

2019 FEB -6 PM 3:16

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

Received & Inspected

FEB 04 2019

FCC Mailroom

In re Application of)
)
Mountain Community Translators , LLC) File No. BPFT-20190102AAH
) Fac. ID No. 143430
)
For a Minor Modification of License)
K281DD Cheyenne, WY)
)

To: Office of the Secretary
Federal Communications Commission
Attn: The Chief, Audio Division, Media Bureau

INFORMAL OBJECTION

Comes now, Rocket Radio, Inc., ("Rocket"), pursuant to *Section 73.3587* of the Commission's rules, hereby submits its Informal Objection to the application of Mountain Community Translators, LLC (the "Mountain Community Translators, LLC") for a construction permit for a minor modification of License of K281DD Facility ID 143430 (translator), Cheyenne, WY (the "Application") BPFT-20190102AAH. In support of this Informal Objection, the following is submitted:

1. The Applicant, is wholly owned by Victor A. Michael, Jr. ("Michael"). On June 26, 2017, Michael, thru Kona Coast filed informal objections against the application to upgrade KIKO-FM, Claypool, Arizona (Fac.# 11894) and the KIKO-FM License. Kona Coast objections were denied by the Commission Staff in via a *Letter Decision* dated April 25, 2018. Kona Coast has now petitioned for reconsideration of said *Letter Decision*.

2. In its Reply to Opposition to Informal Objection in the KIKO-FM matter, Kona Coast

provides the Declaration of Victor A. Michael, Jr. This Declaration was signed by Mr. Michael under the penalty of perjury. A copy of this September 5, 2017 Declaration is attached hereto as Attachment 1. In the Declaration, Michael states at #3 "I do not currently have, or ever had any business relationship with John L. Low Jr."

3. Again in the KIKO-FM matter on June 22, 2018, Kona Coast filed a Reply to 1TV's Opposition to Petition for Reconsideration. Like their Reply in 2017, Kona Coast provides yet another Declaration by Michael in which he states categorically that "I do not currently have, or ever had any business relationship with John L. Low Jr."

4. As will be show herein, these Michael Declarations filed with the FCC are patently false. Michael has a business relationship with Low, thus, Michael has attempted to usurp the power of any FCC legal proceedings and use said proceedings to attack a business associate in this case Low. In this instant case Kona Coast/Michael's conduct is so egregious, inexcusable, and destructive that no lesser sanction than the designation of Kona Coast's licenses could be adequate as the FCC's punishment for lack of candor, perjury, and abuse of the FCC filings to harm Low.

5. Attached hereto is the Declaration of Jon L. Low, Jr. which contains Exhibits A - Y. This Exhibits contain samples of emails exchanges between Low and Michael and other associates. These emails establish that a business relationship exists between Low and Michael/Kona Coast. These facts can lead to only one conclusion, the Declarations provided are false. With the falsehood established, then it is clear that Kona Coast/Michael's lack of candor and abuse of process smacks in the face of FCC precedent and FCC Rules.

6. As can be seen in the emails, Michael or his associate Todd Robinson or both have sent or have been copied in the tread of nearly 100 emails to Low plus numerous telephone calls. Michael has been and is still involved with Robinson and Low, and holds a 3% ownership of KZLZ, LLC. Moreover, KZLZ, LLC currently owes Low a complete accounting and revenue from the sale of KHIL (AM). Low is due a payment from each Station held by Michael. Low has in fact signed the operating agreement and Michael and Robinson has extensively interacted with Low, they seek and received Low proprietary work product on numerous potential radio transactions including KFRM, KDAP, KZLZ-FM, KWCX-FM KHIL(AM) KZMK, KKYZ, KFLX, KQMR, KRDE, KCDX, and KAFF.

7. Michael, Robinson and Low worked intensely for several years from approximately 2005 to 2009 seeking out radio properties in the US with a working relationship in Arizona after approximately year 2009 the parties continued their relationship due to the fact, that Michael, Robinson and Low were part of the business structure for KZLZ, KWCX-FM, and KHIL(AM). Low, as indicated above is due a payment from the proceeds of recent sale of KHIL (AM) and will be due proceeds from the KZLZ and KWCX when the these property are sold. The interacting within the relationship again increased with communications from 2015 to the present. Recent action or lack thereof shows that Robison and Michael's counsel Amy be involved in the cover up , conceal or whitewash the depth and scope of the business relationship between Michael, Robison and Low, Low has send emails to Gammon & Grange, and Craig S. Lair both parties have failed tp reply. Low's is entitled to a copy of the document and the operating agreement as of this date both of the aforesaid counsel refuse to reply and release the

signed copies. In fact awf@gg-law.com know as A. Wray Fitch email address in on Exhibit A (noted below) for the circulating of the documents to Michael , Robinson, and Low signatures. At this point the FCC is also entitled to copies to review the depth and scope of the business relationship between Michael, Robison, and Low.

8. As a typical example of the business relationship, one need only to look to the email set forth on Exhibit A. That email provides:

On August 6, 2007 23:46:55 Robinson sent to Michael, Low, Law, and Jon: "Hi Guys- Here is the final LLC operating agreement for us all to sign. I just put each person in for \$100,000 and 20% of our group (Which is putting up 10% for the overall deal)....If each of you could sign and then send a check or wire if you are ok with the amount, we will close on Sept 1. Please call or email with any questions. Thanks! Todd"

9. There are multiple other emails provided which absolutely establish a relationship. The establishment of the relationship prove that Declarations provided by Kona Coast are false.

10. All licensees have a duty of candor to the FCC that "is basic, and well known". *RKO Gen., Inc. v. FCC*, 670 F.2d 215, 232(D.C. Cir 1981) (affirming denial of licensee's renewal application based on licensee's lack of candor in proceedings). "The FCC generally views misrepresentation and lack of candor in an applicant dealings with the Commission as serious breaches of trust".

11. Consistent with the foregoing, *Section 1.17* of the Commission's rule forbids a licensee from "povid[ing] material factual information that is incorrect or omit[ting] 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.” See *Schoenbohm v. FCC*, 204 F.3d 243 (D.C. Cir. 2000), as amended (June 28, 2000) (affirming FCC’s denials of amateur radio licensee’s renewal application and reconsideration of that order based on his misrepresentation and lack of candor during the renewal proceeding).

12. In addition, Michael lacks of candor wherein Michael has filed informal objections against Low on K246CH File No. BPFT-20180625ABP and K256DB FCC File No. BPFT-20170710ABF Michael filed the aforementioned without disclosing any existing business relationship with Low which is lack of candor and an abuse of processes. An abuse of process ordinarily involves intent to gain some benefit by manipulating the Commission’s procedures. (See *TRMT, Inc.*, 11 FCC Rcd. 17081, 17087 at Par. 10 (1996)). In the KIKO-FM matter and the K246CH litigation, all such filings were done to hurt Low by gaming FCC process.

13. Kona Coast has filed, on multiple occasion false declarations and process abusing pleadings. Before any action takes place on Kona Coast’s application BP-20180712ABP, or any other application it might file, their blatant lack of candor, misrepresentations and abuse of processed must be reviewed by the Commission to determine where it is qualified to be a licensee. This FCC review would be in the public interest in supporting the integrity of the Commission’s processes.

This Informal Objection is timely filed as Section 73.3587 of the Commission’s rules regarding informal objections sets no time limits for the filing of objections provided that the objection is filed prior to action on the subject application.

The Licensee of KIKO-FM is 1TV.Com, LLC (“1TV”). John L. Low, Jr., (“Low”) is the sole member of 1TV and of Rocket.

See *Letter Decision* from Rodolfo Bonacci, Assistant Chief, Audio Division, Media Bureau

A copy is attached as Attachment 2.

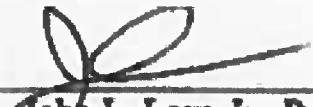
See also Sea Island Broadcasting Corp. v. FCC, 627 F.2d 240, 243 (D.C. Cir.1980), *cert. denied*, 449 U.S. 834 (1980).

Swan Creek Commc'ns, Inc. v. FCC, 39 F.3d 1217, at 1221-1222 (D.C. Cir. 1994).

See Policy Regarding Character Qualifications in Broadcast Licensing, Report, Order and Policy Statement, 102 F.C.C. 2d 1179 (1985)

Respectfully submitted,
Rocket Radio, Inc.

By: _____


John L. Low, Jr., President
4501 Broadway
Miami, AZ 85539

Declaration John L. Low Jr.

I John L. Low Jr. do declare under the penalty of perjury that all of the information provided in the informal objection including attachments and exhibits are true and correct to the best of my knowledge and belief.

The foregoing was signed the 28th day of January, 2019


John L. Low, Jr.

January 28, 2019

CERTIFICATE OF SERVICE

I, Jon L. Low, President of Rocket Radio, Inc., do hereby certify that copies of the
“Informal Objection” have been sent via first class, U.S. mail, postage prepaid, this 28 day of
January 28, 2019, to the following:

Albert Shuldiner, Chief
Audio Division
Media Bureau
Federal Communications Commission
445-12th St., S.W.
Room 2A-320
Washington, DC 20554

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

Submitted by:
Rocket Radio Inc.
4501 Broadway
Miami, az 85539

Victor A. Michael, Jr., Sole Member
Mountain Community Translators , LLC
87 Jasper Lake Road
Loveland, CO 80537



John L. Low, Jr.

ATTACHMENT 1

DECLARATION

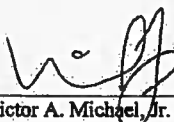
I, Victor A. Michael, Jr., do hereby submit this Declaration. These statements are truthful and are to the best of my knowledge and belief.

1. I am the sole member and 100% owner of Kona Coast Radio, LLC, applicant for a new FM at Star Valley, Arizona, BNPH-20170621ABC on channel 242A.
2. I am the sole member and 100% owner of Mountain Community Translators, LLC, licensee of K243BN, Laveen, Arizona, facility ID 92373.
3. I do not currently have, or ever had any business relationships with John L. Low, Jr.
4. My only connection with John L. Low, Jr. is that I had some technical discussions with him on the phone and with a couple of email correspondence approximately 10 years ago.
5. I have never seen the written agreement that Mr. Low refers to in his Declaration. I am a minor 3 percent silent investor and engineering consultant to KZLZ, LLC, which is licensee of KZLZ(FM) Casas Adobe, AZ, facility ID 36022, KHIL(AM) Willcox, AZ, facility ID 72656, and KWCX-FM Tanque Verde, AZ, facility ID 72659. Todd P. Robinson is also a member of KZLZ, LLC. While Mr. Robinson and I share this business connection, I was not involved and I was unaware of any such discussions or agreement with Mr. Low or 1TV.COM, LLC before the Informal Objection was filed. Mr. Robinson owns many other broadcast stations and investments of which I have no connection with.
6. In Mr. Low's Declaration his statements in Paragraph 3 are just plain false. Mr. Low and I have never had any business relationship, and certainly not one that recently soured.

If Mr. Low and Mr. Robinson have or had any business relationship, it is not one that I have any interest or involvement with.

7. While I do own K243BN, Laveen, AZ, facility ID 92373, it is not a concern of mine that this translator might be displaced by any planned upgrade by KIKO-FM on channel 243. There is currently no prohibit overlap of contours between K243BN and KIKO-FM, and even if KIKO-FM were to upgrade to channel 243C, there still would not be any primary service (60 dBμ) overlap between the two facilities (see figure 1 attached).
8. It is true that I was aware of the Facilities Modification Agreement that was disclosed with the applications filed by KRFM(FM) Show Low, AZ, facility ID 33692, and KIKO-FM Claypool, AZ, facility ID 11894. While KIKO-FM obviously had an interest in upgrading with the new spectrum that would be potentially opened up by KRFM(FM) changing channels from 243C0 to 253C0, I had identified that channel 242A would be available for use as a first local service Star Valley, Arizona, and was waiting for the vacated spectrum of channel 243C0 to become available. No other channels are available for use at this community.
9. My wife and I purchased a home in Carefree, Arizona approximately 3 years ago. Since I have been a long time broadcast station owner, engineer and operator, I do have an interest in the development of a new FM station at Star Valley, Arizona which has easy access and is approximately 45 miles from Carefree, Arizona.

Executed this 5th day of September, 2017 under penalty of perjury.



Victor A. Michael, Jr.

ATTACHMENT 2

EXHIBIT C

DECLARATION

I, Victor A. Michael, Jr., do hereby submit this Declaration. These statements are truthful and are to the best of my knowledge and belief.

1. I am the sole member and 100% owner of Kona Coast Radio, LLC, applicant for a new FM at Star Valley, Arizona, BNPH-20170621ABC on channel 242A.
2. I do not currently have, or ever had any business relationships with John L. Low, Jr.
3. On October 26th, 2018, I personally photographed the tower and antenna system utilized by KIKO-FM Claypool, AZ. These photos were utilized in the Petition for Reconsideration and Reply to the Opposition to Petition for Reconsideration filed by Kona Coast Radio, LLC.

Executed this 22nd day of June, 2018 under penalty of perjury.



Victor A. Michael, Jr.

EXHIBIT A

EXHIBIT A

From:	CottonBay@aol.com
To:	VicMichael@aol.com, awf@gg-law.com, jon@speedbeam.com
Subject:	Fwd: FW: Operating AGreement KZLZ v.6.DOC
Date:	Sun, 6 Aug 2006 23:46:55

Hi Guys-

Here is the final LLC operating agreement for us all to sign. I just put each person in for \$100,000 and 20% of our group (Which is putting up 10% for the overall deal)....

If each of you could sign and then send a check or wire if you are ok with the amount, we will close on Sept 1.

Please call or email with any questions.

Thanks!  Todd

EXHIBIT B

EXHIBIT B

From:	<cottonbay@aol.com>
To:	v.low@att.net
Subject:	Re: John Low
Date:	Tue, 8 Aug 2006 11:32:16

Hi John!

Sorry to attach no explanation- I was just trying to get it out.

Yes-You will still get a 20pc fee on top of your investment after capital plus return-20pc- is paid back. So, you don't even have to put up 100,000 if you don't want to...may need to share some with Vic if we choose to do one of his plans vs your original PHX plan....but I think we are heading toward your PHX idea...

If you wanted to put up 0, I would just change the ownership to 25pc each between me, Jon, Wray and Vic...

You can have a corp invest instead of an individual. No real need to though since this is a new LLC and that gives you personal protections.

Other than additional capital calls that are voted on- you will have no other

liability. That being said, we are guaranteeing that Ronnie won't lose any of his 4.5mm on this deal...

Please call or email with any other thoughts or questions.

Thanks!
Todd

EXHIBIT C

EXHIBIT C

From:	CottonBay@aol.com
To:	v.low@att.net
Subject:	KZLZ
Date:	Sat, 19 Aug 2006 19:18:00

Hi John-

Did you decide if you want to go in for the 100k? Either way is fine with me...

Thanks!¹¹_{SEP}Todd

EXHIBIT D

EXHIBIT D

From:	CottonBay@aol.com
To:	VicMichael@aol.com, v.low@att.net, jon@speedbeam.com
Cc:	awf@gg-law.com, dsnider@mountaire.com, geh@btcmlaw.com
Subject:	Fwd: kzlz
Date:	Wed, 30 Aug 2006 15:01:18

Hi Guys-

Here are some documents for each of you to sign.

Jon (R) and Vic need to sign both. John Lowe needs to sign the Right of First Refusal.

John (Lowe)- if you want to still be in on the equity side, please let me know by noon and we will send a revised document. If you don't want to be on the equity side, these documents are in good shape....

Please sign and fax your signature pages to Wray at 703 761 5023. Also, please call or email me with any questions or concerns. We will close on Friday. The mod was approved by the FCC yesterday...

Thanks!
Todd

EXHIBIT E

EXHIBIT E

v.low@att.net

VicMichael@aol.com, jon@speedbeam.com

Cc:

Subject:

Re: KFLX

Date: Fri, 23 Mar 2007 17:19:01

Vic and John-
can we arrange a call sometime in the next few days to discuss?

Thanks!
Todd

EXHIBIT F

EXHIBIT F

Vic 3/31/07

Just as a head up, controlling Wilcox makes the three stations move-in Tucson a perfect fit in my opinion (totally spaced).

How do we control Wilcox? Unless you disagree Wilcox can be moved to 274 Class A and will continue to serve Wilcox. In this case three FM will go into Tucson on 283,285,287. If we don't totally control Wilcox there are other options as I described in my previous. Letter.

Thanks

EXHIBIT G

EXHIBIT G

From: VicMichael@aol.com

v.low@att.net

Cc: CottonBay@aol.com

Subject:

Re: KFLX

Date: Sun, 1 Apr 2007 19:16:56



John,

 Sorry, was out building translators all week.

Me and another engineer are working in the office today. Will look at this stuff and get back with you.

All very interesting.

Thanks!

Vic

EXHIBIT H

EXHIBIT H

From:	CottonBay@aol.com
To:	v.low@att.net
Cc:	VicMichael@aol.com
Subject:	Re: KZLZ
Date:	Sun, 1 Apr 2007 21:42:28 Project is looking good

Project is looking good

EXHIBIT I

EXHIBIT I

From: _CottonBay@aol.com

To:

"Wray Fitch" <AWF@GG-Law.com>, "Jon Robinson"

<jon@speedbeam.com>, "V. Low" <v.low@att.net>,

"VicMichael" <vicmichael@aol.com>

Subject:

Fwd: Re: KZLZ

Date: Wed, 4 Apr 2007 18:49:13 +0000

Vic thinks we are ok to go...so I am fine with it..

EXHIBIT J

EXHIBIT J

From:	VicMichael@aol.com
To:	v.low@att.net
Cc:	CottonBay@aol.com
Subject:	Re: TUCSON
Date:	Sun, 15 Apr 2007 19:37:52

John,

The KZMK rulemaking petition is still quite active and has been for some time. In fact Cochise filed a counterproposal for KKEYZ to get to the same community we proposed on 265C3. We have been going back and forth for a year or so now. Don't know how it will come out. Here is a link to the FCC rulemaking which is MB Docket 05-245, RM 11265. We filed this in June of 2005, been pending ever since. FCC works in slow and mysterious ways.

I have also attached a channel spacing study which shows the allotment points for KZMK and KKEYZ. Quite the mess. Interesting reading if you read through the whole thing. Bottom line is that it has a bunch of channels tied up at the moment around the Tucson area.

I also have attached a study southwest of Tucson where you were looking at channel 294A. I don't think being a 130+

kilometers short to Mexico will fly.

Is your channel search program looking at all allocations? I know some programs let you turn off looking at allotment points, since in some cases they don't count, when in reference to an existing licensed station. But they do count with new allotments and proposals, and even time when the FCC reserves points on their own, just for fun.

Anyway, I have some interesting ideas, so of which might be worth chasing. I am just playing devils advocate, rotten job, but with the big money on the line, my job sometime is to second guess things. So keep looking at the possibilities. Some are good. Some will have problems, but the job is to find answers to problems.

My biggest challenge in the Tucson area in the Mexican issues, and I will say it again, I just don't know what you can and can't do there. Need to find someone better qualified to look at that stuff then me.

I have attached some allotment studies from spot right in Tucson. Did a study on 283, 285, 287 and one on channel 288C3 from an existing site east of Tucson.

I will admit, you can probably do some with Wilcox on one of these channels. But 283, 285, and 287 look short to Mexico to me. You can probably make a deal with them, or show protection. But further study of this would be needed by someone other then me.

Hope some of this info might help.

Any other questions, let me know. Headed to Vegas tomorrow for a one day trip for some meetings. Be back in the office on Tuesday.

Thanks!

Vic Michael

EXHIBIT K

EXHIBIT K

From: VicMichael@aol.com	
To:	v.low@att.net
Cc:	CottonBay@aol.com
Subject:	Re: TUCSON-3-FM's
Date: Thu, 19 Apr 2007 17:40:02	



John,

These all look fine to me. But once again, I know nothing about Mexican spacing issues, so I will take your word on the 3KW thing.

I have no doubt that we could get Wilcox to Tucson too with a good signal. Might just take a little time.

Vic

EXHIBIT L

EXHIBIT L

From: _CottonBay@aol.com	
To: "mailto:v.low@att.net"	
Subject:	Re: KZLZ \$100,000.00
Date: _Fri, 4 May 2007	

Hi John!

Great!

You can send it on and I will get you a subscription agreement...

Vic and Jon and I are going to get together in 2 weeks to go through all the AZ stuff....

Todd

EXHIBIT M

EXHIBIT M

From: _CottonBay@aol.com	
To:	v.low@att.net
Cc:	VicMichael@aol.com
Subject:	Re: URGENT
Date: Fri, 8 Jun 2007 19:29:36	

Maybe-

let's try to set up a time with Vic to discuss. Vic is busy now so why don't you get Daryl's initial thoughts...

Maybe we can cut a deal with the Tuckers....they don't know we own Wilcox yet...

Thanks!

EXHIBIT N

EXHIBIT N

Vic 6/9/07

I suggest that we talk on Sunday night even if Todd is not free. Todd has asked me for a report I believe we cannot delay into the next week without increase risk. How late on Sunday or how early on Monday Morning? If Todd is free, all the better for our chat. If we can do it early Monday morning that great, it still leaves time to take action if Todd agrees

Thanks

EXHIBIT O

EXHIBIT O

From: _CottonBay@aol.com	
To:	v.low@att.net
Cc:	VicMichael@aol.com
Subject:	Re: URGENT
Date: Sat, 9 Jun 2007 14:59:26	



John-

I cannot seem to get this all in my head straight- you are very far ahead of me! What exactly do we need to do? If you can tell me, I can do it...

Thanks!

EXHIBIT P

EXHIBIT P

From: _CottonBay@aol.com

To:

v.low@att.net, VicMichael@aol.com

Subject:

Re: FW: Re: URGENT

Date: Sat, 9 Jun 2007 19:55:06



Hi Vic and John-

I get on a plane Sunday night at 5pm edt with my son. Will be on the ground 8 hours later in Norway. My phone and email work there so I would suggest that the 2 of you figure out what we should do and send it to Wray and/or Daryl to file...

If we cannot preserve the 3 channels in Tucson without fighting the Tuckers, maybe we can cut a deal with them to get some of their upside and then we keep 2 signals...? Any other thoughts or suggestions or strategies are welcome!

Thanks!

Todd

EXHIBIT Q

EXHIBIT Q

In a message dated 6/9/2007 2:22:58 P.M. Eastern Daylight Time, v.low@att.net writes:

Vic 6/9/07

I suggest that we talk on Sunday night even if Todd is not free. Todd has asked me for a report I believe we cannot delay into the next week without increase risk. How late on Sunday or how early on Monday Morning? If Todd is free, all the better for our chat. If we can do it early Monday morning that is great and best for me, it still leaves time to take action on Monday if Todd agrees

Thanks

EXHIBIT R

EXHIBIT R

From: VicMichael@aol.com [1]
To: CottonBay@aol.com, v.low@att.net [1]
Subject: Re: URGENT [1]
Date: Sat, 9 Jun 2007 17:28:51
+0000 [1]

John and Todd,

I am pretty busy the next day or two. We could set up a time on Monday, or Sunday night maybe.

[1]
[1] Vic

EXHIBIT S

EXHIBIT S

From:	VicMichael@aol.com
To:	v.low@att.net
Cc:	CottonBay@aol.com
Subject:	Re: FW: Re: URGENT
Date:	Sat, 9 Jun 2007 03:53:56

I am headed back to Colorado tonight. Will be headed back to SD on Sunday night, be there until Wednesday building a 100KW FM. Will have my cell the whole time if you want chat.

970-744-9191

Vic

EXHIBIT T

EXHIBIT T

From: _VicMichael@aol.com	
To:	v.low@att.net
Cc:	CottonBay@aol.com
Subject:	Re: Wilcox
Date: Wed, 13 Jun 2007 05:19:41	

I am building a 100KW FM in Rapid City this week, so I don't really have time to comment.

As far as moving Wilcox, I don't think this will be too hard. There is an AM there, please another FM allotment, however, that one is currently not used. I think there is a way to get around any loss problems, with one step downgrading the station right now.

I will get into this more when I get back home.

[11]
SEP Thanks for helping with all of the this.

Vic

EXHIBIT U

EXHIBIT U

From: _VicMichael@aol.com	
To:	jon@speedbeam.com, CottonBay@aol.com, AWF@GG-Law.co
Cc:	v.low@att.net
Subject:	Re: Wilcox
Date: Mon, 25 Jun 2007 12:44:58	

A call might be a good idea if possible.

I am out in PA visiting with the folks, and then headed to Indiana for a race on Thursday, late morning. So I will be at my PA cabin until then, 570-759-1184. Thursday I would be on my cell most of the day driving the RV to IN, 970-744-9191. Friday I would be on the cell too.

All of this is getting complicated, but it appears the John has a good handle on the spectrum in that part of the world. May be beneficial to make a deal with the Tuckers, since they are trouble makers in that area.

Let me know.

Vic

EXHIBIT V

EXHIBIT V

From: _VicMichael@aol.com	
To:	AWF@GG-Law.com, v.low@att.net, jon@speedbeam.com
Cc:	CottonBay@aol.com
Subject:	Re: Willcox Conference Call 5 p.m. ET
Date: Tue, 26 Jun 2007 19:08:10	

I might be 10 or 15 minutes late. I have another conference call at 5pm, turns out. Shouldn't take long however.

Vic

EXHIBIT W

EXHIBIT W

from: _CottonBay@aol.com

from: _CottonBay@aol.com	
To:	VicMichael@aol.com, awf@gg-law.com, jon@speedbeam.co
Subject:	Fwd: FW: Operating AGreement KZLZ v.6.DOC
Date:	Sun, 6 Aug 2006 23:46:55

Hi Guys-

Here is the final LLC operating agreement for us all to sign. I just put each person in for \$100,000 and 20% of our group (Which is putting up 10% for the overall deal)....

If each of you could sign and then send a check or wire if you are ok with the amount, we will close on Sept 1.

Please call or email with any questions.

Thanks!^{SEP}Todd

EXHIBIT X

EXHIBIT X

From: "todd@cottonbay.us" <todd@cottonbay.us>

**Subject: Re: Vic Micheal Todd Robinson Notice Parker
Stanbury LLP ATTORNEYS AT LAW**

Date: July 3, 2018 at 2:17:52 AM PDT

To: victoria low <v.low@att.net>

Cc: "CottonBay@aol.com" <CottonBay@aol.com>

Hi again John.

But, seriously, what agreement do you feel we have given
you stealing our channel and messing up our deal with Hank?

Best,
Todd

EXHIBIT V

EXHIBIT Y

From: "Clarence M. Beverage" <cbeverage@commtechrf.com>

To:

CottonBay@aol.com, v.low@att.net, Jon Robinson
<jon@speedbeam.com>, VicMichael@aol.com

Subject:

KRFM Move to KRDE Site as 243C0

Date:

Mon, 30 Jan 2006 20:21:15 +0000



Gentlemen:

John did not ask me to address the allocation scenario in detail so I will only say that there are short spacing to XHITA CH 243B and the allotment at Sonoita for CH 243C that do need to be addressed.

The site is short spaced to KSWG CH 242C by 10.4 km but that short spacing qualifies for 73.215 processing.

Figure 1 depicts the 54 dBu interfering and 60 dBu coverage contours for both facilities and the Longley Rice signal ratios. The KRFM contour is based on the KRDE radiation center and an ERP of 13.3 kW

which is a full
C0. There is prohibited overlap from the KSWG 54 dBu to the
KRFM 60
dBu. I wanted to run this to show you what the Longley Rice
signal
level would be predicted to be based on full facilities. Figure 2
is an
expended plot.

On Figures 1 & 2 the area plotted in blue and white would be
expected to
be an interference zone where neither station is well received.
The
gray and yellow would be KSWG dominant and the
pink/red/green KRFM
dominant. As you can see shadowing from the KSWG site into
the Tolleson
area causes an anomaly where KRFM would be strong inside the
KSWG 60.
This situation would be likely to cause KSWG to be very
observant of
the KRFM installation.

For Figure 3 I have backed the KRDE site ERP back to 7 kW to
remove the
prohibited overlap and recalculated the signal ratios. This
makes a
large difference dropping the signal in Tempe into the
interference area
but leaving Chandler and Mesa in better predicted signal areas.

The problem with these predictions is the number of variables.
Probably
KSWG will optimize their antenna making this showing suspect.
Moving
the antenna radiation centers can have a dramatic level on the
signal
levels.

I dropped the ERP to 7 kW using a ND antenna because that
gives you the
ability to do some optimization toward the west. You have to
be careful
not to intentionally directionalize the pattern.

John, I think you were wise to question this as the interference
zone
will be right in the middle of the populous and probably change
with
weather due to the path distances. With this initial information
I
would say lets talk about what you really want to achieve and
see if
that matches the physics.

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Clarence M. Beverage

Communications Technologies, Inc.
P.O. Box 1130
Marlton, NJ 08053
Phone 856-985-0077 ext. 12

Fax: 856-985-8124
web site www.commtechrf.com