



Federal Communications Commission  
Washington, D.C. 20554

September 30, 2019

*In Reply Refer to:*  
1800B3-KV

Red Wolf Broadcasting Corporation  
c/o Scott Woodworth, Esq.  
Edinger Associates, PLLC  
1875 I St, NW,  
Suite 500  
Washington, DC 20006

In Re: **W235CN, Providence, RI**  
Radio Sharon Foundation  
File No. BLFT-20171124AAA  
Facility ID No. 41191

**Interference Complaints**

Dear Counsel:

This letter refers to the following pleadings filed by Red Wolf Broadcasting Corporation (Red Wolf), licensee of Station WJJF(FM), Montauk, New York: (1) a December 21, 2017, "Informal Objection and Interference Complaint" (Objection- Complaint); (2) a January 24, 2018, "Supplement to Informal Objection and Interference Complaint" (First Supplement); (3) a March 5, 2018, "Second Supplement to Informal Objection and Interference Complaint" (Second Supplement); (4) a March 12, 2018, "Request to Immediately Cease Operation" (First Request); (5) a May 24, 2018, "Further Request to Immediately Cease Operation" (Second Request); and (6) an October 9, 2018, "Third Request to Immediately Cease Operation" (Third Request).<sup>1</sup> In the Objection-Complaints, Red Wolf alleges that FM Translator Station W235CN, Providence, Rhode Island (W235CN or Station), licensed to Radio Sharon Foundation (Radio Sharon or Licensee)<sup>2</sup> is interfering with the reception of WJJF(FM).

Recently, the Commission adopted certain changes to the FCC's rules (Rules) relating to the translator interference complaint resolution process.<sup>3</sup> The Commission stated that, once effective, all pending complaints would be decided under the new Rules. The Commission further stated that parties

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<sup>1</sup> Collectively, the Objection-Complaint; First and Second Supplements; and First, Second and Third Requests will be referred to as the Objection-Complaints.

<sup>2</sup> The Station is licensed to operate as W300AC, Providence, Rhode Island. Red Wolf, however, alleges interference under the Station's permitted operations as W235CN.

<sup>3</sup> See *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Report and Order, FCC 19-40, 34 FCC Rcd 3457(2019) (*Translator Interference Order*).

involved in pending proceedings would be given an opportunity to submit supplemental material to address the changes.<sup>4</sup>

Our initial review of the Objection-Complaints under the revised interference standards reveals that additional information is required. Specifically, in order to continue processing the Objection-Complaints the items marked below must be submitted:<sup>5</sup>

1. Listener Complaints:

- X   Detailed information on the Complaining Station's protected contour and the population located therein;
- X   Minimum Number of Listener Complaints as determined by the population located within the Complaining Station's protected contour;<sup>6</sup>
- X   Signed and dated (within one year of Complaint and all other listener complaints) by Listener;
- X   Listener's full name, address and phone number;
- X   Clear, concise, and accurate description of the location where interference is alleged;<sup>7</sup>

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<sup>4</sup> *Id.* at ¶ 49.

<sup>5</sup> An item will be marked as missing the required information if it is missing from one or more listener complaints.

<sup>6</sup> See 47 CFR § 74.1203 Table 1.

Population within Protected Contour	Minimum Listener Complaints Required for Interference Claim
1-199,999	6
200,000-299,999	7
300,000-399,999	8
400,000-499,999	9
500,000-999,999	10
1,000,000-1,499,999	15
1,500,000-1,999,999	20
2,000,000 or more	25
LPFM stations with fewer than 5,000	3

<sup>7</sup> In the *Translator Interference Order*, the Commission noted that "[a]ppropriate descriptions include map coordinates, street addresses, street intersections, or other descriptions such as 'along Route XX near mile marker XX' or 'between Exits 1 and 2 on Route XX.' Unacceptable descriptions would include 'on my way to work' or

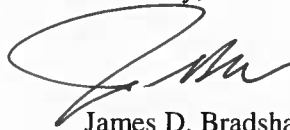
- X   Statement that Listener listens over-the-air to the desired station at least twice a month;
- X   Statement that Listener has no legal, financial, employment, or familial affiliation or relationship with desired station.

2. Technical Interference Showing:

- X   Map plotting the specific location of the alleged interference in relation to the Complaining Station's 45dBu contour;
- X   Statement that the Complaining Station is operating within its licensed parameters;
- X   Statement that the Complaining Station licensee has used commercially reasonable efforts to inform the relevant translator licensee of the claimed interference and attempted private resolution;
- X   Undesired/Desired data demonstrating that at each listener location the ratio of undesired to desired signal strength exceeds -20 dB for co-channel situations, -6 dB for first-adjacent channel situations or 40 dB for second- or third- adjacent channel situations, calculated using the Commission's standard contour prediction methodology.

Within thirty (30) days of this letter, Red Wolf must submit the above information and any other information not referenced above that might be required by the Rules. Further action on the Objection-Complaints will be withheld for a period of 30 days from the date of this letter to provide Red Wolf an opportunity to respond. Failure to submit the required information will result in the dismissal of the Objection-Complaints.<sup>8</sup>

Sincerely,



James D. Bradshaw  
Senior Deputy Chief  
Audio Division  
Media Bureau

cc: Lee Peltzman, Esq. (by email)

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'downtown,' as they do not inform . . . [if] within its 45 dBu contour or . . . provide sufficient information to resolve the compliant." *Id.* at note 65.

<sup>8</sup> This action is without prejudice to any other issues raised in the Objection-Complaints.