



Federal Communications Commission
Washington, D.C. 20554

February 26, 2021

Intelli LLC
1982 Senter Rd.
San Jose, CA 95111

Re: Intelli LLC
KKOL(AM), Seattle, Washington
Fac. ID No.: 20355
License Application: BMML-20190624ACC

Dear Licensee:

This letter is in reference to two interference complaints concerning KKOL(AM) recently filed with the FCC. On July 16, 2020 Ann and David Knight ("The Knights") filed a blanketing interference complaint with the FCC on behalf of themselves and their neighbors along NE Murden Cove Drive on Bainbridge Island, Washington. The Knights contend that blanketing interference from AM station KKOL(AM) is negatively impacting residents along NE Murden Cove Drive. They claim that KKOL(AM) received authority on July 19, 2019, to test its recently upgraded 50 kilowatt facility and immediately after equipment tests began, residents on Murden Cove Drive began experiencing interference.

Specifically, The Knights state that during August 2019, the Chief Engineer for Salem Media Group (Salem), the previous licensee of KKOL(AM),¹ came to their office and home to test the impact of the interference. The test showed that interference from KKOL(AM) prevented The Knights from accessing the Internet at their residence. According to The Knights, the Chief Engineer tried several mitigating strategies, and none worked. They also state that Comcast replaced all the hardware in the neighborhood. However, the Comcast repairs did not restore The Knights' Internet service.

Philip Hutcherson, who resides at 9804 NE Murden Cove Dr., filed a separate interference complaint with the FCC on February 9, 2021. In his complaint, Mr. Hutcherson wrote that whenever KKOL(AM) is operating at high power, his EV car charger (EVSE) malfunctions and will not charge the car. Mr. Hutcherson states that this is a big problem since the inability to charge means the vehicle becomes nearly useless. He further states that the interference problem has been confirmed in the presence of the KKOL(AM) engineer and that the engineer is trying to find a solution.²

This document constitutes formal notice to Intelli of the complaints filed with the FCC and explains the licensee's responsibilities under the FCC's blanketing interference rules.³ Pursuant to section 73.3587 of the Commission's rules (Rules),⁴ we will treat the complaints as Informal Objections filed against the license application of KKOL(AM). Copies of the complaints are enclosed.

¹ Salem sold KKOL(AM) to Intelli LLC (Intelli) in application BAL20180514AAH granted on October 18, 2018.

² On February 16, 2021, Salem's counsel, Kathleen Kirby, Esq. of Wiley Rein LLP, sent an email to FCC staff. Ms. Kirby states that Salem has been communicating directly with Mr. Hutcherson and has provided him with a filter that has resolved the issue with his car charger.

³ See 47 CFR §§ 73.88, 73.318.

⁴ 47 CFR § 73.3587.

Background

According to our records, KKOL(AM) is a licensed station.⁵ The Media Bureau granted KKOL(AM) Program Test Authority (PTA) on July 19, 2019, to test its new facilities from a new site location. However, the station went silent on September 27, 2019, as the station changed ownership and new equipment was being installed. On November 7, 2019, the Media Bureau granted the station a new license (BMML-20190624ACC) but the station remained silent until the following year. On September 24, 2020, the Media Bureau granted the station special temporary authority (STA) to operate with a reduced power of 3.2 kilowatts during daytime hours. The next day the station resumed broadcast operations in accordance with the STA in order to keep the station's license from expiring as a matter of law.⁶

Blanketing Interference Information

The type of interference described by the complainants may be attributable to "blanketing" interference, which can occur to receivers that are in close proximity to an AM transmitter.⁷ To give the station guidance in applying the blanketing rules, we have formulated a list of the five most common blanketing interference situations. The situations vary depending on the following:

1. **Whether or not the complaint was filed within the first year of operation.** Pursuant to section 73.318 of the Rules, complaints will be considered to be filed within the first year of operation if they are filed within one year from the date the station begins program tests.
2. **Whether the complainant is located inside or outside the blanketing contour.**
3. **Whether the device experiencing interference is covered under the blanketing interference rule.**

⁵ KKOL(AM) is licensed to operate on 1300 kHz with a daytime power of 50,000 watts and a nighttime power of 3,200 watts, employing different directional antenna patterns.

⁶ See 47 U.S.C. § 312(g). The station's request for authorization to operate with reduced power stated the power adjustment was necessary in order to resume operations while trying to find solutions to the interference complaints of neighbors.

⁷ See 47 CFR §§ 73.88 and 73.318. Section 73.318 of the Rules states that licensees "must satisfy all complaints of blanketing interference which are received by the station during a one year period. The period begins with the commencement of program tests. . . . These requirements specifically do not include interference complaints resulting from malfunctioning or mistuned receivers, improperly installed antenna systems, or the use of high gain antennas or antenna booster amplifiers. Mobile receivers and non-RF devices such as tape recorders or hi-fi amplifiers (phonographs) are also excluded." Hard-wired telephones, alarm systems, and fire systems are considered non-RF devices under section 73.318 and, as such, are not covered by this rule. Cordless telephones are covered by Part 15 of the Rules (See section 15.3(j) for cordless telephone system description). Section 15.5(b) of the Rules states, in pertinent part, that interference to cordless telephones caused by the operation of an authorized radio station must be accepted. Accordingly, any hard-wired or cordless telephone complaints referenced in this case are not covered by the blanketing interference rules.

Situation # 1

The station is financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 of the Rules⁸ if the complaint is filed within the first year of program test authority and the complainant is located **inside** the station's blanketing contour.⁹

Situation # 2

The station is not financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 of the Rules if the complaint is filed within the first year of program test authority but the complainant is located **outside** of the station's blanketing contour. However, the station is expected to cooperate with the complainant by providing effective technical assistance in determining the cause of the problem and offering advice on corrective measures.¹⁰

Situation # 3

The station is not financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 of the Rules if the complaint is filed **after** the first year of program test authority even if the complainant is located inside the station's blanketing contour. The station is required to provide effective technical assistance to the complainant. This entails the providing of information on the cause of the interference and also providing information on proper corrective measures.¹¹

Situation # 4

The station is not financially responsible for resolving complaints of interference to electrical devices covered under section 73.318 of the Rules if the complaint is filed **after** the first year of program test authority and the complainant is located **outside** of the station's blanketing contour. However, in similar past cases, to promote goodwill within the station's community, licensees have taken steps to assist in alleviating interference complaints.

Situation # 5

The station is not financially responsible for resolving complaints of interference to electrical devices not covered under section 73.318 of the Rules. However, in similar past cases, to promote goodwill within the station's community, licensees have taken steps to assist in alleviating interference complaints.

Effective Technical Assistance

Section 73.318(d) of the Rules states, “[f]ollowing the one year period of full financial obligation to satisfy blanketing complaints, licensees shall provide technical information or assistance to complainants on remedies for blanketing interference.” The rule requires that the station provide

⁸ 47 CFR § 73.318.

⁹ See *FM Broadcast Station Blanketing Interference*, FCC 84-514, 57 RR 2d 126, para 15 (1984).

¹⁰ *Id.* at para 17.

¹¹ *Id.* at para 20.

information and assistance sufficiently specific to enable the complainant to eliminate all blanketing interference and not simply that the station attempt to correct the problems.¹² Effective technical assistance entails providing specific details about proper corrective measures to resolve the blanketing interference.¹³ For example, providing complainants with diagrams and descriptions which explain how and where to use radiofrequency chokes, ferrite cores, filters (i.e. Microwave Filter Company filters), and/or shielded cable. In addition, effective technical assistance also includes the recommendation on replacement equipment that would work better in the high radiofrequency fields. Also, effective technical assistance does not mean referring the complainant to the equipment manufacturer.

Complaint Report

The Commission intends that broadcast stations take very seriously their responsibility to resolve blanketing interference. Accordingly, the station must respond to the complaints that have been filed and must submit a detailed report of the steps taken to resolve the complaints **within 30 days from the date of this letter**. The report must contain the following information for each complaint:

1. The affected devices (i.e., the manufacturer, model number and serial number);
2. Whether or not the complainant is within the blanketing contour;
3. The dates and description of the assistance provided; and
4. Whether or not the interference has been resolved.

The report must include a map showing the following:

1. The location of the station's transmitter site;
2. The location of the station's 1 V/m blanketing contour; and
3. The locations of the complainants.


Intelli must determine which of the five situations described above apply and take the appropriate actions required by section 73.318 to fulfill its obligations. Failure to address all interference complaints may result in a reduction in authorized power levels (by means of a modified limited Program Test Authority or a Special Temporary Authorization). The complainant will be expected to cooperate fully with the station's efforts to resolve the interference problems. The complainant's failure to do so could lead to a finding that the station has fulfilled its obligations pursuant to section 73.318. Excessive

¹² See *Calvary Educational Broadcasting Network, Inc.*, Memorandum Opinion and Order, 7 FCC Rcd 4040 (1992).

¹³ See *FM Broadcast Station Blanketing Interference*, 57 RR 2d 126.

postponements of appointments by either party will be viewed as an obstructive tactic in delaying the resolution of the blanketing interference. These requirements are in place to ensure that all parties cooperate fully and immediately. Any further complaint received by the FCC will be forwarded to Intelli for investigation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jerome J. Manareh". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

for

James Bradshaw,
Senior Deputy Chief, Audio Division
Media Bureau

cc: Dan Alpert, Esq.
Tron Dinh Do
Mrs. Ann Knight
Mr. David Knight
Mr. Philip Hutcherson