

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

In re Application of)	
)	
REDROCK RADIO GROUP LLC)	FCC File No. BPFT-20180927ABP
MEDIA MINISTRY)	Facility ID No. 141424
)	
For Modification of FM Translator)	
Station K256CA at)	
Navajo Mt./Lake Powell, Utah)	

To: Division Chief, Audio Division
Media Bureau

**REPLY TO
OPPOSITION TO PETITION TO DENY**

Lake Powell Communications, Inc. ("Lake Powell"), by counsel, hereby submits this Reply to the "Opposition to Petition to Deny" filed October 29, 2018 by Redrock Radio Group LLC ("Redrock"). In support hereof, Lake Powell submits the following:

1. Red Rock argues that the service area of its proposed facility will include a substantial amount of "white area" thereby warranting a waiver of Section 74.1232(d) of the Commission's Rules. Red Rock claims that the white area includes the tribal villages of the Navajo Mountain Chapter in Tonalea, Utah and the Navajo Mountain Chapter. Red Rock supports its argument with an engineering statement prepared by Roy P. Stype, III.

2. Attached hereto as Exhibit No. 1 is the sworn statement of Janet Brown, President of Lake Powell, dated November 6, 2018. In response to Red Rock's opposition pleading, Ms. Brown drove the exact areas identified by Red Rock as "white area" and she could clearly pick up eight (8) radio signals. As Ms. Brown's statement further indicates, residents of that area told her that they also listen to two additional radio signals.

Therefore, irrespective of the theoretical technical studies, in reality the area is well served by radio stations.

3. Ms. Brown's statement also confirms a September 29, 2018 telephone conversation she had with Red Rock's president wherein he talked about moving his radio signal into Page. Ms. Brown further states that the community of Page is the only place in that area that has potential radio revenue. As such, the FCC needs to recognize that Red Rock's supposed desire to serve white areas is merely a sham.

4. As a gesture of good faith, Lake Powell is willing to work with Red Rock to retain an independent, third party to drive the areas identified by Red Rock in order to confirm Ms. Brown's findings. We respectfully submit that, before the Commission considers Red Rock's waiver request it should accept the findings of a third party technical observer.

In light of the foregoing, Lake Powell continues to submit that pending application BPFT-20180927ABP must be DENIED.

Respectfully submitted,

LAKE POWELL COMMUNICATIONS, INC.

By: 

Cary S. Tepper

Its Attorney

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November 7, 2018

Exhibit No. 1

Sworn Statement of Janet Brown



LAKE POWELL COMMUNICATIONS, INC.

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11/6/2018

My name is Janet Brown, President and owner of Lake Powell Communications in Page Arizona. I offer this statement in response to Petition for Opposition to Deny filed by Red Rock Radio Group.

I drove to the area of Navajo Mountain Chapter in Tonalea, Utah, the Navajo Mountain Chapter House to verify or not if this is a "white area" with no broadcast signals. Upon arriving at the Chapter House, I was able in my car radio (a Toyota Highlander 2012) to receive these radio signals loud and clear:

KRTZ	98.7 FM	Cortez	Colorado
KOLT	107.5 FM	Flagstaff	Arizona
KAFF	92.9 FM	Flagstaff	Arizona
KXAZ	93.3 FM	Page	Arizona
	102.9FM	Prescott	Arizona
KTNN	660 AM	Window Rock	Arizona
	88.1FM	airing "undercurrents"	
	88.7FM	Classical-music	

I went into the Chapter House and asked the ladies inside if they listened to radio. They do, and they also added to the list of what radio stations can be heard there:

The Mountain	93.9 FM	Flagstaff	Arizona
	105.1 FM	St George	Utah

Navajo Mountain Chapter is one of the eighteen Chapters which make up the Western Agency, one of five agencies which make up the Navajo Nation. As of the 2010 census, the Chapter had a total population of 542, of which 501 were Navajo. It has an estimated elevation of 5,886 feet (1,794 m) above sea level.



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There is NO VOID of public weather, news, and area information in this entire area due to its elevation, and location. Please protect broadcasters like myself from these illegal "HOPS" by FM translators into markets they have no right or expectation to be in.

As for addressing Glen Canyon National Recreation Area, we re-positioned our FM signal on a Phinger Point Utah tower years ago just to be able to reach many boaters on Lake Powell. Most all boats use Marine Radios when help is needed.

On the weekend of September 29th I was told by the president of Red Rock Radio Group that they were coming into Page with an additional radio signal. Since I'm not an engineer, I thought they somehow had legal FCC permission to come into Page, Arizona. Upon further investigation, it now seems clear that they are trying to come in through the backdoor, and I'm hoping the FCC can see their intentions. They have no desire to serve the white area. Page, Arizona is the only location for potential radio revenue business in the entire coverage area.

The foregoing statements are true and are made under the penalty of perjury. Thank you in advance for your consideration!

Janet Brown

Owner KXAZ-FM KPGE-AM K252FG

CERTIFICATE OF SERVICE

I, Cary S. Tepper, Esquire, hereby certify that on this 7th day of November 2018, I have served a copy of the foregoing **"Reply to Opposition to Petition to Deny"** on the following:

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Cary S. Tepper, Esq.

*/ denotes delivery by email