

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

In re Application of)	
)	
INTELLI LLC)	File No. 0000150697
(Assignor))	
)	Pleading File No. 0000153478
and)	
)	
INSPIRATION MEDIA, INC.)	
(Assignee))	
)	
For Consent to the Assignment of License)	Facility ID No. 20355
of KKOL(AM), Seattle, Washington)	

To: The Secretary, Federal Communications Commission
Attn: The Chief, Audio Division, Media Bureau

**JOINT OPPOSITION TO INFORMAL OBJECTION AND REQUEST FOR EXPEDITED
CONSIDERATION**

Inspiration Media, Inc. (“Inspiration”) and Intelli LLC (“Intelli” and, collectively with Inspiration, the “Applicants”), by their attorneys, hereby respectfully request that the Commission act to grant the above-referenced assignment application expeditiously in order that the parties may consummate the transaction before AM station KKOL enters the license renewal cycle on October 1, 2021.

As the Applicants stated in their Joint Opposition to the Informal Objection filed by Mr. Richard Weaver, this application proceeding is an inappropriate forum for the Commission to adjudicate the Objection (or others of a similar nature), and grant of the instant application would not aggrieve Mr. Weaver or similarly situated individuals. Complaints about blanketing

interference are the subject of a separate and ongoing FCC investigation.¹ Inspiration (a former licensee of KKOL) is well aware that a number of such complaints have been lodged with Intelli and with the Commission, and its engineering personnel have assisted in significant efforts by Intelli to respond to and resolve all such complaints.

In fact, the Applicants have had their engineering personnel personally respond to each of the approximately twenty (20) individuals reporting specific problems potentially related to interference from the Station. In some instances, the issue readily was resolved through installation of an RF choke, or simple equipment rewiring or replacement. In others, the problems complained of were determined to have no relation whatsoever to blanketing interference from KKOL. As a result of those efforts, all of the complaints which have been reported to Intelli and Inspiration have been successfully resolved.²

Upon grant of the instant assignment application, Inspiration will simply step into Intelli's shoes and assume all regulatory risk of KKOL's operation and all responsibilities of complying with the Commission's rules and directives. Inspiration Media is owned by Salem Media Group, which operates 99 radio stations nationwide. Inspiration, therefore, is well-positioned to work with parties and the Commission to address complaints that are, in fact, tied to KKOL's operations. Commission approval of KKOL's sale will in no way affect the rights of Mr. Weaver and others similarly situated with respect to concerns of interference from the station; KKOL's

¹ *Letter on behalf of James Bradshaw, Senior Deputy Chief, Audio Division, re License Application BMML-20190624ACC*, dated February 26, 2021.

² Two recent situations are illustrative of how Applicants have taken action and resolved complaints. One couple complained that they were experiencing difficulties with an oven. An engineer went out to their home and installed a filter. According to our engineer, the filter resolved the problem with the oven and the couple was satisfied. In another recent instance, Applicants' engineering staff worked a resident having difficulty with a garage door opener. Like several others the Applicants have addressed, the problem had nothing whatsoever to do with KKOL's operations but was the result of a RF interference from nearby refrigerator.

compliance with the terms of its license; or any other aspect of the station's technical operation, and thus there is no basis for the Commission to deny its consent to the assignment.³

Conversely, delaying consummation of the Station sale for four months or more pending action on KKOL's renewal application will adversely affect the Applicants. Intelli owns several other AM broadcast stations whose revenues have been seriously affected from the COVID-19 Pandemic. As a result, Stations WAZX (Facility No. 22983), KCLE (Facility No. 59263), and KKOY (Facility No. 69812) currently are silent. Expeditious approval of the sale of Station KKOL will provide Intelli with much needed revenues that will allow those stations to more quickly resume operations.

Accordingly, the application should be granted before KKOL enters the renewal cycle on October 1, 2021.

Respectfully submitted,

INSPIRATION MEDIA, INC.

By: /s/ Kathleen A. Kirby /s/
Kathleen A. Kirby
Gregory L. Masters
Its Attorneys

WILEY REIN LLP
1776 K Street NW
Washington DC 20006
(202) 719-7370

³ Cf. *Alpha Media Licensee LLC, Debtor-in-Possession*, DA 21-825 (Med. Bur., released Jul. 13, 2021), at 11-12 para. 32 (to establish formal standing, a petitioner in an assignment proceeding must allege and prove, *inter alia*, that there is a causal link between the proposed assignment and the claimed injury in fact and that not granting the assignment would remedy or prevent that injury).

INTELLI LLC

By: /s/ Dan J. Alpert /s/
Dan J. Alpert
Its Attorney

LAW OFFICE OF DAN J. ALPERT
2120 North 21st Road
Arlington, VA 22201
(703) 243-8690

September 24, 2021

Certificate of Service

I, Kathleen A. Kirby, hereby certify that a true copy of the foregoing “Joint Opposition to Informal Objection and Request for Expedited Action” was sent this 24th day of September 2021, by first class United States mail, postage prepaid, to the following:

Mr. Richard Weaver
10018 Edgecombe Place NE
Bainbridge Island, WA 98110

Diana Trump
9821 NE Murden Cove Dr
Bainbridge Island, WA 98110

Nancy and Steve Paul
10205 Manitou Beach Drive NE
Bainbridge Island, WA 98110

Leah Applewhite
Realogics Sotheby's International Realty
240 Winslow Way East
Bainbridge Island, WA 98110

s/ Kathleen A. Kirby /s/