

BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C.

In Re Application of	)	
	)	
<b>CENTRO CRISTIANO DE VIDA ETERNA</b>	)	LMS No. 0000124943
Sugar Land, Texas	)	
	)	
For Modification of License for FM Translator	)	
Station K258BZ, Sugar Land, Texas	)	
To: The Chief		
Media Bureau		

**SECOND SUPPLEMENT TO INFORMAL OBJECTION**

Gow Media, LLC ("Gow"), the licensee of Station KFNC(FM), Mont Belvieu, Texas ("KFNC" or "Station"), by its attorneys and pursuant to Sections 1.41 and 73.3587 of the Commission's Rules, hereby provides its Second Supplement to its Informal Objection, initially submitted on December 23, 2020 and supplemented on April 27, 2021, to the above-referenced application, filed by Centro Cristiano de Vida Eterna ("Centro"), requesting the grant of a minor modification of license, through a substitution of channel and transmitter site relocation, for its FM Translator Station K258BZ, Sugar Land, Texas ("K258BZ" or "Translator"). In support thereof, Gow states as follows.

In its Supplement to Informal Objection, Gow submitted an Engineering Statement that evidenced the locations of the Listener Declarations that supported Gow's showing that its listeners would be detrimentally impacted by interference from the proposed modifications to the Translator. Gow is now submitting a revised Engineering Statement, in place of the Engineering Statement presented with the initial Supplement, that shows the area where the KFNC (248C) 45dBu contour is greater than the 45dBu minimum listening level specified in 74.1204(f)(2) and

the f50,10 interfering level of the proposed K258BZ (on 247D) is not compliant with the prescribed -6dBu interfering level for first adjacent facilities.

This further evidences that the Commission cannot grant the authorization requested as it will cause a level of interference that a former licensee described in LMS No. 0000114123 as the basis for a migration from Channel 247 to a non-adjacent channel:

The licensee for K247CP has been notified by Gow Media, LLC ("Gow") regarding interference that is being caused by K247CP to the Gow FM station KFNC, Mont Belvieu, TX 238C [sic]. Based on the attached Figure 1 that shows the KFNC 60 and 45 dBu F50,50 contours and the K247CP 54 dBu F50/10 Interference Contour, the K247CP licensee will voluntarily migrate to an alternative FM channel.

WHEREFORE, it is respectfully requested that the Informal Objection be further supplemented and that grant of a construction permit for a minor modification of the license for FM Translator Station K258BZ, as filed by Centro Cristiano de Vida Eterna be dismissed or, in the alternative, denied.

Respectfully submitted,

**GOW MEDIA, LLC**

By: 

Barry A. Friedman  
Thompson Hine LLP  
Suite 700  
1919 M Street, N.W.  
Washington, D.C. 20036  
(202) 331-8800

Dated: July 7, 2021

## ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Gow Media, LLC, the licensee of FM radio station KFNC, Mont Belvieu, Texas, and in support of an Informal Objection to an application by Centro Christiano De Vida Eterna seeking to change frequency and relocate translator station K258BZ. This change would cause impermissible interference to first adjacent KFNC. As has now been proven by Gow in multiple proceedings against similar proponents, this exhibit will, once again, prove that the proposed K258BZ will cause impermissible interference to KFNC.

KFNC is licensed to operate on Channel 248C (97.5MHz) with 100kW effective radiated power ("ERP") and at 597 meters Height Above Average Terrain ("HAAT"). KFNC broadcasts from a 2,000-ft. tower located near Winnie, Texas and provides documented service to areas and population within its 45dBu FCC f50,50 contour. KFNC has been operating at full licensed power continuously since 2009 following reconstruction after hurricane damage.

This Engineering Statement will demonstrate that the projected interference to KFNC from K258BZ meets the new interference protection guidelines adopted by the Report and Order in MB Docket Number 18-119 (FCC 19-40), released May 9, 2019. KFNC has readily obtained over 40 Listener Declarations and is **submitting 35 unique Listener Declarations identifying 48 unique listening locations which are projected to receive interference from K258BZ.** **This number exceeds the listener complaint requirement** contained in Section 74.1203(a)(3) for a Station with the protected contour such as that of KFNC.<sup>1</sup> These documented KFNC

---

<sup>1</sup> 25 Listener Complaints is the upper limit of Listener Complaints required for any broadcast station under Table 1 to Section 74.1203 of the Commission's Rules.



Listener Declarations represent only a small fraction of the listeners that KFNC serves in the Houston area who would be equally adversely affected by the translator's impermissible and harmful interference.

### HARMFUL INTERFERENCE

K258BZ has applied to broadcast on the first adjacent channel to KFNC. The K258BZ proposed transmitter site is located just inside the 52dBu contour for KFNC. As is reflected in the supporting materials, many of the interference complaints involve locations inside the proposed 70dBu contour of K258BZ. At these locations, K247CP generates more than 25dB in excess of the allowable undesired/desired signal ratio to KFNC, **which is well in excess of the -6 dB U/D threshold ratio for first-adjacent channel interference listener complaints**, Exhibit B is a map denoting each location where a listener is expected to receive impermissible interference from the proposed K258BZ (247D). The red shaded area in Exhibit B denotes places where the Undesired to Desired ratios of the proposed K258BZ to KFNC are exceeded.

Exhibit A is a chart describing the interference types and locations. The following information is gleaned from this chart:

- There are 35 separate respondents used in this evaluation. Interference was received either at specific home, work, or specific commuting locations (roadway intersections).
- There are 51 separate and valid (inside the KFNC 45dBu contour), fixed location declarations (home and/or work, and/or other specific location).
- Each respondent's name, address where listening is specified, phone number, coordinates of each location where listening is specified. The desired (KFNC) and undesired (K258BZ) FCC 50,50 and FCC 50,10 signal levels respectively are shown along with the D/U calculation showing the relationship between the two signals. Any location where the

proposed K258BZ is projected to be in excess of FCC allowable ratios is listed in red. The proposed K258BZ ratio is in excess of FCC limits at 48 of the 51 plotted locations.


#### CONCLUSION

KFNC has a long history of being forced into playing “whack-a-mole” with translators either filing for or operating on channel 247D. All, including the instant proposal by K258BZ (247D) have requested or operated in the same heavily populated area of Houston bounded by I-610 to the East, State Highway 6 to the West, Interstate 10 to the North and Alt US90 to the South. This area comprises a large portion of the KFNC listenership. Gow has had to repeatedly file against applications or operating translator facilities first adjacent to KFNC over the last several years. Based upon the new interference protection standards, it is unquestionable that the proposed K258BZ (247D) will violate the requirement that it protect all full power FM stations from impermissible interference, specifically, KFNC (248C) within the KFNC 45 dBu contour.

Gow respectfully requests that the Commission dismiss the application of K258BZ as proposed to operate on channel 247D.

#### CERTIFICATION

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direct supervision, and that they are true and correct to the best of his knowledge and belief.

  
Bertram S. Goldman  
Goldman Engineering Management  
7/6/2021 (Updated from 4/2021 filing)



## Exhibit A- Address and Interference Chart

KEY	Name	Address	Phone	H/ W	LAT	LON	KFNC f50,50	TRANS f50,10	D/U (dB)
1	Nathan Gordon	4317 Costa Rica Rd, Houston, TX 77092	916-220-6910	H	29.83345	-95.472173	55	47.9	7.1
2	Nathan Gordon	4500 Bissonnet St, Bellaire, TX 77401	"	W	29.7165	-95.454676	56	57.7	-1.7
3	"	I-610 between exit 7 & 13B	"	D	29.72603	-95.462526	55.7	57.2	-1.5
4	Doug Rotan	11 Farther Pt. Houston, TX 77024	713-629-1694	H	29.77066	-95.484156	54.9	53.9	1
5	"	3737 Buffalo Speedway, Houston, TX 77098	"	W	29.73316	-95.430271	56.9	54.7	2.2
6	Ben McPhail	5014 Libbey, Houston, TX 77072	972-415-7293	H	29.83108	-95.467381	55.2	48	7.2
7	William Thorsell	5132 Longmont, Houston, TX 77056	713-621-6685	H	29.756	-95.468733	55.4	54.7	0.7
8	Martin Taylor	8923 Briar Forest, Houston, TX	713-206-5555	H	29.7496	-95.528573	53.4	57.4	-4
9	Camilo Diaz	20419 Prince Creek Dr. Katy, TX 77450	281-935-3490	H	29.76154	-95.741719	46.5	48.5	-2
10	"	1880 S. Dairy Ashford Rd, Houston, TX 77077	"	W	29.70462	-95.546883	52.8	65.3	-12.5
11	Caroline Mealey	2303 Mid Lane #531, Houston, TX 77027	713-410-3916	H	29.73909	-95.450631	56.1	55.3	0.8
12	Rachel Faust	5520 Auden St. Houston, TX 77005	713-725-6943	H	29.722	-95.440109	56.5	56.2	0.3
13	Kevin Shuvalov	8421 Winningham LA, Houston, TX 77055	512-656-6326	H	29.78837	-95.498938	54.3	52.7	1.6
14	"	4500 Bissonnet St, Bellaire	"	W	29.7165	-95.454676	56	57.7	-1.7
15	Robert Murray	2521 Stanmore Dr. Houston, TX 77019	832-633-0608	H	29.74903	-95.419575	57.2	52.8	4.4
16	Eduardo Hurtado	16602 Bishop Knoll La. Houston, TX	701-304-0356	H	29.85802	-95.682542	48	44.6	3.4
17	"	Hwy 6 Intersection I-10 (Eastex Fwy)	"	D	29.78416	-95.6473	49.4	51.7	-2.3
19	Ally Stovall	5014 Libbey Ln, Houston, TX 77092	940-704-2254	H	29.83108	-95.467376	55.2	48	7.2
20	Kendall Trozzo	922 Constance, Houston, TX 77024	713-446-7407	H	29.77945	-95.52902	53.3	54.1	-0.8
21	"	I-10 & Bunker Hill Rd	"	D	29.78463	-95.534504	53.1	53.6	-0.5
22	Clay Trozzo	8811 Gaylord Dr. Houston, TX 77024	713-705-8600	W	29.78243	-95.509428	54	53.5	0.5
23	David White	150 W Sam Houston Pkwy. Houston, TX 77024	713-385-0996	H	29.76354	-95.559077	52.4	55.9	-3.5
24	"	10370 Richmond Ave, Houston, TX 77042	"	W	29.72821	-95.558584	52.4	60.8	-8.4
25	Shawnette Anderson	1360 Post Oak, Houston, TX 77056	832-206-5936	W	29.75314	-95.464286	55.6	54.7	0.9
26	Richard Anderson	8811 Boone Rd. Houston, TX 77099	832-865-4180	H	29.68204	-95.574126	51.9	70	-18.1
27	Ahnjonae Davis	4410 Westheimer, Houston, TX 77027	713-232-4594	H	29.74214	-95.454062	56	55.2	0.8
28	Claudia Garza	10810 Katy Fwy, Houston, TX 77043	713-899-4841	W	29.78616	-95.570234	51.9	53.4	-1.5
29	Michael Vayner	3411 E Heathrock Circle, Sugar Land, TX 77479	832-721-1001	H	29.57653	-95.594792	51	70.9	-19.9
30	Michael Schneiders	3402 Velasco Ct. Missouri City, TX 77459	832-687-7050	H	29.49706	-95.514202	53.1	57.2	-4.1



EXHIBIT A (Cont'd)

KEY	Name	Address	Phone	H/ W	LAT	LON	KFNC f50,50	TRANS f50,10	D/U (dB)
31	Andre Abara	11250 S. Wilcrest, Houston, TX 77074	832-302-5896	W	29.65716	-95.573486	51.9	77.6	-25.7
32	Dave Schunck	5939 Kuldell Dr. Houston, TX 77074	214-406-4844	H/W	29.68081	-95.499593	54.4	67.1	-12.7
33	Hunter Halbert	3730 Pantano Court, Missouri City, TX 77459	281-685-0628	H	29.54761	-95.520637	53.3	65.7	-12.4
34	Wesley King	7019 Ladera Ln, Missouri City, TX 77459	713-933-9200	H	29.40754	-95.575059	50.3	48.5	1.8
35	"	US59 & Hwy90, Mile Marker 110	"	D	29.63362	-95.595835	51.1	77.4	-26.3
36	R Scott Podsim	707 Blue Willow Dr, Houston, TX 77042	832-498-1760	H	29.75415	-95.56525	52.2	56.9	-4.7
37	"	1900 West Loop So, Houston, TX 77027	"	W	29.74734	-95.460476	55.8	55.1	0.7
38	"	West Loop & San Felipe	"	D	29.74791	-95.459088	55.8	54.9	0.9
39	Andrew Martin	15611 Memorial Dr. Houston, TX 77079	832-724-3149	W	29.77752	-95.633218	49.9	52.8	-2.9
40	Leticia Garza	15411 Palmway, Houston, TX 77071	713-249-0062	H/W	29.63266	-95.521949	53.6	82.7	-29.1
41	Kathleen Panus	6127 Piping Rock La. Houston, TX 77024	281-793-0060	H	29.74118	-95.492403	54.7	57.2	-2.5
42	"	8955 Katy Fwy, Houston, TX 77024	"	W	29.78341	-95.511815	53.9	53.4	0.5
43	Ben Griffin	1334 Brittmore, Houston, TX 77043	281-630-2415	W	29.79541	-95.571953	51.8	52.5	-0.7
44	"	I-10 & Beltway 8	"	D	29.82303	-95.565696	51.9	49.9	2
45	Aldo Ortiz	1314 Brittmore Rd, Houston, TX 77043	281-217-2233	W	29.79463	-95.571079	51.9	52.6	-0.7
46	Mark Barineau	8911 Limerick La. Houston, TX 77024	713-444-4525	H/W	29.77872	-95.464039	55.5	52.4	3.1
47	Patrick Wade	1614 Driscoll St Houston, TX 77019	713-775-4255	H	29.75104	-95.408784	57.6	52.1	5.5
49	John Maclay	506 Fall River Rd, Houston, TX 77024	713-932-7838	H	29.77489	-95.486893	54.8	53.6	1.2
50	William Thorsell	1011 Augusta, Houston, TX 77057	713-621-6685	W	29.75755	-95.484525	54.9	55.2	-0.3
51	Todd Deppert	718 W. Creekside Dr, Houston, TX 77024	713-805-0036	H	29.77582	-95.492792	54.6	53.7	0.9
52	David Freed	18003 McNish La, Richmond, TX	281-240-4949	H	29.65407	-95.705709	47.6	56.1	-8.5
53	"	1650 Hwy 6, Sugar Land, TX 77478	"	W	29.59901	-95.630816	49.9	67.4	-17.5

NOTE K258BZ MUST BE 6dB LESS THAN KFNC TO AVOID INTERFERENCE (D/U=>6dB)

POPULATION WITHIN KFNC 60DBU CONTOUR, 2,215,441

MINIMUM LISTENER COMPLAINTS REQUIRED: 25 (74.1203 TABLE 1)

NUMBER OF UNIQUE LISTENERS: 35

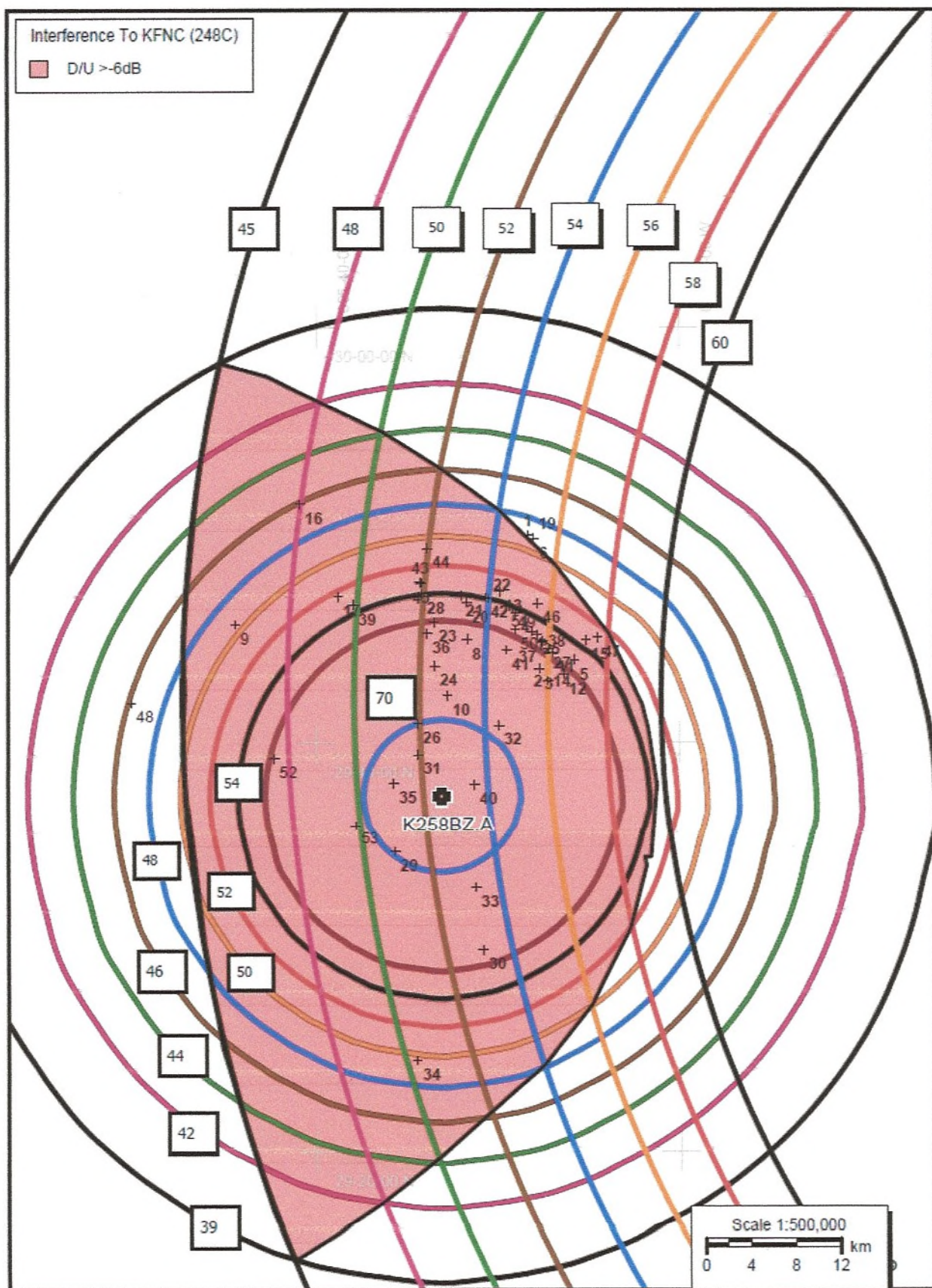
NUMBER OF UNIQUE LOCATIONS: 51

AT 48 OF 51 PLOTTED LOCATIONS THE TRANSLATOR IS PROJECTED  
TO CAUSE INTERFERENCE TO KFNC

EXHIBIT B- Map of Proposed K258BZ (247D) and KFNC Contours



K258BZ (APPL) 247D INTERFERENCE TO KFNC (FM) 248C



## CERTIFICATE OF SERVICE

I, Barry A. Friedman, hereby certify that I have served on this 7th day of July, 2021, a copy of the foregoing Second Supplement to Informal Objection on the following party by first-class mail, postage pre-paid:

Dan J. Alpert, Esq.  
Law Office of Dan Alpert  
2120 North 21st Road  
Arlington, VA 22201

A handwritten signature in blue ink, appearing to be 'B. Friedman', written over a horizontal line.

Barry A. Friedman