

TECHNICAL STATEMENT AND WAIVER REQUEST
K271CR CASA GRANDE, ARIZONA, CH. 258D
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
MAY 2018

This Technical Statement is made in support of a modification of FM translator station, K271CR at Casa Grande, Arizona, facility ID 146671. K271CR seeks to remain at its present tower site and remain a “fill-in” for KLVA(FM) Maricopa, Arizona, facility ID 2749. K271CR seeks to make technical changes to lower its antenna height from 850 Meters Height Above Mean Sea Level to 843 Meters and modify its directional antenna pattern. K271CR also seeks to change its channel of operation from channel 271D to 258D. This request is being made since K271CR began operations on channel 271D on April 18th, 2018, it has received numerous listener interference complaints to full power co-channel station KAHM(FM) Spring Valley, Arizona, facility ID 61510. The licensee of KAHM(FM), Phoenix Radio Broadcasting, LLC, has also filed an Informal Objection against the license application of K217CR, BLFT-20180418AIA (See Figure 7 attached). K271CR ceased operations on channel 271D on April 30th, 2018 to eliminate the interference being caused to KAHM(FM) and has filed for a Silent STA, BLSTA-20180502AAX. By this application, it is respectfully requested that the Commission waive §74.1233(a)(1) which defines a minor change application by an FM translator station as “changes to first, second or third adjacent channels, or intermediate frequency channels”. A channel search of all available minor change channels would require a drastic reduction of present coverage by K271CR. A channel search of all available non-reserved channels revealed that channel 258D would produce the best coverage for

K271CR without creating any prohibit overlap with other existing or proposed facilities. The following will show that the new proposed operation of K271CR on channel 258D will meet all of the Commissions technical requirements for an FM translator station.

The new proposed operation of K271CR specifies a maximum Effective Radiated Power of 0.25 kilowatts (250 watts). It will operate with a directional antenna with an “off the shelf” type antenna, or a BEXT LOG-R with vertical only polarization. The antenna will be mounted on an existing non-registered tower, with an overall height of 33 meters above the ground. The antenna will be mounted with a Center of Radiation of 14 meters above the ground, and 843 meters Above Mean Sea Level. The coordinates of this tower are located at N 33° 00’ 11”, W 111° 40’ 26”, NAD 27.

Figure 1 is a detailed interference study conducted on channel 258D with the new proposed facilities. It shows that the new operation of K271CR will not cause any interference to any existing or proposed FM stations on any of the pertinent same channel or adjacent channels to channel 258D with the exception of second adjacent channel station, KESZ(FM) Phoenix, Arizona, facility ID 40992, operating on channel 260C.

Figure 2 shows the predicted 75.2 dB μ contour at the K217CR transmitter site. The worse case interference contour towards KESZ(FM) would therefore be 115.2 dB μ .

Figure 3 shows the coverage area for the worse case 115.2 dB μ interference contour F(50-10) and shows that there is no population in the area of interference. The 115.2 dB μ interference contour will extend 191.8 meters from the K271CR antenna. Figure 4 shows is a Satellite map showing the area around a 192 meter radius from the tower site. The applicant, Mountain Community Translators, LLC, respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no

population within the area of predicted interference. There are no homes nearby the proposed existing tower site, which is privately owned with private access. The transmitter building is uninhabited and does not have indoor plumbing. The area around the tower base is fenced. There are two locked gates at the base of the mountain which prevent public access to the transmitter site which is known as the Sacaton Mountain Communications site. There are other communication shelters and towers at this site, but they are un-occupied as well. Should any unforeseen actual interference be caused, the licensee will immediately cease broadcasting with K271CR until such interference can be eliminated.

Figure 5 is the proposed directional antenna data for the new operation of K271CR on channel 258D.

The proposed operation of K271CR Casa Grande, Arizona will be considered a “Fill-In” operation for KLVA(FM) Maricopa, Arizona. KLVA(FM) operates with 50 kilowatts at 150 meters HAAT on Channel 288C2. Figure 6 shows that the proposed 60 dBμ contour for the proposed K271CR will not extend beyond the 60 dBμ contour of KLVA. Since this is a “Fill-In” translator, the maximum ERP will not exceed the maximum permissible ERP of 250 watts in any azimuth.

Since K271CR will remain at its current transmitter site, it can be assumed that there will be overlap between the two facilities as required.

It was found that the new proposed operation of K271CR Casa Grande, Arizona on channel 258D, will satisfy all of the required commission rules and regulations for an FM translator station.

FIGURE 1 - DETAILED CHANNEL INTERFERENCE STUDY

K271CR CASA GRANDE, AZ, CH 258D

REFERENCE
33 00 11.0 N.
111 40 26.0 W.

CH# 258D - 99.5 MHz, Pwr= 0.25 kW DA, HAAT= 394.6 M, COR= 843 M
Average Protected F(50-50)= 25.68 km
Standard Directional

DISPLAY DATES
DATA 05-11-18
SEARCH 05-13-18

CH CITY	CALL	TYPE ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*OUT* (Overlap in km)
260C Phoenix	KESZ	LIC _CY AZ	315.6 135.4	51.53 BLH19970324KD	33 20 01.0 112 03 44.0	100.000 519	12.8 888	88.0 Cc Licenses, Lic, As Debto	-37.5*
258C Tucson	KIIM-FM	LIC _CY AZ	147.9 328.2	98.65 BLH19850131LP	32 14 56.0 111 06 59.0	93.000 621	194.9 1385	90.4 Radio License Holding Cbc,	1.1
258C2 Morristown	KRPB	LIC NCX AZ	323.5 142.9	158.51 BLH20110225ACJ	34 08 45.7 112 41 56.1	50.000 150	157.8 1262	66.5 Deportes Y Musica Comunica	12.4
257D Phoenix	K257CD	LIC DC_ AZ	329.9 149.6	76.02 BLFT20180213AAA	33 35 40.0 112 05 12.0	0.250 112	34.0 671	22.5 Michael Piazza, Lic	15.0
204C3 Chandler	KPNG	LIC DCN AZ	270.3 90.1	28.73 BLED20150812AAS	33 00 14.0 111 58 53.0	15.000 113	1.1 503	9.5 East Valley Institute Of T	11.5R 17.2M
256D Globe	K256DB	APP DV_ AZ	26.2 206.3	30.21 BPFT20170710ABF	33 14 50.0 111 31 49.0	0.250 111	0.9 618	10.4 Rocket Radio Corporation	18.4
258C2 Morristown	KRPB	CP ZCY AZ	323.2 142.6	165.64 BPH20170216AAF	34 11 32.0 112 45 13.0	8.000 369	149.9 1575	65.8 Deportes Y Musica Comunica	20.9
258D Wittman	KRPB-FM1	LIC _C_ AZ	325.1 144.7	129.23 BLFTB20121210ACV	33 57 17.0 112 28 34.0	0.625 112	80.5 1123	28.5 Deportes Y Musica Comunica	21.3
256D Globe	K256DB	LIC DV_ AZ	68.2 248.5	51.65 BLFT20170614AAU	33 10 26.0 111 09 33.0	0.250 111	1.1 1063	26.7 Rocket Radio Corporation	24.9
257L1 Gold Canyon	KRWV-LP	LIC ____ AZ	30.7 210.8	43.80 BLL20150727AAP	33 20 31.0 111 25 57.9	0.100 111	573	Gold Canyon Public Radio I	32.3
257C2 Payson	KEMP	CP ZCX AZ	13.2 193.4	134.69 BPH20100430ACE	34 11 04.0 111 20 16.0	50.000 140	109.6 1468	75.7 Kemp Communications, Inc.	48.0
257C3 Payson	KEMP	LIC _CX AZ	13.2 193.4	134.69 BLH20070813ABX	34 11 04.0 111 20 16.0	17.000 123	91.9 1457	63.3 Kemp Communications, Inc.	61.4
255D Tucson	K255AC	LIC _CN AZ	126.5 307.0	104.49 BLFT19950113TD	32 26 29.0 110 46 44.0	0.010 1209	0.2 2775	19.9 Maricopa County Community	84.5
205A Tucson	KALC	LIC _VX AZ	113.8 294.4	105.60 BLED20070124AKJ	32 36 56.0 110 38 38.0	1.800 8	1.1 1090	9.5 Calvary Chapel Of Tucson,	9.5R 96.1M
256B Sonoita	XHSITFM	OPE _HN SO	221.6 41.0	168.45	31 51 52.0 112 51 30.0	50.000 150	5.3 608	65.0	103.4
256B Sonoita	XHSITFM	USE ____ SO	221.6 41.0	168.45	31 51 52.0 112 51 30.0	50.000 150	5.3 608	65.0	103.4
259L1 Payson	KPJM-LP	LIC ____ AZ	17.2 197.4	149.31 BLL20140804AB0	34 17 16.0 111 11 34.0	0.001 265	1920	Payson Helping Payson, Inc	137.2
261A Sonoita	AL2469	SO ____	221.4 40.8	168.47	31 51 41.0 112 51 16.0	3.000 100	2.0 560	24.0	144.5
256A Nogales	KOFH	CP _CX AZ	158.4 338.8	191.69 BPH20170925AEA	31 23 39.7 110 55 46.4	6.000 92	3.5 1301	37.1 Felix Corporation	151.4
256A Nogales	KOFH	LIC _C_ AZ	158.8 339.2	191.82 BLH20001128AAA	31 23 19.0 110 56 35.0	6.000 51	3.5 1263	37.1 Felix Corporation	153.4
256C1 Thatcher	KFMM	LIC DCX AZ	92.7 273.9	220.19 BMLH20151029AUH	32 53 22.0 109 19 23.0	6.200 701	5.0 1986	65.8 Cochise Broadcasting Lic	154.1
259C2 Ash Fork	KAFZ	CP NCX AZ	350.0 169.7	239.83 BPH20150624ABF	35 07 52.0 112 08 03.0	10.500 325	81.0 2390	54.5 Alex Media, Inc.	154.8
204B Sasabe	AL6570	VAC ____ SO	175.9 355.9	170.22	31 28 19.0 111 32 39.0	50.000 150	1.1 1226	9.5 10.0R	160.2M
204B Sasabe	AL0527	VAC ____ SO	176.0 356.0	170.78	31 28 00.0 111 32 50.0	50.000 150	1.1 1219	9.5 10.0R	160.8M
205A Sonoita	XHSSAFM	OPE _HN SO	221.6 41.0	168.37	31 51 52.0 112 51 30.0	3.000 100	1.1 558	9.5 5.0R	163.4M

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DI ST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	Page # 2 (Overl ap in km)	*OUT*
205A Sonoi ta	XHSSAFM	USE ____ SO		221. 6 41. 0	168. 37	31 51 52. 0 112 51 30. 0	3. 000 100	1. 1 558	9. 5	5. 0R	163. 4M
256C Puerto Penasco	AL6133	VAC ____ SO		223. 3 42. 4	257. 74	31 18 12. 0 113 32 10. 0	100. 000 600	13. 5 604	92. 0		165. 7
259C2 Snowfl ake	DKGQQ	VAC ____ AZ		39. 4 220. 2	210. 62	34 27 30. 0 110 12 50. 0	50. 000 150	65. 5 1979	40. 8 Kemp Communi cations, Inc.		167. 6
261C2 Fl agstaff	KVNA-FM	LIC _C_ AZ		4. 0 184. 0	218. 49 BMLH20060113ABB	34 58 05. 0 111 30 29. 0	5. 300 437	4. 2 2615	48. 0 Yavapai Broadcasti ng Corpo		168. 9
256A Prescott	KTMG	LIC _CN AZ		337. 2 156. 7	189. 60 BLH19930510KC	34 34 29. 0 112 28 45. 0	6. 000 61	1. 6 1759	15. 8 Flagstaff Radi o, Inc		173. 1
260C Agua Pri eta	R29180	ADD ____ SO		132. 5 313. 6	272. 56	31 19 45. 0 109 33 28. 0	100. 000 600	14. 3 1872	92. 0		180. 6
260B Naco	AL8688	VAC ____ SO		138. 4 319. 4	246. 61	31 19 53. 0 109 57 05. 0	50. 000 150	7. 5 1652	65. 0		181. 6
257C2 Parker	DKVEZ	VAC ____N AZ		298. 6 117. 2	266. 32	34 07 22. 0 114 12 40. 0	50. 000 150	62. 4 374	38. 2		188. 6
204C Fl agstaff	KNAU	LIC _C_ AZ		4. 0 184. 1	218. 56 BLED19991014AAT	34 58 07. 0 111 30 24. 0	100. 000 445	1. 1 2624	9. 5 Northern Ari zona Uni versi t	28. 5R	190. 1M
261B Caborca	XHCBRFM	OPE _HN SO		190. 2 10. 0	260. 40	30 41 50. 0 112 09 29. 0	50. 000 150	5. 2 450	65. 0		195. 4
261B Caborca	XHCBRFM	USE ____ SO		190. 2 10. 0	260. 40	30 41 50. 0 112 09 29. 0	50. 000 150	5. 2 450	65. 0		195. 4
259L1 Show Low	KPKX-LP	LIC ____ AZ		49. 7 230. 7	208. 88 BLL20160316AAA	34 12 21. 5 109 56 31. 9	0. 002 236	2312	Show Low Communi ty Radi o		201. 1
255C2 Doney Park	KZXX	LIC _CX AZ		1. 6 181. 7	248. 25 BLH20170627AAA	35 14 25. 0 111 35 49. 0	0. 560 610	1. 6 2844	43. 9 Cochi se Broadcasti ng Lic		204. 2
255A San Pedro	AL0316	VAC ____ SO		144. 1 324. 9	241. 50	31 14 05. 0 110 11 03. 0	3. 000 100	2. 0 1541	24. 0		217. 5
205C2 Sierra Vi sta	KUAS-FM	CP DCX AZ		135. 9 316. 8	233. 69 BMPED20160826AAX	31 28 51. 7 109 57 31. 3	1. 700 675	1. 1 2204	9. 5 Arizona Board Of Regents F	14. 5R	219. 2M
259A Ash Fork	KAFZ	LIC _CX AZ		343. 4 162. 9	257. 58 BLH20150623ABL	35 13 29. 0 112 29 11. 0	0. 100 -46	8. 0 1609	5. 6 Alex Medi a, Inc.		221. 3
255B Cuervos	AL0149	VAC ____ BN		262. 8 81. 1	299. 77	32 37 35. 0 114 51 03. 0	50. 000 150	6. 0 190	65. 0		234. 1
257A Caborca	AL0473	VAC ____ SO		190. 2 10. 0	260. 40	30 41 50. 0 112 09 29. 0	3. 000 100	28. 4 400	24. 0		235. 3
205C3 Yuma	KAWC-FM	LIC _CX AZ		262. 3 80. 9	251. 94 BLED20150320ABO	32 40 24. 0 114 20 11. 0	1. 500 363	1. 1 511	9. 5 Arizona Western College	11. 5R	240. 4M
260C3 Somerton	KYMZ	LIC _CX AZ		262. 3 80. 7	273. 16 BLED20180313AAM	32 38 31. 0 114 33 34. 0	25. 000 56	2. 6 118	25. 3 Campesinos Sin Fronteras		245. 0
257A Agua Pri eta	R17613	VAC ____ SO		132. 4 313. 6	273. 42	31 19 33. 0 109 32 56. 0	3. 000 100	44. 7 1377	24. 0		247. 3
261C2 Ki ngman	KGMN	LIC _CX AZ		319. 7 138. 4	310. 14 BMLH20020213AAY	35 06 37. 0 113 52 55. 0	0. 910 883	2. 1 2340	52. 5 New West Broadcasti ng Syst		256. 3
205A Parker	KAWP	LIC _EX AZ		298. 6 117. 2	266. 38 BLED20131202ADC	34 07 28. 9 114 12 38. 2	0. 250 287	1. 1 517	9. 5 Arizona Western College	9. 5R	256. 9M
205A Dougl as	VA0877	VAC ____N AZ		132. 2 313. 3	271. 85	31 20 36. 0 109 33 09. 0	6. 000 100	1. 1 1371	9. 5	9. 5R	262. 4M
261A Nacozari De Garcia	AL2737	VAC ____ SO		198. 5 18. 0	307. 78	30 22 25. 0 112 41 30. 0	3. 000 100	2. 6 214	24. 0		283. 8
256B1 Nacozari De Garcia	XHNZ1FM	OPE _HN SO		146. 8 327. 8	347. 32	30 22 25. 0 109 41 28. 0	3. 000 100	1. 8 1401	45. 0		302. 3
256B1 Nacozari De Garcia	XHNZ1FM	USE ____ SO		146. 8 327. 8	347. 32	30 22 25. 0 109 41 28. 0	25. 000 100	3. 0 1401	45. 0		302. 3
255B Essex	KHWY	LIC _CX CA		304. 6 122. 7	376. 62 BLH20060320ADE	34 52 50. 0 115 04 06. 0	9. 000 348	5. 3 1136	70. 3 Heftel Broadcasti ng Compan		304. 0

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	Page # (Overlap in km)	*OUT*
257A Imperial	KMXX	LIC _CX CA		269.4 87.3	360.48 BLH20020220AAC	32 54 40.0 115 31 40.0	6.000 92	41.0 63	26.5 Entravision Holdings, LIc		310.0
257A Imperial	KMXX	RSV-A _N CA		268.6 86.5	363.91	32 51 44.0 115 33 41.0	6.000 100	44.3 77	28.7 Entravision Holdings, LIc		311.7
261A Nacozari De Garcia	R43111	ADD _ SO		146.8 327.8	347.29	30 22 25.0 109 41 30.0	3.000 100	1.8 1401	24.0		323.3
261A Nacozari De Garcia	R29272	DEL _ SO		146.8 327.8	347.29	30 22 25.0 109 41 30.0	3.000 100	1.8 1401	24.0		323.3
261A Holville	KGBA-FM	LIC NCX CA		267.6 85.6	358.29 BLH20170627AAH	32 48 43.0 115 29 49.4	6.000 100	2.7 86	27.4 The Voice Of International		330.3
261D Bullhead City	KGMN-FM1	LIC DV_ AZ		313.0 131.5	335.81 BLFTB20050601CEU	35 02 05.0 114 22 10.0	0.003	0.0 1213	1.7 New West Broadcasting Syst		332.6
204A Calxico	KUBO	LIC _CN CA		267.4 85.3	358.99 BLED19890503KA	32 47 57.0 115 30 12.0	3.000 83	1.1 66	9.5 Radio Bilingue, Inc.	9.5R	349.5M
205A Los Moscos	AL0755	VAC _ CH		115.2 297.1	369.75	31 32 24.0 108 08 50.0	6.000 100	1.1 1397	9.5	5.0R	364.8M

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone= West Zone, Co to 3rd adjacent.
All separation margins (if shown) include rounding.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
Incoming contour overlap is ignored.
***affixed to 'IN' or 'OUT' values = site inside restricted contour.
« = Station meets FCC minimum distance spacing for its class.
Reference station has protected zone issue: Mexico

* No actual interference will be caused to KESZ(FM) Phoenix, AZ, since the worse case 115.2 DBU interference contour will not cover any population. See the Technical Statement for more details.

BLFT20180418AIA
Latitude: 33-00-11 N
Longitude: 111-40-26 W
ERP: 0.25 kW
Channel: 258
Frequency: 99.5 MHz
AMSL Height: 850.0 m
Elevation: 829.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

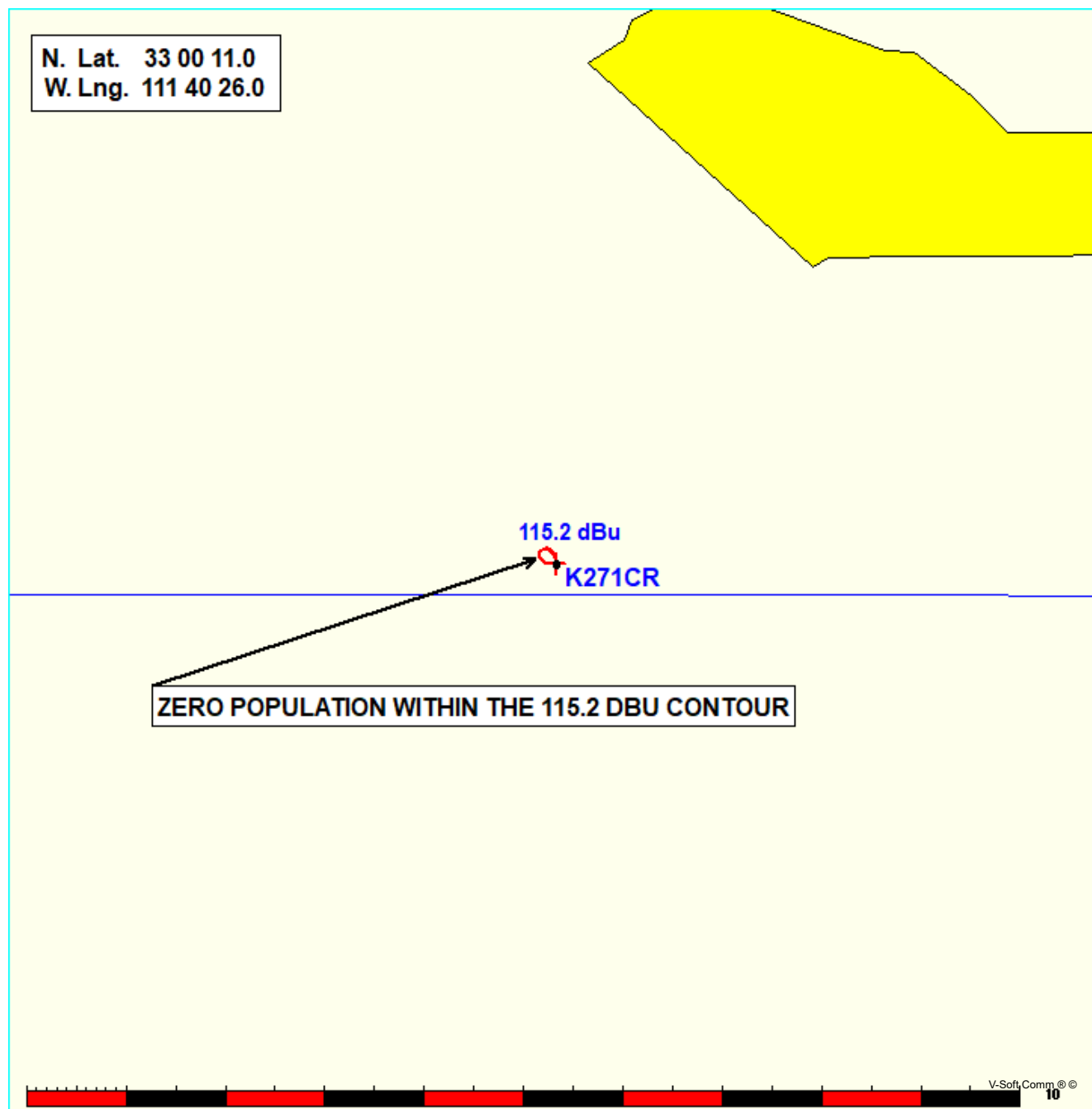
[illegible]

10/-Soft Communications LLC ® ©

FIGURE 3 - PREDICTED 115.2 DBU CONTOUR
K271CR CASA GRANDE, AZ, CH 258D

Coverage Study - NGDC 30 SEC
05-13-2018

K271CR CH258 D , 0.25 kW, 394.6m HAAT, 843.0m COR AMSL
Interference Contour = 115.2 dBu. Population = 0





33°00'10.7"N 111°40'28.3"W

FIGURE 4 - SATELLITE MAP OF SITE



Imagery ©2018 Google, Map data ©2018 Google 500 ft

FIGURE 5 - DIRECTIONAL ANTENNA DATA

K271CR CASA GRANDE, AZ, CH 258D

05-13-2018

RMS(V) = .392

Graph is Relative Field

Azi	Field	dBk	kW
000	0.250	-18.062	0.016
010	0.085	-27.432	0.002
020	0.020	-40.000	0.000
030	0.010	-46.021	0.000
040	0.006	-50.458	0.000
050	0.006	-50.458	0.000
060	0.005	-52.041	0.000
070	0.005	-52.041	0.000
080	0.005	-52.041	0.000
090	0.006	-50.458	0.000
100	0.007	-49.119	0.000
110	0.008	-47.959	0.000
120	0.009	-46.936	0.000
130	0.010	-46.021	0.000
140	0.009	-46.936	0.000
150	0.008	-47.959	0.000
160	0.007	-49.119	0.000
170	0.006	-50.458	0.000
180	0.005	-52.041	0.000
190	0.005	-52.041	0.000
200	0.005	-52.041	0.000
210	0.006	-50.458	0.000
220	0.006	-50.458	0.000
230	0.010	-46.021	0.000
240	0.020	-40.000	0.000
250	0.085	-27.432	0.002
260	0.250	-18.062	0.016
270	0.470	-12.579	0.055
280	0.645	-09.829	0.104
290	0.820	-07.744	0.168
300	0.950	-06.466	0.226
310	1.000	-06.021	0.250
320	0.950	-06.466	0.226
330	0.820	-07.744	0.168
340	0.645	-09.829	0.104
350	0.470	-12.579	0.055

BEXT LOG-R AT 310 DEGREES

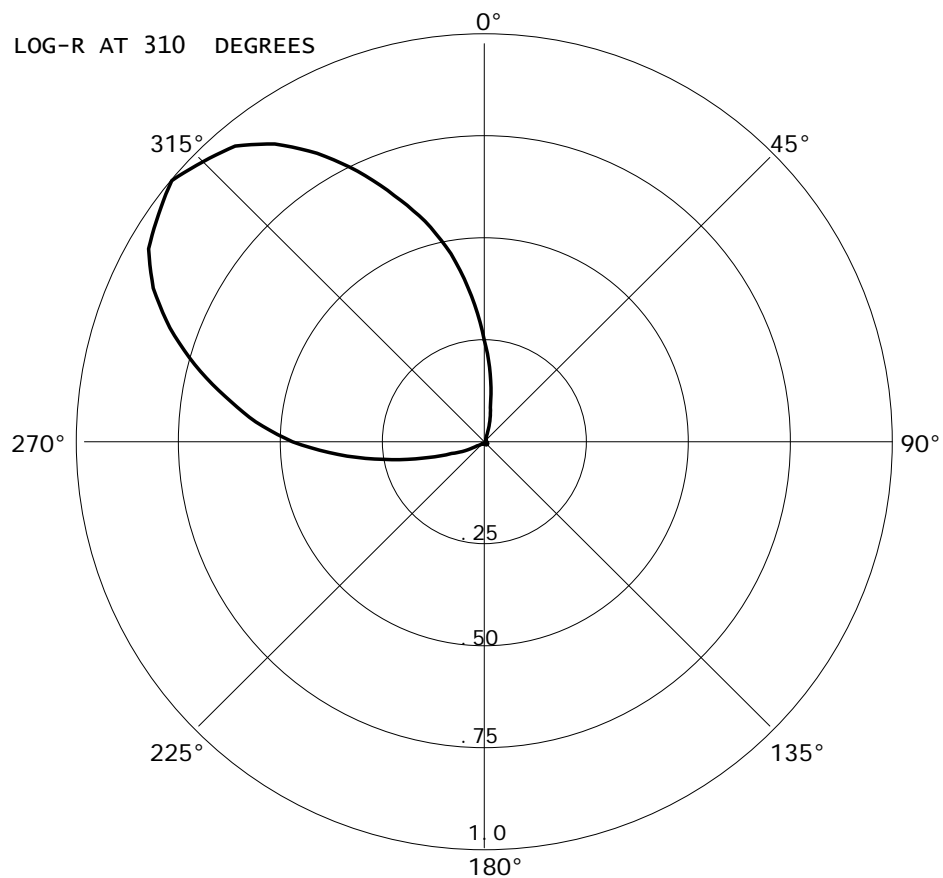


FIGURE 6 - FILL IN MAP WITH KLVA(FM)
K271CR CASA GRANDE, AZ, CH 258D

Coverage Study - NGDC 30 SEC
05-13-2018

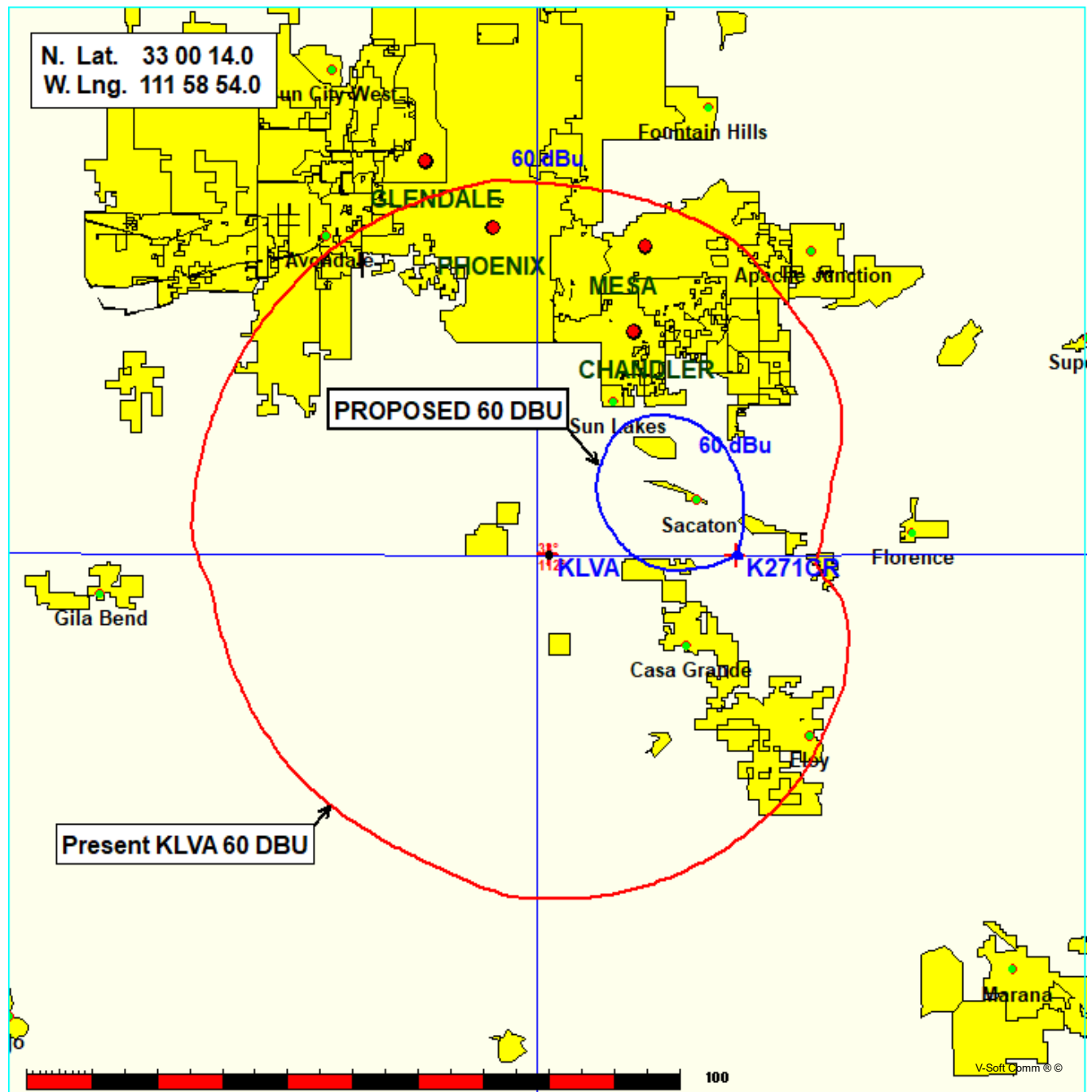


FIGURE 7 - INFORMAL OBJECTION FILED AGAINST K271CR

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

In the Matter of

**MOUNTAIN COMMUNITY
TRANSLATORS, LLC**

FM Translator Station K243BP
Casa Grande, AZ

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)
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File No. BLFT-20180418AIA
Facility ID No. 146671

To: Office of Secretary
Attn: Chief, Audio Division, Media Bureau

Informal Objection and Interference Complaint

Phoenix Radio Broadcasting, LLC (“Phoenix”), licensee of full-power radio station KAHM(FM), 102.1 MHz, Prescott, Arizona, by its attorney, hereby objects to the above-captioned application filed by Mountain Community Translators, LLC (“Mountain”) for a license to cover modifications to FM translator station K243BP (the “Application”).¹

Mountain filed the Application on April 18, 2018,² and just one day later, listeners of KAHM(FM) began calling the station complaining that “K-Love”³ programming had begun interfering with their reception of KAHM(FM). In fact, as of today, Phoenix has received at least

¹ The modifications to K243BP included an increase in power and a change of frequency from 96.5 MHz to 102.1 MHz (*i.e.*, the same frequency as KAHM(FM)). *See* File No. BMPFT-20170718AGR, *further modified by* File No. BMPFT-20180302ABA.

² The K243BP construction permit, File No. BMPFT-20180302ABA, contained a condition requiring Mountain to file a license application prior to commencing program test operations.

³ K243BP rebroadcasts KLVA(FM), Maricopa, Arizona, Facility ID. No. 2749, which is licensed to Educational Media Foundation (“EMF”) and broadcasts EMF’s K-Love programming.

half a dozen calls or e-mails from listeners complaining of new interference from K243BP programming.

The recently activated co-channel operations of K243BP on 102.1 MHz is causing actual interference to reception of KAHM(FM) by regular listeners in violation of section 74.1203 of the Commission's rules.⁴ Accordingly, Phoenix hereby respectfully requests that the Commission take appropriate action to end this interference.⁵

Phoenix is currently in the process of gathering complaint declarations from listeners to document the interference, but in the interim, the Commission should (1) either deny or defer action on K243BP's license application and (2) require Mountain immediately to end the actual interference either through a reduction in power or a complete suspension of operations.

Respectfully submitted,

PHOENIX RADIO BROADCASTING, LLC

By: 

Brad C. Deutsch
Garvey, Schubert & Barer
1000 Potomac Street, NW
Second Floor
Washington, DC 20007
Tel: 202-965-7880
Its Attorney

Dated: April 26, 2018

⁴ 47 C.F.R. § 74.1203(a) ("An authorized FM translator or booster station will not be permitted to continue to operate if it causes any actual interference to: ... (3) The direct reception by the public of the off-the-air signals of any authorized broadcast station.... Interference will be considered to occur whenever reception of a regularly used signal is impaired by the signals radiated by the FM translator or booster station, regardless of the quality of such reception, the strength of the signal so used, or the channel on which the protected signal is transmitted.").

⁵ 47 C.F.R. § 74.1203(e) ("It shall be the responsibility of the licensee of an FM translator or FM booster station to correct any condition of interference which results from the radiation of radio frequency energy by its equipment on any frequency outside the assigned channel. Upon notice by the Commission to the station licensee that such interference is being caused, the operation of the FM translator or FM booster station shall be suspended within three minutes . . .").


CERTIFICATE OF SERVICE

The undersigned, an employee of Garvey Schubert Barer, hereby certifies that a copy of the foregoing "Informal Objection and Interference Complaint" was served this date, by U.S. Postal Service First Class mail, postage prepaid, upon the following:

James Bradshaw, Deputy Chief *
Media Bureau, Audio Division
Federal Communications Commission
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Washington, D.C. 20554
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