20160129AVI prior to attempting to modify its outstanding CP. If Rocket was required to dismiss its pending license application for operation on channel 275, any Interference Complaints it filed against MCT's K275CP would be moot. Both pending K246CH proposed 349 applications are in violation of the same coverage pattern as co-owned K247CF (which Rocket is now attempting to amend as noted above). MCT also questions why Rocket should be allowed to have two pending form 349 minor change applications for K246CH at the same time.

MCT has well documented that the original Interference Complaint filed by Rocket against MCT's K275CP Phoenix, AZ and now this additional Reply Interference Complaint filed

against K275CP should not be considered. Especially considering that K246CH Tuba City, AZ has never been licensed to operate on channel 275D. K246CH is currently silent as of May 7th, 2018 and no longer even running program tests on channel 275D. Yet Rocket feels compelled to file an additional Reply Interference Complaint against MCT's licensed operation of K275CP on July 12th, 2018 despite not even being operational. The one additional listener complaint Rocket provides as evidence of interference to its K246CH was dated May 9th, or two days after K246CH went silent on May 7th, 2018. The listener even notes that they were able to receive K246CH on channel 275D just fine until it went silent.

Rocket continues to have a mounting pattern of making false and misleading statements to the Commission, perhaps worthy of further investigation. Wherefore, Rocket's multiple Interference Complaints filed against MCT's K275CP Phoenix, AZ should be summarily dismissed.

Respectfully submitted,

MOUNTAIN COMMUNITY TRANSLATORS, LLC

BY: 

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November 17, 2018

CERTIFICATE OF SERVICE

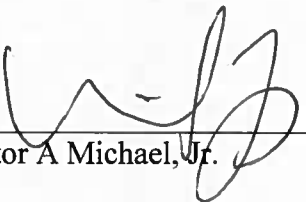
I, Victor A Michael, Jr., do hereby certify that a copy of the foregoing "Additional K275CP Interference Complaint Response" was mailed by First Class U.S. Mail, postage prepaid, this 17th day of November, 2018, to the following:

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** Via Electronic Mail only