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BROADCAST & MEDIA LEGAL SERVICES

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October 26, 2017

*Via Hand Delivery*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

Attn: Audio Division, Media Bureau

**ACCEPTED/FILED**

**OCT 26 2017**

**Federal Communications Commission  
Office of the Secretary**

*Re: FM Translator Station K270BZ, Phoenix, Arizona  
Complaint of Sierra H Broadcasting, Inc.*

Dear Ms. Dortch:

Riviera Broadcasting, LLC (“Riviera”), licensee of FM Translator Station K270BZ, Phoenix, AZ, by its attorneys hereby responds to the above-referenced letter filed by Sierra H Broadcasting, Inc. (“Sierra”) on September 25, 2017 (the “Complaint”), alleging interference to Sierra’s station KNRJ(FM), Cordes Lake, AZ.

Riviera became aware of the Complaint shortly after its posting to the K270BZ license record in CDDBS, and promptly undertook an investigation of the claims. Sierra provided no telephone numbers or email addresses to allow Riviera to contact the persons submitting declarations in the Complaint; consequently, Riviera engaged engineers to conduct testing to determine whether K270BZ was causing any interference to KNRJ.

Attached hereto as Attachment One is the report of Robert Reymont, President of Double R Consulting. As demonstrated therein, K270BZ is not the source of whatever interference KNRJ listeners may be experiencing; indeed, any interference is likely not coming from the

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Columbia

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South Mountain site used by K270BZ and others at all. Testing showed that turning K270BZ on or off made no difference to the KNRJ signal whatsoever. *Id.*

A translator is only required to cure interference that “*it causes*” or that “*results from the radiation of radio frequency energy by its equipment.*” *See*, 47 C.F.R. §§ 74.1203(a), (d) (emphasis added). As shown in Attachment One, K270BZ is not the cause of whatever KNRJ or any of its listeners may be experiencing. Consequently, Riviera respectfully submits that the Complaint should promptly be dismissed or denied. Riviera respectfully requests that the Commission issue a letter or public notice dismissing or denying the Complaint, in order to allow Riviera to timely consummate the Commission-approved assignment of Station K270BZ (*see* File No. BALFT-20170712ABT).

Thank you for your attention to this matter. If you have any questions or require additional information concerning this matter, kindly contact the undersigned.

Respectfully submitted,



Christine McLaughlin

Counsel to Riviera Broadcasting, LLC

cc (*via* email): James Bradshaw, Deputy Division Chief, Audio Division  
Mr. Robert Gates, Audio Division  
Barry A. Friedman, Esq., counsel to Sierra H Broadcasting, Inc.

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**ATTACHMENT ONE**

**Measurement and Analysis  
of Potential Interference to KNJR Radio, 101.1 MHz**  
October 3, 2017

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### Scope

The scope of this project is to include a set of measurements on KNRJ-FM, 101.1 MHz, 40 KW licensed to Cordes Lakes, AZ, owned by Sierra H Broadcasting, Inc., K270B2 101.9 MHz licensed to Phoenix, AZ at .25 KW Riviera Broadcasting, Llc and KALV-FM, 101.5 MHz, 100 KW licensed to Phoenix owned by CBS Radio

### Procedure.

All of the signals operate from South Mountain. With the help of Richard White of Klien Engineering. On October 3, 2017 we went to the recreational site across from the South Mountain antenna farm at the top of the mountain. At that location we were able to terminate the signals from each of the stations in question looking for any interference issues. I began by turning off the carrier of KNRJ-AM and observed the signal from the other stations on the site. I did not observe any interference on 101.1 MHz. Then I turned each of the other stations off and looked for any change in the 101.1 baseband. There was none. Then we looked at the occupied bandwidth of K270B2. It was completely legal. I also did the same with each of the other signals (KALV-FM and K270B2) looking for interference to 101.1 MHz. There was none noted.

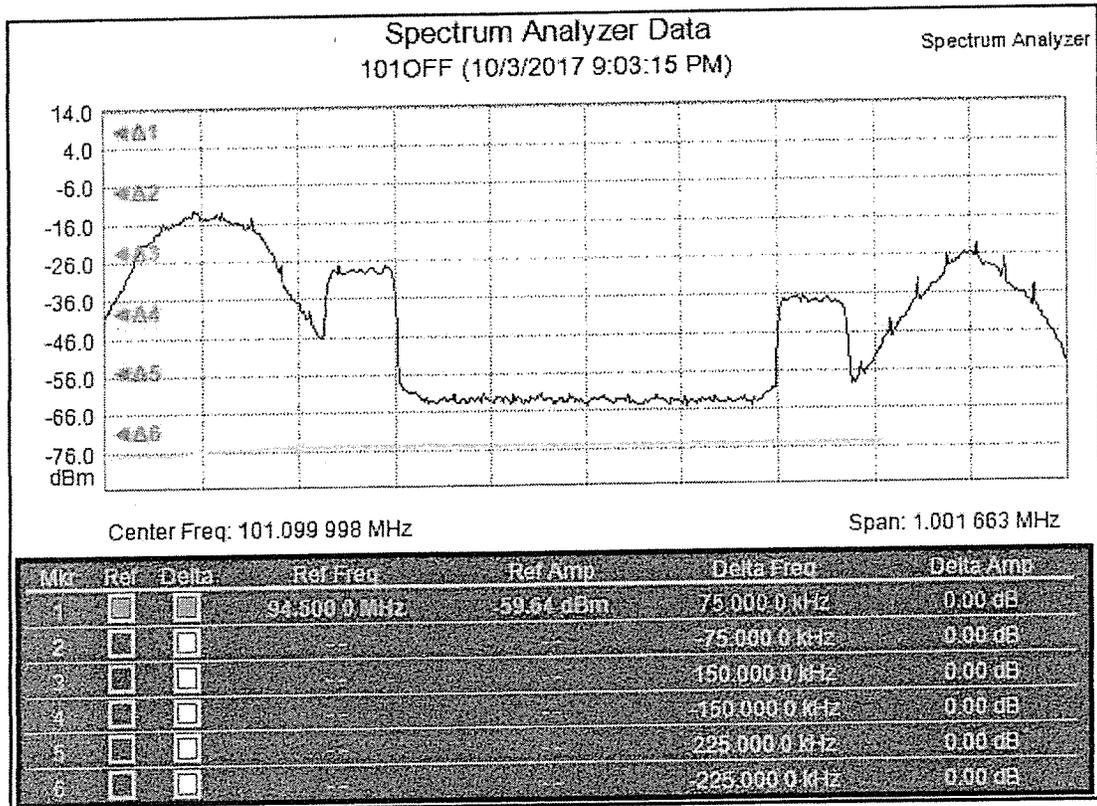
### Results

The bottom line is the procedure, showing all the stations observed were operating within their occupied bandwidth with no spurious emission coming from any of them. It is my conclusion if there is interference to 101.1 MHz it is not coming from South Mountain. In the following pages I have pictures of the spectrum display for each of the tests

Respectfully submitted,



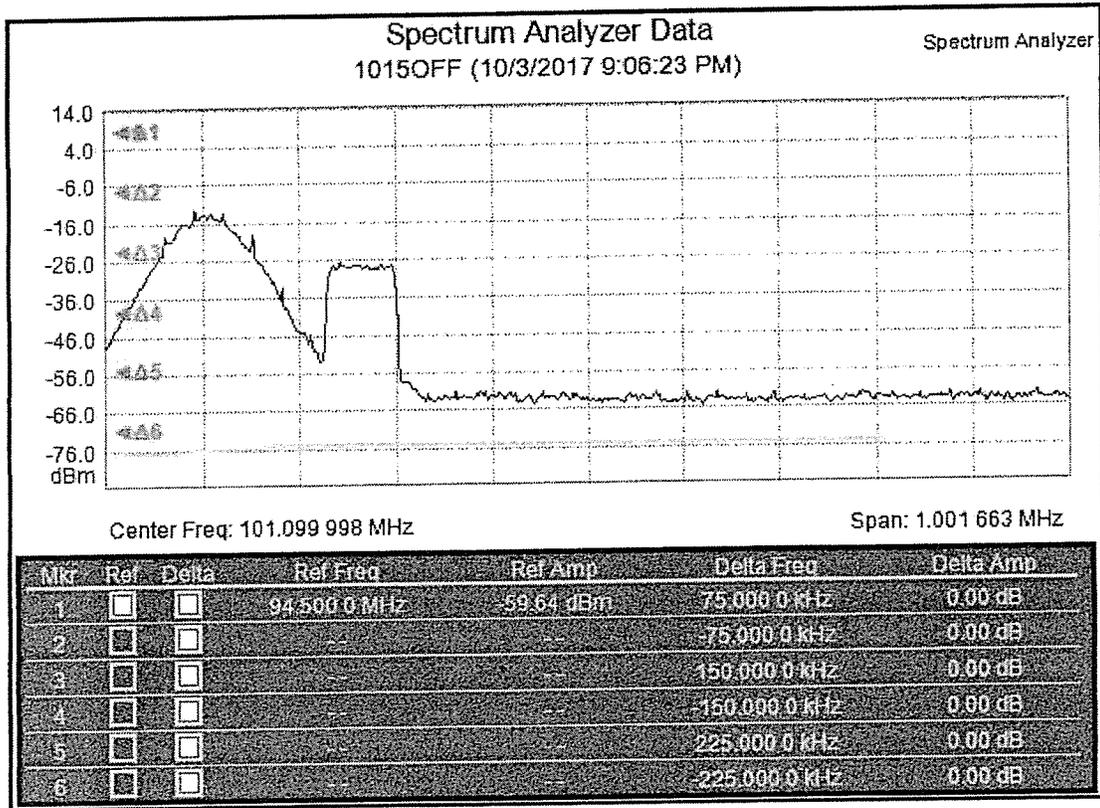
Robert Reymont,  
President



Measurement Parameters

Trace Mode	Average	Stop Frequency	101.601 MHz
Trace Average	30	Frequency Span	1.002 MHz
Reference Level Offset	0.0 dB	Reference Level	0.000 dBm
Input Attenuation	50.0 dB	Scale	10.0 dB/div
RBW	3.0 kHz	Serial Number	716129
VBW	3.0 MHz	Base Ver.	V1.88
Detection	Peak	App Ver.	V1.89
Center Frequency	101.100 MHz	Date	10/3/2017 9:03:15 PM
Start Frequency	100.599 MHz	Device Name	DOUBLE-R-CONSULTING

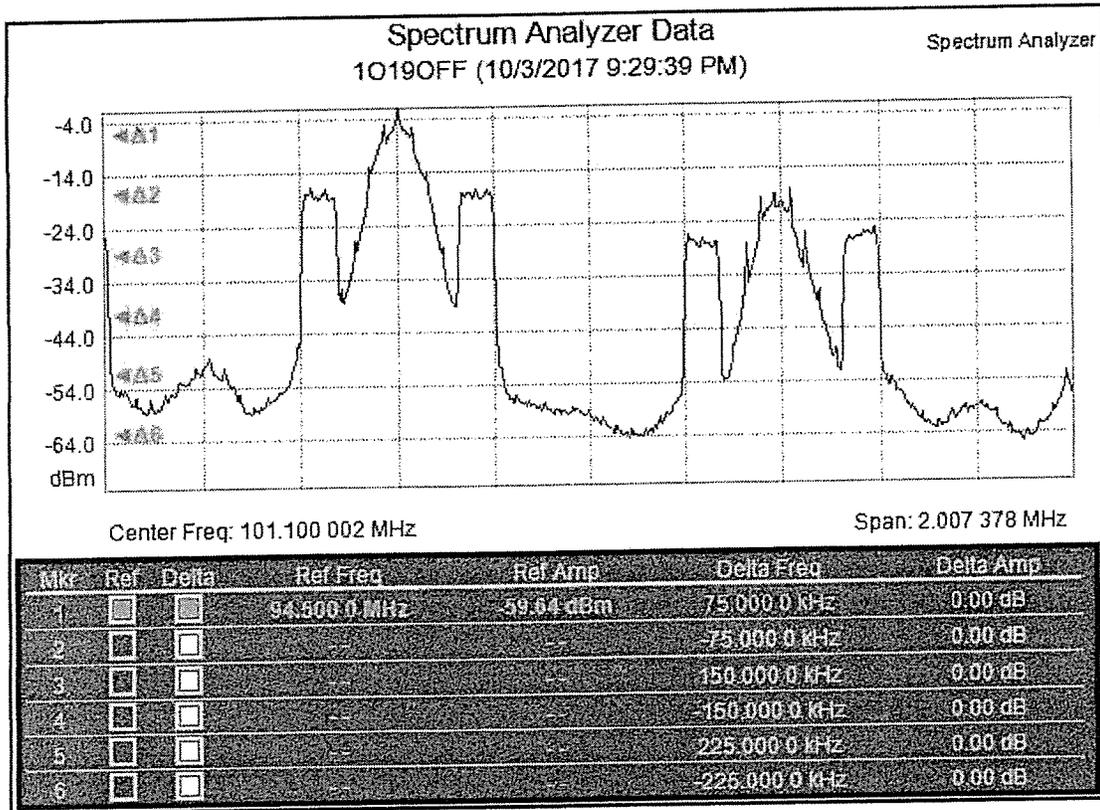
This shows the baseband with KNRJ-FM, 101.1MHz Off



#### Measurement Parameters

Trace Mode	Average	Stop Frequency	101.601 MHz
Trace Average	30	Frequency Span	1.002 MHz
Reference Level Offset	0.0 dB	Reference Level	0.000 dBm
Input Attenuation	50.0 dB	Scale	10.0 dB/div
RBW	3.0 kHz	Serial Number	716129
VBW	3.0 MHz	Base Ver.	V1.88
Detection	Peak	App Ver.	V1.89
Center Frequency	101.100 MHz	Date	10/3/2017 9:06:23 PM
Start Frequency	100.599 MHz	Device Name	DOUBLE-R-CONSULTING

This display show the baseband with KALV-FM, 101.5 MHz off the air



**Measurement Parameters**

Trace Mode	Average	Stop Frequency	102.104 MHz
Trace Average	30	Frequency Span	2.007 MHz
Reference Level Offset	0.0 dB	Reference Level	0.000 dBm
Input Attenuation	20.0 dB	Scale	10.0 dB/div
RBW	3.0 kHz	Serial Number	716129
VBW	3.0 MHz	Base Ver.	V1.88
Detection	Peak	App Ver.	V1.89
Center Frequency	101.100 MHz	Date	10/3/2017 9:29:39 PM
Start Frequency	100.096 MHz	Device Name	CUBLE-R-CONSULTING

This picture shows the baseband with translator K270B2, 101.9 MHz off the air.

Certification: Proof of Performance

The data contained in this report concerning performance and useful information of KNRJ-FM, 101.1 MHz, 40 KW licensed to Cordes Lakes, AZ, owned by Sierra H Broadcasting, Inc., K270B2 101.9 MHz licensed to Phoenix, AZ at .25 KW Riviera Broadcasting, Llc and KALV-FM, 101.5 MHz, 100 KW licensed to Phoenix owned by CBS Radio

My qualifications are as follows:

ASEE, New Mexico State University	1969
Chief Engineer KGRT, Las Cruces, N.M	1967-1971
Chief Engineer WNCR, Cleveland, Ohio	1971-1972
Chief Engineer WGAR, Cleveland, Ohio	1971-1985
Group Engineer-Radio, Nationwide Communications Inc.	1985-1998
President Double R Consulting, Inc	1998-2011
Retired	2012-Present

Equipment

Anritsu MS2721B spectrum Analyzer, SN 716129 w/ broadband antenna from a Potomac FIM 71 FM field meter