



December 16, 2013

Repp Law Firm  
1629 K Street, N.W., Suite 300  
Washington, D.C. 20006-1631  
T 202.656.1619  
F 202.400.3737  
[marissa@repplawfirm.com](mailto:marissa@repplawfirm.com)  
[www.repplawfirm.com](http://www.repplawfirm.com)

**By Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Attention: Audio Division, Media Bureau**

**Re: Response to Interference Complaint  
W232CB, Frederick, MD, Facility ID No. 31140**

Dear Ms. Dortch:

This letter on the behalf of AMFM Radio Licenses, LLC (“AMFM”) is in response to the letter of James D. Bradshaw, Deputy Chief, Audio Division, Media Bureau (the “Division Letter”) concerning interference complaints filed by Red Zebra Broadcasting Licensee, LLC (“Red Zebra”) on September 16, 2013, regarding alleged interference to the reception of WWXX(FM), 94.3 MHz, Buckland, Virginia, Facility ID No. 16819, by the operation of FM Translator station W232CB, Frederick, Maryland, Facility ID No. 31140, as modified in August 2013. *See* FCC File No. BLFT-20130805ACZ.

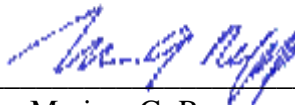
AMFM contacted each of the identified complainants. Several were non-responsive, and others clarified that they were either not regular listeners of WWXX(FM) on 94.3 MHz or had no current interference complaint. For the remaining identified complainants, AMFM requested details as to the listening locations and receivers. AMFM’s Director of Engineering for the region mapped out the locations of these complainants, all of whom are in Northern Virginia, and conducted on-off tests with a standard vehicle receiver; that is, the reception of WWXX(FM) on 94.3 MHz was monitored in a car with W232CB operating at licensed power, and again with the W232CB signal turned off, at the locations identified by the remaining complainants. AMFM’s Director of Engineering found in some locations there was interference to WWXX(FM) from another station broadcasting on 94.3 MHz (not W232CB) and areas where the WWXX(FM) signal was difficult to discern through static (white noise) with W232CB not broadcasting. Outside of small localized areas not associated with the listener

complaint locations, the operation of W232CB had no qualitative impact on the reception of a listenable WWXX(FM) signal. In sum, when W232CB was not broadcasting, there was still significant static and other spectrum issues with the WWXX(FM) signal in the analyzed Northern Virginia complaint areas.

Individual testing with the remaining Northern Virginia complainants is likely to confirm that the operation of W232CB is not the cause of poor reception of WWXX(FM) on 94.3 MHz or may otherwise establish grounds for voiding of the remaining complaints.<sup>1</sup> However, due to holiday schedules, AMFM has not had the opportunity to meet individually with the remaining complainants. In the meantime, in an abundance of caution, AMFM is reducing W232CB to 25% of licensed power and is simultaneously submitting an STA for such reduced power operation. AMFM will proceed with further investigations after the holiday season, including W232CB on (at full licensed power) and off tests with cooperative individual complainants, and will update the Commission and Red Zebra accordingly.

Respectfully submitted,

REPP LAW FIRM

By:   
Marissa G. Repp

Attorney for AMFM Radio Licenses, LLC

cc: James D. Bradshaw, Deputy Chief, Audio Division, Media Bureau (via e-mail)  
Robert Gates, Audio Division, Media Bureau (via e-mail)  
David A. O'Connor, Esq. and Michael D. Sullivan, Esq., Counsel to Red Zebra  
Broadcasting Licensee, LLC (via e-mail)

---

<sup>1</sup> Based on information provided by some of the complainants, it became clear that Red Zebra's on-the-air solicitation of interference complaints also generated responses from individuals who are regular listeners not of WWXX(FM) on 94.3 MHz, but of WTEM(AM), 980 kHz, the programming of which is simulcast on WWXX(FM). AMFM's Director of Engineering found that reception of WTEM(AM) 980 kHz was excellent in the surveyed interference complaint areas in Northern Virginia.