

January 7, 2022

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

## **INFORMAL OBJECTION**

**RE: FCC file number 0000167028 Calvary Chapel Morris Hills**

Dear Ms. Dortch:

Redeemer Broadcasting, Inc. (“Redeemer”) informally objects to the application for a new NCE-FM radio station, filed by Calvary Chapel Morris Hills (“Calvary”) (file number 0000167028). The Calvary application is included in FCC MX Group 145 along with an application filed by Redeemer.

**Calvary’s application was substantially incomplete and defective at the close of the NCE-FM filing window.**<sup>1</sup> Calvary’s application, at the close of the NCE-FM window, failed to address required compliance with 47 C.F.R. Section 73.525 of the Commission’s rules with respect to two affected TV-6 television stations: WRGB and WPVI.<sup>2</sup>

More than six weeks past the close of the filing window, Calvary finally completed its application by amendment with the addition of an extensive six-page TV-6 interference exhibit.

Acceptance of a substantially incomplete application, well after the close of a time sensitive blind filing window, would extend an unfair advantage to an applicant that essentially files an incomplete “skeleton” application and then, several weeks later, after evaluating other parties’ complete applications, invests additional resources into the creation of original technical exhibits to complete its application.

---

<sup>1</sup> “Applications must be filed between November 2, 2021, and November 9, 2021. The filing deadline will be strictly enforced. Applications submitted before November 2, 2021, or after the 6:00 pm EST November 9, 2021, application deadline (Application Deadline) will be dismissed by public notice without further consideration.” “Each applicant bears full responsibility for submitting an accurate, complete, and timely application.” DA 21-885, July 23, 2021

<sup>2</sup> “Broadcast Facility: The applicant must certify that the proposed facility complies with the Commission's engineering standards and assignment requirements for FM stations. See 47 CFR §§ 73.203, 73.207, 73.213, 73.315, 73.509, 73.515, and 73.525. An explanatory attachment is required to explain noncompliance with any of these rule sections” INSTRUCTIONS – FORM 2100, SCHEDULE 340 - NONCOMMERCIAL EDUCATIONAL STATION FOR RESERVED CHANNEL CONSTRUCTION PERMIT APPLICATION

For the reasons stated above, Redeemer objects to the completion of Calvary's application 0000167028 more than six weeks after the close of the NCE-FM filing window.

Sincerely,

  
Dan Elmendorf,

President and General Manager  
REDEEMER BROADCASTING, INC.  
PO Box 1520  
OLIVEBRIDGE NY 12461  
(845) 657-6239 Home, (845) 389-4436 Cell

Copy sent via U.S. Mail to:

Calvary Chapel Morris Hills  
James Keavney  
158 W. Clinton Street  
Dover NJ 07801