

October 25, 2021

Garry Wing
1800 Joe Crosson Dr., #55
El Cajon, CA 92020

FCC Headquarters
445 12th Street, SW
Washington, DC 20554

Filed via LMS on-line, on 10-25-21

Please accept this as an **Informal Objection** regarding the pending license renewal of:

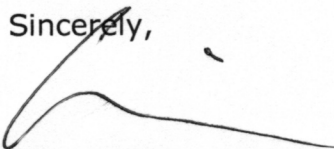
Call sign: **KZLQ-LP**
Facility ID Number: **195343**
License renewal application file number: **0000155938**

As supported by documents included in this PDF, KZLQ-LP has been operating at power levels well in excess of their licensed power for several years. In addition, they have been over-modulating and causing interference and "splatter" on both sides of Channel 255 (98.9 MHz) throughout the greater Palm Springs metropolitan area. Should this be denied by the licensee, a site visit to determine correct output power, combined with an audit of electric utility records from the KZLQ-LP transmitter site over the past 3-years would establish a pattern of continuous output power violations.

Furthermore, KZLQ-LP has never aired a single EAS test during the 3+ years they have been licensed to operate. This fact can be corroborated by a review of log records stored in their EAS encoder, assuming it is even operational. Additionally, KZLQ-LP has not posted notice of their application for license renewal on their station website, www.larradio.com, as required by 47 CFR Section 73.3580(b)(1)(vi), (b)(2) (Website screenshot PDF from today; attached.) At the very least, licensee should produce written confirmation of when the required on-air announcements regarding license renewal were aired, and that should be inspected as to its accuracy and authenticity.

Finally, KZLQ-LP answered the question on their current license renewal application regarding any "**FCC Violations during the Preceding License Term...**" in an untruthful manner. The licensee surely is aware that their LP station is operating well beyond its licensed 3-watt ERP, that it's over-modulating and not airing EAS tests, and that it has not posted the necessary notification of pending FCC Applications on its website. This lack of candor, as well as blatant and continued disregard for FCC rules and regulations makes Cadena Radial Remanente unsuitable as a licensee, and for that reason I ask that their application for license renewal be promptly dismissed, as it is not in the public interest that it be granted.

Sincerely,



Garry Wing



To: The Federal Communications Commission

I, Garry Wing, hereby state as follows:

1. I am the sole principal of Desert Broadcasters LLC ("Desert"), licensee of FM translator K256CU (99.1 Mhz) (Facility ID 150758), Palm Springs, CA, which rebroadcasts Desert's AM Station KKGX (Facility ID 67355). I am providing this statement to the FCC in support of Desert's interference-based complaint that LPFM Station KZLQ-LP (98.9 Mhz) (Facility ID 195343), La Quinta, CA, licensed to Cadena Radial Remanente ("Cadena"), is operating in excess of its licensed power and, as a result, is causing interference to the reception of adjacent-channel K256CU.
2. Around the beginning of 2018, Desert began to get a few phone calls and emails from listeners of K256CU who asked about problems with our signal. After several similar calls, in which listeners described a "scratchy" sound or audio "dropping out", we were able to pinpoint the actual cause of the problem. It was not a problem with our translator's operations; it was an interference issue caused by KZLQ-LP, on adjacent 98.9 Mhz.
3. After "driving" the K256CU/99.1Mhz signal and noting how KZLQ-LP was covering and interfering with it, I surmised that KZLQ-LP likely was operating in excess of its licensed 3-watts ERP. On 9/20/18 I telephoned KZLQ-LP's FCC attorney of record, Dan Alpert, and had a brief discussion with him. He was apologetic, said they were new station operators, and that he would reach out to the station and get back to me. Although I did not receive any communication from him after my phone conversation with him, I did notice that the interference to the reception of K256CU stopped for approximately 6 weeks after my phone conversation with Mr. Alpert. However, the interference-free reception of K256CU was short-lived.
4. In the months since the short-lived hiatus from interference, KZLQ-LP has repeatedly operated with excess power (as verified by a signal monitor in Palm Springs, 14 miles from the KZLQ-LP transmitter site), and has consistently over-modulated, splattering on both sides of 98.9, and adversely affecting reception of Desert's FM Translator K256CU/99.1.
5. Cadena operates KZLQ-LP with a remote-controlled Nautel VS300 transmitter, and by doing so, I believe it changes KZLQ-LP's operating power at various times. I often listen from the same locations --- my residence, my stations' studios, my car route between home and the studios --- and notice that KZLQ-LP's signal is stronger during certain hours of programming.
6. A few months ago, I reached out to local broadcast engineer Bill Watson, and he concurred that KZLQ-LP should not be reaching Palm Springs and Cathedral City with its 3-watt ERP signal, as it currently is. I asked Watson to survey the KZLQ-LP transmitter site, measure the station's modulation and conduct and document field strength measurements. Mr. Watson's statement included with this complaint demonstrates that KZLQ-LP is not operating in compliance with its license.
7. Given the fact that after I notified KZLQ-LP's counsel that KZLQ-LP was causing interference to the reception of K256CU, the station only temporarily ceased to do so, I believe FCC enforcement action against KZLQ-LP is warranted. Further, I believe a significant monetary forfeiture up to potential license revocation should be considered because of Cadena's egregious conduct as a licensee. Indeed, that conduct has demonstrated that Cadena will not voluntarily operate KZLQ-LP within licensed parameters on an on-going basis.

I declare, under penalty of perjury, that the foregoing statement is true and correct to the best of my knowledge, information and belief.

Dated: 10-14-20


Garry Wing
Managing Member
Desert Broadcasters LLC
garry@920KGX.com



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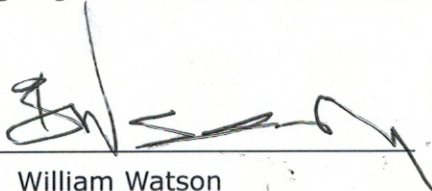
To: The Federal Communications Commission

I, William Watson, hereby state as follows:

1. I am a broadcast engineer with more than 30 years of experience. As a Chief Engineer, I've provided transmitter, studio and consulting engineering services to dozens of radio stations. I've also overseen build-outs for new and re-located broadcast facilities numerous times.
2. On 9-17-20, I conducted an external inspection of the transmitting facilities of Low Power FM Station KZLQ-LP (98.9 MHz) (Fac. ID 195343), La Quinta, CA, at the request of Desert Broadcasters LLC, licensee of FM Translator Station K256CU (99.1 MHz) (Fac. ID 150768), Palm Springs, CA. I was asked to do so because K256CU is receiving interference from KZLQ-LP. In that regard, I have confirmed that K256CU is operating within its licensed parameters.
3. At the KZLQ-LP facility, I observed an Andrew LDF4-50A 1/2" transmission line, approximately 35 - 40 feet in length, feeding an Armstrong FMA-707 antenna. KZLQ-LP is licensed to operate with an ERP of 3 watts. Based on my calculations, to achieve that ERP, KZLQ-LP should be operating with transmitter power output (TPO) of no more than 7.9 watts. However, the KZLQ license application (File No. BLL- 20180116ABJ) reported that the TPO is 15 watts. Notably, no data was provided to show how the TPO was calculated. (In my experience, most qualified engineers provide such calculations in license applications.)
4. I also conducted multiple field strength measurements of the KZLQ-LP signal, utilizing a Pira P275 FM Analyzer from an open area within line-of-sight of the transmitter site, (measurements are attached to this statement). I compared the KZLQ-LP measurements to those of FM Translator Station K226BT (Fac. ID 140886, 36 watts ERP), Indio, CA, which operates from an adjacent transmitter site as KZLQ-LP, and which I know to be operating within its licensed parameters.
5. Based on my observations and field strength measurements, I conclude that KZLQ-LP is operating well in excess of its licensed ERP, perhaps by a factor of as much as 8-10 times. I also believe that the TPO of 15 watts reported in the KZLQ-LP license application is erroneous. Finally, in addition to grossly exceeding its authorized ERP of 3 watts, I observed that KZLQ-LP is exceeding its 75 kHz deviation, and is operating in excess of 88kHz deviation.

I declare, under penalty of perjury, that the foregoing statement is true and correct to the best of my knowledge, information and belief

Dated: 10/13/20



William Watson
61150 Esparta Ave.
Whitewater, CA 92282
Tel: 760-409-4188
Email: bill@kppg.net

Field Strength Measurements --- 9-17-2020

Location: Showcase Parkway & Spectrum Street, Indio CA (33.742.162 / 116.224.765)
[3.6 nm – 168-degrees azimuth from transmitter site]

	<u>Monitor point #1</u>	<u>Monitor point # 2</u>
KZLQ-LP (98.9 Mhz – 3-watts ERP)	51-db	52-db
K222BT (93.1 Mhz – 36-watts ERP)	47-db	46-db