

## Attachment 1

**AMENDMENT TO ENGINEERING STATEMENT IN RESPONSE TO FCC LETTER  
DATED AUGUST 20, 2019 REQUESTING ADDITIONAL INFORMATION RELATIVE TO  
CLEAR COMMUNICATIONS, INC. INTERFERENCE COMPLAINT CONCERNING  
W221DG BLFT-20170106ACP, EXTON, PENNSYLVANIA  
TO THE SIGNAL OF WVLT(FM) CH 221A VINELAND, NEW JERSEY  
OCTOBER 2019**

**HISTORY AND PURPOSE FOR AMENDMENT**

This engineering statement has been prepared on behalf of Clear Communications, Inc. ("Clear"), licensee of FM station WVLT(FM) licensed to Vineland, New Jersey. On January 6, 2017 WVLT started to receive interference complaints from the public saying that the station was no longer listenable. By January 23<sup>rd</sup> of 2017 Clear had received over 50 interference complaints to the regularly received WVLT over the air signal and identified W221DG as the station causing the interference. Clear filed with the FCC an interference complaint on January 23, 2017 which included a request that the FCC order W221DG, the interfering station, to shut down.

This filing is made in response to a Commission letter dated August 20, 2019 requesting that Clear file additional information to comply with recently adopted changes to the FCC interference complaint resolution process. This amendment is believed to demonstrate compliance with the revised interference standards in the Translator Interference Order, Report and Order, Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference, MB Docket No. 18-119, effective date August 13, 2019.

**WVLT PROTECTED CONTOUR AND POPULATION LOCATED THEREIN**

Figure1 attached hereto depicts the licensed WVLT 60 dBu contour as authorized in BLH-20021028AAY based on 72 evenly spaced radials. Population has been determined using the 2010 U.S. Census data. FCC terrain data and U.S. Census data provided by RadioSoft/LS Telecom for its well-known broadcast engineering software package ComStudy. Population within the 60 dBu contour is 330,011 persons.

**MINIMUM NUMBER OF LISTENER COMPLAINTS**

Based on FCC rule section 74.1203, Table 1, a population within the 60 dBu contour of between 300,000 and 399,999 persons requires a minimum of 8 interference complaints. Clear herein submits 41 interference complaints for the purpose of complying with the rule section.

## **LISTENER COMPLAINTS DATED WITHIN ONE YEAR OF FILING**

The 41 listener complaints submitted herein were signed and dated by the listener within the last 60 days and thus comply with the requirements of the rules.

## **CONTENT OF INTERFERENCE COMPLAINTS**

Each listener complaint complies with the following requirements:

Each listener's full name, address and phone number are supplied with their complaint.

Clear concise and accurate descriptions of the locations where interference is encountered has been provided for each complaint. Clear has gone to great care to have each person complaining of interference provide an exact description of where interference is experienced so that coordinates on the route and/or fixed location can be determined. This approach allows more than one set of coordinates to be developed for some listeners thereby providing enhanced documentation of interference for review by FCC staff.

Each interference complaint states that the person listens over-the-air to WVLT, Vineland, NJ on 92.1 MHz at least twice a month.

Each interference complaint states that the listener has no legal, financial employment or familial affiliation or relationship with Clear Communications, Inc. or Station WVLT.

Listener complaints are found in the attached Appendix 1 separated into four files due to LMS upload capacity. The complaints are in the same order as the complaint index locations found in Table 1.

## **TECHNICAL INTERFERENCE SHOWING**

Each listener complaint location has been plotted on a Google Earth map for purposes of determining coordinates for the listener location(s) found on the interference complaint. The map is found in Appendix 2.

Table 1 Lists each person filing an interference complaint, the location of the interference complaint, geographic coordinates for a point of interference along the driving route or fixed location, the WVLT F(50,50) contour value at the coordinates, the W221DG (50,10) contour value

at the coordinates and the interfering signal level in dB relative to the desired translator signal. For each of the 41 interference complaints the coordinates lie inside the WVLT 45 dBu F(50,50) contour and the W221DG interfering signal exceeds the - 20 dB co-channel value necessary for the WVLT signal to be properly protected.

Appendix 3 includes 11 map figures encompassing every interference complaint shown on Table 1 depicting the study coordinates, the WVLT F(50,50) service contour value and the W221DG F(50,10) interfering contour value.

Clear Communications, Inc. is operating WVLT in full compliance with its license, BLH-20021028AAY.

Clear Communications, Inc. is on record with the FCC in this interference proceeding as demonstrating to Broadcast Sciences LLC, the licensee for W221DG, that W221DG has caused massive interference to WVLT's existing listener area by both interference complaints from listeners and audio recordings. To the best of Clear's understanding the W221DG translator has been silent for an unknown period of time.

### **CONCLUSION**

It is believed that the requirements relating to the processing of FM translator applications adopted recently by the FCC have been fully complied with herein.

The foregoing was prepared on behalf of **Clear Communications, Inc.** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.



Clarence M. Beverage  
for Communications Technologies, Inc.  
Marlton, New Jersey

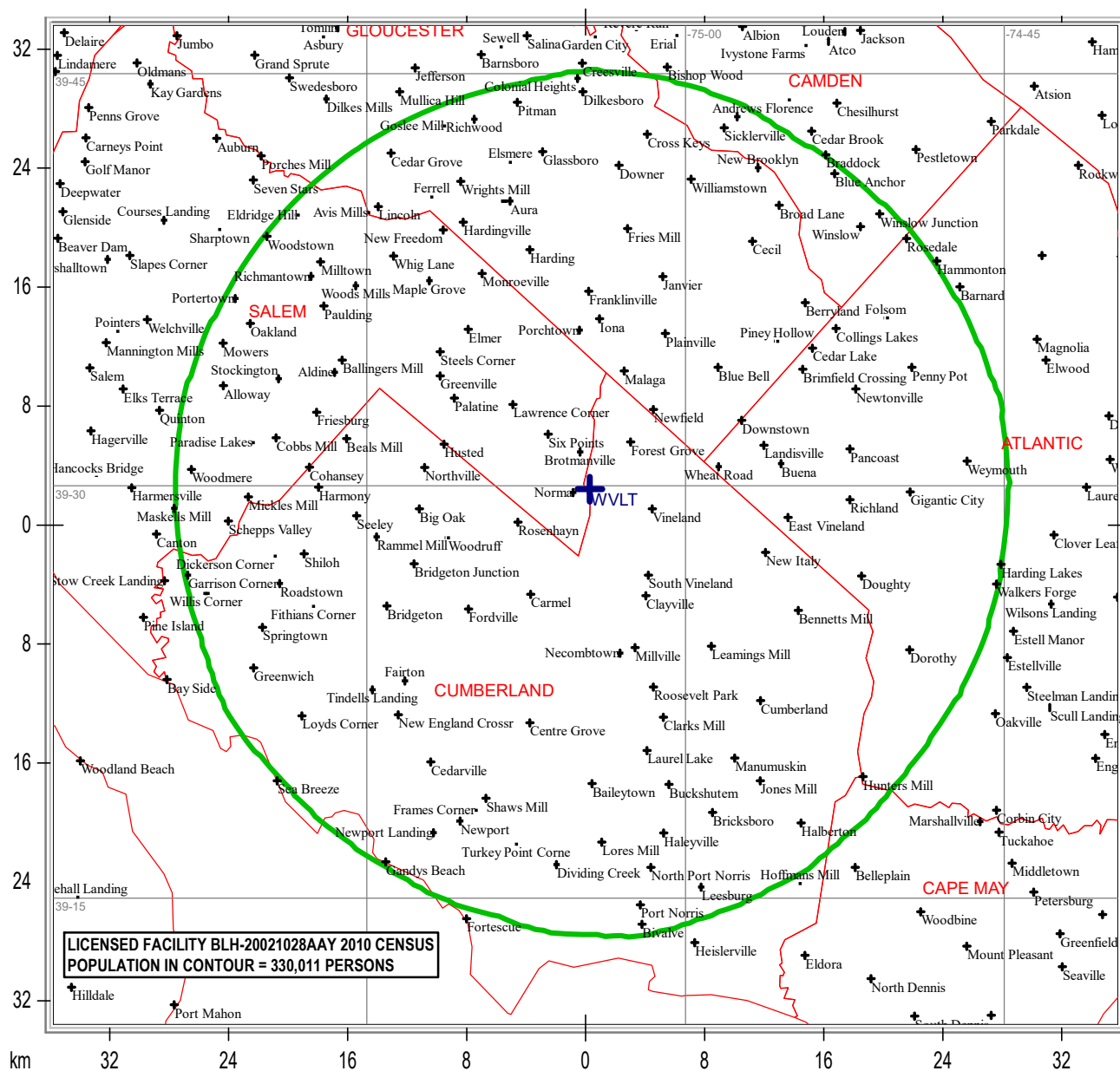
October 7, 2019

TABLE 1  
W221DG INTERFERENCE COMPLAINTS  
AMENDMENT TO PENDING INTERFERENCE COMPLAINT  
WVLT(FM) 92.1 MHz CH 221A VINELAND, NEW JERSEY  
OCTOBER 2019

Index	Complaint	Name	Location	City	State	ZIP	Latitude	Longitude	W221DG	WVLT	D/U
1	1	Kevin Kostyk	129 Morris Ave	Woodlyn	PA	19094	39.87522	-75.33976	41.9	49.9	8
1B		Kevin Kostyk	1 South Sellers Ave	Ridley Park	PA			-75.31818			10.1
2		Michael Kostyk	3319 Upland Ave		PA			-75.45848			1.3
2b		Michael Kostyk	1 South Sellers Ave	Ridley Park	PA			-75.31818			10.1
3		Debbora Kostyk	281 Kossuth Ave	Milmont Park	PA			-75.34019	42		7.7
3b		Debbora Kostyk	MacDade Blvd & Milmont Ave	Milmont Park	PA			-75.337			7.8
4		Matthew A. Rockle, Sr	1307 Donna Ave	Woodlyn	PA			-75.34827			7
4b		Matthew A. Rockle, Sr	1000 MacDade Blvd	Folsom	PA	19033		-75.32151			8.6
5		Jamie Rockle	1307 Donna Ave	Woodlyn	PA			-75.34827			7
5b		Jamie Rockle	1 South Sellers Ave	Ridley Park	PA			-75.31818			10.1
6		David Kostyk	I95 Exit 4	Chester	PA			-75.38613			6
7		Nicholas Kostyk, Jr	1 South Sellers Ave	Ridley Park	PA			-75.31818			10.1
V6		Debbie Evans	240 Harwicke Rd	Springfield	PA			-75.33057			5.9
10		Jack Scavichio	280 Bridgewater Road	Brookhaven	PA			-75.39137	45		4.4
11		Gail J. Watson	510 Orchard Way	Lansdowne	PA			-75.27803		48	9.1
13		Doris J Chan	28 N Valentine Drive	Garnet Valley	PA			-75.4777			-2.7
14		Gail Zaccarelli		Springfield	PA			-75.35905		47	3.5
15		James Hiadley	126 Fairview Rd	Springfield	PA			-75.32785			5.8
19		Jan Gentile	170 E Baltimore Pike	Media	PA			-75.386			1.6
20		Harrise Wesner	842 Garrett Lane	Springfield	PA			-75.31514			7.4
21		Irene Bradley	626 Country Lane	Morton	PA			-75.32085			7.6
22		Irene Reardon	285 Priscilla Lane	Aldan	PA			-75.295			8.7
23		Thresa Biahcahiello	3407 Berkley Ave	Drexel Hill	PA			-75.29005			7.9
24		Jacquelyn Powers	1321 Dermond Rd	Drexel Hill	PA			-75.33021			4
25		Ruth Cupples	658 Clymer Lane	Ridley Park	PA			-75.31217			10
27		Aileen Patterson	1114 Broadway Avenue	Secane	PA			-75.30899			7.9
28		Fred Cordova	1329 Nicklaus Drive	Springfield	PA			-75.35034			4.7

Index	Complaint	Name	Location	City	State	ZIP	Latitude	Longitude	W221DG	WVLT	D/U
30		June M Roman	272 Shadeland Ave	Drexel Hill	PA			-75.28963			7.6
31		James J Guida	477 S Andrews Ave	Glenolden	PA			-75.30149			9.6
32		Joann T Spata	477 S Andrews Ave	Glenolden	PA			-75.30149			9.6
33		Barbara Reina	1329 Nicklaus Drive	Springfield	PA			-75.35034			4.7
34		Sarah Holcomb	16 N Diamond St	Clifton Heights	PA			-75.29587			8.1
35		Sherry Marshall	3131 Meetinghouse Rd	Boothwyn	PA			-75.46014			1.6
36		Mikki Cavaliere	2519 Marshall Rd	Drexel Hill	PA			-75.28445			7.8
37		Nicholas J. Veriabo	518 Collins Drive	Springfield	PA			-75.36096			3
38		Maria Veriabo	518 Collins Drive	Springfield	PA			-75.36096			3
39		John Roschety	709 Walnut St	Darby	PA			-75.25816			11.3
40		Barbara Rotella	237 E Broadway Ave	Clifton Heights	PA			-75.29041			8.4
41		Louis G Wheeler	237 E Broadway Ave	Clifton Heights	PA			-75.29041			8.4
42		Robert Kopp	229 Garvin Blvd	Sharon Hill	PA			-75.26438	38		11.3
43		Carol Kopp	229 Garvin Blvd	Sharon Hill	PA			-75.26438	38		11.3
44		Krystal Curry	355 E Broadway Ave	Clifton Heights	PA			-75.28812			8.5
46		Edward Heinemann	109 Pennsylvania Ave	Prospect Park	PA			-75.30044			11.1
47		Marilyn Stratton	720 Rhoads Dr	Springfield	PA			-75.35012	43		3.9
48		Kenneth Acala	95 West Madison Ave	Clifton Heights	PA			-75.29545			8.4
49		Joann Harris	3827 Berkley Ave	Drexel Hill	PA			-75.29274			7.8
49b		Joann Harris	Springfield Best Buy	Springfield	PA			-75.32778		48	6.6

## WVLT(FM) CH 221A 6 kW ERP 100 M HAAT ND LICENSE VINELAND, NEW JERSEY



Communications Technologies, Inc. Marlton, New Jersey

County Borders      Lat/Lon Grid

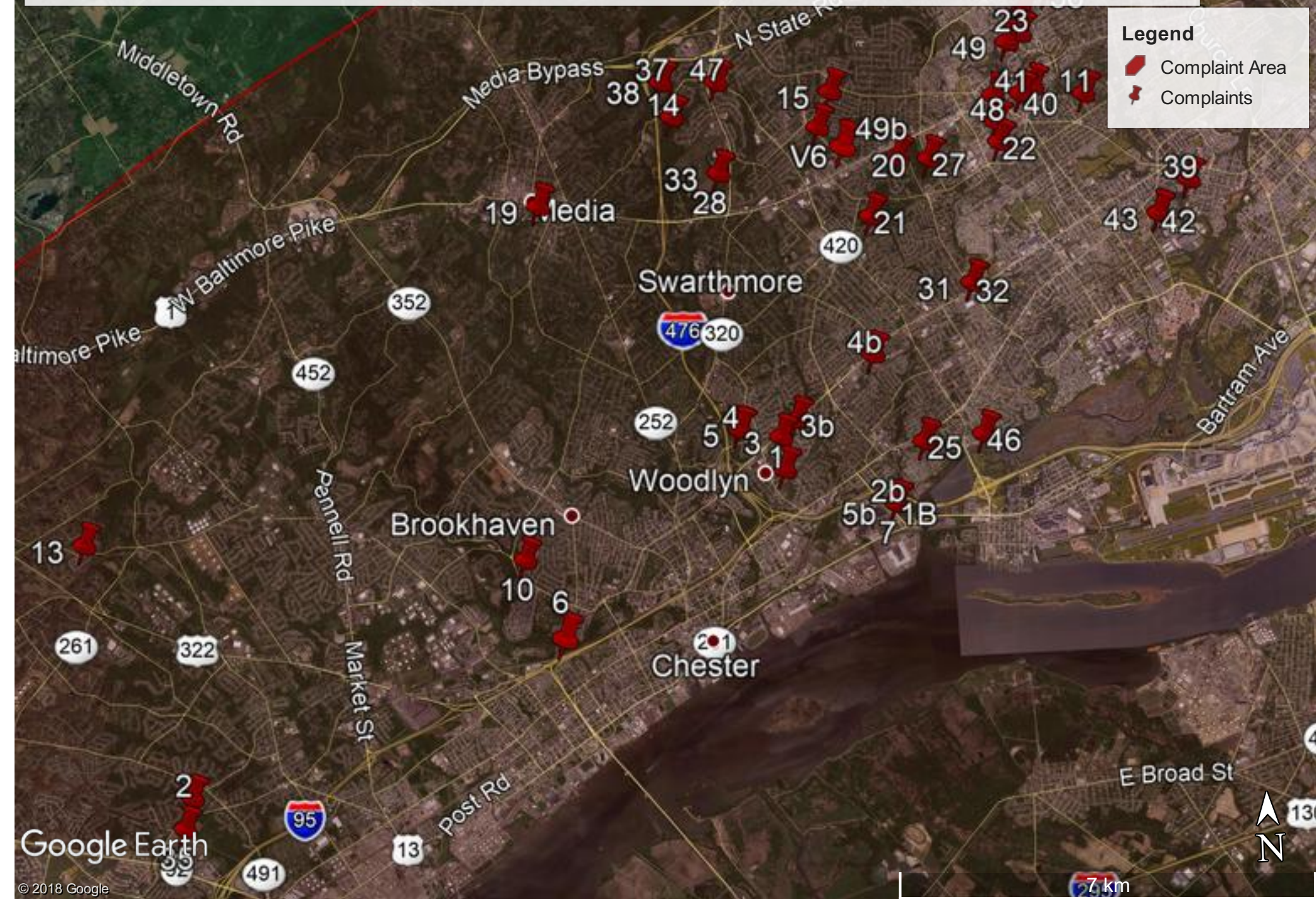
## **ATTACHMENT 1 – APPENDIX 1**

**WVLT LISTENER COMPLAINTS HAVE BEEN SEPARATED INTO FOUR FILES FOR  
SEPARATE UPLOAD INTO LMS DUE TO LMS ATTACHMENT FILE SIZE LIMITATIONS**



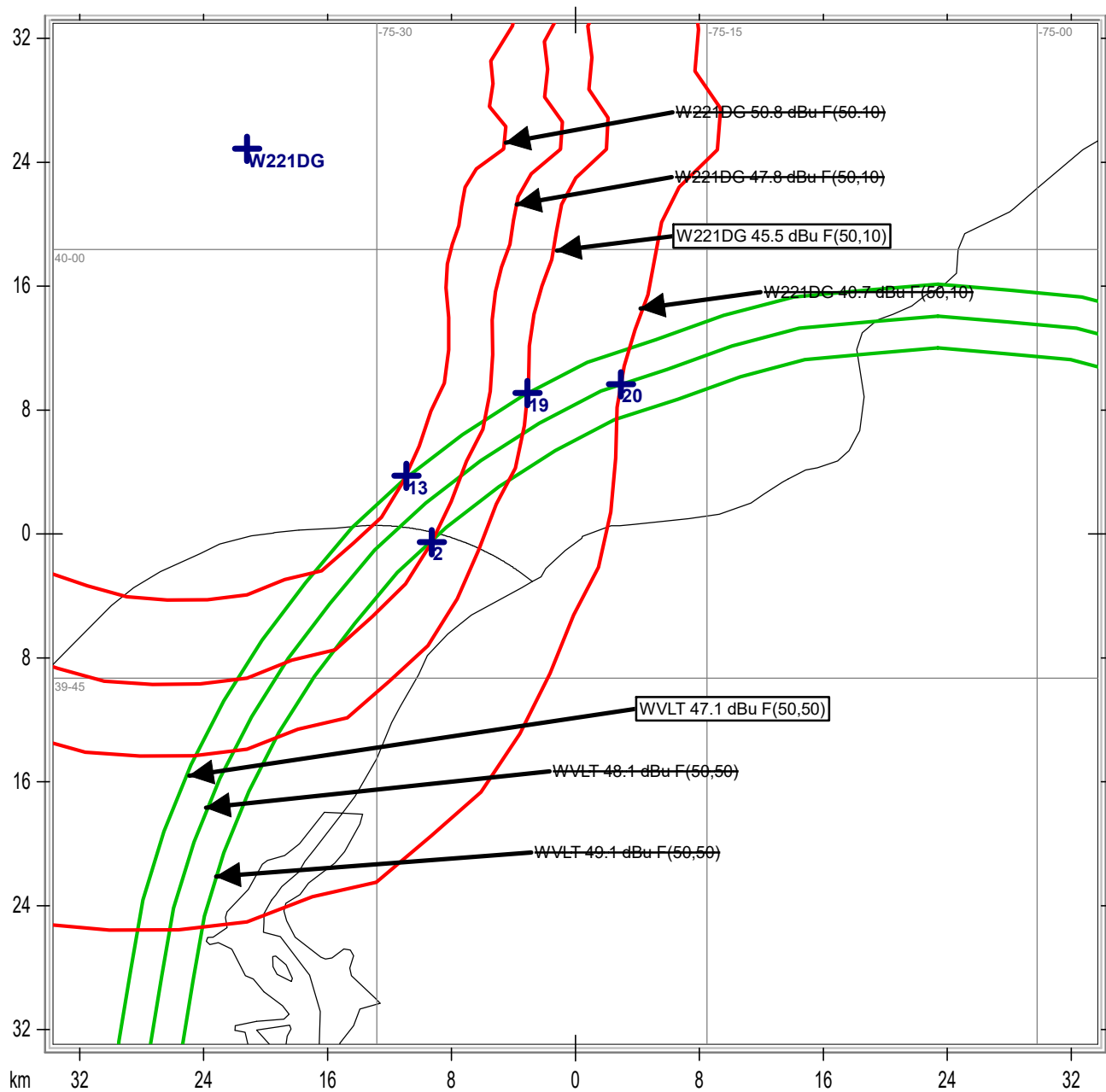
## APPENDIX 2 GOOGLE EARTH MAP WITH LESS THAN 20 dB C/I AREA SHADED

AND EACH COMPLAINT LOCATION LABELED





## WVLT F(50,50) CONTOUR W221DG F(50,10) CONTOUR ANALYSIS AT POINT OF INTERFERENCE



Communications Technologies, Inc., Marlton, New Jersey

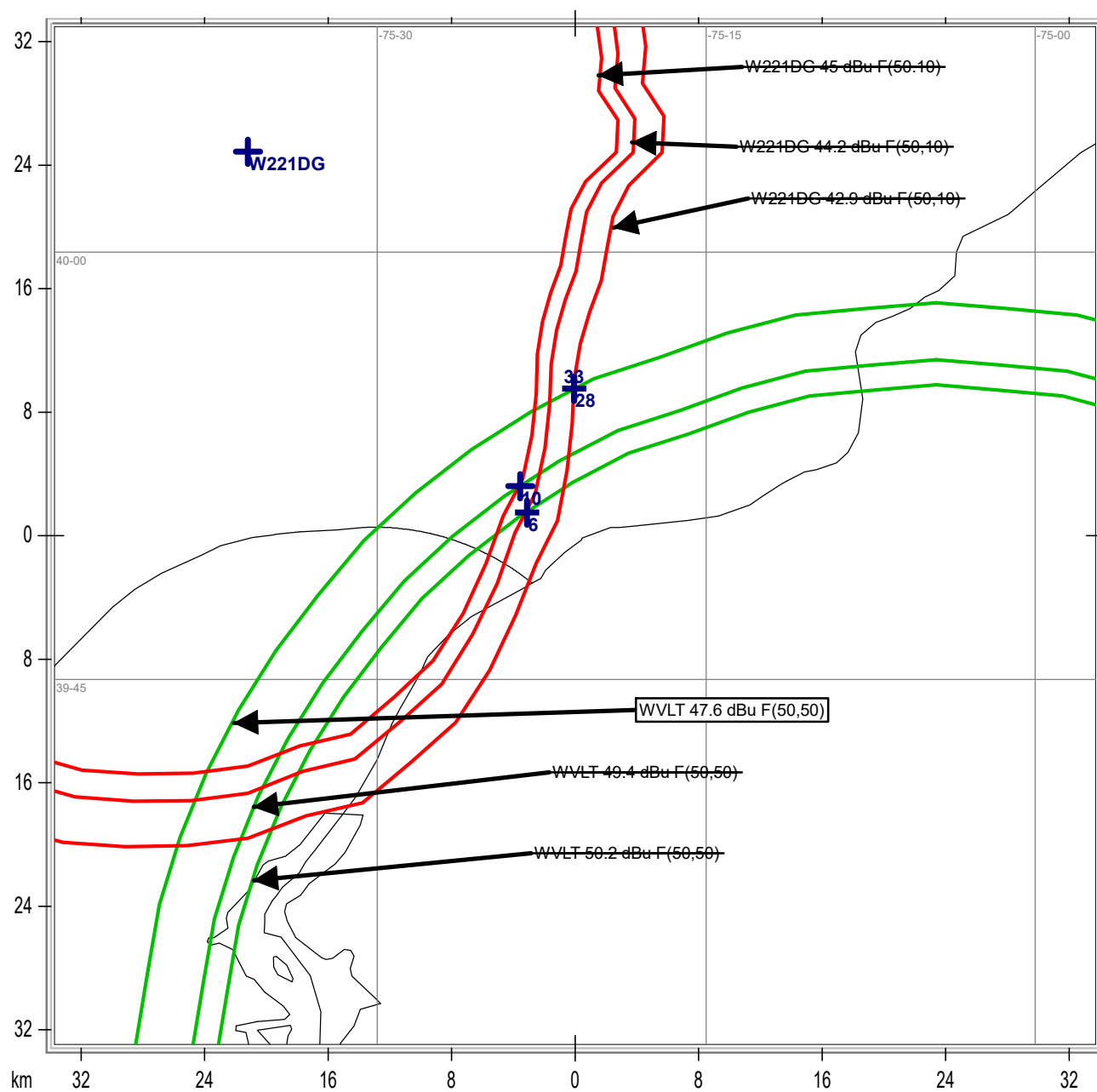
## APPENDIX 3 - FIGURES 1 -11

State Borders Lat/Lon Grid

Figure 10 is a map of the W221DG and WVLT regions, showing predicted noise contours for various aircraft types and flight levels. The map includes latitude and longitude coordinates, a scale bar, and labels for specific aircraft types and flight levels. The contours are color-coded: red for W221DG and green for WVLT. The map shows the coastline of the region and the locations of the airports. The noise contours are plotted for various aircraft types and flight levels, with labels indicating the aircraft type, flight level, and noise level. The map is oriented with North at the top.

Figure 2

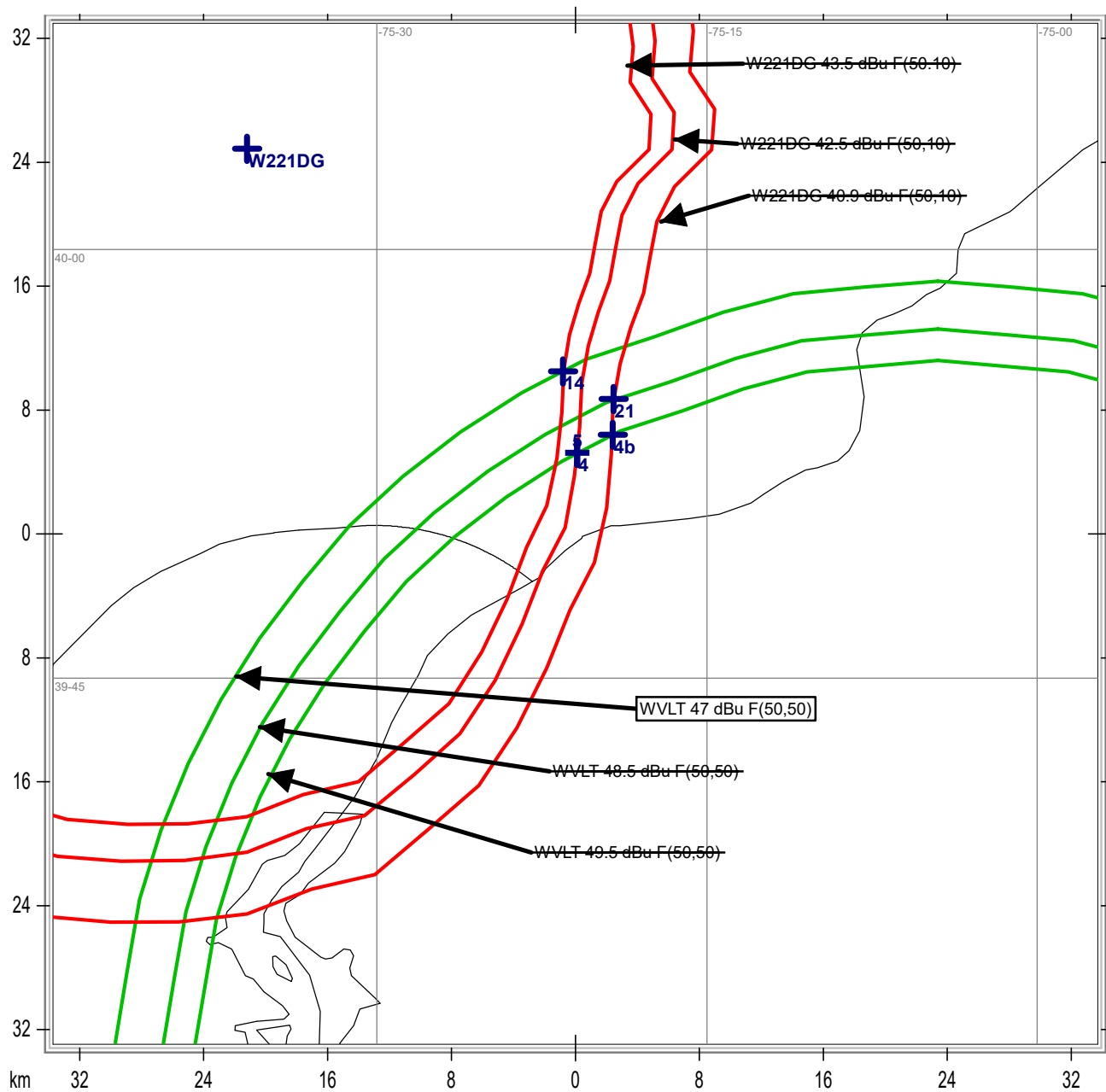
## WVLT F(50,50) CONTOUR W221DG F(50,10) CONTOUR ANALYSIS AT POINT OF INTERFERENCE



Communications Technologies, Inc., Marlton, New Jersey

State Borders Lat/Lon Grid

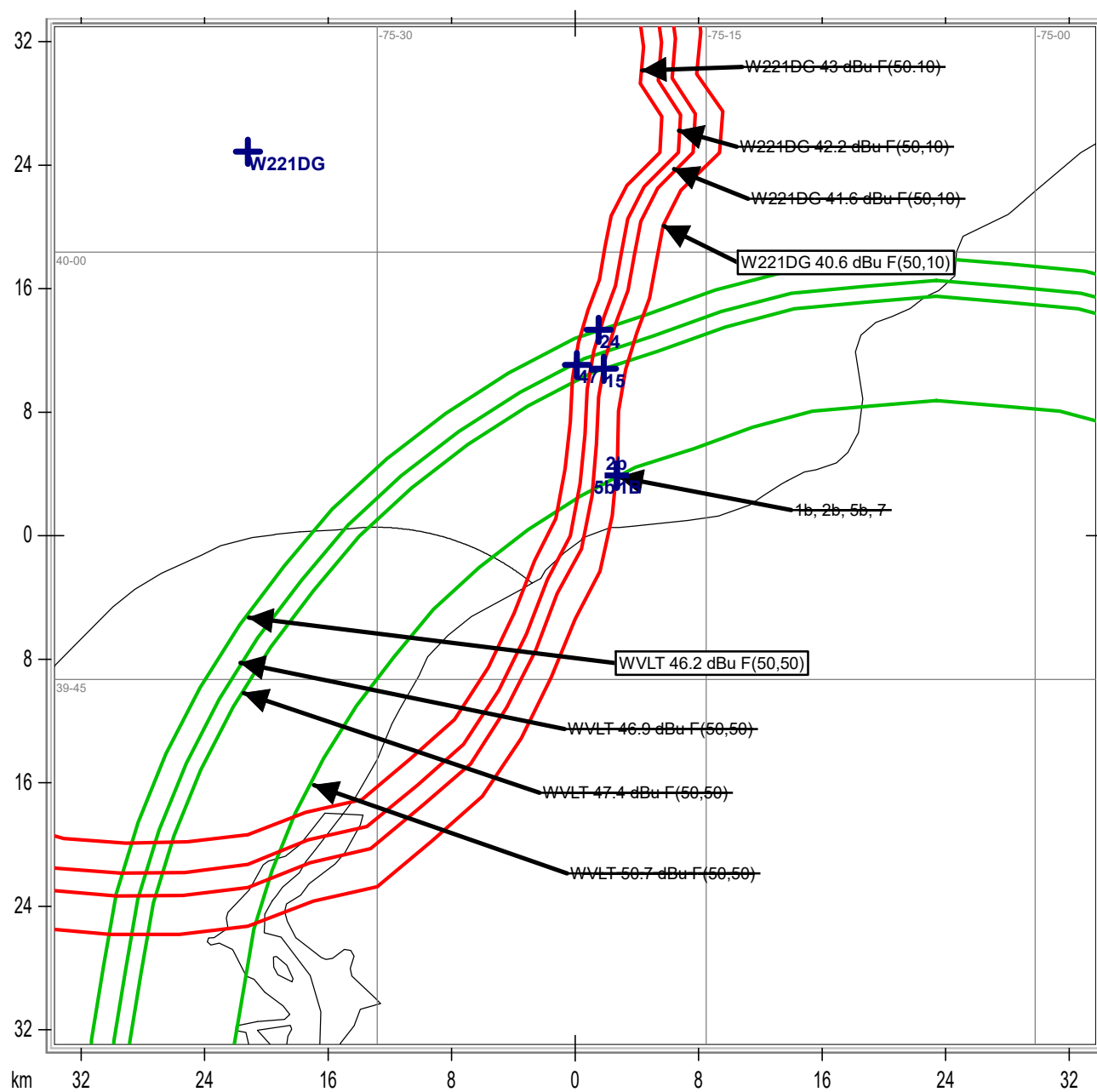
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Communications Technologies, Inc., Marlton, New Jersey

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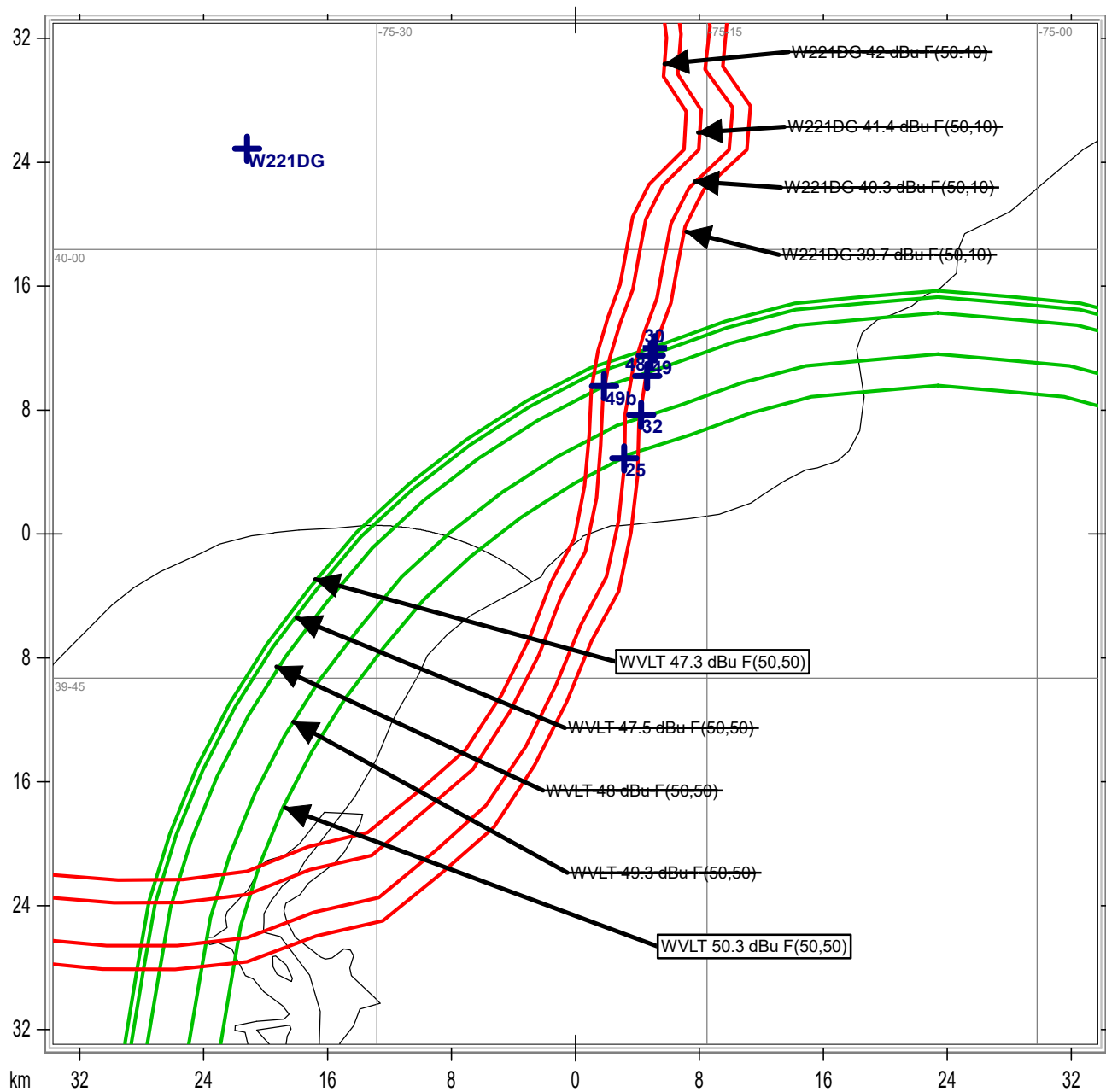
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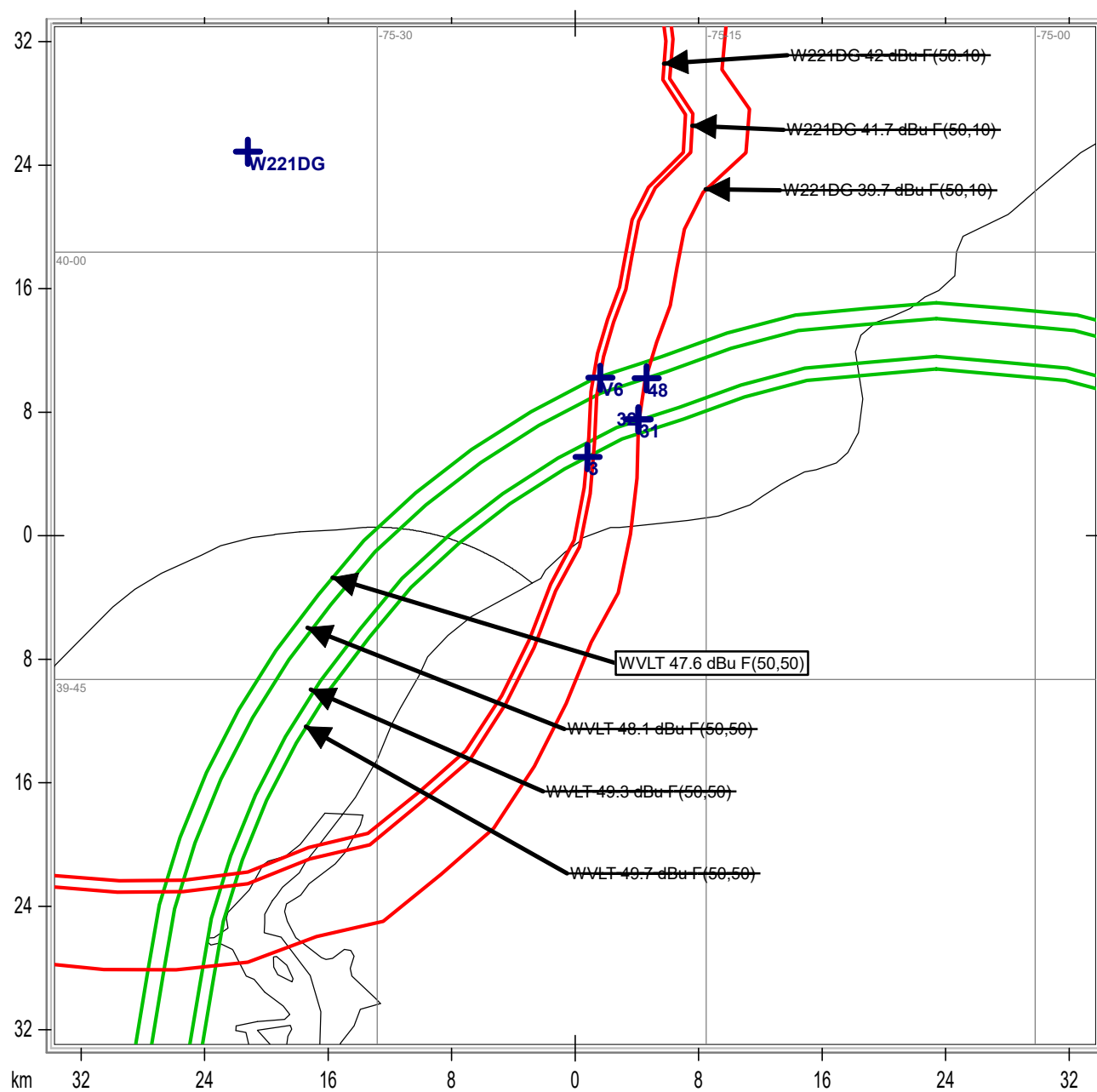
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Communications Technologies, Inc., Marlton, New Jersey

State Borders Lat/Lon Grid

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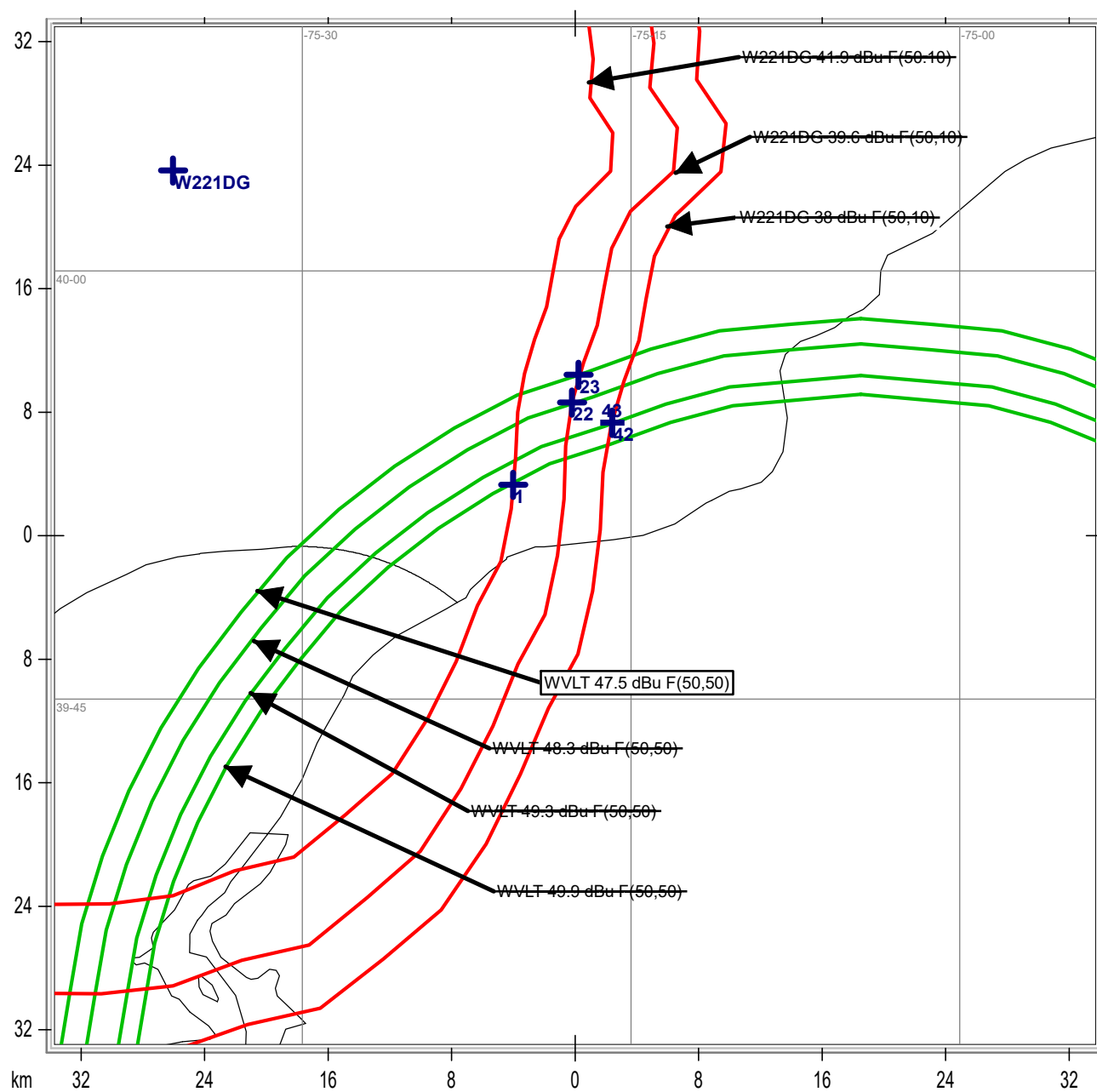


Communications Technologies, Inc., Marlton, New Jersey

State Borders Lat/Lon Grid



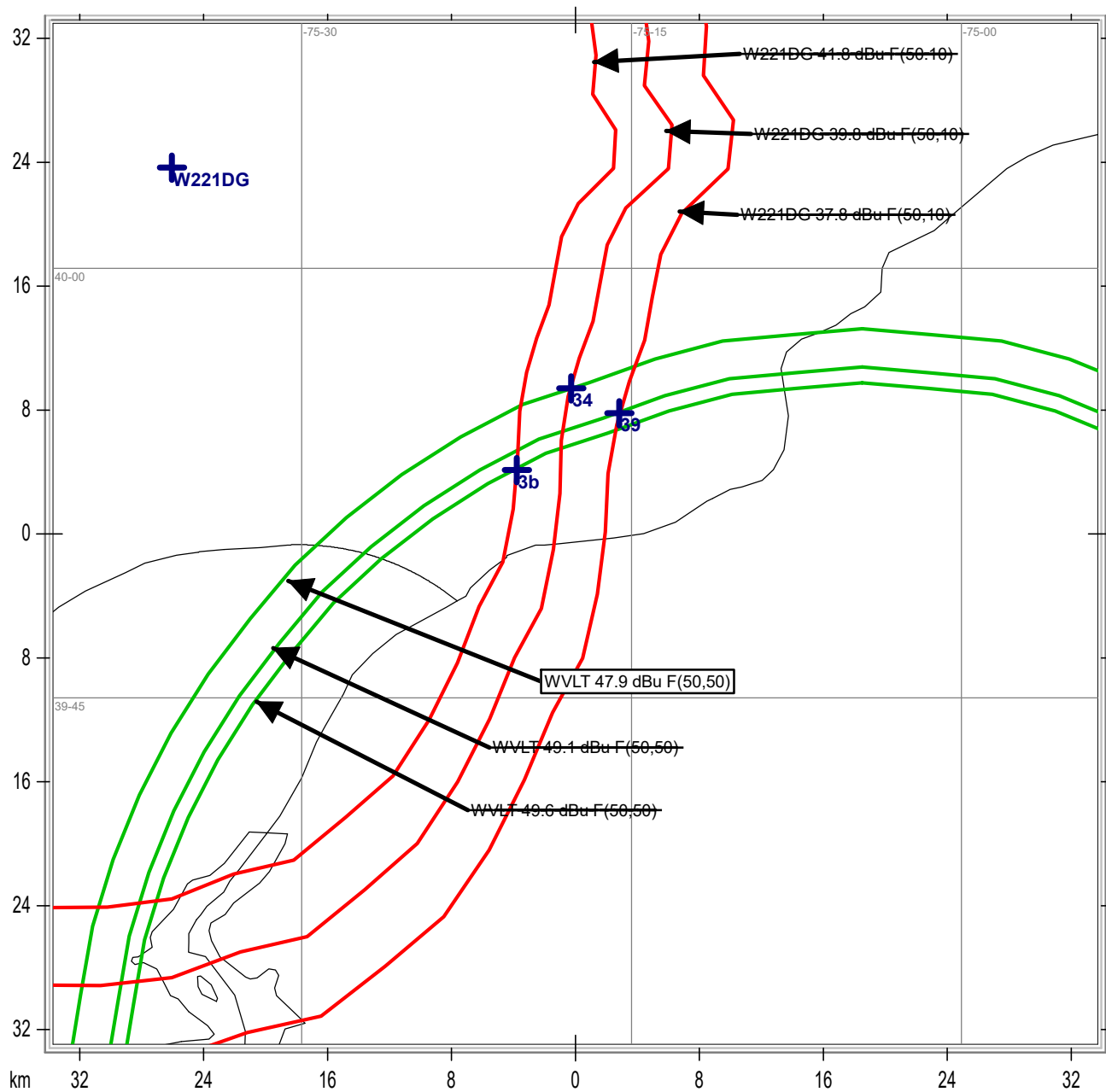
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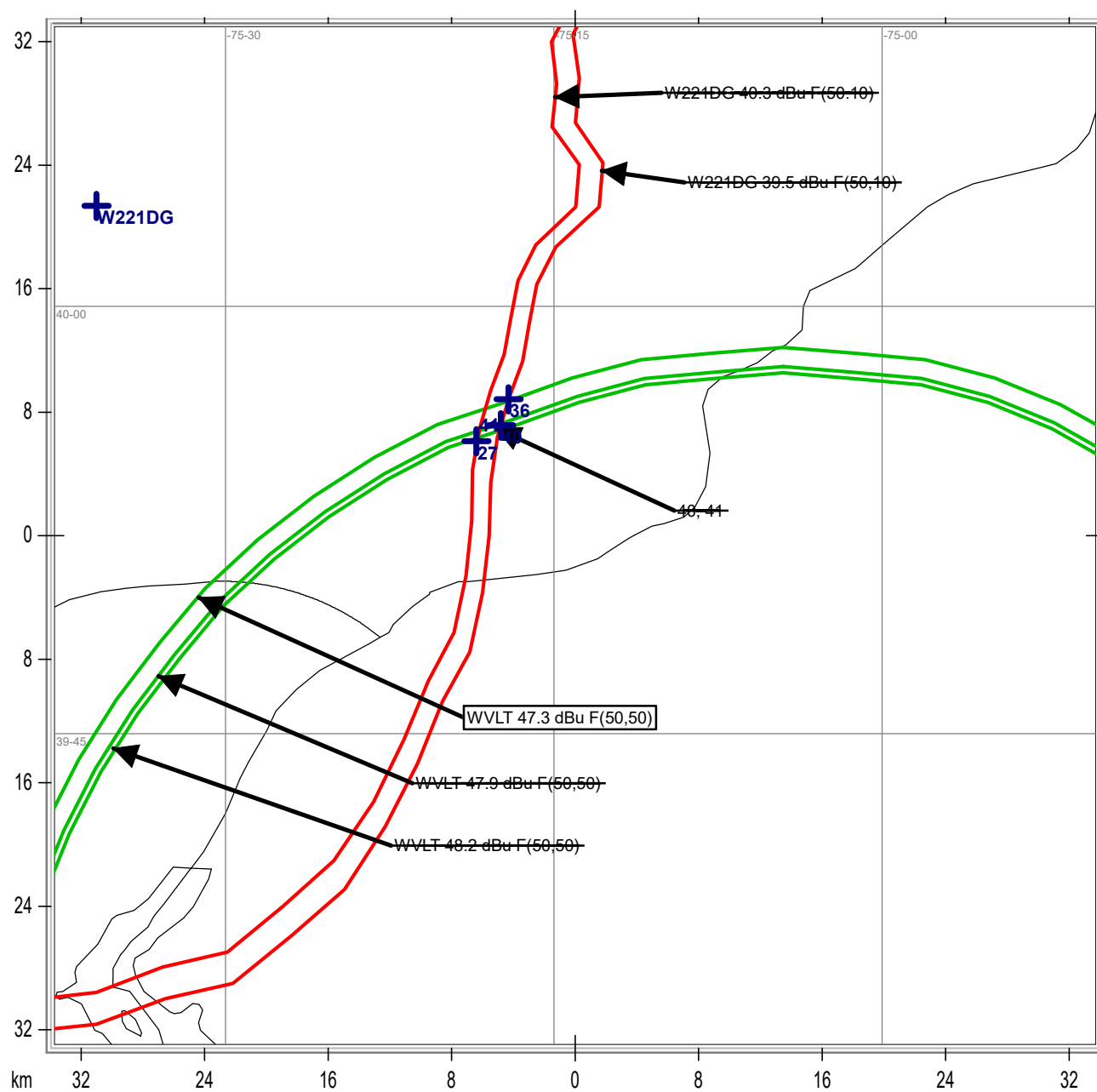
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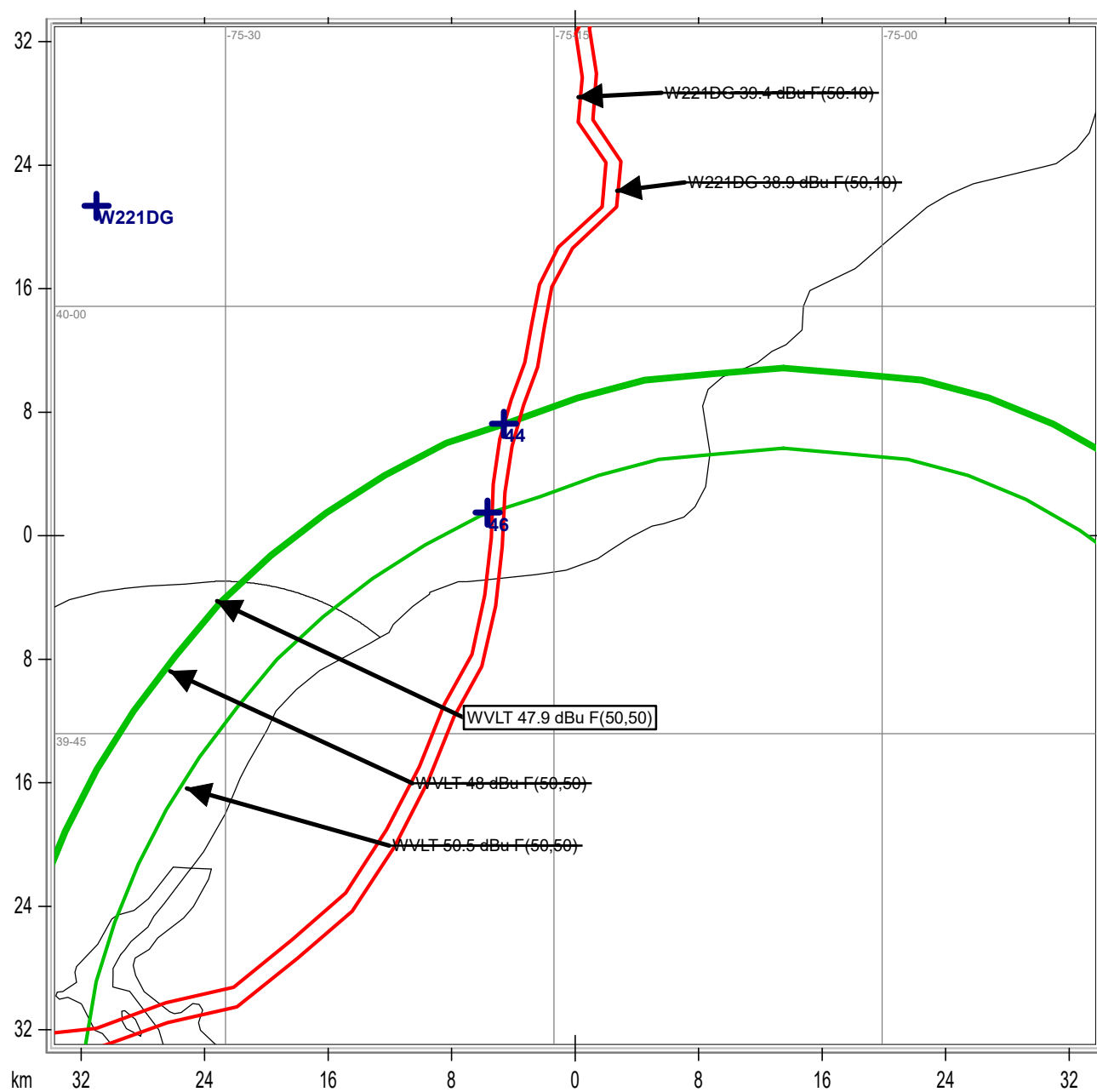
## WVLT F(50,50) CONTOUR W221DG F(50,10) CONTOUR ANALYSIS AT POINT OF INTERFERENCE



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State Borders Lat/Lon Grid

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