

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of Application of:)	
)	
Centro Cristiano De Vida Eterna)	File No. 0000097724
)	Facility ID No. 148295
Minor Modification of FM Translator)	
K278CR, Houston, Texas)	

To: Office of the Secretary
Attention: Chief, Audio Division, Media Bureau

SUPPLEMENT TO PETITION TO DENY

Educational Media Foundation ("EMF"), by its attorneys, and pursuant to Sections 73.3584 and 74.1204 of the Commission's rules, hereby submits this Supplement to Petition to Deny directed against the above-captioned application ("Application") for a minor modification of an FM broadcast translator station at Houston, Texas, to operate on Channel 278 (103.5 MHz) ("Translator"). EMF, is the licensee of full-power NCE FM station KHJK, Channel 279, (103.7 MHz), LaPorte, Texas (Facility ID No. 48676) ("KHJK"). EMF filed a Petition to Deny on January 22, 2020 and is hereby supplementing that Petition with the attached engineering statement.

Respectfully submitted,

EDUCATIONAL MEDIA FOUNDATION

By: 

David D. Oxenford

Mary N. O'Connor

Wilkinson Barker Knauer, LLP

1800 M Street, NW - Suite 800N

Washington, DC 20036

202-783-4141

Its Attorneys

January 27, 2020

Analysis of predicted interference to KHJK from the application of K278CR (ARN 0000097724)

In response to the application of Centro Cristiano de Vida Eterna (CCVE) to modify the orientation of the coverage of K278CR Houston TX, FCC ID Number 148295 (see ARN 0000097724), I used RadioSoft Comstudy 2.2 software to analyze the potential impact of the application to station KHJK La Porte TX, FCC ID Number 48676, owned and operated by Educational Media Foundation (EMF).

Figure 1 shows a population scattergram of the area surrounding the K278CR license and application, the 60 dBu contours for each, as well as the 60 and 45 dBu F(50,50) contours for KHJK. This map clearly shows the location of the translator as between the 60 and 45 dBu contours of KHJK, and that the proposed modification does not decrease the number of people who are potential recipients of interference:

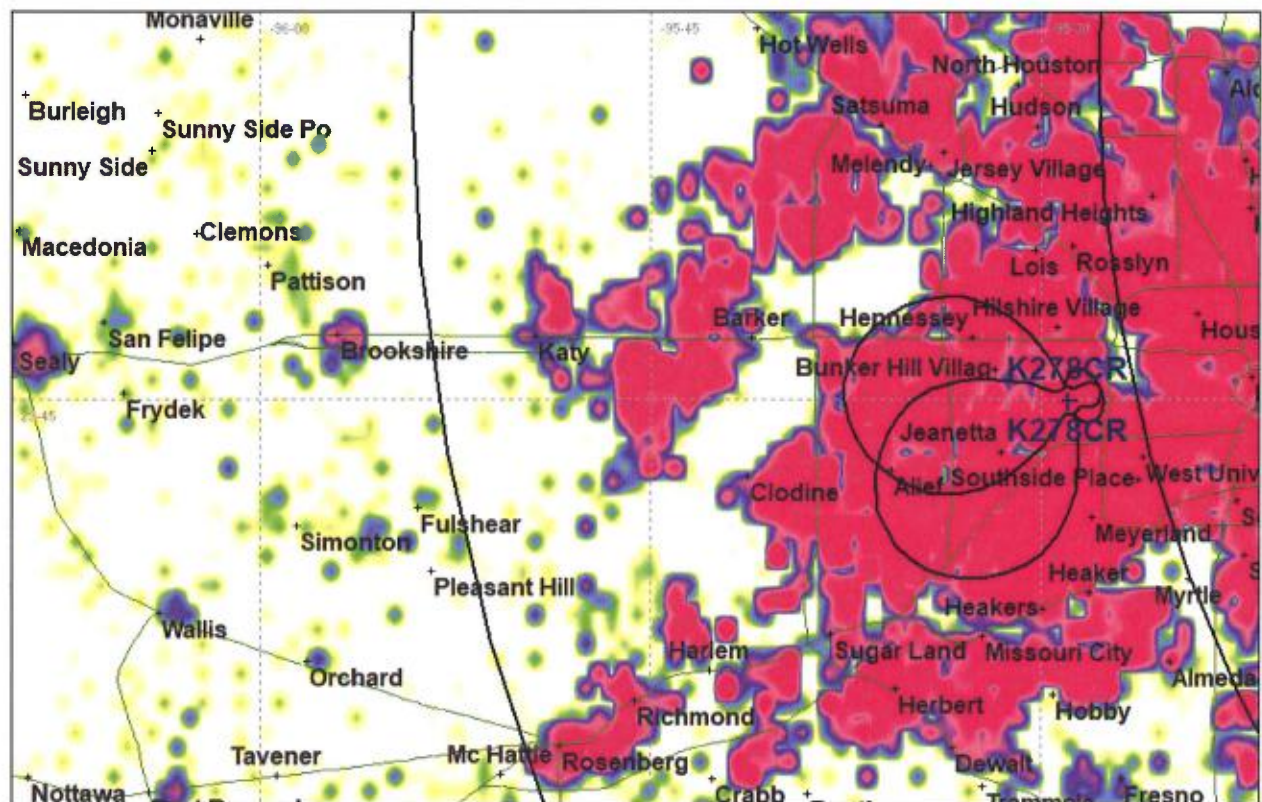


Figure 1

Using the ITU model (which allows for adjacent-channel interference calculations), I created Figure 2, which shows the same area and a Longley-Rice analysis of potential interference. The red area is where the interfering K278CR signal is 40 dBu stronger than that of KHJK, yellow is 20 dBu, and blue is 10 dBu higher.

The areas of predicted interference are described in Table 1:

Interference Ratio	Geographic area	Impacted population
≥ 40 dBu	6.81 km ²	4,941
≥ 20 dBu	48.92 km ²	84,932
≥ 10 dBu	285.99 km ²	403,154

Table 1

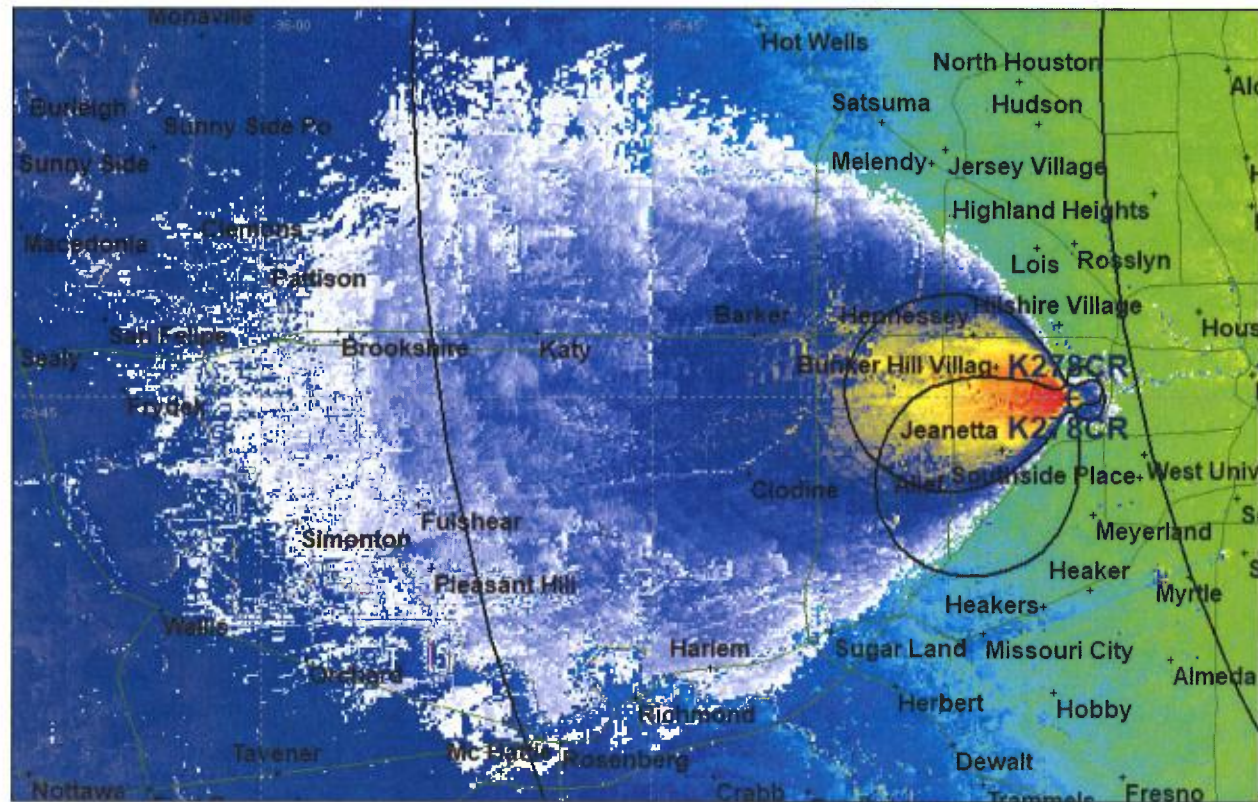


Figure 2

The former (licensed) operation of K278CR has proven to have indeed resulted in real-world interference to KHJK as demonstrated by EMF in previous filings.

Figure 3 gives the same evaluation for the recent application of K278CR:

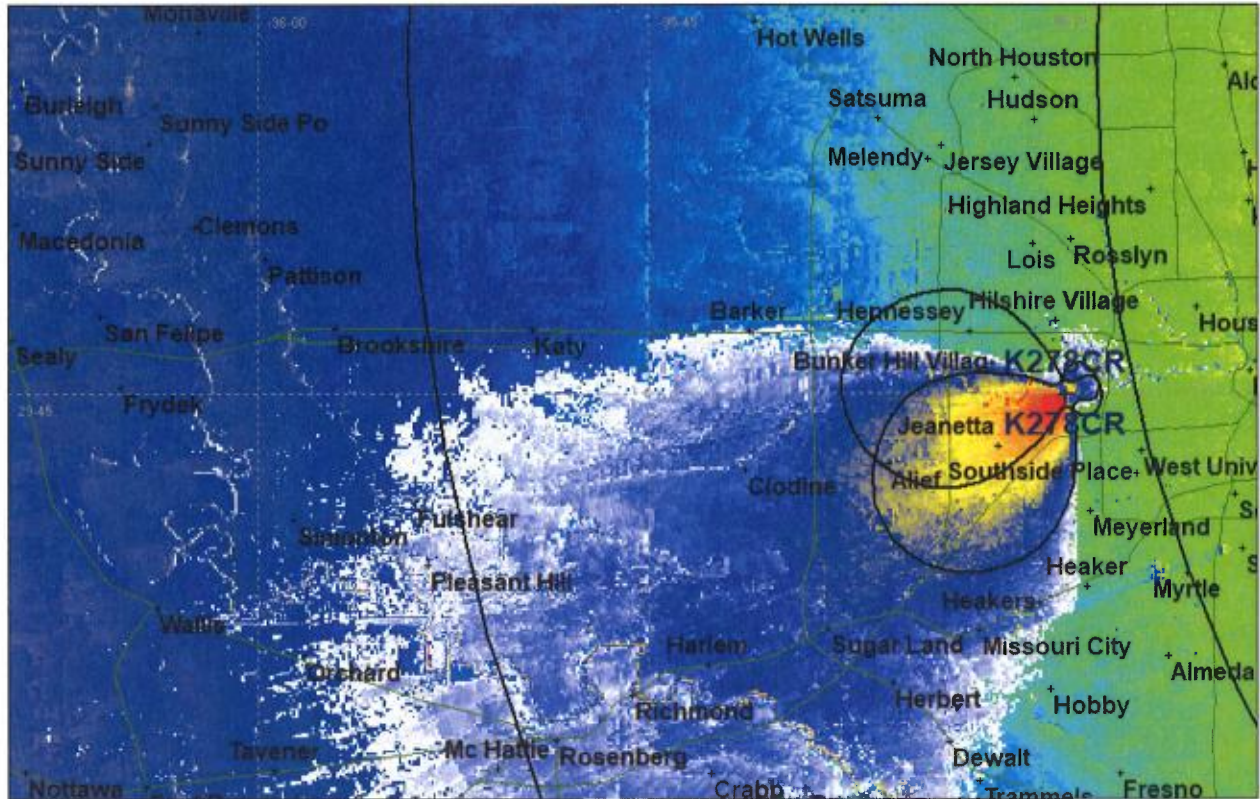


Figure 3

The affected areas and population values are given in Table 2, as well as the increase in affected population as compared to the licensed operation:

Interference Ratio	Geographic area	Impacted population	Population increase
≥ 40 dBu	6.72 km ²	5,136	195
≥ 20 dBu	48.29 km ²	134,270	49,338
≥ 10 dBu	285.95 km ²	562,295	159,141

Table 2

This analysis makes clear that the proposed changes to K278CR do NOT improve the predicted interference to KHJK; indeed, these changes would INCREASE the potential for interference.

Therefore, EMF urges the Commission to dismiss the K278CR application under discussion, since it only exacerbates the previously existing interference.

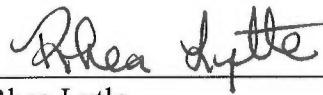
Sam Wallington
Vice President of Operations and Engineering
Educational Media Foundation

CERTIFICATE OF SERVICE

I, Rhea Lytle, a legal secretary with the law firm of Wilkinson Barker Knauer, LLP, hereby certify that on this 27th day of January, 2020, I served copies of the foregoing **"Supplement to Petition to Deny"** on the following via first-class United States mail, postage prepaid:

Dan J. Alpert
The Law Offices of Dan J. Alpert
2120 21st Rd. N.
Arlington, VA 22201

By e-mail: audiodivisionpleadings@fcc.gov

A handwritten signature in cursive script that reads "Rhea Lytle". The signature is written in dark ink and is positioned above a horizontal line.

Rhea Lytle