

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC

22 November 2019

Application of )  
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RADIO TRAINING NETWORK, INC. ) FRN 0001843341  
For Translator Station Renewal ) FCC File No. 0000082139  
Lead Call Sign W300CY, Lake Wales, FL )  
Lead Facility ID 145128 )

To: Marlene H. Dortch, Secretary  
Federal Communications Commission  
Attn: Media Bureau, Audio Division

**INFORMAL OBJECTION**

Triangle Access Broadcasting, Inc. (“Triangle”), pursuant to 47 C.F.R. §73.3587, objects to a full grant of the above-referenced application. On September 25, 2019, Radio Training Network, Inc. (“RTN”) submitted the referenced application (“Application”) for renewal of FM translators W300CY (Facility ID 145128), W242AK (Facility ID 76167), W240DB (Facility ID 76209), and W291AG (Facility ID 76175) (collectively, the “translators”). Triangle objects because W240DB is a same-area translator that is not licensable.<sup>1</sup>

As shown in Exhibit A, 57% of the W240DB service area is common with the area served by W291AG and W300CY. Exhibit B shows that each of the translators carry the same “The JOY FM” programming. Specifically, Exhibit B shows the station's webpage showing the simulcast on four translators serving Auburndale, Winter Haven, Lakeland, Haines City and Lake Wales. These are all communities in Polk County, Florida where the translators are also all located. These FM frequencies

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<sup>1</sup> 47 C.F.R. § 74.1232(b).

match to W300CY at 107.9 MHz, W242AK at 96.3 MHz, W240DB at 95.9 MHz, and W291AG at 106.1 MHz. Triangle is not aware that a technical need has ever been demonstrated to justify the multiple translators.

It was RTN's responsibility to declare its same-area translator. RTN was the original applicant for each of the translators, and form FCC 349 requires an applicant to certify that it does not have any interest in an FM translator that serves substantially the same area with the same programming.

The Bureau should allow the license for unwarranted W240DB to expire. Alternatively, RTN could amend its Application to either demonstrate a technical need for its translators or withdraw another facility such that W240DB would be licensable with less than 50 percent common service area to other translators, however RTN must be held accountable for its failures to disclose a same-area translator and its subsequent operation.

Respectfully Submitted,



Steven L. White

Director; *Triangle Access Broadcasting, Inc.*

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