

**BEFORE THE**  
**Federal Communications Commission**  
**Washington, DC 20554**

In the Matter of	)	
	)	
Bicoastal Media Licenses IV LLC	)	File No. BNPFT020180430AAV
	)	Facility ID #202510
Application for a new FM Translator	)	
On Channel 267, Centralia, Washington	)	Call sign K267CX

To: Honorable Marlene H. Dortch  
Secretary of the Commission

**Petition for Reconsideration**

Northwest Rock N Roll Preservation Society ("NWR"), licensee of FM translator K266BM Olympia, Washington, respectfully request the Commission to reconsider dismissal of our Informal Objection and August, 2019, Supplemental Information to Informal Objection ("Supplement").

On December 9, 2019, the FCC public notice announced the re-grant\* of K266BM License to Cover. On that same day, the FCC dismissed NWR's Informal Objection and granted a Construction Permit for K267CX. NWR had neither the opportunity to dispute the dismissal of the Informal Objection, nor file an amended supplement for the new engineering parameters.

\*The FCC granted a License to Cover to K266BM on September 11, 2019 and rescinded it on September 12, 2019. No explanation was given.

While the engineering parameters have changed with the Commission's recent re-granting of K266BM's current license, there will still be unacceptable interference to twenty-seven (27) documented regular K266BM listeners as well as hundreds of other K266BM listeners if K267CX is built.

The attached map shows regular listeners previously documented in the Supplement.

Please refer to the Supplement Attachment A for the Tabulation Table and Listener Declarations.

Please note that twenty-seven (27) listeners either live inside or regularly pass-through the protected 45 dBu contour zone with predicted -6dB (or greater) interference from the recently permitted first adjacent channel per the map prepared by DuTreil, Lundin & Rackley.

Three listeners reside inside the protected zone: 23-Allan Ohlsen, 29-Lane Trissel, and 43-Kevin Flanagan. Six additional listeners travel through the zone as were previously documented in the Supplement: 1, 2, 28, 30, 33, and 58. Based on information in their Declarations, eighteen (18) additional listeners regularly pass-through the protected zone, but were not previously documented in the Supplement (as the parameters have changed): 4, 7, 10, 11, 12, 15, 16, 18, 20, 21, 22, 32, 34, 36, 41, 42, 45, and 60.

As only six (6) affected listeners within the 45 dBu contour are required, and NWR has shown 27 valid listeners, the Rules are clear that K267CX should not be granted. Furthermore, K266BM could qualify for a waiver of the 45 dBu limit if needed, since thirty-two (32) documented listeners live outside of or regularly travel outside of the protected zone, and will be affected by greater than -6 dB interference from K267CX if built.

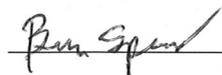
With the revised Rules (MB Docket No. 18-119 Report and Order), Bicoastal was given the golden opportunity in August to change channels. They did not have that option before. They chose not to do that. Instead, Bicoastal chose the path of interference to long established listeners, who are not going to go away. Those listeners will continue to fight to keep K266BM free and clear of interference.

While the parameters are changed, the listeners and their interests remain.

K266BM listeners have enjoyed listening while living or traveling through Lewis County, Washington, for more than ten years. NWR respectfully requests that its Informal Objection and Supplement be reinstated with the addition of this new information.

Respectfully, NWR also requests that the FCC commence the process prescribed in Report and Order: 1). Review NWR's Supplement (plus the information in this Petition), 2). Issue a letter to Bicoastal that the package has met requirements, and 3). Establish a deadline for Bicoastal to correct its engineering or dismiss the Construction Permit.

Respectfully yours,



---

Brian Spencer, President

Northwest Rock N Roll Preservation Society

December 31, 2019

## Declaration

I, Brian Spencer, hereby declare under penalty of perjury as follows:

1. I am President of Northwest Rock N Roll Preservation Society
2. I have reviewed this Petition to which this declaration is attached and the facts set forth therein, except those which are attested to by another, are true and correct to the best of my knowledge, information and belief and is not interposed for delay.



---

Signature

December 31, 2019

## Certificate of Service

It is hereby certified that a true copy of the forgoing Petition for Reconsideration was served by first-class United States mail, postage prepaid, on the 31st day of December, 2019, upon the following:

Melodie A. Virtue, Esq.  
1000 Potomac, N.W.  
Suite 200  
Washington, DC 20007-3501

By:   
Brian Spencer

---