

# 145085

Received & Inspected

SEP 09 2013

FCC Mail Room

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D C 20554

In the matter of:

Midwest Communications, Incorporated  
NEW (FX), Neenah, Wisconsin  
Original Construction Permit, Tendered for Filing  
File No. BNPFT-20130820AAR

**INFORMAL OBJECTION**

Comes now, Seehafer Broadcasting Corporation, (hereinafter, "Seehafer") by its Vice-President, Mark Seehafer, with serious concerns by the Commission's tendering of this application as published in the FCC Daily Digest on August 23, 2013.

That, Seehafer is the licensee of FM Broadcast Station, WLKN-FM, Cleveland, Wisconsin and operates from a tower site in the Town of Newton, Wisconsin. This Class A radio station operates on the exact same frequency as the proposed new FM translator, Channel 251, namely 98.1 Mhz.

We hereby assert, that a good portion of our listenership is obtained in an area between these two selected tower sites, and that the proposal by Midwest is no simple 'rooftop' or 'low power' translator, but rather a significant threat to our listenership base and our advertising / income stream. To utilize a tower which is 64 meters in height above average terrain, at the full-power of 250 watts, combined with the effects of ducting and temperature inversions which are common with FM signals broadcasting across the massive Lake Winnebago body of water, will make listening to WLKN-FM an impossible task in many areas enjoyed today.

WLKN-FM also enjoys serving the customers who advertise from such communities as Chilton, Brillion, Reedsville, New Holstein and Kiel, Wisconsin. The encroachment of this translator signal, will only



add interference to our already established advertising base and listening area, or cause us to simply be 'unheard' in areas, which we currently depend on.

To say, that Seehafer could easily gather listener letters that would object to this application would be an understatement. It is foolish to think that this new translator would not negatively affect our operations.

Whether or not Midwest is using 'terrain shielding' or other computer programs to predict where it's signal is predicted to cover, is frankly immaterial. It should be noted, that the consulting engineer intentionally eliminated the Lake Winnebago water feature from it's Exhibit. (attached as Exhibit 13.6(a)) This is not an area of flat farmland, as depicted. That actual coverage of this translator will be substantially more than predicted, by virtue of 'real life examples' of FM reception in that portion of Eastern Wisconsin. A Longley-Rice study would show a significant overlap, when the Lake Winnebago area is included.

It is for that reason, that Seehafer Broadcasting requests that the Commission direct Midwest Communications, Incorporated to amend its application and move its translator frequency to a channel that would not directly impact the operations of Seehafer Broadcasting's stations.

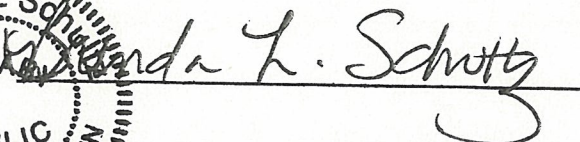
Respectfully submitted,

SEEHAFER BROADCASTING CORPORATION



Mark D. Seehafer, Vice-President

Subscribed and Sworn before me, this 27<sup>th</sup> day of August, 2013.



Notary Public, State of Wisconsin  
My Commission expires 5/24/15

# Exhibit 13.6(a)

Midwest Communications, Inc.

Protection to WLKN(FM) - Cleveland, WI

FMCommander Single Allocation Study - 08-14-2013 - NGDC 30 SEC

New's Overlaps (In= -25.0 km, Out= 3.53 km)

New CH 251 D

Lat= 44 11 45.0, Lng= 88 30 28.0

0.25 kW 64.4 M HAAT, 302 M COR

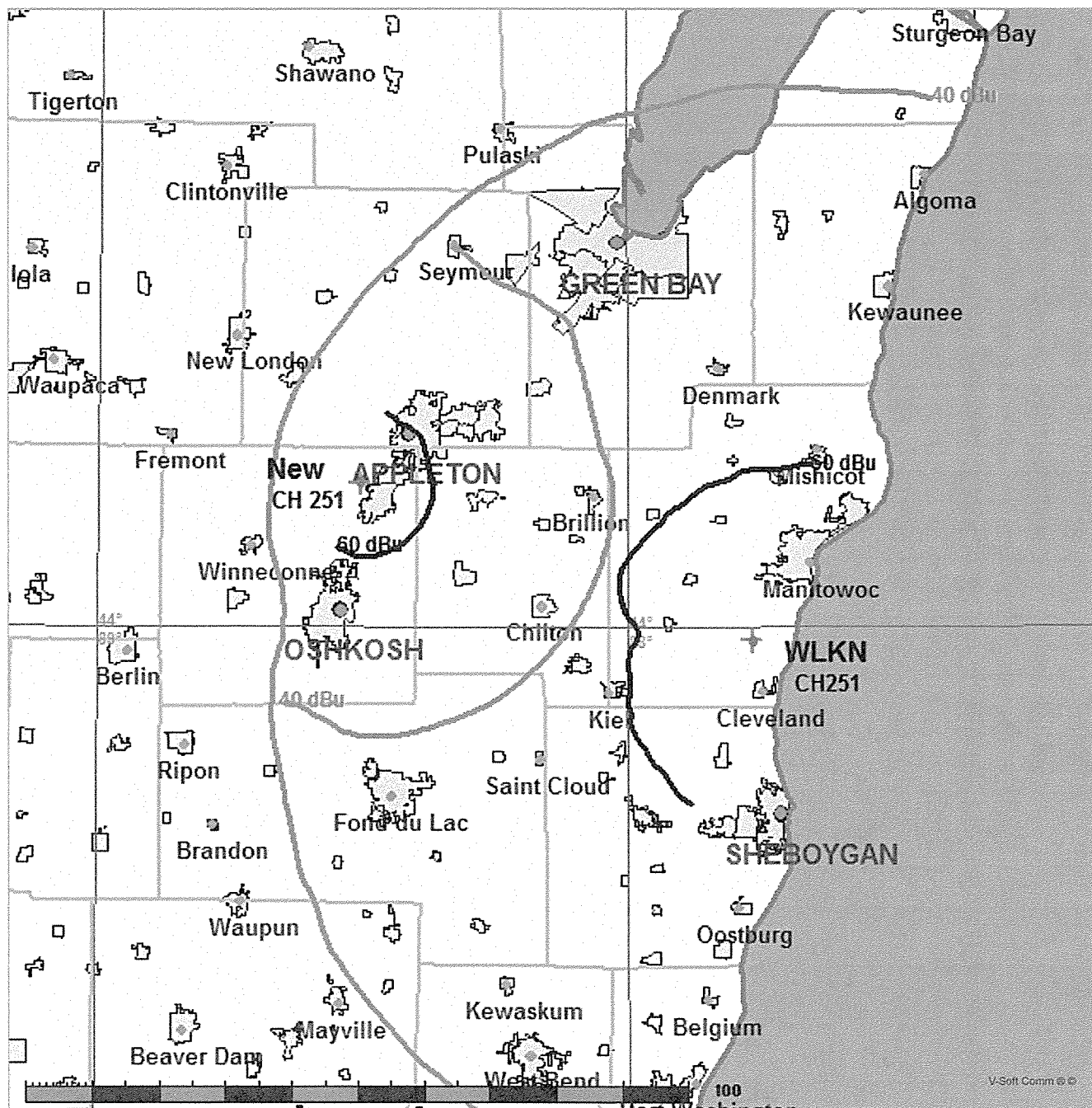
Prot.= 60 dBu, Intef.= 40 dBu

WLKN CH 251 A 73.215 N BLH19991025AET

Lat= 43 59 03.0, Lng= 87 45 55.0

5.8 kW 89 M HAAT, 310 M COR

Prot.= 60 dBu, Intef.= 40 dBu





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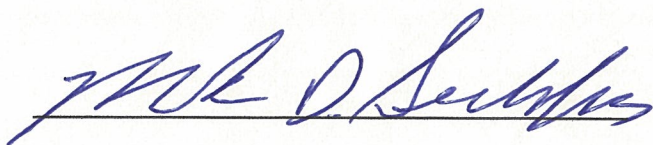
Affidavit of Service

I, Mark Seehafer, on the 27<sup>th</sup> day of August, 2013, provided a copy of the attached, "Informal Objection" via U.S. Mail, First Class, to the following:

Assistant Chief, Audio Division  
Media Bureau  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> Street, SW,  
Washington, DC 20554

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

Mr. Paul Rahmlow  
Midwest Communications  
904 Grand  
Wausau, WI 54403



Mark D. Seehafer

August 27<sup>th</sup>, 2013