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April 26, 2022

**Via Email: James.Bradshaw@fcc.gov**

Mr. James Bradshaw  
Senior Deputy Chief, Audio Division, Media Bureau  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: Interference Complaint Letter Dated February 26, 2021 re KKOL(AM),  
Seattle, WA (Facility ID No. 20355) and Applications for Assignment and  
Renewal of KKOL(AM) License  
(File Nos. 0000150697 and 0000161926)**

Dear Mr. Bradshaw:

Intelli LLC ("Intelli"), licensee of radio station KKOL(AM), Seattle, WA, FCC Facility ID No. 20355 (the "Station"), and Inspiration Media, Inc. ("Inspiration"), the proposed assignee of the Station (together with Intelli, the "Parties") hereby supplement the response to the above-referenced letter dated February 26, 2021 (the "Letter") regarding blanketing interference complaints filed pertaining to the Station. We ask that you resolve this matter so as to facilitate expeditious grant of the long-pending KKOL assignment (File No. 0000150697) and renewal (File No. 0000161926) applications. As the Parties have demonstrated, they have acted in good faith and in accordance with the Commission's rules. Further, there is no reasonable basis upon which either the renewal or assignment applications should be denied.<sup>1</sup> During its tenure as licensee, Intelli has in good faith acted to resolve successfully the blanketing interference complaints that were the subject of your letter as well as those complaints the Station has received from the date of the initial response through the present. Moreover, Inspiration has assisted Intelli in these efforts and has pledged to work with the Commission on any legitimate complaints involving blanketing interference by KKOL once it acquires the Station.

As you are aware, various individuals, including David and Andrea Knight (who filed one of the initial complaints), as well as the City of Bainbridge Island, WA, have challenged the pending assignment application for the Station and/or its renewal application on grounds tied to the alleged blanketing interference complaints. For over a year, Mr. and Mrs. Knight and certain of their neighbors have seen fit to engage in a seemingly never-ending cycle of complaints to

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<sup>1</sup> See the Parties' Joint Opposition to Informal Objection and Request for Expedited Consideration in connection with the pending assignment application, Pleading File No. 0000160323 (filed Sept. 24, 2021); see also Intelli's Consolidated Opposition to Petitions to Deny in connection with the pending renewal application, Pleading File No. 0000184567 (filed Feb. 7, 2022).

the Commission alleging blanketing interference or unauthorized operation, some filed as recently as this month, now in the context of the assignment or the renewal applications. Many of these complaints have been lodged without any prior communication to the Station about the nature of the problem or a request for Station action. Since the summer of 2021, Station engineering personnel have maintained detailed logs of complaints made known to the Station by residents living near the KKOL site, including subsequent Station communications and visits with the complainants and efforts by Station engineers to resolve the issues. Based on these records, the Parties have determined that of the more than forty resident individuals or households that have either submitted or given declarations in support of filings against the assignment and/or renewal applications, only eleven have contacted the Station to seek relief.

Moreover, residents have peppered the FCC with declarations and objections that reflexively attribute a host of various device issues to “blanketing interference,” without serious analysis of the Commission’s actual blanketing interference rules or the standards for complying with those rules. A number of the complaints have asserted legitimate blanketing interference issues -- virtually all of these (and many problems with devices not technically covered by the rules) have been resolved (free of charge) by installation of RF chokes. Station engineers have determined that a number of other alleged instances of “blanketing interference,” however -- for example, slow Internet, a malfunctioning bike charger, a non-working home generator -- were not caused by KKOL’s RF emissions. Other objections or supporting declarations are simply regurgitations of previously lodged complaints that the Parties have already successfully resolved. And of late, certain residents seem to have adopted a practice of filing correspondence in LMS virtually every time they encounter an irregularity with a device in their homes. The Knights, for instance, have made no fewer than seven different submissions in the docket of the KKOL renewal application since the first of the year (including one earlier this month). Yet, Station engineers have made exhaustive efforts over the past ten months to address the Knights’ many and varied complaints and are confident that the Knights’ continuing grievances, ranging from malfunctioning computer monitors and keyboards to slow internet speed to allegedly “corrupted” computer data, are not a result of KKOL’s transmissions.

Indeed, the Parties have made their technical people available to each and every person who has communicated with the Station about potential interference. As noted above, in numerous cases, installation of RF chokes has resolved the problems. In many instances, RF interference had nothing whatsoever to do with the complained of problem -- yet the Parties assisted in identifying the cause and finding a resolution for the complainants in any event. Indeed, according to the Station’s records of contacts and remedial efforts, Station personnel have found it necessary to have contact with only three complainants (none of them new) since the beginning of this year.

The Parties have acted in good faith, in accordance with the Commission's rules, and as good neighbors. KKOL relocated to Bainbridge Island after its operation at two prior sites raised concerns of worker safety at nearby industrial areas. Inspiration (the station's prior owner) did not develop a new parcel of land as a relocation site; instead, it proposed to "triplex" KKOL with two other AM stations at an existing site. Thus, KKOL's operation at Bainbridge Island serves important public policies of co-location of transmitter sites; mitigating worker safety; land conservation and environmental protection; and operation of an AM broadcast transmission facility there is not new. Yet the Parties have acknowledged the concerns of neighbors and, as discussed above, have been extraordinarily responsive (and, the Parties believe, generally successful) in resolving residents' complaints of interference (meritorious or not).

Notwithstanding the stream of objections from nearby residents and the City of Bainbridge Island, there is not a single legal basis for the FCC to continue to withhold action on the KKOL assignment and renewal applications. As the Parties have shown in their responses, no petitioner, objector, or complainant has challenged Inspiration's qualifications to acquire KKOL, Intelli's qualifications to sell it, or any aspect of the terms of the sale transaction. Nor have they made any semblance of a case for non-renewal of the Station's license under Section 309(k) of the Communications Act. Continued inaction on the initial interference complaints and the assignment and renewal applications has served only to empower those whose ultimate goal appears to be cessation of KKOL's operation altogether as they continue to waste the Commission's resources by filing redundant and often baseless claims.

Moreover, Intelli's financial position continues to deteriorate. As the Parties have informed the Commission previously, 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 a host of radio stations nationwide. Inspiration, therefore, is well-positioned to work with complainant parties and the Commission to continue to address any complaints that are, in fact, tied to KKOL's operations. Commission approval of KKOL's sale will in no way affect the rights of those who wish to bring complaints about the Station's operations, and Inspiration, as the proposed assignee, is willing to accept a condition to that effect as a prerequisite to the consummation of the transaction.

For all of the above reasons, the Parties respectfully submit that the public interest would best be served by swift Commission action with respect to this investigation and grant of the renewal and assignment applications.

Sincerely,

/s/

Dan J. Alpert  
Counsel to Intelli LLC

A handwritten signature in dark ink, appearing to read 'Kathleen A. Kirby', with a stylized, sweeping flourish extending to the right.

Kathleen A. Kirby  
Gregory L. Masters  
Counsel to Inspiration Media, Inc.

cc: Richard Weaver  
Diana Trump  
Nancy and Steve Paul  
Leah Applewhite  
Scott Woodworth  
David and Andrea Knight  
Debra Marie Robert  
Eileen Nicol  
Denise Pajak  
Christine E. Spencer