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March 25, 2021

**Via Email: James.Bradshaw@fcc.gov**

Mr. James Bradshaw  
Senior Deputy Chief, Audio Division, Media Bureau  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: Interference Complaint Letter Dated February 26, 2021 re KKOL(AM),  
Facility ID No. 20355**

Dear Mr. Bradshaw:

Intelli LLC (“Intelli”), licensee of radio station KKOL(AM), Seattle, WA, FCC Facility ID No. 20355 (the “Station”), is in receipt of your letter dated February 26, 2021 (the “Letter”) regarding the blanketing interference complaints filed by Ann and David Knight and Philip Hutcherson pertaining to the Station. Intelli hereby submits, through counsel, its detailed report of the steps taken to resolve the complaints.

As background, we note that Intelli acquired KKOL(AM) from Inspiration Media, Inc. (“Inspiration”) as part of an asset exchange agreement dated April 26, 2018 (“Agreement”). The parties closed that transaction on September 27, 2019. In connection with the transaction, Inspiration agreed to indemnify Intelli for the costs associated with resolving any potential interference complaints, including those arising during the one-year period covered under 47 CFR § 73.318, resulting from the Station’s move. The parties have coordinated, therefore, in their communications with the complainants and in their efforts to resolve any problems that may have been caused by blanketing interference from the Station. As the prior owner and operator of the Station, Inspiration has been aware of the problems experienced by the Knights and Mr. Hutcherson. Monte Passmore, a local engineer working for Inspiration, has been working diligently with each of the complainants for some time, and has helped achieve a resolution to the interference issues they raised, consistent with 47 CFR § 73.318, as detailed below.

Attached as Attachment A is a map depicting the location of the KKOL(AM) transmitter site, the Station’s 1 mV/m blanketing contour, and the location of the Knight and Hutcherson residences, both of which fall within that contour.

### **Ann and David Knight**

Of the five blanketing interference situations described in the Letter, Situation #1 applies to the Knights' complaint. The complaint was filed on July 16, 2020, within the one-year testing period, and the Knights' residence is located within KKOL(AM)'s blanketing contour.

On July 19, 2019, the FCC granted Inspiration Program Test Authority ("PTA") for the Station's new location. KKOL(AM) was turned on for tuning and testing in August 2019. Ann and David Knight, whose residence is located at 9790 NE Murden Cove Dr., Bainbridge Island, WA 98110, immediately reported that they were experiencing internet connectivity issues they believed to be the result of KKOL(AM)'s operations.

Over the next several weeks, Mr. Passmore attempted to resolve the issues through trial and error including, but not limited to, filtering of the cable modem, filtering of the cable service, and grounding techniques at various locations in the Knights' office. Mr. Passmore also tried shielding of Mrs. Knight's computer and replaced both Mr. and Mrs. Knights' keyboards and mice.

Between August 27, 2019, and mid-September 2020, there were no further complaints from Mr. & Mrs. Knight, as the Station remained dark for much of that time.<sup>1</sup> On September 18, 2020, however, the Station resumed operations at full power so that any resulting interference issues could be identified and addressed. The Knights immediately reported that their internet service was again disrupted. Mr. Passmore quickly visited the Knight residence and conducted a speed test with the cable modem which showed no data transfer, confirming that the service was down. Turning off KKOL(AM) restored the internet service. Mr. Passmore tried several filtering options, but they did not resolve the problem. At that point, Mr. Passmore informed the Knights that he would need to contact Comcast/Xfinity, the Knights' internet service provider, for assistance. He explained that the Station would cease operation until the issue was resolved.

Mr. Passmore contacted Xfinity and on October 14, 2020, he joined an Xfinity field engineer and supervisor at the Knight residence to diagnose the issue. After several hours, the problem was identified as a defective RG6 coax cable that ran between the Xfinity-supplied distribution amplifier mounted on the outside of the garage to a splitter mounted on the outside front of the home. Xfinity installed a temporary above-ground replacement cable, and when KKOL(AM) resumed operation at full power, the Xfinity cable modem booted normally. A full speed test of the Knight's internet service showed full functionality with no degradation of internet performance. Xfinity subsequently returned to the Knight residence to remove the temporary cable and install a new permanent replacement cable underground. The Knights were not charged for replacement of the cable or for troubleshooting time; costs were borne by Inspiration. The Knights have not contacted the Station with any complaint about the internet connectivity problem since the remediation steps were taken.

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<sup>1</sup> Due to the interference issues, Intelli did not want to continue to operate the station at full power until those issues could be resolved. Intelli periodically resumed operations, sometimes as reduced power, to assess these interference issues. During this time, KKOL operated in accordance with STAs filed by Intelli.

### **Philip Hutcherson**

While Mr. Hutcherson filed his complaint with the FCC on February 9, 2021, more than one year after KKOL(AM)'s PTA was granted, because the Station was powered off for much of this period, Intelli is responding to the Commission's letter in the context of Situation #1. In fact, Intelli and Inspiration made continued and successful efforts to resolve Mr. Hutcherson's complaint. As described to the FCC in an email dated February 16, 2021 from Inspiration's counsel, Kathleen Kirby, Esq. to James Bradshaw of the FCC (Attachment B), Intelli believes the interference issue cited by Mr. Hutcherson has been resolved.

Mr. Hutcherson resides at 9804 NE Murden Cove Dr., Bainbridge Island, WA 98110, which is within the blanketing contour of KKOL(AM). On January 26, 2021, Mr. Hutcherson sent emails to [kkolinterference@gmail.com](mailto:kkolinterference@gmail.com), an account set up by Mr. Passmore specifically for parties wishing to report interference issues believed to be resulting from KKOL(AM)'s operations. In the first email, Mr. Hutcherson advised that his internet connection dropped out for 15-20 minutes that day at 11:00 a.m., and that his upload and download speeds had been negatively affected. In response, Mr. Passmore visited Mr. Hutcherson's residence that same day to investigate whether the problems resulted from the Station's operations. Instead, Mr. Passmore determined that Xfinity's own technical issues were at fault and advised Mr. Hutcherson as such. To Mr. Passmore's knowledge, Xfinity has resolved Mr. Hutcherson's internet connection problem and the Station has received no further complaint about internet connectivity.

Mr. Hutcherson emailed Mr. Passmore again later that same day, this time reporting that his electric car charger was not functioning properly. Mr. Passmore quickly returned to Mr. Hutcherson's residence and observed that, when the Station was operating at full power, Mr. Hutcherson's car, a new full electric KIA, was not recognizing a connection to the PSE (Puget Sound Energy) 220-volt car charger installed in the garage.<sup>2</sup> The charger worked properly when the Station was off the air. Therefore, Mr. Passmore advised Mr. Hutcherson that he would order filter chokes to install on the charger line and that the Station would not resume operations until the filters arrived.

On February 9, 2021, Mr. Passmore returned to the Hutcherson residence with the filters. He installed two Palomar ¾" ID mix 77 toroids on the charger cord between the charger and Mr. Hutcherson's car. One was placed 6" from the charger plug on one end and the other was placed 6" from the control box on the other end. KKOL(AM) was then turned on at full power. Thereafter, Mr. Passmore confirmed that communication between the car and charger was restored and charging operations became normal. As a courtesy, Mr. Passmore placed two more of the same filters on the 110-volt mobile charger which Mr. Hutcherson carries in the trunk of the car. Mr. Hutcherson declined Mr. Passmore's offer to connect the mobile charger to verify its proper operation. All filters were installed at no cost to Mr. Hutcherson. To date, the Station has received no further complaint from Mr. Hutcherson about his car charger operation.

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<sup>2</sup> Mr. Hutcherson informed Mr. Passmore that the car would send an alert email, and that a fault light also appeared on the charger.

Should you have any further questions or need additional information, please do not hesitate to contact the undersigned.

Sincerely,

/Dan J. Alpert/

Dan J. Alpert, Esq.  
*Counsel to Intelli LLC*

Enclosure

cc: Mr. Tron Dinh Do  
Mrs. Ann Knight [aknight@resource-fiber.com](mailto:aknight@resource-fiber.com)  
Mr. David Knight [dknight@resource-fiber.com](mailto:dknight@resource-fiber.com)  
Mr. Philip Hutcherson [philiphutcherson@yahoo.com](mailto:philiphutcherson@yahoo.com)  
Ms. Tracey Kim [tracey.kim@salemmedia.com](mailto:tracey.kim@salemmedia.com)  
Robert Mesrop, Esq. [BobM@SalemMedia.com](mailto:BobM@SalemMedia.com)

## *Attachment A*



*Attachment B*

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**From:** Kirby, Kathleen  
**Sent:** Tuesday, February 16, 2021 10:49 AM  
**To:** 'james.bradshaw@fcc.gov' <james.bradshaw@fcc.gov>  
**Subject:** FW: "Interference - AM Station KKOL, BSTA-20200921ABY, and BP-2011207ABL

Hi Jim,

Hope this finds you well. Per my voicemail, I represent Salem – they've sold KKOL but have remained committed (including contractually) to working to resolving any interference problems, and have been coordinating with the new licensee. The parties have been communicating directly with Mr. Hutcherson and provided him with a filter that resolved the issue with his car charger. Salem asked me to reach out to you to let you know that – we welcome your thoughts on any next steps. Please give me a call at your convenience.

Kathy



Kathleen A. Kirby  
Attorney at Law  
[kkirby@wiley.law](mailto:kkirby@wiley.law)

Wiley Rein LLP • 1776 K Street NW • Washington, DC 20006  
o: 202.719.3360 • m: 703.927.8386  
[Download V-Card](#) | [wiley.law](http://wiley.law) | [Bio](#)

Note: The firm's domain has changed to wiley.law. To update my contact information, please download my [vCard](#)

----- Forwarded message -----

From: James Bradshaw <[James.Bradshaw@fcc.gov](mailto:James.Bradshaw@fcc.gov)>  
Date: Wed, Feb 10, 2021, 10:05 AM  
Subject: RE: "Interference - AM Station KKOL, BSTA-20200921ABY, and BP-2011207ABL  
To: P Hutcherson <[philiphutcherson@yahoo.com](mailto:philiphutcherson@yahoo.com)>, Elizabeth Mumaw <[Elizabeth.Mumaw@fcc.gov](mailto:Elizabeth.Mumaw@fcc.gov)>, JoAnn Lucanik <[JoAnn.Lucanik@fcc.gov](mailto:JoAnn.Lucanik@fcc.gov)>, Ricardo Durham <[Ricardo.Durham@fcc.gov](mailto:Ricardo.Durham@fcc.gov)>, Albert Shuldiner <[Albert.Shuldiner@fcc.gov](mailto:Albert.Shuldiner@fcc.gov)>, Lisa Scanlan <[Lisa.Scanlan@fcc.gov](mailto:Lisa.Scanlan@fcc.gov)>, [kkolinterference@gmail.com](mailto:kkolinterference@gmail.com) <[kkolinterference@gmail.com](mailto:kkolinterference@gmail.com)>  
Cc: Son Nguyen <[Son.Nguyen@fcc.gov](mailto:Son.Nguyen@fcc.gov)>, Jerome Manarchuck <[Jerome.Manarchuck@fcc.gov](mailto:Jerome.Manarchuck@fcc.gov)>

Mr. Hutcherson,

Thanks for your email.

We are aware of the situation involving KKOL(AM) and are currently investigating how best to proceed.

You can expect to hear more from us about this shortly.

Sincerely,

Jim Bradshaw  
Audio Division  
Media Bureau  
Federal Communications Commission

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**From:** P Hutcherson <[philiphutcherson@yahoo.com](mailto:philiphutcherson@yahoo.com)>

**Sent:** Tuesday, February 09, 2021 2:46 PM

**To:** Elizabeth Mumaw <[Elizabeth.Mumaw@fcc.gov](mailto:Elizabeth.Mumaw@fcc.gov)>; JoAnn Lucanik <[JoAnn.Lucanik@fcc.gov](mailto:JoAnn.Lucanik@fcc.gov)>; Ricardo Durham <[Ricardo.Durham@fcc.gov](mailto:Ricardo.Durham@fcc.gov)>; Albert Shuldiner <[Albert.Shuldiner@fcc.gov](mailto:Albert.Shuldiner@fcc.gov)>; James Bradshaw <[James.Bradshaw@fcc.gov](mailto:James.Bradshaw@fcc.gov)>; Lisa Scanlan <[Lisa.Scanlan@fcc.gov](mailto:Lisa.Scanlan@fcc.gov)>; [kkolinterference@gmail.com](mailto:kkolinterference@gmail.com)

**Subject:** "Interference - AM Station KKOL, BSTA-20200921ABY, and BP-2011207ABL

Hello

I am writing to report interference from AM Station KKOL during high power testing.

Whenever the KKOL station is working at high power, our EV car charger (EVSE) constantly malfunctions and will not charge the car. This is a big problem, obviously, since the inability to charge means the vehicle becomes nearly useless.

The charging interference problem has been confirmed in the presence of the KKOL engineer. The engineer is trying to find a solution.

Even if a solution is found, it is not hard to think of many such charger interference problems that will occur in the future if the station is approved for high power use. Any time someone in the neighborhood acquires an EV, they will have this problem. What will be their recourse?

Best regards,

Philip Hutcherson  
9804 NE Murden Cove Dr  
Bainbridge Is, WA 98110  
206-556-0161

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