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

Accepted / Filed

DEC 12 2018

Federal Communications Commission
Office of the Secretary

In re Application of)	
)	
Hodges Media, LLC)	Facility ID No. 201183
)	File No. BLFT-20181004ABC
Application for License to Cover)	
W289CU, Channel 289,)	
Knoxville, Tennessee)	

Attn: Chief, Audio Division, Media Bureau

OPPOSITION TO EMERGENCY INTERFERENCE COMPLAINT

Hodges Media, LLC ("Hodges Media"), licensee of FM translator W289CU, Knoxville, Tennessee (Facility ID No. 201183) (Channel 289/ 105.7 MHz) ("W289CU"),¹ hereby files this Opposition to 3B Properties, Inc.'s ("3B Properties") November 29, 2018 Emergency Interference Complaint ("Interference Complaint")² referencing W289CU's License to Cover Application (File No. BLFT-20181004ABC) ("License to Cover Application"), which was granted by the Commission on November 15, 2018. For the reasons stated herein, 3B Properties' Interference Complaint is procedurally defective and is without merit. Therefore, the Interference Complaint must be dismissed by the Commission.

¹ W289CU provides cross-service FM translator service for its parent AM broadcast station, WKGN, Knoxville, Tennessee (Facility ID No. 68146) ("WKGN").

² 3B Properties' Interference Complaint appears to have been initially filed on November 28, 2018 as an informal objection ("Informal Objection"). *See generally* Emergency Interference Complaint and Informal Objection of 3B Properties, Inc. (filed Nov. 28, 2018). That same day, however, 3B Properties withdrew its Informal Objection stating that "the informal objection portion of this filing was an improper filing and will resubmit the 'emergency interference complaint' thru proper FCC channels[] [p]ursuant to 47 CFR 73.3588 of the Commission[]'s rules" Withdrawal of Informal Objection of 3B Properties, Inc. at Ex. 1 (filed Nov. 28, 2018). The instant Interference Complaint was served on Hodges Media's counsel via email.

I. BACKGROUND

A. Petition to Deny

3B Properties previously filed a petition to deny (“Petition to Deny”) against W289CU’s License to Cover Application on October 15, 2018, alleging that the FM translator’s operations were interfering with FM broadcast station, WIHG, Rockwood, Tennessee (Facility ID No. 51113) (Channel 289/ 105.7 MHz) (“WIHG”), in violation of the Commission’s rules.³ 3B Properties, however, failed include any interference complaints in its Petition to Deny because WIHG staff failed to document the complaints that the station received during this time period.⁴ Nevertheless, 3B Properties stated that it would be filing a “more detailed ‘Interference Complaint’” in the near future.⁵

B. Opposition to Petition to Deny

On October 23, 2018, Hodges Media filed its Opposition to 3B Properties’ Petition to Deny.⁶ In its Opposition, Hodges Media asserted that the Commission should dismiss the Petition Deny because it was procedurally defective, and otherwise failed to properly allege actual interference by W289CU with the receipt of WIHG’s signal by its listeners under Section 74.1203(a)(3) of the Commission’s rules.⁷

³ Petition to Deny of 3B Properties, Inc. at 3 (filed Oct. 15, 2018) (“Petition to Deny”).

⁴ *See id.* (“Because our staff was unaware of what was wreaking havoc on our Knoxville area signal, most of those calls were not documented.”).

⁵ *Id.*

⁶ *See generally* Opposition to Petition to Deny of Hodges Media, Inc. (filed Oct. 23, 2018) (“Opposition to Petition to Deny”).

⁷ *Id.* at 3-6. *See also* 47 C.F.R. § 74.1203(a)(3).

C. Interference Complaint

On November 28, 2018, 3B Properties filed its Interference Complaint, and served it upon Hodges Media's counsel via email.⁸ In its Interference Complaint, 3B Properties alleges that W289CU is causing interference to the receipt of WIHG's signal by the station's listeners.⁹ Specifically, 3B Properties contends that it has received numerous reports of interference to WIHG's signal "in and around the areas of the Knoxville metro area[,] including[:] Cedar Bluff, Farragut, Kingston Pike, Turkey Creek, Campbell Station, Oak Ridge, Solway, [and] Pellissippi Parkway"¹⁰ 3B Properties supports its interference allegations against W289CU by attaching complaints from nine (9) alleged listeners.¹¹ Based on these listener complaints, 3B Properties contends that Section 74.1203 of the Commission's rules requires W289CU to cease operations *until* all complaints of interference can be resolved.¹²

II. DISCUSSION

A. The Interference Complaint is not Based on *Bona Fide* Listeners

It appears that at least five (5) of the nine (9) alleged interference complainants provided in support of 3B Properties' Interference Complaint are not *bona fide* complainants. Section 74.1203(a)(3) of the Commission's rules provides, in pertinent part, that an FM translator station "will not be permitted to continue to operate if it causes any actual interference to . . . the direct reception by the public of the off-the-air signals of any authorized broadcast station"¹³ The

⁸ See *supra* note 2.

⁹ Interference Complaint at 1-3.

¹⁰ *Id.* at 2.

¹¹ *Id.* at Attachment.

¹² *Id.* at 1, 3.

¹³ 47 C.F.R. § 74.1203(a)(3).

FCC interprets the “direct reception to the public” language in Section 74.1203(a) to mean that actionable interference complaints must be made by “*bona fide*” listeners.¹⁴ In order for a listener complainant to be *bona fide*, the FCC’s staff requires each listener complainant to provide: (1) his or her name and address; (2) the location(s) at which the interference with the desired station occurs; and (3) a statement that the listener is, in fact, a *regular* listener of the desired station.¹⁵ Furthermore, a listener complainant must be disinterested, i.e., have no legal, economic, or familial stake in the outcome of the proceeding.¹⁶

At least five (5) of the nine (9) interference complainants supporting 3B Properties’ Interference Complaint are not *bona fide* for the following reasons:

<u>Complainant</u>	<u>Reason not <i>Bona Fide</i></u>
Connie Worthington	Failure to specify that she is a regular listener of desired station ¹⁷
Brenda Farney	Failure to specify that she is a regular listener of desired station ¹⁸

¹⁴ *Association for Community Education, Inc.*, Memorandum Opinion and Order, 19 FCC Rcd. 12682, 12688, ¶ 16 (2004) (“*Community Education*”) (“[O]nly a complaint from a *bona fide* listener of the desired station can force a translator station off the air.”).

¹⁵ *See Creation of an LPFM Service*, Fifth Order on Reconsideration and Sixth Report and Order, 27 FCC Rcd. 15402, 15431-32, ¶ 83 (2012). *See also Richard J. Bodoroff, Esq., et al.*, Letter, 27 FCC Rcd. 4870, 4873 (MB 2012 (rejecting interference complaint from complainant who “no longer listens” to the desired station)).

¹⁶ *See Association for Community Education, Inc.*, 19 FCC Rcd. at 12688, n.37; *Creation of a Lower Power Radio Service*, Fifth Report and Order, 27 FCC Rcd. 15402, 15441, ¶ 109 (2012).

¹⁷ *See* Interference Complaint, Complaint of Connie Worthington (“She *had been* able to listen to WIHG as she traveled to and from work” (emphasis added)).

¹⁸ *See id.*, Complaint of Brenda Farney (“Listens to 105.7 The HOG/WIHG as she *traveled* to and from work at East TN Tree Service. . . . She *could* always hear 105.7 The HOG/WIHG” (emphasis added)).

<u>Complainant</u>	<u>Reason not <i>Bona Fide</i></u>
Chris Singer	Failure to specify that he is a regular listener of desired station ¹⁹
Stephen Smith	No street address provided ²⁰
John (jander7278@aol.com)	Full name not provided, and no street address provided ²¹

Further, two (2) of the alleged listener complainants fail to state that W289CU is the source of the interference with their receipt of WIHG's signal.²²

Under Section 309(e) of the Communications Act, as amended (the "Act"),²³ "informal objections, like petitions to deny, must provide properly supported allegations of fact that, if true, would establish a substantial and material question of fact that grant of the application would be *prima facie* inconsistent with Section 309(a)."²⁴ Accordingly, as 3B Properties fails to support its interference allegations against W289CU with complaints from *bona fide* listeners of WIHG, its Interference Complaint must be dismissed with respect to the defective listener complaints discussed above for failing to comply with Section 309(e) of the Act.

¹⁹ See *id.*, Complaint of Chris Singer ("He *had been* able to listen to WIHG as he traveled to and from work." (emphasis added)).

²⁰ See *id.*, Complaint of Stephen Smith (complainant only provides email address).

²¹ See *id.*, Complaint of John (jander7278@aol.com) (complainant fails to provide full name, and only provides an email address).

²² See, e.g., Interference Complaint, Complaint of Larry Rosenbalm, Jr. (no mention of WKGN, W289CU, or those stations' format); *id.*, Complaint of John (jander7278@aol.com) (states that WIHG's "signal is weak and other station bleed[s] over" without specifically mentioning WKGN, W289CU, or those stations' format). Cf. 47 C.F.R. § 74.1203(a) (requiring evidence of "actual interference to . . . [t]he direct reception by the public of the off-the-air signals of any authorized broadcast station . . .").

²³ 47 U.S.C. § 309(e).

²⁴ *Saga Communications of New England, LLC*, Memorandum Opinion and Order and Notice of Apparent Liability for Forfeiture, 25 FCC Rcd. 4491, 4493, ¶ 6 (MB 2010) (finding that "Finger Lakes has failed to raise a substantial and material question of fact calling into question Saga's character or its basic qualifications as a licensee") (citing 47 U.S.C. § 309(a)).

B. The Commission should Limit Hodges Media's Listener Complaint Response Obligations to those within WIHG's 54 dBμ Service Contour

Nevertheless, to the extent that any of the interference complainants supporting 3B Properties' Interference Complaint are bona fide, Hodges Media is in the process of contacting those complainants in an effort to resolve their interference complaints as prescribed by the Commission's rules.²⁵ In the interests of equity and fairness, and in conformance with the policy justifications of the FCC's AM Revitalization program, Hodges Media requests that the Commission hold in abeyance Hodges Media's obligations to respond to the *bona fide* listener interference complaints – if any – until the FCC has resolved its pending proposal on placing geographic limitations on FM translator interference complaints.²⁶

Unlike WKGN/W289CU, WIHG does not have an established presence in the Knoxville, Tennessee market. WIHG's community of license is Rockwood, Tennessee – a community over 30 miles southwest of Knoxville. While WIHG is technically within the Knoxville, Tennessee BIA Market,²⁷ neither its principal contour nor its community of license fall within the Knoxville geographic market area.²⁸ In contrast, the service contours of WKGN/W289CU are well within the Knoxville geographic market area.²⁹

²⁵ See 47 C.F.R. § 74.1203(b).

²⁶ See *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Notice of Proposed Rulemaking, 33 FCC Rcd 4729, 4740-43, ¶¶ 23-29 (2018) ("*FM Translator Interference Complaints NPRM*").

²⁷ See Knoxville, Tennessee BIA Market Report, attached hereto as **Exhibit A**.

²⁸ See Map of the Knoxville, Tennessee Market Area, attached hereto as **Exhibit B** (noting the principal contours for WIHG, WKGN, and W289CU). Rockwood, Tennessee is located in Roane County Tennessee, which is outside of Knoxville's geographic market area. See *id.*

²⁹ See *id.*

The FCC's current rules place no geographic limitation on FM translator interference complaints.³⁰ The Commission, however, has proposed the implementation of geographic limitations on such complaints (i.e., the 54 dBμ service contour of the desired station).³¹ One of the reasons asserted for establishing geographic limitations on FM translator interference complaints was to prevent full-service FM broadcast stations from "'troll[ing] for complaining individuals' so that they can extend their signal out to the 'last gasp of his or her radio signal coming through the FM hash.'"³² Doing so "would 'protect local radio listeners in the primary station's community of license against a loss of service precipitated by an out-of-market radio station seeking to claim distant radio listeners far outside its service area.'"³³ While the Commission expressed concerns in the *FM Translator Interference Complaints NPRM* that "setting an outer limit for listener interference complaints . . . would be inconsistent with translators' role as a secondary service,"³⁴ it noted that doing so would support the policies underlying the AM Revitalization program.³⁵

Surely, 3B Properties' Interference Complaint is a prime example for justifying the adoption of geographic limitations on FM translator interference complaints as proposed in the *FM Translator Interference Complaints NPRM*. As stated above, unlike WIHG, WKGN/W289CU operates squarely within the Knoxville, Tennessee market. Further, the FCC's AM Revitalization program was designed to aid small, independent AM broadcasters such as

³⁰ *Community Education*, 19 FCC Rcd. at 12688, ¶ 16.

³¹ *See FM Translator Interference Complaints NPRM*, 33 FCC Rcd at 4740-43, ¶¶ 23-29.

³² *Id.* at 4740, ¶ 23 (quoting Petition for Rulemaking of Aztec Capital Partners, Inc. at 9 (filed Apr. 7, 2018) ("Aztec Petition")).

³³ *Id.* at 4740, ¶ 24 (quoting Aztec Petition at 3).

³⁴ *Id.* at 4741, ¶ 26.

³⁵ *See id.* at 4741-42, ¶¶ 26-27.

Hodges Media by providing them with a lifeline in a rapidly evolving marketplace.³⁶ Finally, as demonstrated by the map attached hereto as **Exhibit C**, *none* of the locations of listener complaints submitted in support of 3B Properties' Interference Complaint are within WIHG's 54 dBμ service contour.³⁷ Therefore, Hodges Media requests that the Commission hold in abeyance Hodges Media's obligations to respond to the *bona fide* listener interference complaints – if any – until the FCC has determined whether it will impose geographic limitations on FM translator interference complaints.

C. 3B Properties' Request for W289CU's Immediate Cessation of Operations is Improper

Finally, 3B Properties requests in its Interference Complaint that the Commission order W289CU to cease operations *until* Hodges Media has resolved all of interference complaints made against its translator.³⁸ FM translators, however, are *not* required to cease operations until all interference complaints are resolved. Instead, Section 74.1203(b) of the Commission's rules provides that an FM translator must only cease operations *after* first endeavoring to eliminate the alleged interference that the station may be causing: "If interference cannot be properly eliminated by *the application of suitable techniques*, operation of the offending FM translator or booster station shall be suspended and shall not be resumed until the interference has been eliminated."³⁹ In fact, Section 74.1203(b) goes on to state that: "If a *complainant refuses* to

³⁶ Cf. *Revitalization of the AM Radio Service*, First Report and Order, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 30 FCC Rcd. 12145, 12146-48, ¶¶ 3-6 (2015).

³⁷ See generally Map of Listener Complaint Locations, attached hereto as **Exhibit C** (noting in red the locations of the listener complaints as well as the roads identified in the complaints where the alleged interference was experienced).

³⁸ Interference Complaint at 1, 3.

³⁹ 47 C.F.R. § 74.1203(b) (emphasis added). See also *Creation of a Low Power Radio Service*, Fifth Order on Reconsideration and Sixth Report and Order, 27 FCC Rcd. 15402, 15431-32, ¶ 83 (2012) (stating that "the staff has considered only those complaints of

permit the FM translator or booster licensee to apply remedial techniques which demonstrably will eliminate the interference without impairment to the original reception, *the licensee of the FM translator or booster station is absolved of further responsibility for that complaint.*”⁴⁰ Accordingly, Section 74.1203(b) contemplates that FM translators be provided with the opportunity to resolve interference allegations made against the station *before* ceasing operations.

Assuming that W289CU is the source of interference with WIHG’s signal, 3B Properties is essentially demanding that Hodges Media cease operations without attempting to resolve the interference – which may require the FM translator to *continue* operations until the source of interference is identified.⁴¹ Accordingly, 3B Properties’ demand that W289CU immediately cease operations is without merit, and must be dismissed by the Commission.⁴²

CONCLUSION

For the foregoing reasons, Hodges Media respectfully requests that the Commission:

(1) dismiss or deny 3B Properties’ Interference Complaint to the extent that some listener complainants are not *bona fide*; and (2) hold in abeyance Hodge Media’s obligations to respond

FM translator interference where the *complainant cooperates in efforts to identify the source of interference and accepts reasonable corrective measures*” (emphasis added) (citing *Radio Power, Inc.*, Letter, 26 FCC Rcd 14385, 14385-86 (MB 2011))).

⁴⁰ 47 C.F.R. § 74.1203(b) (emphasis added).

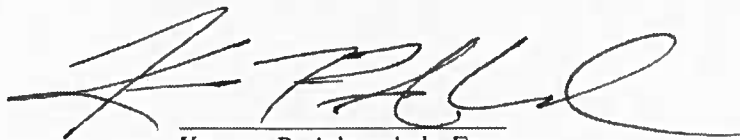
⁴¹ *See, e.g., FM Translator Interference NPRM* ¶ 7 (“‘On-off’ tests may be required on a case-by-case basis to determine whether the translator is the source of the alleged interference.” (citing *Apple 107.1, Inc.*, Memorandum Opinion and Order and Notice of Apparent Liability for Forfeiture, 28 FCC Rcd 15722, 15723, ¶ 4 (MB 2013))).

⁴² *See* 47 C.F.R. § 73.3584(e) (“[P]leadings . . . which do not lie as a matter of law or are otherwise procedurally defective, are subject to return by the FCC’s staff without consideration.”).

to any of the *bona fide* listener complaints until the FCC has determined whether it will impose geographic limitations on such interference complaints.

Respectfully submitted,

HODGES MEDIA, LLC

A handwritten signature in black ink, appearing to read 'K. Adamchak', written over a horizontal line.

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Counsel for Hodges Media, LLC

Dated: December 12, 2018

DECLARATION

I, Nathan A. Hodges, hereby attest to the following:

1. I am the Chief Executive Officer of Hodges Media, LLC.
2. I have personal knowledge of the facts set forth in the foregoing Opposition.
3. I have read the Opposition, and the statements therein are truthful and correct to the best of my knowledge, information, and belief.

I hereby certify that to the best of my knowledge, information, and belief, under penalty of perjury, the foregoing statements are true and correct.



Nathan A. Hodges

Dated: December 11, 2018

Exhibit A

Knoxville, Tennessee BIA Market Report

FCC Geographic Market Definition for Knoxville, TN

Call Letters	AM/FM	Type	Station	Format	Home Market	Market			City & State of License	County of License
						Designtn	Home Mkt Rank	Owner		
WBCR	AM	1470	C	Nws/Tlk/Spt	Knoxville, TN	07/02/2003	72	Blount County Broadcasting	Alcoa, TN	Blount
WBLC	AM	1360	NC	Chrst/Talk	Knoxville, TN	07/02/2003	72	LifeTalk Radio Inc	Lenoir City, TN	Loudon
WCYQ	FM	100.3	C	Country	Knoxville, TN	07/02/2003	72	SummitMedia LLC	Oak Ridge, TN	Anderson
WDKW	FM	95.7	C	Country	Knoxville, TN	07/02/2003	72	Midwest Communications Incorporated	Maryville, TN	Blount
WDVX	FM	89.9	NC	Americana	Knoxville, TN	07/02/2003	72	Cumberland Communities Communications	Clinton, TN	Anderson
WETR	AM	760	C	Talk	Knoxville, TN	07/02/2003	72	Moffitt, Thomas H, Jr	Knoxville, TN	Knox
WFGW	FM	106.7	NC	ChrsContem	Knoxville, TN	07/02/2003	72	Blue Ridge Broadcasting	Norris, TN	Anderson
WFIV	FM	105.3	C	AAA	Knoxville, TN	07/02/2003	72	Home Radio LLC	Loudon, TN	Loudon
WGAP	AM	1400	C	Sprts/Talk	Knoxville, TN	07/02/2003	72	Blount Broadcasting Corporation	Maryville, TN	Blount
WIFA	AM	1240	C	AdCHR/CCT	Knoxville, TN	07/02/2003	72	Progressive Media Inc	Knoxville, TN	Knox
WIHG	FM	105.7	C	Clsc Hits	Knoxville, TN	08/10/2007	72	3B Properties Inc	Rockwood, TN	Roane
WIMZ	FM	103.5	C	Clsc Rock	Knoxville, TN	07/02/2003	72	Midwest Communications Incorporated	Knoxville, TN	Knox
WITA	AM	1490	C	Religion	Knoxville, TN	07/02/2003	72	F.W. Robbert Broadcasting	Knoxville, TN	Knox
WIVK	FM	107.7	C	Country	Knoxville, TN	07/02/2003	72	Cumulus Media Holdings Inc	Knoxville, TN	Knox
WJBE	AM	1040	C	Urban AC	Knoxville, TN	07/02/2003	72	Arm & Rage LLC	Powell, TN	Knox
WJBZ	FM	96.3	C	Sothn Gspel	Knoxville, TN	07/02/2003	72	Meredith, Ronald C	Seymour, TN	Sevier
WJRV	FM	106.1	C	Modern AC	Knoxville, TN	10/27/2009	72	Momentum Broadcasting LLC	Oliver Springs, TN	Roane
WJXB	FM	97.5	C	AC	Knoxville, TN	07/02/2003	72	Midwest Communications Incorporated	Knoxville, TN	Knox
WKCE	AM	1180	C	Sports	Knoxville, TN	07/02/2003	72	Mid-Century Radio LLC	Knoxville, TN	Knox
WKCS	FM	91.1	NC	Oldies	Knoxville, TN	07/02/2003	72	Fulton High School	Knoxville, TN	Knox
WKGN	AM	1340	C	Sports	Knoxville, TN	07/02/2003	72	Hodges Media LLC	Knoxville, TN	Knox
WKHT	FM	104.5	C	Rhymc/CHR	Knoxville, TN	07/02/2003	72	SummitMedia LLC	Knoxville, TN	Knox
WKVL	AM	850	C	Sprts/Talk	Knoxville, TN	07/02/2003	72	Blount Broadcasting Corporation	Knoxville, TN	Knox
WKXV	AM	900	C	Sothn Gspel	Knoxville, TN	07/02/2003	72	Knoxville Ra-Tel	Knoxville, TN	Knox
WKZX	FM	93.5	C	Mexican	Knoxville, TN	07/02/2003	72	BP Broadcasters LLC	Lenoir City, TN	Loudon
WLIL	AM	730	C	Country	Knoxville, TN	07/02/2003	72	Fowlers Holdings LLLP	Lenoir City, TN	Loudon
WLOD	AM	1140	C	Sprts/Talk	Knoxville, TN	07/02/2003	72	Blount Broadcasting Corporation	Loudon, TN	Loudon
WMYL	FM	96.7	C	Country	Knoxville, TN	10/04/2006	72	Meredith, Ronald C	Halls Crossroads, TN	Knox
WNFZ	FM	94.3	C	Alternative	Knoxville, TN	07/02/2003	72	Pirkle, John W	Powell, TN	Knox
WNML	FM	99.1	C	Sports	Knoxville, TN	07/02/2003	72	Cumulus Media Holdings Inc	Friendsville, TN	Blount
WNML	AM	990	C	Sports	Knoxville, TN	07/02/2003	72	Cumulus Media Holdings Inc	Knoxville, TN	Knox
WNOX	FM	93.1	C	Clsc Hits	Knoxville, TN	07/02/2003	72	SummitMedia LLC	Kams, TN	Knox
WOFM	FM	89.1	NC	Chrs/Alive	Knoxville, TN	07/02/2003	72	Educational Media Foundation	Alcoa, TN	Blount
WOKI	FM	98.7	C	News/Talk	Knoxville, TN	07/02/2003	72	Cumulus Media Holdings Inc	Oliver Springs, TN	Roane

"C" - Commercial Station; "NC" - Non Commercial Station

FCC Geographic Market Definition for Knoxville, TN

Call Letters	AM/FM	Freq	Station Type	Format	Home Market	Market		Owner	City & State of License	County of License
						Designtn	Home Mkt Rank			
WPFT	FM	106.3	C	Country	Knoxville, TN	10/09/2007	72	Whitfield Communications Inc	Pigeon Forge, TN	Sevier
WRJZ	AM	620	C	Relgn/Talk	Knoxville, TN	07/02/2003	72	Moffit, Thomas H, Jr	Knoxville, TN	Knox
WSEV	AM	930	C	Variety	Knoxville, TN	07/02/2003	72	Bristol Broadcasting Company Inc	Sevierville, TN	Sevier
WSEV	FM	105.5	C	AC	Knoxville, TN	07/02/2003	72	Whitfield Communications Inc	Gatlinburg, TN	Sevier
WUOT	FM	91.9	NC	NPR/Cls/Jaz	Knoxville, TN	07/02/2003	72	University of Tennessee	Knoxville, TN	Knox
WUTK	FM	90.3	NC	Modern	Knoxville, TN	07/02/2003	72	University of Tennessee	Knoxville, TN	Knox
WVLZ	AM	1120	C	Oldies	Knoxville, TN	07/02/2003	72	Mid-Century Radio LLC	Maryville, TN	Blount
VWQK	FM	88.7	NC	Sothn Gspel	Knoxville, TN	12/16/2013	72	Power Foundation	Oak Ridge, TN	Anderson
WWST	FM	102.1	C	CHR	Knoxville, TN	07/02/2003	72	SummitMedia LLC	Sevierville, TN	Sevier
WYFC	FM	95.3	NC	Chrst/Talk	Knoxville, TN	07/02/2003	72	Bible Broadcasting Network Inc	Clinton, TN	Anderson
WYLV	FM	88.3	NC	ChrsContem	Knoxville, TN	07/02/2003	72	Educational Media Foundation	Maynardville, TN	Union
WYSH	AM	1380	C	Country	Knoxville, TN	07/02/2003	72	Meredith, Ronald C	Clinton, TN	Anderson

Number of Stations in Geographic Market 46

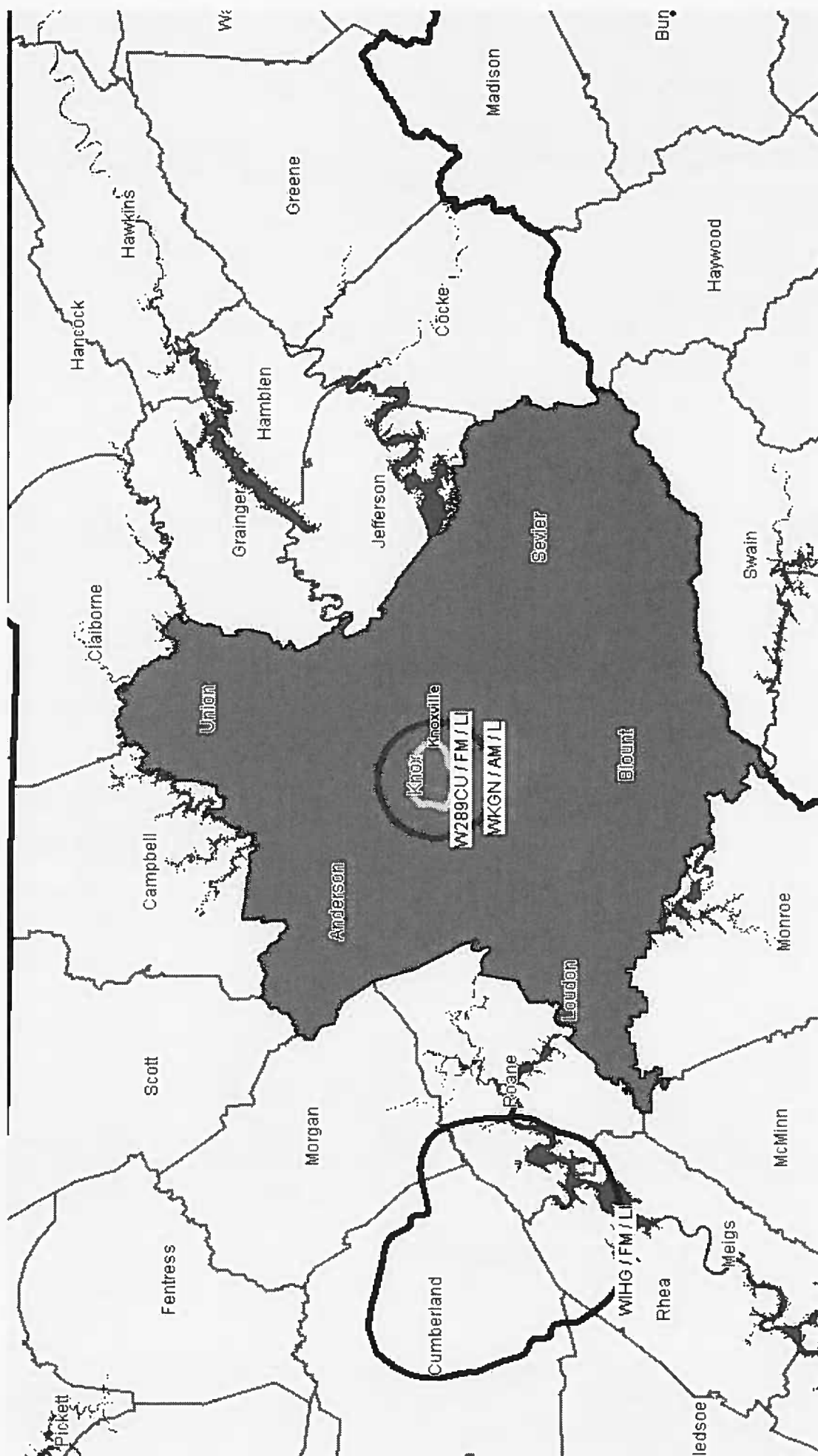
Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Exhibit B

Map of the Knoxville, Tennessee Market Area



BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

Latitude: N35-59-10.08

Longitude: W083-53-7.82

BIAMapX:

Station / Service / Status

W289CU / FM / LI

WIHG / FM / LI

WKGN / AM / L

Market

Knoxville, TN - Radio

BIAMapX:

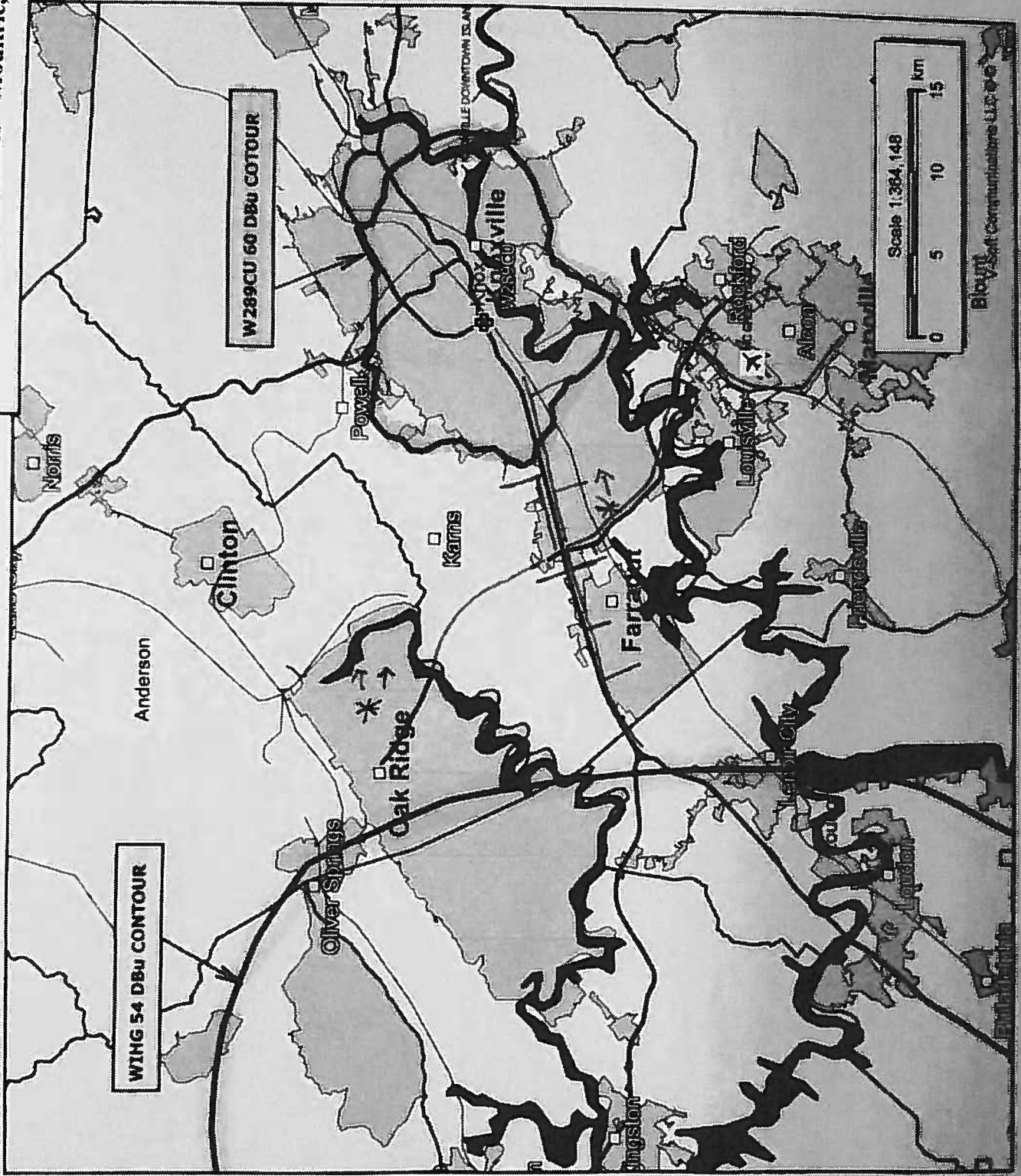
Latitude: N35-59-10.08

Longitude: W083-53-7.82

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

Exhibit C

Map of Listener Complaint Locations



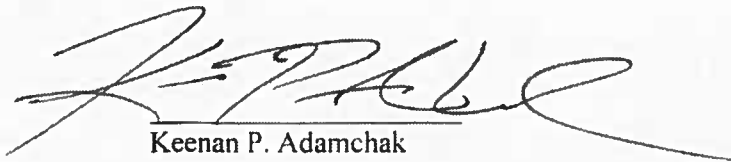
W289CU
BLFT20181004ABC
Latitude: 35-57-20 N
Longitude: 083-58-14 W
ERP: 0.25 kW
Channel: 289
Frequency: 105.7 MHz
AMSL Height: 359.0 m
Elevation: 262.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

WING
BLH20090330AJB
Latitude: 35-53-27 N
Longitude: 084-52-01 W
ERP: 2.40 kW
Channel: 289
Frequency: 105.7 MHz
AMSL Height: 835.0 m
Elevation: 810.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

CERTIFICATE OF SERVICE

I, Keenan P. Adamchak, of Fletcher, Heald & Hildreth, PLC, hereby certify that I caused a true copy of the foregoing Opposition to be sent this 12th day of December, 2018, via U.S. First Class Mail, postage prepaid, to the following individual:

Mr. Kirk Tollett
Vice President/GM
3B Properties, Inc.
37 South Dr.
Crossville, TN 38555



Keenan P. Adamchak