



Federal Communications Commission
Washington, D.C. 20554

October 31, 2019

In Reply Refer to:
1800B3-KV

Gow Media, LLC
c/o Barry A. Friedman, Esq.
Thompson Hine, LLP
1919 M Street, NW
Suite 700
Washington, DC 20036-3537

In Re: K247CP, Houston, TX
Elohim Group Corporation
Facility ID No. 148127
File No. BLFT-20180815AAD

Interference Complaint

Dear Counsel:

This letter refers to the “Complaint of Interference by FM Translator Station to Full-Service Station” (Complaint) filed on October 22, 2019, by Gow Media, LLC (Complaining Station), licensee of Station KFNC(FM), Mont Belvieu, Texas alleging interference from FM Translator K247CP, Houston, Texas licensed to Elohim Group Corporation.

Recently, the Commission adopted certain changes to the FCC’s rules (Rules) relating to the translator interference complaint resolution process.¹ The Commission stated that once effective all complaints would be decided under the new Rules.

We have reviewed the Complaint and found it to be not in compliance with the new Rules. Specifically, the Complaint fails to include the items marked below:

¹ See Amendment of Part 74 of the Commission’s Rules Regarding FM Translator Interference, Report and Order, 34 FCC Rcd 3457 (2019) (Translator Interference Order).

1. Listener Showings:²

- Detailed information on the Complaining Station's protected contour and the population located therein;³
- Minimum number of Listeners as determined by the Complaining Station's protected contour;⁴
- Signed and dated (within one year of Complaint and all other listener showings) by Listener;
- Listener's full name, complete address and phone number;
- Clear, concise, and accurate description of the location where interfere is alleged;⁵
- Statement that Listener listens over-the-air to the Complaining Station at least twice

² An item will be marked as missing the required information if it is missing from one or more Listener showings. In addition, Listener showings that are missing required information will not be counted towards the minimum number of Listeners.

³ If a Complaining Station has elected to submit 25 or more listener complaints in lieu of providing specific population information, it will be reviewed by Commission staff as requiring rule compliant showings from 25 listeners.

⁴ 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

⁵ 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 ‘downtown,’ as they do not inform . . . [if] within its 45 dBu contour or . . . provide sufficient information to resolve the complaint.” *Id.* at note 65.

a month;

_____ Statement that Listener has no legal, financial, employment, or familial affiliation or relationship with Complaining Station.

2. Technical Interference Showing:

_____ 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.

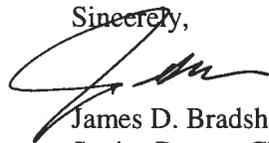
3. Waiver Request (if applicable): N/A

_____ Minimum number (20) of Listener showings outside of the Complaining Station's 45 dBu contour;

_____ Information on other relevant factors such as (1) whether geographic features or power/directionality enhance reception at the relevant listener locations (supported if possible by field strength testing; and (2) how established the listener expectation of service is -- *i.e.*, how long the Complaining Station has served the relevant communit(ies).

Accordingly, for the reasons noted above, IT IS ORDERED that the "Complaint of Interference by FM Translator Station to Full-Service Station" filed on October 22, 2019, by Gow Media, LLC IS DISMISSED.

Sincerely,



James D. Bradshaw
Senior Deputy Chief
Audio Division
Media Bureau

cc: Elohim Group Corporation