

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC

27 September 2019

Application of	)
	)
OUR THREE SONS BROADCASTING, LLP	) FRN 0000014795
For Translator Renewals of Licenses	) FCC File No. 0000077902
Lead Call Sign WRHM, Lancaster, SC	) Facility ID 50776

To: Marlene H. Dortch, Secretary  
Federal Communications Commission  
Attn: Media Bureau, Audio Division

**INFORMAL OBJECTION**

Triangle Access Broadcasting, Inc. (“Triangle”), pursuant to 47 C.F.R. §73.3587, objects to a full grant of the above-referenced application. On July 11, 2019, Our Three Sons Broadcasting, LLP (“OTS”) submitted the referenced application (“Application”) for renewal of the above-captioned FM station and its two translators W232AX (Facility ID 50778) and W281BE (Facility ID 153412). Triangle objects because the translator are same-area translators and thus are not licensable.<sup>1</sup> Triangle has no objection to a prompt renewal of primary station WRHM.

As shown in Exhibit A, 88% of W232AX's service area is common with W281BE. Exhibit B shows that the two translators both carry the same Christian music programming from WRHM. WRHM itself serves the same area as yet another source of the same programming. Specifically, Exhibit B shows the station's webpage as retrieved on September 27, 2019, stating with particularity that “The Bridge programming is simulcast on two different dial positions at 104.1 and 94.3.” These frequencies match the frequencies of W281BE (104.1 MHz) and W232AX (94.3 MHz).

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<sup>1</sup> 47 C.F.R. § 74.1232(b).

A review of translator histories indicates that W232AX's current facility was initially licensed in 2008 shortly after primary station WRHM began hybrid digital operation. When OTS's acquisition of W281BE was proposed in 2013,<sup>2</sup> the outstanding construction permit was not same area to W232AX. After a series of minor modifications,<sup>3</sup> a license was granted on March 21, 2014, that still did not significantly overlap W232AX.<sup>4</sup> Assignment consummated on April 26, 2014. Shortly before consummation, however, on April 17, 2014, another modification was granted that specified primary station WRHM (without HD subchannel details) and W281BE's current facility.<sup>5</sup> The modification application contained a certification that it was not a same-area translator,<sup>6</sup> and no amendment of the assignment application was tendered. Triangle does not know the status of WRHM's HD channels and translator primaries/programming over the period that the co-owned translators have been on the air, but it is now known that their contours significantly overlap and retransmit the same programming.

The Bureau should inquire of OTS which one of the two translators should be renewed; the license for the non-selected translator should expire. In lieu of selecting a single translator to renew, OTS could alternatively amend the renewal Application to include a showing demonstrating a technical need for both translators.

Respectfully Submitted,



Steven L. White

Director; *Triangle Access Broadcasting, Inc.*

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<sup>2</sup> BAPFT-20130708AAA, with BNPFT-20130318ACW as the active permit.

<sup>3</sup> BMPFT-20130904ABR, as amended.

<sup>4</sup> BLFT-20140225AAY.

<sup>5</sup> BPFT-20140311ADR

<sup>6</sup> *Id.*, at Section III-A. Question 14.