

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

In the Matter of )  
)  
WEST VIRGINIA RADIO CORPORATION ) File No. BLFT-20160725ABW  
OF THE ALLEGHENIES ) Facility ID No. 154324  
)  
FM Translator Station )  
W229CM, Martinsburg, WV )

Accepted / Filed

JUN 13 2017

To: The Secretary  
Attention: Chief, Audio Division, Media Bureau

Federal Communications Commission  
Office of the Secretary

**OPPOSITION TO INTERFERENCE COMPLAINT**

West Virginia Radio Corporation of the Alleghenies (“WVRCA”), licensee of FM Translator Station W229CM, Martinsburg, West Virginia (Facility ID No. 154324), by its counsel, hereby submits this Opposition to the “Interference Complaint” filed by Greencastle-Antrim Education Foundation (“Greencastle”) dated May 23, 2017, and received by the Federal Communications Commission (“FCC”) on June 5, 2017 (the “Complaint”), which alleges interference to its LPFM Station WRGG-LP, Greencastle, Pennsylvania (FCC Facility ID No. 197436) caused by W229CM. With respect thereto, the following is stated:

WVRCA is licensee of FM Translator Station W229CM, Martinsburg, West Virginia. W229CM rebroadcasts Class C AM Station WEPM(AM), Martinsburg, West Virginia. As permitted under the Commission’s FM Translator Filing Window<sup>1</sup>, a modification application was filed during the first FM Translator Modification Window to move W229CM within the 2 mV/m contour or 25 mile radius of WEPM, in order to provide much-needed relief to the station,

<sup>1</sup> *Revitalization of the AM Radio Service*, First Report and Order, Further Notice of Proposed Rule Making, and Notice of Inquiry, FCC 15-142, 30 FCC Rcd 12145 (rel. Oct. 23, 2015).

in accordance with the FCC's AM revitalization policies. The application was filed on January 29, 2016. No opposition was filed to the application prior to its grant. The application, which complied with the protection requirements of Section 74.1204 of the FCC's Rules (47 C.F.R. § 74.1204), was granted on a routine basis on February 16, 2016, and the Public Notice announcing the grant was released on February 19, 2016. *See* Broadcast Actions, Report No. 48674, p. 9. Again, no petition for reconsideration was filed within the 30 day window available for such pleadings subsequent to its grant. The modified facilities for W229CM were constructed at Martinsburg, WV, and a license application to cover was filed on July 25, 2016 (File No. BLFT-20160725ABW), which was granted on August 1, 2016. Now, nearly a year after W229CM has been on the air, Greencastle has filed a Complaint claiming that W229CM causes interference to the reception of WRGG-LP, and requesting that the FCC remedy this alleged signal interference.

The Complaint must be denied for several reasons. As an initial matter, LPFMs are intended to serve small, local areas, typically within a 3.5 mile radius of the station's transmitter site, and are not entitled to protection from interference from distances beyond this limited service area. And W229CM, the transmitter site of which is approximately 45.2 km (28.1 mi) from the transmitter site for WRGG-LP, was constructed and is operating as authorized in its construction permit (File No. BMPFT-20160129AJB). As shown in the attached engineering study, any interference to the reception of WRGG-LP is not being caused by W229CM. The signals of W229CM and WRGG-LP correspond with their authorized facilities. Accordingly, WVRCA respectfully requests that Greencastle's Complaint be denied.

Respectfully submitted,

**WEST VIRGINIA RADIO  
CORPORATION OF THE ALLEGHENIES**

By:

A handwritten signature in black ink that reads "Frank R. Jazzo". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Frank R. Jazzo  
Ashley Ludlow  
Its Attorneys

Fletcher, Heald & Hildreth, P.L.C.  
1300 North 17th Street, 11th Floor  
Arlington, VA 22209  
(703) 812-0400

June 13, 2017

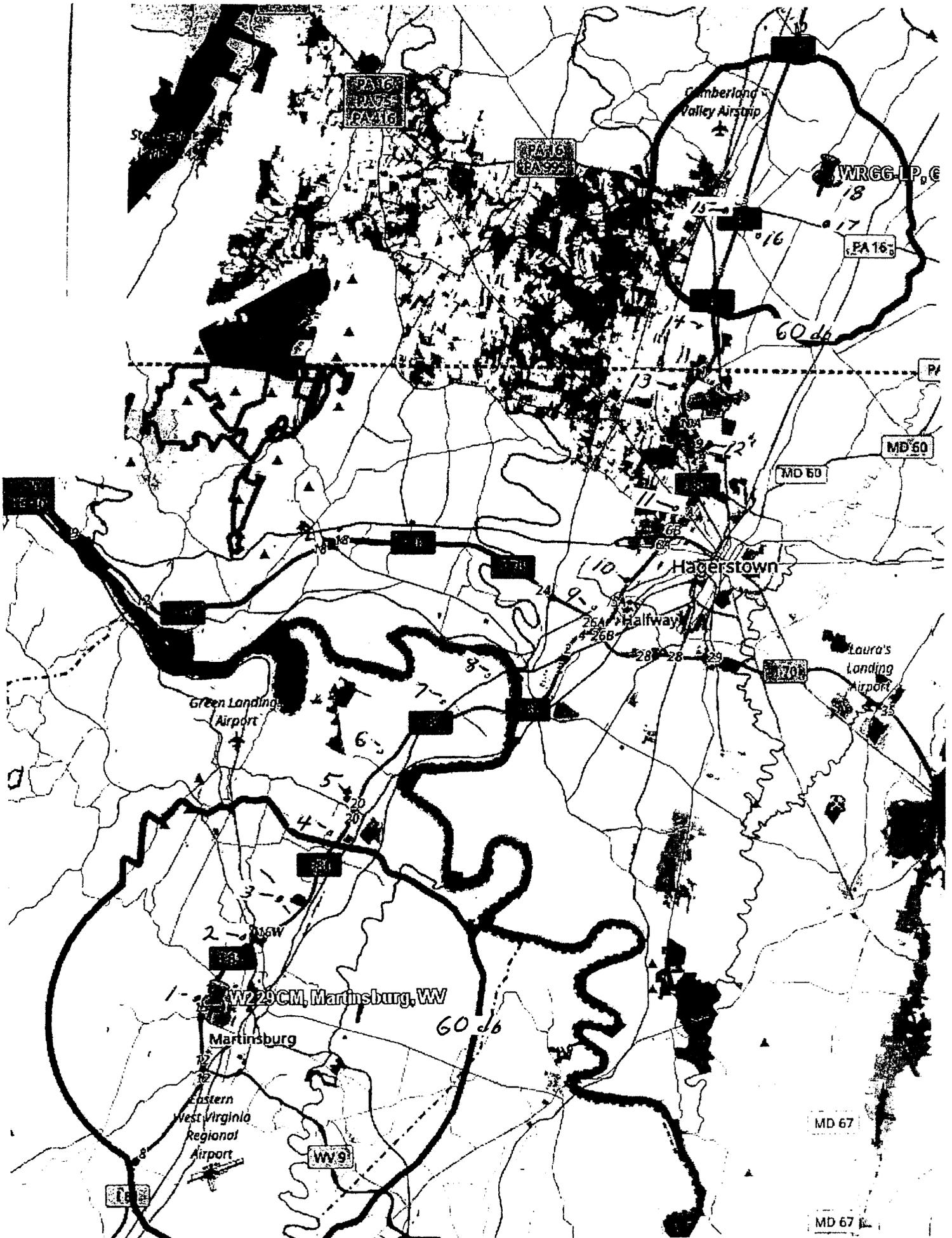
**FIELD INTENSITY MEASUREMENTS BETWEEN  
W229CM TRANSLATOR, MARTINSBURG, WV  
AND WRGG-LP, GREENCASTLE, PA  
BOTH STATIONS OPERATE ON 93.7mhz**

**THESE MEASUREMENTS WERE TAKEN AS A RESULT  
OF AN INTERFERENCE COMPLAINT REGISTERED BY  
GREENCASTLE-ANTRIM EDUCATION FOUNDATION**

**MEASUREMENTS WERE TAKEN BY NOEL RICHARDSON,  
CERTIFIED PROFESSIONAL BROADCAST ENGINEER / SBE  
AND ANDY KUPAS, CHIEF ENGINEER, ALLEGANY RADIO  
ON THURSDAY 1 JUNE 2017 USING AZTEC AZ-10/100 PORTABLE  
FM MONITORING RECEIVER SERIAL 1146.**

Most measurements taken at various locations along I-81 North to WRGG

<b>MONITORING POINT / LOCATION</b>	<b>STRENGTH IN db</b>
1....1604 W. King St. Martinsburg.....	W229CM.....90
2....2.3 mile north on I-81.....	W229CM.....63
3....3.5 mile north I-81, ½ mile past exit 16.....	W229CM....42
4....4.5 mile north I-81.....	W229CM....40
5....5.8 mile north I-81.....	W229CM....30
6....7.5 mile I-81 Spring Mill Exit @ Dollar Tree.....	W229CM....35
7....10.6 mile I-81 Exit 23 Ramp B.....	W229CM....35
<u>MARYLAND / WEST VIRGINIA STATE LINE</u>	
8....14.1 mile I-81 Williamsport Exit Ramp B SIGNALS SPLATTERING...	24
9....16.0 ½ south of JCT I-70/I-81...MULTI-PATH.....	W229CM...26
*****POINTS 10, 11, 12 INTERFERENCE AND MULTIPATH FROM BOTH STATIONS WITH WRGG-LP SIGNAL BEING MORE NOTICBLE	
13...25.5 mile I-81, MD-mile marker 11.4 WRGG SIGNAL STRONGER WITH W229CM BARELY NOTICBLE UNDERNEATH	
<u>PENNSYLVANIA / MARYLAND STATE LINE</u>	
14....28.2 mile I-81 EXIT 3.....	CLEAR SIGNAL WRGG-LP.....29
15....30.6 mile I-81 EXIT 5 RAMP.....	WRGG-LP....49
16....31.4 mile SHEETZ INT. GRINDSTONE HILL & BUCHANON TRAIL .....	WRGG-LP....56
17....32.2 mile INT. BUCHANON TRAIL & LONG LANE....	WRGG-LP....67
18....33.4 mile WRGG-LP TOWER SITE @ VERTICAL BRIDGE.....	94



FA 16  
FA 16

FA 16  
FA 16

WRGG LP, C  
18  
17  
16  
FA 16

MD 60

MD 60

Hagerstown

Halfway

Laura's  
Landing  
Airport

Green Landing  
Airport

W36W

W29CM, Martinsburg, WV

Martinsburg

Eastern  
West Virginia  
Regional  
Airport

WV 9

MD 67

MD 67

60 db

60 db

VERTICAL

SEE GATE ROOM GREENCASTLE FM

SEE GATE ROOM PLANTS

NO TRESPASSING

VERTICAL

SEE GATE ROOM GREENCASTLE FM

SEE GATE ROOM PLANTS

NO TRESPASSING

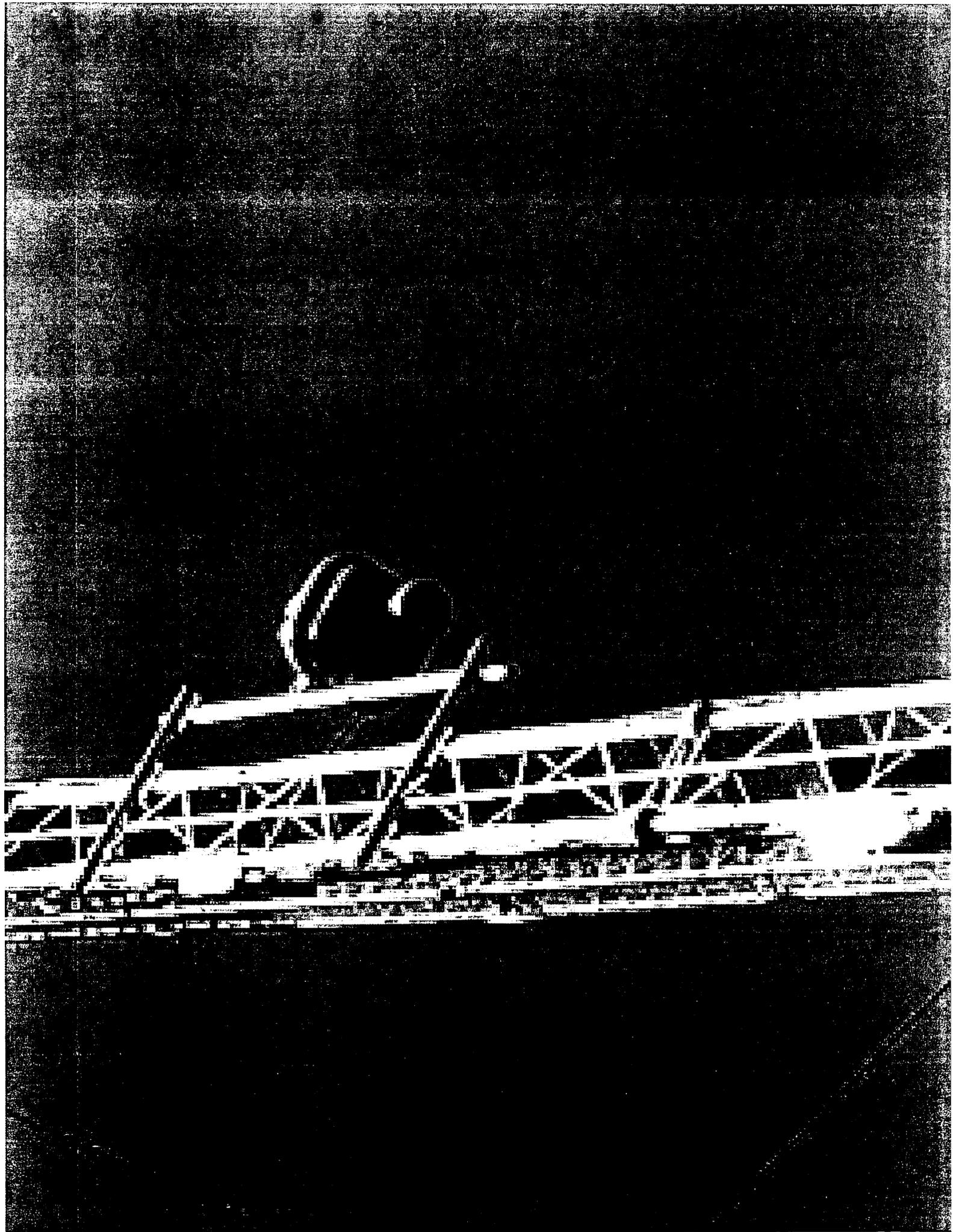
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NOTICE

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**CERTIFICATE OF SERVICE**

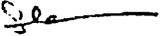
I, Sandi Kempton, an assistant at Fletcher, Heald & Hildreth, PLC, do hereby certify that a copy of the foregoing Opposition to Interference Complaint is being sent via first-class, U.S. Mail, postage prepaid (or, as indicated below, transmitted by email) this 13<sup>th</sup> day of June, 2017, to the following:

Mr. Wade G. Burkholder  
Development Director  
113 South Carlisle Street  
Greencastle, PA 17225

Dr. C. Gregory Hoover  
Director of Operations  
113 South Carlisle Street  
Greencastle, PA 17225

James Bradshaw, Esquire\*  
Deputy Chief, Audio Division  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Robert Gates, Esquire\*  
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445 12th Street SW  
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\_\_\_\_\_  
Sandi Kempton

\* By e-mail