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Federal Communications Commission
Office of the Secretary

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

In the Matter of License of:)	
)	
LIGHTHOUSE CHRISTIAN CENTER)	License No. BLL-20061106AAA
)	Facility No. 133854
WLCQ-LP, Feeding Hills, Massachusetts)	
)	
To: Office of the Secretary)	
Attention: Chief, Audio Services Division,)	
Media Bureau)	

PETITION TO REVOKE LICENSE

Saga Communications of New England, LLC ("Saga"), licensee of WLZX(FM), Northampton, Massachusetts, by its counsel and pursuant to Section 312(a) of the Communications Act of 1934, as amended ("Act") hereby respectfully files this Petition to Revoke the license of low power FM station WLCQ-LP, Feeding Hills, Massachusetts. WLCQ-LP is licensed to Lighthouse Christian Center ("LCC").¹

Section 312(a) of the Act provides that the Commission may revoke any station license if: (1) the applicant knowingly made false statements to the Commission in either the application or any related statement of fact; (2) the Commission becomes aware of subsequent conditions that would warrant the refusal to grant a license or permit; (3) the licensee willfully or repeatedly fails to operate substantially as set forth in its license; or (4) there is a willful or repeated violation of, or willful or repeated failure to observe, any provision of the Act or Commission rule.

¹ The Commission's Consolidated Data Base System ("CDBS") shows that WLCQ-LP is licensed to "Lighthouse Christian Center", but records of the Secretary of State of Massachusetts indicate the legal name of LCC is "Lighthouse Christian Center, Inc." See: <http://corp.sec.state.ma.us/CorpWeb/CorpSearch/CorpSearchResults.aspx>. As used herein, the term "LCC" refers to both the FCC licensee name in CDBS and the legal name of the entity.

The Commission must revoke the license of WLCQ-LP for: (1) causing intolerable interference to the listening reception of WLZX; (2) operating with facilities not authorized by the Commission; (3) broadcasting commercial announcements in violation of Section 399B of the Act; (4) failing to comply with the National Environmental Policy Act (“NEPA”)²; and (5) willfully making false certifications in connection with its application for construction permit and application for license to cover that permit.³

The Commission should promptly order WLCQ-LP to cease operating and initiate a “show cause” hearing under Section 312(d) of the Act requiring LCC to demonstrate whether it has the basic requisite character qualifications to be and remain a Commission licensee and why its license for WLCQ-LP should not be revoked.

Bases on Which Commission Must Revoke WLCQ-LP’s License.

Interference and Operation of Unlicensed Facilities. Saga’s personnel have been receiving reports from listeners of WLZX, which operates on channel 257 (99.3 MHz), indicating that they are receiving interference to reception of that station due to the presence of WLCQ-LP, which operates on second-adjacent channel 259 (99.7 MHz) from a location at Feeding Hills, Massachusetts, which is approximately 20 miles south of the WLZX transmitter site. While attempting to confirm the source of the interference, Saga’s staff members discovered that WLCQ-LP is operating with an antenna configuration that the Commission did not authorize. WLCQ-LP is authorized to operate a non-directional Scala FMO transmitting antenna with transmitter power output (“TPO”) of 0.242 kW.⁴ The attached Engineering

² Title 42 U.S.C. § 4321, *et seq.*

³ This Petition is supported by the Declaration of Gary Zenobi, a Vice President of Saga Communications of New England, LLC, and Market Manager of WLZX.

⁴ See copy of license for WLCQ-LP (**Attachment A**).

Statement (**Attachment B**) explains that a non-directional Scala FMO antenna is a one-bay, horizontally polarized antenna.

However, LCC is broadcasting with a different make and type antenna. The photographs submitted as **Exhibit 2.0** in the Engineering Statement reveal that WLCQ-LP is using a two-bay, circularly-polarized, “ring-horn” type antenna. The Engineering Statement explains that, if WLCQ-LP’s TPO of 0.242 kW were fed into a two-bay antenna, the resulting effective radiated power (“ERP”) would be greater than the ERP generated by a one-bay antenna with the same TPO. Thus, WLCQ-LP could be operating at twice its licensed power. If LCC is using a higher TPO than 0.242 kW, WLCQ-LP’s ERP would be higher and the interference to WLZX’s listeners would be even worse. This is very likely the explanation for why WLZX listeners have been suffering interference from WLCQ-LP.⁵ The Commission should immediately order WLCQ-LP to cease operating and the Commission should inspect the station to determine the facilities with which it is operating. One of Saga’s staff members attempted to visit what he believed to be LCC’s station, but when he approached the station during regular business hours, he found no personnel there. Saga’s only recourse is to seek the intervention of the Commission.

Broadcasting Commercial Announcements. Like all low power FM stations, WLCQ-LP must operate on a noncommercial educational (“NCE”) basis. Pursuant to Section 399B of the Act and Title 47 CFR §73.503(d), NCE radio stations “may not air advertisements, *i.e.*, promotional announcements on behalf of for-profit entities in exchange for any remuneration.”⁶

⁵ In addition, it appears that there is a two second error in latitude and a four second error in longitude between the location of the WLCQ-LP licensed facilities and the facilities from which WLCQ-LP actually operates.

⁶ *Maricopa Community College District*, 29 FCC Rcd 15042 (2014).

Further, NCE stations must identify program sponsors.⁷ NCE stations may broadcast the contributor's slogan, location, value-neutral description of products, and trade names, but such material may only identify, rather than promote, the underwriter.⁸ An NCE licensee may not broadcast comparative or qualitative descriptions, price information, calls to action, and inducements to buy, sell, rent or lease, because such material is promotional.⁹ But WLCQ-LP is brazenly airing precisely the types of advertisements that are prohibited on NCE stations. Attached hereto as **Attachment C** are transcripts of commercial announcements broadcast by WLCQ-LP, showing the dates and times of the broadcasts. Prohibited calls to action and inducements to buy, sell, rent or lease are highlighted in the attachment.

Violation of NEPA Certification Requirements. An additional ground for revoking the license of WLCQ-LP is LCC's failure to comply with NEPA requirements at the time it filed an application for a construction permit for WLCQ-LP (the "Permit Application"). As part of the Permit Application (File No. BNPL-20010613AGT, at Section VI, Question 10) LCC certified that "the proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306."

However, this certification is demonstrably false. In assessing the effect of facility construction on historic properties, the permittee or licensee must follow the provisions of the Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation

⁷ See 47 U.S.C. § 317; 47 C.F.R. § 73.1212. The sponsorship identification rules require announcements only where the monetary or other consideration is provided as an inducement for the broadcast of specific programming, whereas announcements acknowledging general contributions are discretionary. In either situation, where acknowledgments of contributions are aired, the underwriting rules apply.

⁸ See *Commission Policy Concerning the Noncommercial Nature of Educational Broadcast Stations*, Third Report and Order, 97 FCC 2d 255, 265 (1984) ("*1984 Order*"), Public Notice (1986) *republished*, 7 FCC Rcd 827, 827-28 (1992).

⁹ *Id.* at 827.

Act Review Process (the “NHPA Agreement”).¹⁰ Part V(1) of the NHPA Agreement provides that if the structure is over 45 years old, an applicant must comply with the consultation process set forth in Subpart B of 36 CFR Part 800. In this instance, as set forth in the Engineering Statement, the building on which the roof-mounted tower/antenna remains mounted was constructed in 1900 and LCC’s Permit Application did not comply with the above-referenced consultation process; thus, LCC could not have truthfully made the NEPA certification as part of the Permit Application, in light of the age of the building.

Part V(4) of the NHPA Agreement further requires that co-locations such as WLCQ-LP’s be reviewed under the consultation process as set forth under Subpart B of 36 CFR Part 800 when the licensee has received written or electronic notification that the FCC is in receipt of a complaint from a member of the public asserting that the co-location could have an adverse effect to a historic property eligible or potentially eligible for listing in the National Register of Historic Places. Pursuant to the National Parks Service criteria, the 19th century church building meets these two criteria in that the structure is at least 50 years old and materially looks the way it did in the past (or at least it did until the WLCQ-LP tower and antenna were mounted on it); and the building carries historical significance as the former historic Protestant Episcopal Church for Feeding Hills, Massachusetts (see also Engineering Statement, *Exhibit 5.0*). The building remains potentially eligible for listing in the National Register of Historic Places.

This Petition serves as the necessary written complaint as required under Part V(4) of the NHPA Agreement. Therefore, LCC should have, but did not, initiate the required NEPA consultation process for co-location to an existing non-tower structure. This NEPA consultation

¹⁰ 47 C.F.R. Part 1, Appendix C.

process remains relevant to the existing WLCQ-LP licensed structure, because the roof mounted tower was constructed after March 16, 2001.¹¹

Also attached is a copy (Engineering Statement *Exhibit 5.1*) of the U.S. Fish & Wildlife Service's Information for Planning and Conservation (“IPaC”) report for the Feeding Hills, WLCQ-LP site location. This report identifies two endangered species and seventeen migratory birds requiring further study. As noted in the Commission’s presentation, IPaC findings do not necessarily prohibit tower construction or co-location. However, the presence of identified endangered species prohibits an applicant from claiming a categorical exemption from environmental processing under 47 CFR § 1.1306. LCC’s affirmative certification in the Permit Application therefore was false and a misrepresentation of material facts.

The Law on False Certification and Willful Misrepresentation.

The Commission and the courts have recognized that “[t]he FCC relies heavily on the honesty and probity of its licensees in a regulatory system that is largely self-policing.” (“[I]t is essential that licensees make full and clear disclosure of all material facts in every application...”).¹² Misrepresentation is “a false statement of fact made with intent to deceive.”¹³ Lack of candor is “concealment, evasion, or other failure to be fully informative, accompanied by intent to deceive.”¹⁴ A false certification may also constitute a misrepresentation.¹⁵

¹¹ March 16, 2001 is the grandfathered cut-off date as outlined in the *NATIONWIDE PROGRAMMATIC AGREEMENT for the COLLOCATION OF WIRELESS ANTENNAS; ATTACHMENT 1; FCC 04-222; issued September 2004.*

¹² *Commercial Radio Service, Inc.*, 21 FCC Rcd 9983, 9986 (2006) (“*CRS Order*”) citing, e.g., *Contemporary Media, Inc., v. FCC*, 214 F.3d 187, 193 (D.C. Cir. 2000) (“*Contemporary Media*”); and *Cumulus Licensing, LLC*, 22 FCC Rcd 13711, 13717 (MB 2007).

¹³ *CRS Order*, 21 FCC Rcd at 9986, citing *Policy Regarding Character Qualifications in Broadcast Licensing Amendment of Rules of Broadcast Practice and Procedure, Relating to Written Responses to Commission Inquiries and the Making of Misrepresentation to the Commission by Applicants, Permittees, and Licensees, and the Reporting of Information Regarding Character Qualifications*, 102 FCC 2d 1179, 1210-11 (1986).

¹⁴ *Id.*, citing *Fox River Broadcasting, Inc.*, 93 FCC 2d 127, 129 (1983)).

Intent to deceive is established if a licensee knowingly makes a false statement.¹⁶ Intent to deceive also can be inferred when the surrounding circumstances clearly show the existence of intent to deceive.¹⁷ The Commission may disqualify an applicant who deliberately makes misrepresentations or lacks candor in dealing with it.

Title 47 CFR § 1.17(a)(2) states that no person may provide to the Commission, in any written statement of fact, “material factual information that is incorrect,” nor can such person “omit material information that is necessary to prevent any material factual statement that is made from being incorrect or misleading without a reasonable basis for believing that any such material factual statement is correct and not misleading.”¹⁸ In expanding the scope of Section 1.17 in 2003 to include written statements that are made without a reasonable basis for believing the statement is correct and not misleading, the Commission explained that this requirement was intended to more clearly articulate the obligations of persons dealing with the Commission, ensure that they exercise due diligence in preparing written submissions, and enhance the effectiveness of the Commission's enforcement efforts.¹⁹ Thus, even absent an intent to deceive, a false statement may constitute an actionable violation of Section 1.17 of the Rules if it is provided without a reasonable basis for believing that the statement is correct and not misleading.²⁰

¹⁵ *Id.* at n.15, citing *San Francisco Unified School District*, 19 FCC Rcd 13326, 13334 at n.40-41 (2004) (“*San Francisco*”).

¹⁶ *Id.* at 9986 (citing *Leflore Broadcasting, Co., Inc. v. FCC*, 636 F.2d 454, 462 (D.C. Cir. 1980)).

¹⁷ See *Contemporary Media*, 214 F.3d at 196.

¹⁸ See *White Park Broadcasting, Inc.*, 24 FCC Rcd 3549, 3565 (MB 2009).

¹⁹ See *Amendment of Section 1.17 of the Commission's Rules Concerning Truthful Statements to the Commission*, 18 FCC Rcd 4016, 4016-4017, 4021 (2003), *recon. denied*, 19 FCC Rcd 5790, *further recon. denied*, 20 FCC Rcd 1250 (2004).

²⁰ See *id.* at 4017, stating that the revision to Section 1.17 is intended to “prohibit incorrect statements or omissions that are the result of negligence, as well as an intent to deceive”; see also *San Francisco*, 19 FCC Rcd at 13337 (2002) (“[A] false statement, even absent an intent to deceive, may constitute a violation of Section 1.17. . . .”).

**LCC May Have Made Disqualifying Misrepresentations
that Must Be Explored at Hearing.**

LCC made a false certification in its Permit Application by failing to comply with NEPA requirements prior to filing the form. In addition, LCC also has falsely certified in its application for a license to cover the Permit Application (File No. BLL-20061106AAA, the “License to Cover Application”) by certifying in Section III, Question 2, that “[t]he facility was constructed as authorized in the underlying construction permit.” Because the facility is at the wrong geographical location and was constructed using a two-bay, ring-horn antenna, the certification is patently false. Moreover, if LCC installed the 2-bay antenna before it filed its License to Cover Application, then LCC may have committed an additional false certification. The appropriate way to confirm these false certifications is to designate the license for revocation hearing. The Commission should order LCC to show cause as to why its license for WLCQ-LP should not be revoked, on the following issues:

To determine whether, prior to certifying its application for construction permit (File No. BNPL-20010613AGT), LCC exercised reasonable diligence to determine whether the proposed facility was excluded from environmental processing under 47 C.F.R. Section 1.1306; and in light of the evidenced adduced, to determine whether LCC falsely certified its application for construction permit for a new low power FM station to operate at Feeding Hills, Massachusetts;

To determine whether LCC installed at a location not authorized by its construction permit (File No. BNPL-20010613AGT), and operated at that location, an antenna different from the antenna authorized by its construction permit, and in light of the evidence adduced, to determine whether LCC falsely certified its application (File No. BLL-20061106AAA) for a license to cover the construction permit, or whether other sanctions are appropriate;

To determine whether LCC has willfully and repeatedly allowed commercial announcements to air on WLCQ-LP, including announcements that are “calls to action” and contain comparative and qualitative statements.

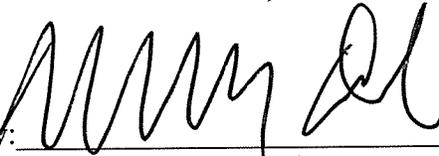
To determine, in light of the evidence adduced pursuant to the foregoing issues, whether the license for WLCQ-LP should be revoked.

Should the Audio Division order LCC to show cause in an evidentiary hearing, Saga requests that it be made a party to the proceeding and be given rights to discovery which Saga will specify pursuant to the order of the presiding administrative law judge.

In view of the foregoing, Saga respectfully requests the Audio Division to issue an Order to Show Cause to LCC upon the issues set out above, and upon conclusion of the hearing, to revoke the license of WLCQ-LP, cancel operating authority for WLCQ-LP and delete the call letters WLCQ-LP from all databases.

Respectfully submitted,

**SAGA COMMUNICATIONS
OF NEW ENGLAND, LLC**

By: 

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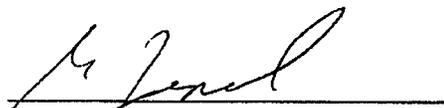
October 7, 2015

DECLARATION OF GARY ZENOBI

Gary Zenobi, under penalty of perjury, declares as follows:

1. I am a vice president of Saga Communications of New England, LLC, and am Market Manager of Radio Station WLZX, Northampton, Massachusetts.
2. I have read a draft of the foregoing Petition to Revoke License and the statements made therein are true and correct to the best of my knowledge and belief.

Executed this 7th day of October 2015.



Gary Zenobi

ATTACHMENT A



United States of America
FEDERAL COMMUNICATIONS COMMISSION
LOW POWER FM STATION LICENSE

Authorizing Official:

Official Mailing Address:

LIGHTHOUSE CHRISTIAN CENTER
522 SPRINGFIELD STREET
FEEDING HILLS MA 01030

James D. Bradshaw
Deputy Chief
Audio Division
Media Bureau

Facility Id: 133854

Call Sign: WLCQ-LP

License File Number: BLL-20061106AAA

Grant Date: November 21, 2006

This license expires 3:00 a.m.
local time, April 01, 2014.

This authorization re-issued December 8, 2006 to reflect removal of the time-share conditions.

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Callsign: WLCQ-LP

License No.: BLL-20061106AAA

Name of Licensee: LIGHTHOUSE CHRISTIAN CENTER

Station Location: MA-FEEDING HILLS

Frequency (MHz): 99.7

Channel: 259

Class: LP100

Hours of Operation: Unlimited

Transmitter: Type Certified. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Transmitter output power: 0.242 kW

Antenna type: Non-Directional

Description: SCA FMO

Antenna Coordinates: North Latitude: 42 deg 04 min 59 sec

West Longitude: 72 deg 38 min 47 sec

Effective radiated power (Watts): 100

Height of radiation center above ground (Meters): 26

Height of radiation center above mean sea level (Meters): 88

Height of radiation center above average terrain (Meters): 29

Antenna structure registration number: Not Required

Overall height of antenna structure above ground: 26 Meters

Obstruction marking and lighting specifications for antenna structure:

It is to be expressly understood that the issuance of these specifications is in no way to be considered as precluding additional or modified marking or lighting as may hereafter be required under the provisions of Section 303(q) of the Communications Act of 1934, as amended.

None Required

Special operating conditions or restrictions:

- 1 The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

*** END OF AUTHORIZATION ***

ATTACHMENT B

**ENGINEERING STATEMENT
IN SUPPORT OF A
"PETITION TO REVOKE LICENSE"**

against

WLCQ-LP(FM) - Feeding Hills, MA
License No. BLL-20061106AAA
(Facility ID No. 133854)
CH259L1 - 99.7 MHz

**IMPROPERLY NOTIFIED ANTENNA
ERROR IN COORDINATES
NEPA ENVIRONMENTAL CERTIFICATION ISSUES**

October 2015

CERTIFICATION OF ENGINEERS

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of the laws of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

October 6, 2015

MUNN-REESE, INC.
385 Airport Drive, PO Box 220
Coldwater, Michigan 49036

Telephone: 517-278-7339

By Wayne S. Reese
Wayne S. Reese, President

By Justin W. Asher
Justin W. Asher, Project Engineer

ENGINEERING STATEMENT

This Engineering Statement supports a Petition to Revoke License filing as submitted by Saga Communications of New England, LLC ("Saga"). This Petition to Revoke License is being filed against LPFM Station WLCQ-LP(FM) - Feeding Hills, MA (Facility ID No. 133854), held by licensee, Lighthouse Christian Center ("Lighthouse"). WLCQ-LP(FM) operates under BLL-20061106AAA with 0.100 kW ERP at 88 meters AMSL (29 meters HAAT) on CH259L1 (99.7 MHz).

Saga station WLZX(FM) - Northampton, MA (Facility ID No. 46963), operates second adjacent channel to WLCQ-LP(FM) under license BLH-20000112ABC with 5.8 kW ERP at 268 meters AMSL (101 meters HAAT) on CH257A (99.3 MHz). While WLCQ-LP(FM) remains fully spaced under §73.807(a)(1) toward WLZX(FM), the WLZX(FM) 60 dB μ F(50:50) service area is still subject to 100 dB μ F(50:10) interfering contour overlap from WLCQ-LP(FM) as noted in **Exhibit 1.0**. Furthermore, under the *Interference protection to full service FM stations* provisions of §73.809, WLZX(FM) has no recourse against this interference as §73.809 limits full service interference resolution solely to co-channel or first adjacent channel relationships. In addition, §73.809 limits full service interference resolution to areas within the full service 70 dB μ service contour or the full service city of license. None of these factors apply to WLZX(FM). Yet interfering 100 dB μ contour overlap still exists.

Therefore, at the request of Saga, other WLCQ-LP(FM) license discrepancies will be addressed here-in. It has been understood additional legal related WLCQ-LP(FM) license discrepancies have been addressed separately by Saga's Counsel.

IMPROPERLY NOTIFIED ANTENNA. Inspection of granted WLCQ-LP(FM) license and license application BLL-20061106AAA indicates use of a Scala FMO, one-bay, horizontally polarized antenna in addition to a Transmitter Operating Power (TPO) of 0.242 kW. However, photographs taken on recent WLCQ-LP(FM) site visits (August 10-13, 2015) indicate use of a two-bay, circularly polarized, "ring-horn" antenna of unknown manufacturer¹. Photographs of the WLCQ-LP(FM) operational plant have been included in **Exhibit 2.0**. Antenna specs for the authorized Scala FMO antenna have been included in **Exhibit 3.0**. Information concerning the WLCQ-LP(FM) license and license application BLL-20061106AAA is a matter of public record before the Commission and therefore not included here-in. Inspection of the aforementioned exhibits indicates the antenna as constructed remains visually different from the antenna as authorized. This discrepancy itself constitutes either a false certification on the Form 319 license application BLL-20061106AAA, or a subsequent violation of §73.875(c)(1).

¹ Photographic evidence of the two-bay antenna operation is also visible through Google Street View photographs available through a variety of universally accessible internet based mapping functions. The WLCQ-LP(FM) operation is identified as the Lighthouse Christian Church; Feeding Hills, MA, or by the corrected site coordinates of 42-04-57.0NL; 72-38-49.6WL (NAD 1983). Google Earth Street View photographs indicate unsubstantiated photograph dates ranging from June 2012 and/or September 2013.

ENGINEERING STATEMENT (continued)

Also of note, the currently licensed TPO of 0.242 kW appears to be associated with the one-bay horizontal only antenna operation at 0.100 kW ERP (Scala FMO specifications lists a one-bay antenna gain of 0.5 (-3 dBd)). Due to the above noted violations, the actual WLCQ-LP(FM) TPO remains unknown. However if Lighthouse is in fact operating with a TPO of 0.242 kW into a two-bay circularly polarized antenna (with a standard gain of approximately 0.9 (-0.46 dBd)), then WLCQ-LP(FM) could potentially be running with approximately twice the legal power. This issue may only be addressed by further FCC action/inquiry.

ERROR IN COORDINATES. Inspection of the WLCQ-LP(FM) license also indicates a two (2) second error in latitude and a four (4) second error in longitude. USGS Aerial Photography of the error in coordinates has been attached in **Exhibit 4.0**. Pursuant to §73.875(b)(2), corrections of coordinates for a LPFM facility requires a corrective Form 318 filing.

NEPA ENVIRONMENTAL CERTIFICATION ISSUES. Further clarification is also being sought concerning the initial Form 318 Environmental Certification (Section VI; Question 10) made within the original WLCQ-LP(FM) Construction Permit filing, BNPL-20010613AGT; the tower construction associated with WLCQ-LP(FM) license BLL-20061106AAA; and further implications extending to the future required §73.875(b)(2) correction of coordinate Form 318 filing. Pursuant to the NATIONWIDE PROGRAMMATIC AGREEMENT for the COLLOCATION OF WIRELESS ANTENNAS; ATTACHMENT 1; FCC 04-222; issued September 2004, ("The Agreement"); Part V(1) stipulates that an antenna may be mounted on a building or non-tower structure without such collocation being reviewed under the consultation process set forth under Subpart B of 36 CFR Part 800 unless the building or structure is over 45 years old. In this instance, the building on which the roof mounted tower/antenna remains mounted was constructed in 1900. The Lighthouse Christian Center (Church) complex is comprised of a 19th century era wood built steepled church building with an adjacent brick church building attachment constructed in 1958. As noted on the previously supplied **Exhibit 2.0** photographs, the WLCQ-LP(FM) roof mounted tower/antenna remains located on the steepled church building constructed in 1900. Agawam Township tax records confirming the 1900 construction date of the wooden steepled church building have been included in **Exhibit 5.0**.

Part V(4) of The Agreement further requires that such collocations be reviewed under the consultation process as set forth under Subpart B of 36 CFR Part 800 when the licensee has received written or electronic notification that the FCC is in receipt of a complaint from a member of the public asserting that the collocation could have an adverse effect to a historic property eligible or potentially eligible for listing in the National Register of Historic Places. Pursuant to the National Parks Service criteria, the 19th century church building meets these two criteria in that the structure is at least 50 years old and materially looks the way it did in the past (or at least it did until the WLCQ-LP(FM) tower and antenna were mounted on it); and the building carries historical significance as the former historical Protestant Episcopal Church for Feeding Hills, MA (see also **Exhibit 5.0**).

ENGINEERING STATEMENT (continued)

As a result, the building remains potentially eligible for listing in the National Register of Historic Places. In addition, this Petition to Revoke License filing serves as the necessary written complaint as required under Part V(4) of The Agreement. Therefore, Lighthouse must initiate the required NEPA consultation process for co-location to an existing non-tower structure. It is believed this NEPA consultation process remains relevant to the existing WLCQ-LP(FM) licensed structure as the roof mounted tower was constructed after March 16, 2001. In addition, the NEPA consultation process would remain relevant for any future WLCQ-LP(FM) filing, including any future §73.875(b)(2) correction of coordinate Form 318 filing.

At the instruction of the recent May 2015 FCC Webinar concerning Environmental Compliance and Historic Preservation Review Training, Saga has also provided the U.S. Fish & Wildlife Service's IPaC (Information for Planning and Conservation) report for the Feeding Hills, MA - WLCQ-LP(FM) site location. This report is located in **Exhibit 5.1**. This report identifies two (2) endangered species and seventeen (17) migratory birds requiring further study. No critical habitats, National Wildlife Refuge areas or wetlands were identified in this study. As noted in the Commission previous presentation, IPaC findings do not necessarily prohibit tower construction or co-location. However, the presence of identified endangered species prohibit an applicant from claiming a categorical exemption from environmental processing under 47 C.F.R. Section 1.1306. Due to these showings, it is also believed this NEPA consultation process remains relevant to the existing WLCQ-LP(FM) licensed structure, as well as any future WLCQ-LP(FM) filing, including any future §73.875(b)(2) correction of coordinate Form 318 filing.

SUMMARY OF ENGINEERING ISSUES. It is believed these three engineering issues, in conjunction with the attached supporting documentation(s), merit a responsive action on either the part of the Lighthouse Christian Center or the Federal Communications Commission. The improper antenna operation constitutes a false certification at the time of the BLL-20061106AAA licensing or a subsequent violation of §73.875(c)(1). Regardless of the offence, FCC enforcement action is believed merited for this violation. The error in coordinates requires immediate corrective action on behalf of the Lighthouse Christian Center. Per §73.875(b)(2) of the Rules, this must be accomplished via a Form 318 filing. Failure of WLCQ-LP(FM) to immediately resolve this coordinate issue could also merit further FCC enforcement action. Finally, as outlined on various environmental levels, the existing WLCQ-LP(FM) roof mounted tower facility requires NEPA consultation and processing under Subpart B of 36 CFR Part 800. NEPA Concurrence remains relevant not only to the existing WLCQ-LP(FM) licensed operation, but also relevant to any future WLCQ-LP(FM) filing, including any future §73.875(b)(2) correction of coordinate Form 318 filing. As stated previously, additional legal related WLCQ-LP(FM) license discrepancies have been addressed separately by Saga's Counsel.

Exhibit 1.0

WLZX(FM) vs. WLCQ-LP(FM) Contour Relationship

FMCommander Single Allocation Study - 08-12-2015 - NGDC 30 SEC
WLCQ-LP's Overlaps (In= 0.0 km, Out= 0.0 km)

WLCQ-LP CH 259 L1
Lat= 42 04 59.0, Lng= 72 38 47.0
0.1 kW 28.9 M HAAT, 88 M COR
Prot.= 60 dBu, Intef.= 100 dBu

WUPE-FM CH 261 A 73.215 N BPH20150513AAF
Lat= 42 41 54.0, Lng= 73 03 54.0
1.15 kW 158.8 M HAAT, 677.3 M COR
Prot.= 60 dBu, Intef.= 100 dBu

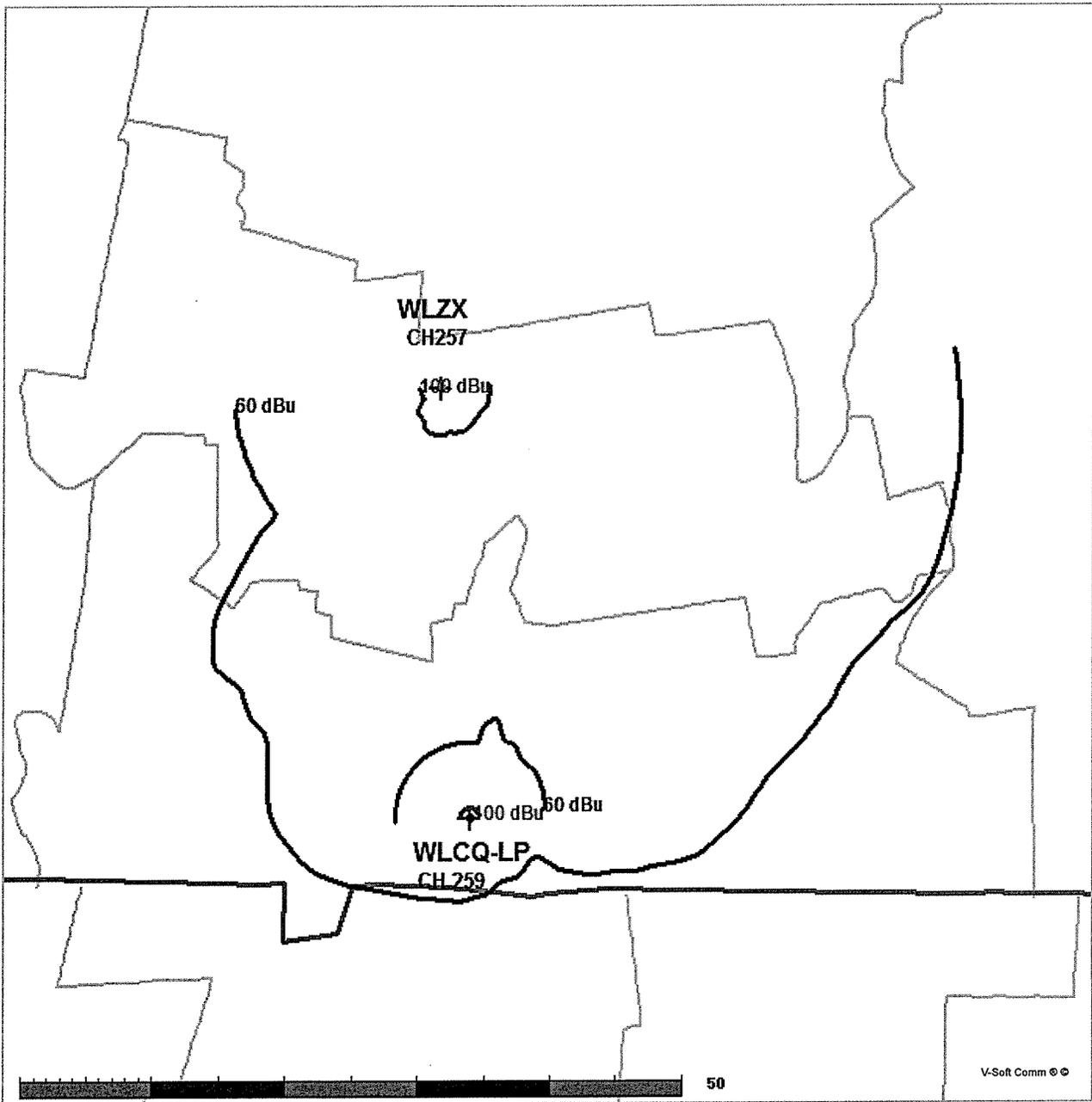


Exhibit 2.0

Photographs of Feeding Hills, MA - WLCQ-LP(FM) Operational Antenna

Photographs taken by Saga Communications of New England, LLC Engineer, Joshua C. Smith (CBT, CBRE, CEA, CBNT)
All Photographs were taken between the dates of August 10, 2015 to August 13, 2015.

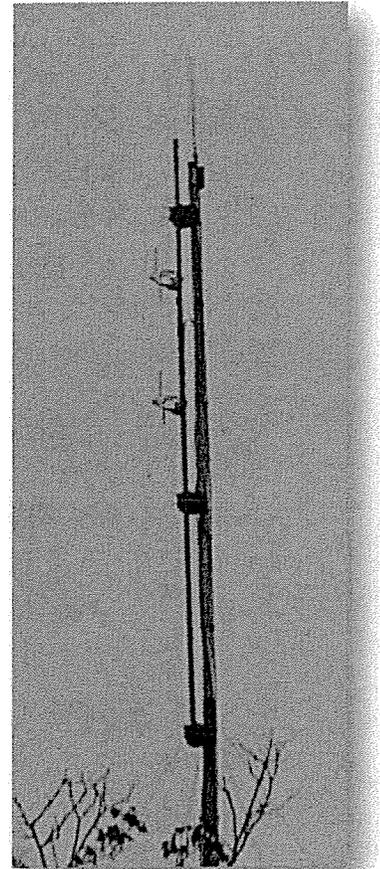
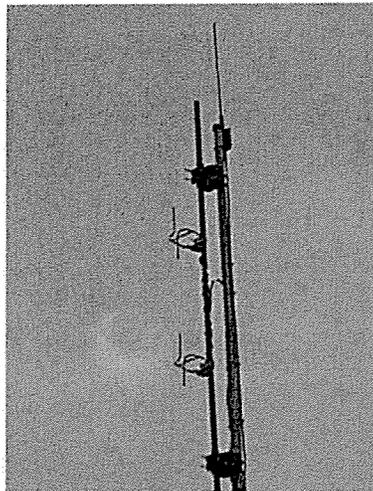


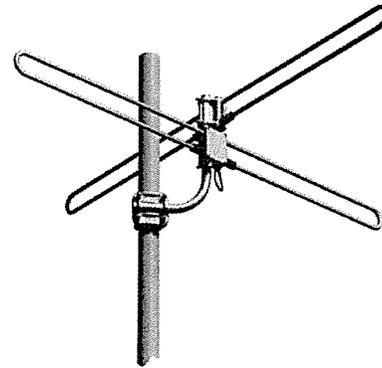
Exhibit 3.0 - Copy of Manufacturer's Scala FMO (Horizontal Only) Antenna Specifications



FMO series

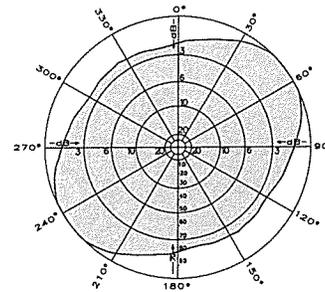
Omnidirectional Antenna 88–108 MHz

The Kathrein Scala Division FMO is a ruggedly built, horizontally polarized FM transmit antenna with an omnidirectional pattern. Like all Kathrein Scala Division antennas, the FMO is made of the finest materials using state of the art electrical and mechanical designs resulting in superior performance and long service life. The FMO is available as a single bay antenna or in vertically stacked arrays for additional gain.



Specifications:

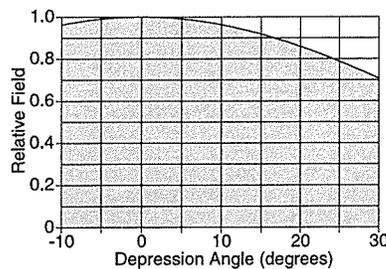
Frequency range	88–108 MHz(broadband)	
Gain	Gain	Power gain
FMO (one bay)	-3 dBd	0.5
FMO-2 (two bays)	0 dBd ($\frac{1}{2}$ spacing)	1
FMO-4 (four bays)	3 dBd ($\frac{1}{2}$ spacing)	2
Impedance	50 or 75 ohms	
VSWR	<1.5:1	
Polarization	Horizontal	
Input power (per bay)		
50 Ω model	500 watts	
75 Ω model	100 watts	
Azimuth pattern	Omni	
Connector	N female	
Weight (approx.)		
FMO (one bay)	10 lb (4.5 kg)	
FMO-2 (Two bays)	28.5 lb (12.9 kg)	
FMO-4 (Four bays)	53 lb (24 kg)	
Height		
FMO (one bay)	1.5 ft (0.46 m)	
FMO-2 (Two bays)	6.5 ft (1.98 m)	
FMO-4 (Four bays)	16.5 ft (5.03 m)	
Wind load	at 100 mph (160 kph)	
Front	35 lbf (154 N) per bay	
Wind survival rating*	120 mph (200 kph)	
Mounting	For masts of 2.375 inches (60 mm) OD.	
<i>See reverse for order information.</i>		



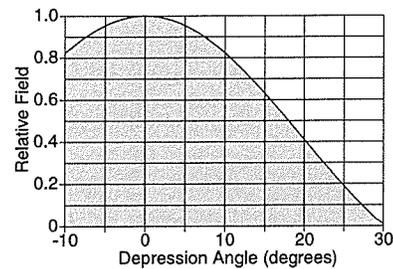
Azimuth pattern

*Mechanical design is based on environmental conditions as stipulated in TIA-222-G-2 (December 2009) and/or ETS 300 019-1-4 which include the static mechanical load imposed on an antenna by wind at maximum velocity. See the Engineering Section of the catalog for further details.

Contact Kathrein Scala Division Sales Engineering for further information on special arrays with higher gain, electrical beamtilt, null fill, and other special features to meet your specific requirements.



Elevation pattern (two bays)



Elevation pattern (four bays)



10275-E

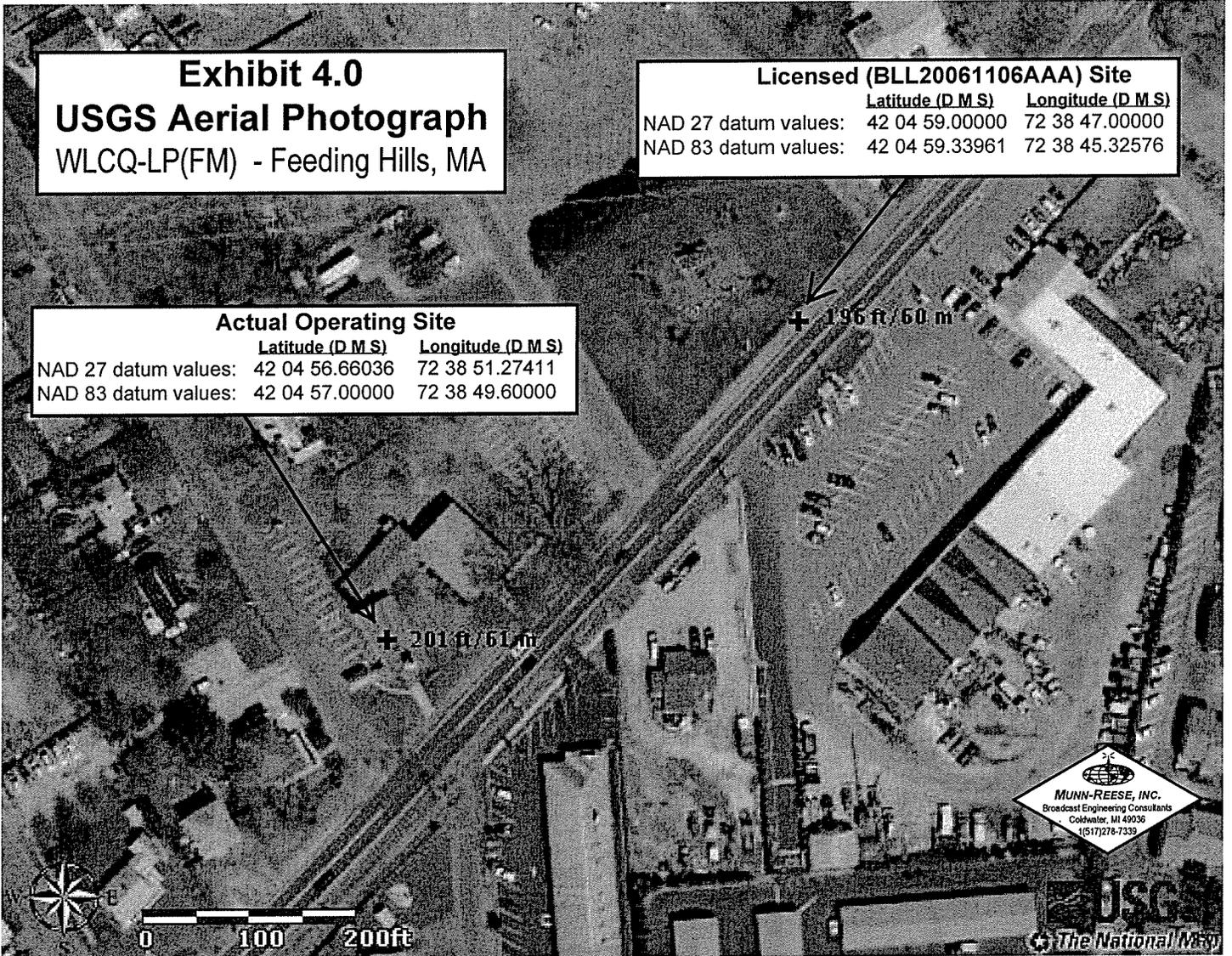


Exhibit 4.0
USGS Aerial Photograph
WLCQ-LP(FM) - Feeding Hills, MA

Licensed (BLL20061106AAA) Site
Latitude (D M S) **Longitude (D M S)**
NAD 27 datum values: 42 04 59.00000 72 38 47.00000
NAD 83 datum values: 42 04 59.33961 72 38 45.32576

Actual Operating Site
Latitude (D M S) **Longitude (D M S)**
NAD 27 datum values: 42 04 56.66036 72 38 51.27411
NAD 83 datum values: 42 04 57.00000 72 38 49.60000

+ 196 ft / 60 m

+ 201 ft / 61 m



0 100 200ft



**Exhibit 5.0 - Copy of Tax Records for the
Lighthouse Christian Church
Building (original construction dates)**



The Town of Agawam, Massachusetts

Property Assessment Data

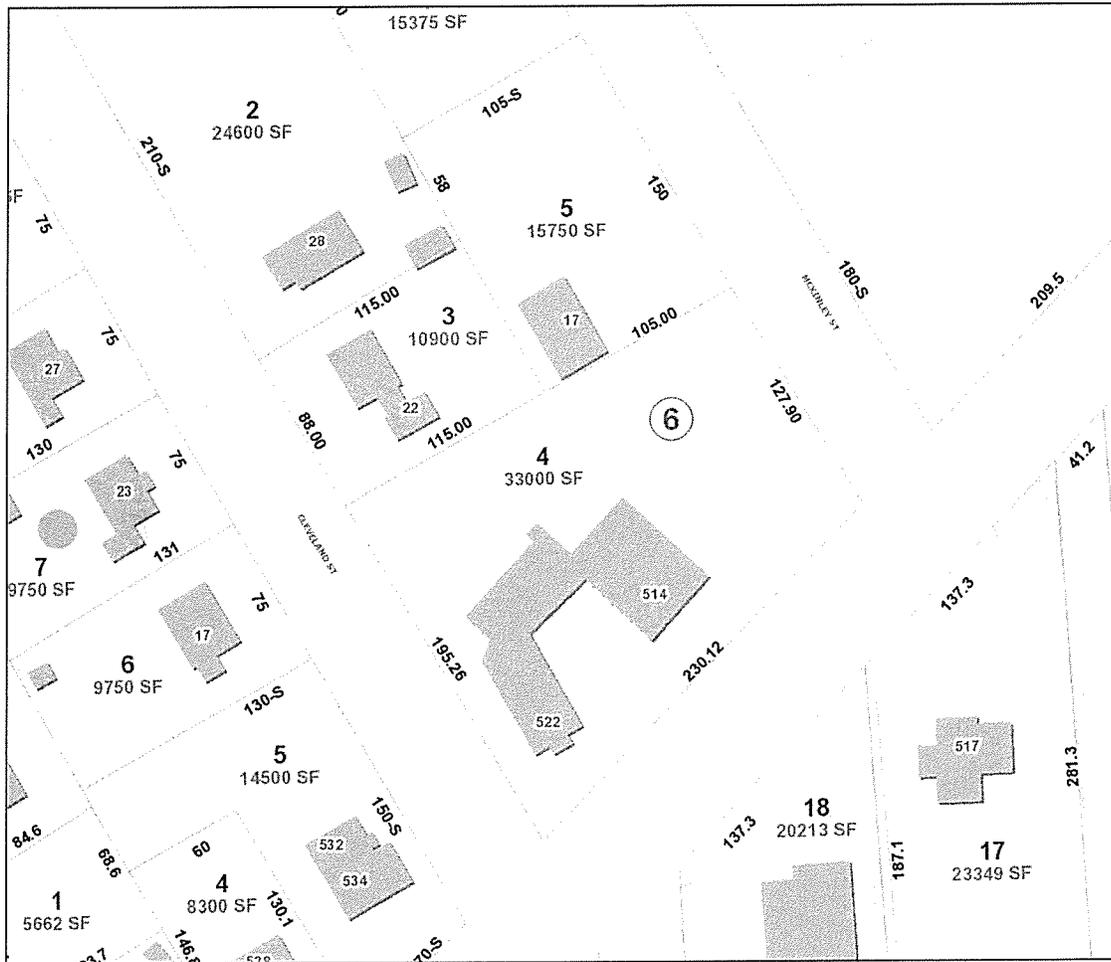


The following information being provided on this website is the state certified Fiscal Year 2015 real property valuations. For most residential properties, including single-family homes and condominiums, these FY 2015 valuations are based on calendar year 2013 sales, as is required by the Massachusetts Department of Revenue.

The Agawam Town Hall is located at 36 Main Street, and the Assessors Office is located at the lower level in the rear of the building. Counter terminals with this information are also available for use in the office, and field cards can be printed from these terminals.

If you have any questions regarding the above information, please do not hesitate to contact the Assessors Office. The Assessors Office telephone number is 413-786-0400, ext. 8703 or 8700, and office hours are 8:30 A.M. to 4:30 P.M. Monday through Friday.

**Exhibit 5.0 - Copy of Tax Records for the
Lighthouse Christian Church
Building (original construction dates)**



1:744
1"=62'



8/11/2015 12:08:38 PM

The information depicted on this map is for planning purposes only. It is not adequate for legal boundary definition, regulatory interpretation, or parcel-level analyses.

Exhibit 5.0 - Copy of Tax Records for the Lighthouse Christian Church Building (original construction dates)



Unofficial Property Record Card - Agawam, MA

General Property Data

Parcel ID H13 6 4 Prior Parcel ID 9000 - Property Owner LIGHTHOUSE CHRISTIAN CENTER Mailing Address 522 SPRINGFIELD ST City FEEDING HILLS Mailing State MA Zip 01030-1837 ParcelZoning RA2	Account Number Property Location 514 522 SPRINGFIELD ST Property Use CHURCH Most Recent Sale Date 9/10/1999 Legal Reference 10922-484 Grantor PROTESTANT EPISCOPAL CHURCH, Sale Price 200,000 Land Area 0.758 acres
---	--

Current Property Assessment

Card 1 Value	Building Value 158,600	Xtra Features Value 600	Land Value 84,600	Total Value 243,800
Total Parcel Value	Building Value 498,400	Xtra Features Value 600	Land Value 84,600	Total Value 583,600

Building Description

Building Style CHURCH/SYN # of Living Units 1 Year Built 1900 Building Grade AVERAGE Building Condition Average Finished Area (SF) 2970 Number Rooms 0 # of 3/4 Baths 0	Foundation Type CONCRETE Frame Type WOOD Roof Structure GABLE Roof Cover ASPHALT Siding ASBESTOS Interior Walls PLASTER # of Bedrooms 0 # of 1/2 Baths 2	Flooring Type HARDWOOD Basement Floor LINO/VINYL Heating Type FORCED H/A Heating Fuel OIL Air Conditioning 0% # of Bsmt Garages 0 # of Full Baths 0 # of Other Fixtures 2
--	---	--

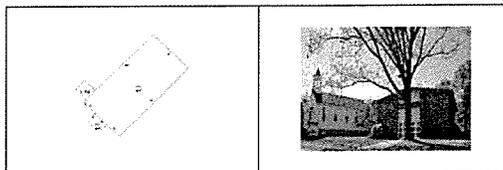
Legal Description

4319

Narrative Description of Property

This property contains 0.758 acres of land mainly classified as CHURCH with a(n) CHURCH/SYN style building, built about 1900 , having ASBESTOS exterior and ASPHALT roof cover, with 1 unit(s), 0 room(s), 0 bedroom(s), 0 bath(s), 2 half bath(s).

Property Images



Disclaimer: This information is believed to be correct but is subject to change and is not warranted.

Exhibit 5.0 - Copy of Tax Records for the Lighthouse Christian Church Building (original construction dates)



Unofficial Property Record Card - Agawam, MA

General Property Data

Parcel ID H13 6 4	Account Number
Prior Parcel ID 9000 -	Property Location 522 514 SPRINGFIELD ST
Property Owner LIGHTHOUSE CHRISTIAN CENTER	Property Use CHURCH
Mailing Address 522 SPRINGFIELD ST	Most Recent Sale Date 9/10/1999
City FEEDING HILLS	Legal Reference 10922-484
Mailing State MA Zip 01030-1837	Grantor PROTESTANT EPISCOPAL CHURCH,
Parcel Zoning RA2	Sale Price 200,000
	Land Area 0.000 acres

Current Property Assessment

Card 2 Value	Building Value 339,800	Xtra Features Value 0	Land Value 0	Total Value 339,800
Total Parcel Value	Building Value 498,400	Xtra Features Value 600	Land Value 84,600	Total Value 583,600

Building Description

Building Style CHURCH/SYN	Foundation Type CONCRETE	Flooring Type SOFTWOOD
# of Living Units 1	Frame Type WOOD	Basement Floor N/A
Year Built 1959	Roof Structure GABLE	Heating Type FORCED H/A
Building Grade GOOD (-)	Roof Cover ASPHALT	Heating Fuel OIL
Building Condition Good	Siding BRICK	Air Conditioning 0%
Finished Area (SF) 5006	Interior Walls DRYWALL	# of Bsmt Garages 0
Number Rooms 0	# of Bedrooms 0	# of Full Baths 0
# of 3/4 Baths 0	# of 1/2 Baths 2	# of Other Fixtures 2

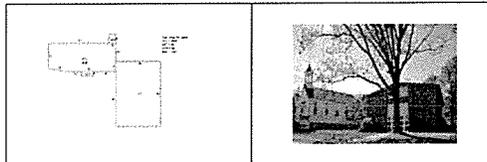
Legal Description

4319

Narrative Description of Property

This property contains 0.000 acres of land mainly classified as CHURCH with a(n) CHURCH/SYN style building, built about 1959, having BRICK exterior and ASPHALT roof cover, with 1 unit(s), 0 room(s), 0 bedroom(s), 0 bath(s), 2 half bath(s).

Property Images



Disclaimer: This information is believed to be correct but is subject to change and is not warranted.

**Exhibit 5.1 - Copy of U.S. Fish & Wildlife
Service IPaC Report**



U.S. Fish & Wildlife Service

Feeding Hills, MA - WLCQ-LP(FM)

IPaC Trust Resource Report

Generated August 12, 2015 11:08 AM MDT



US Fish & Wildlife Service

IPaC Trust Resource Report



Project Description

NAME

Feeding Hills, MA - WLCQ-LP(FM)

PROJECT CODE

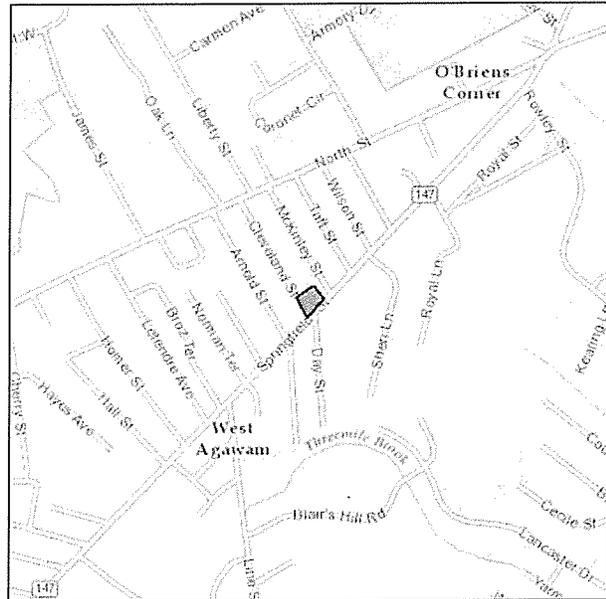
WLLLT-ZSQDB-HHTLG-CMJAY-CHYN3Y

LOCATION

Hampden County, Massachusetts

DESCRIPTION

No description provided



U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

New England Ecological Services Field Office

70 Commercial Street, Suite 300

Concord, NH 03301-5094

(603) 223-2541

Endangered Species

Proposed, candidate, threatened, and endangered species that are managed by the Endangered Species Program and should be considered as part of an effect analysis for this project.

This unofficial species list is for informational purposes only and does not fulfill the requirements under Section 7 of the Endangered Species Act, which states that Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action." This requirement applies to projects which are conducted, permitted or licensed by any Federal agency.

A letter from the local office and a species list which fulfills this requirement can be obtained by returning to this project on the IPaC website and requesting an Official Species List from the regulatory documents section.

Flowering Plants

Small Whorled Pogonia *Isotria medeoloides*

Threatened

CRITICAL HABITAT

No critical habitat has been designated for this species.

<https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?sPCODE=Q1XL>

Mammals

Northern Long-eared Bat *Myotis septentrionalis*

Threatened

CRITICAL HABITAT

No critical habitat has been designated for this species.

<https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?sPCODE=A0JE>

Critical Habitats

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

There is no critical habitat within this project area

Migratory Birds

Birds are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

Any activity which results in the take of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service (1). There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured.

You are responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

American Bittern <i>Botaurus lentiginosus</i>	Bird of conservation concern
Season: Breeding https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F3	
Bald Eagle <i>Haliaeetus leucocephalus</i>	Bird of conservation concern
Year-round https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008	
Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i>	Bird of conservation concern
Season: Breeding https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HI	
Blue-winged Warbler <i>Vermivora pinus</i>	Bird of conservation concern
Season: Breeding	
Canada Warbler <i>Wilsonia canadensis</i>	Bird of conservation concern
Season: Breeding	
Fox Sparrow <i>Passerella iliaca</i>	Bird of conservation concern
Season: Wintering	
Least Bittern <i>Ixobrychus exilis</i>	Bird of conservation concern
Season: Breeding	
Peregrine Falcon <i>Falco peregrinus</i>	Bird of conservation concern
Season: Breeding https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0FU	
Pied-billed Grebe <i>Podilymbus podiceps</i>	Bird of conservation concern
Year-round	
Prairie Warbler <i>Dendroica discolor</i>	Bird of conservation concern
Season: Breeding	
Purple Sandpiper <i>Calidris maritima</i>	Bird of conservation concern
Season: Wintering	
Short-eared Owl <i>Asio flammeus</i>	Bird of conservation concern
Season: Wintering https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD	
Upland Sandpiper <i>Bartramia longicauda</i>	Bird of conservation concern
Season: Breeding https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HC	

Wood Thrush *Hylocichla mustelina*

Season: Breeding

Bird of conservation concern

Worm Eating Warbler *Helmitheros vermivorum*

Season: Breeding

Bird of conservation concern

Refuges

Any activity proposed on National Wildlife Refuge lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

There are no refuges within this project area

Wetlands

Impacts to NWI wetlands and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes.

Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate U.S. Army Corps of Engineers District.

DATA LIMITATIONS

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

DATA EXCLUSIONS

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

DATA PRECAUTIONS

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

There are no wetlands identified in this project area

ATTACHMENT C

Commercial Announcements Scripts

Prohibited Broadcasts Highlighted

Broadcast August 24, 2015:

You Be You Hair Design:

The Q 99.7 is Listener Supported and that includes support from businesses like You Be You Hair Design in Agawam. Maryann offers a range of services from cutting & styling to coloring highlighting and more. "Hi, I'm Maryann and I have a passion for people and helping them feel good about who they are and how they look." Maryann at You Be You Hair Design, 422 Cooper Street, Agawam 413-786-3212. A faithful business partner of the Q 99.7. (Broadcast at 12:22 PM)

Ondrick Natural Earth:

Ondrick Natural Earth supports the mission of the Q 99.7 as a business partner. They provide landscaping architectural and building stone supplies to both the homeowner and contractor. 729 Fuller Road in Chicopee, online at OndrickNaturalEarth.com. (Broadcast at 1:23)

Longo Carpet Cleaning:

Area rugs bring comfort and style to a room but they're also a breeding ground for dirt and bacteria. Longo Carpet Cleaning and Restoration offers certified technicians that provide professional cleaning for area rugs. They use a 9 phase cleaning process on all rug service and offer pick-up and delivery, or drop off at their plant location in Agawam. Longo Carpet Cleaning & Restoration, in business for 29 years. Online at longocarpet.com. A supporting business partner of the Q 99.7. (Broadcast at 2:22 PM)

Once Upon A Child:

Once Upon A Child offers brand name gently used children's clothing, shoes and accessories. They have apparel for every season including back to school, with brands such as Gymboree, The Children's Place and Justice. Once Upon A Child, 1458 Riverdale Street in West Springfield right next to Planet Fitness. A proud Business Partner of the Q 99.7. (Broadcast at 12:22 PM)

Networx:

The Q 99.7 is supported by businesses like Networx. Networx is a local IT Company serving the needs of small to midsize businesses in Western Mass and Northern Connecticut. They provide a range of support for computer systems, networks and software as well as secure Wi-Fi and internet security systems. Networx has been in business for over 25 years. Their number is 413 636 5189. Networx, online under the business partnership directory at TheQ997.com (Broadcast at 12:21 PM)

Personalized Painting & Power Washing:

Neil at Personalized Painting & Power Washing offers professional painting to homeowners, businesses and churches. Whether it's a small or large job, Neil at Personalized Painting is available & fully insured. Personalized Painting & Power Washing, 413 426 5280. A supporting business partner of the Q 99.7. (Broadcast at 7:15 AM)

Broadcast August 25, 2015:

Mike's Auto Service & Repair:

It's state law for all drivers to have an updated inspection sticker. Mike's Auto Service & Repair is a full service repair shop and Massachusetts state inspection station. They're open Monday thru Friday, 9 to 5 and Saturday 9 to Noon. 173 River Street in Westfield. Mike's Auto Service & Repair, a business partner of the Q 99.7. (Broadcast at 6:44 AM)

C2C Landscaping & Property Management:

C2C Landscaping & Property Management provides lawn care for residential & commercial properties such as mowing and fertilizing. They also offer professional spray treatments for mosquitos, fleas & ticks. C2C Landscaping 413 348 9385. A business partner of the Q 99.7. (Broadcast at 8:11 AM)

CERTIFICATE OF SERVICE

I, Sherry L. Schunemann, a secretary in the law offices of Smithwick & Belendiuk, P.C., do hereby certify that a copy of the foregoing "Petition to Revoke License" was either hand delivered (as marked with an asterisk), or mailed by First Class U.S. Mail, postage prepaid, this 7th day of October, 2015, to the following:

*Peter H. Doyle, Esquire
Chief, Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
Also by email to:
Peter.doyle@fcc.gov

*Alexander Sanjenis, Esq.
Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
Also by email to:
Alexander.sanjenis@fcc.gov

Mr. Gary Reiff
President
Lighthouse Christian Center
522 Springfield Street
Feeding Hills, MA 01030



Sherry L. Schunemann