

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of:)
Radio Training Network, Inc.)
) FCC Pleading No. 0000090921
)
Applications for License Renewal:)
Translators W2300CY, Lake Wales, FL;) FCC File Nos. 0000082139
W242AK, Lakeland, FL; W24ODB,)
Auburndale, FL; and W291AG, Highland)
City, FL)

To: The Office of the Secretary
Attn: Chief, Media Bureau (Audio Division)

OPPOSITION TO INFORMAL OBJECTION

Radio Training Network, Inc. (“RTN”), licensee of FM Translators W300CY (Facility ID No. 145128), W242AK (Facility ID No. 76167), W24ODB (Facility ID No. 76209), and W291AG (Facility ID No. 76175) files this Opposition to the Informal Objection filed by Triangle Access Broadcasting, Inc. (“Triangle”). Triangle asserts that the license of W240DB is in violation of rule 74.1232(b) because “57% of the W240DB service area is common with the area served by W291AG and W300CY.”¹ Triangle’s Informal Objection should be denied. Triangle’s claim that RTN failed to demonstrate a technical need for its translators is time-barred. More importantly, RTN has filed a minor amendment reducing the overlapping coverage with W240DB to less than 50%.

¹ Triangle Informal Objection at page 1.

A licensee can own more than one translator with the same programming provided there is no more than 50% overlapping coverage.² If a licensee can demonstrate a technical need then there is no limit in the coverage. RTN's W300CY overlaps W240DB by 10.5% and W291AG overlaps W240DB by 43.7% for a total of 54.2 %. See Exhibit 1. Based on this de minimis 4.2 % over the 50% threshold, Triangle asserts RTN is in violation of the rule for failing to demonstrate a technical need. However, all these translators have been licensed for years and Triangle's late raised objection is time barred. See *In re KGTL(AM), Homer, AK*, 31 FCC Rcd 10912, 2016 FCC LEXIS 3285 (F.C.C. September 30, 2016) ("Second, KSRM contends that Peninsula stations K292ED and K285DU violate the requirement that an applicant for more than one FM translator proposing to serve the same area provide a showing of technical need [citing 47 CFR §74.1232(b)]. The original permits for these translator stations were granted in 1986 and 1979, respectively, and are long since final. Therefore, we find this argument untimely and do not consider it further here.")

Furthermore, RTN has filed a minor modification application to modify the facilities of W300CY to reduce the coverage overlap with W240DB from 4.2 % to 1.7 %. See Exhibit 2. Triangle's Objection is now moot since the total coverage overlap is 44.9%. See *John Jason Bennett*, Letter, 20 FCC Rcd 17193, 17194 (MB 2005), finding that a Section 74.1232(b) issue was resolved by modifying the relevant construction permit to "eliminate the vast majority of the contour overlap."

WHEREFORE RTN respectfully requests that the Informal Objection filed by Triangle be denied.

² See *Eastern Airwaves, LLC and FM 102.9 LLC - FCC-18-89A1* (2018): "Accordingly, we affirm the Bureau's interpretation of "substantially the same area" as a greater than 50 percent overlap."

Respectfully submitted,

RADIO TRAINING NETWORK, INC.

A handwritten signature in black ink, appearing to read "A Wray Fitch III". The signature is written in a cursive, somewhat stylized font.

A. Wray Fitch III

Its Attorney

Gammon & Grange, P.C.

8280 Greensboro Drive, Suite 140

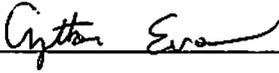
McLean, VA 22102

Dated: December 20, 2019

CERTIFICATE OF SERVICE

I, Cynthia Evans, in the law offices of Gammon & Grange, P.C., do hereby certify that a copy of the foregoing Informal Objection was served by first class mail of the United States Postal Service, postage pre-paid, on this 20th day of December 2019, on the following:

Steven L. White, Director
Triangle Access Broadcasting, Inc.
7813 Highlandview Circle
Raleigh, NC 27613-4109



Cynthia Evans

EXHIBIT A

W240DB Contour Overlaps and Percent Overlap

Radio Traning Network Translators in Polk County FL 60 dbu 50:50 Contours

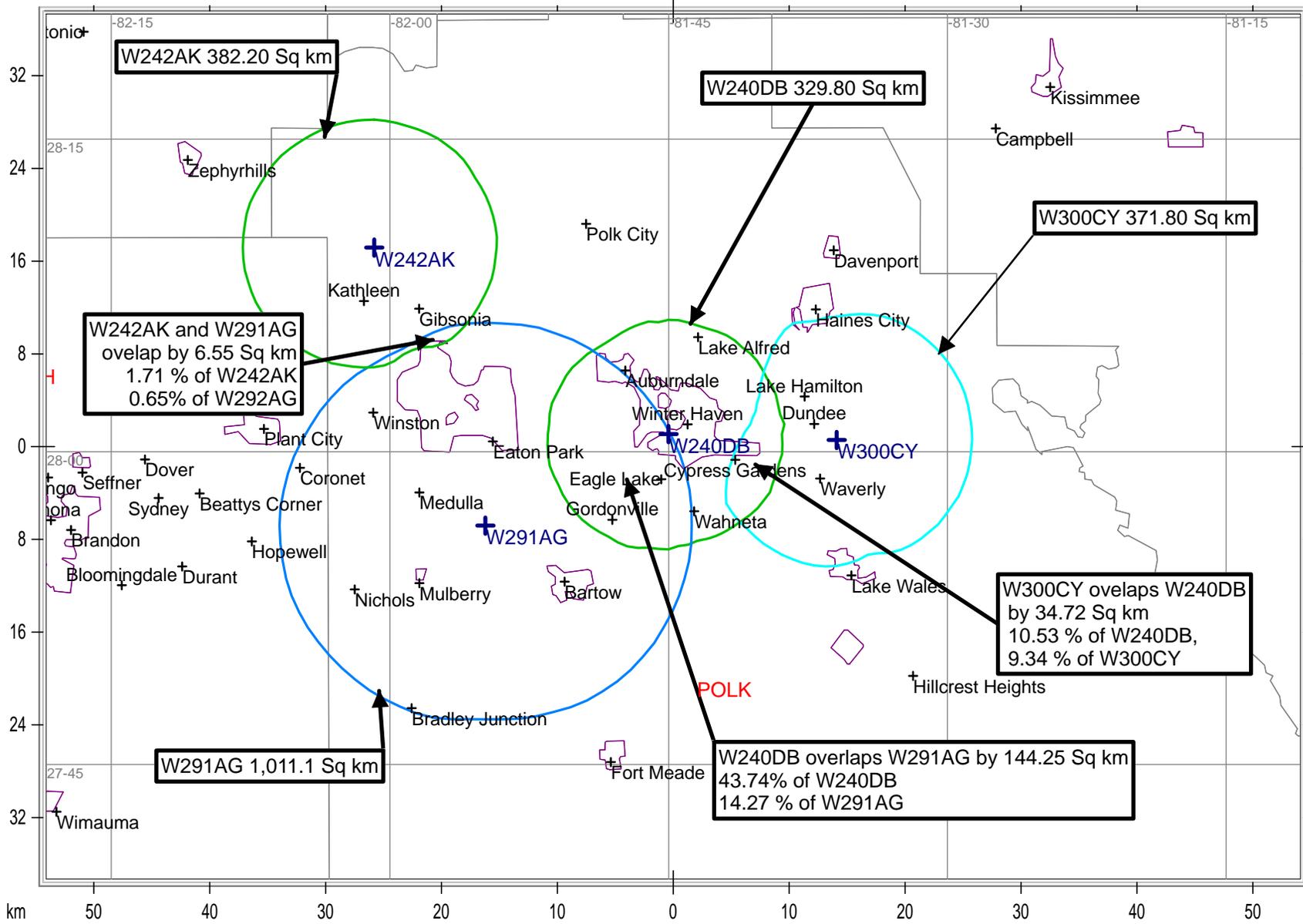


EXHIBIT B

Minor Modification of Licensed Facility Application for W300CY (Date Submitted: 12/16/2019)

and

Map of W300CY-W240DB Overlap Service Area



(<http://www.fcc.gov>)

Licensing and Management System

FRN: 0001843341 | [Search \(/dataentry/public/tv/...](#) [Log Out \(/dataentry/j_spring_security_logout\)](#)

Minor Modification of a Licensed Facility for FM Translator Application

Application Submitted

Approved by [OMB \(Office of Management and Budget\)](#) 3060-0027 September 2014

[FAQ \(/dataentry/api/download/faq\)](#)

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Your application has been submitted for processing.

- Please pay any **fees** associated with this application.
- Use the assigned **File Number** when referencing this application in the future.
- The progress of this application can be tracked on the **Applications** page.

Application Summary

File Number:

0000093500

Application Purpose:

Minor Modification

Status:

Pending

Date Submitted:

12/16/2019

Applicant Information

Name:

RADIO TRAINING NETWORK, INC.

Title:

Address:

PO Box 7217
LAKELAND, FL 33807
United States

Phone:

+1 (863) 644-3464

Email:

GOSRAD@AOL.COM

Fees, Waivers, and Exemptions

Exempt from FCC Application Fees?

Yes

Exempt from FCC Regulatory Fees?

Yes

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Federal Communications Commission

445 12th Street SW

Washington, DC 20554

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Open Government Directive (<http://www.fcc.gov/open>)

Plain Writing Act (<http://www.fcc.gov/encyclopedia/plain-writing-fcc>)

2009 Recovery and Reinvestment Act (<http://www.fcc.gov/encyclopedia/american-recovery-and-reinvestment-act-2009>)



(REFERENCE COPY - Not for submission)
 Minor Modification of a Licensed Facility for FM Translator
 Application

File Number: **0000093500** | Submit Date: **12/16/2019** | Lead Call Sign: **W300CY** | FRN: **0001843341**
 Service: **FM Translator** | Purpose: **Minor Modification** | Status: **Pending** | Status Date: **12/16/2019** | Filing Status:
Active

General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	No

Fees, Waivers, and Exemptions

Section	Question	Response
Fees	Is the applicant exempt from FCC application Fees?	Yes
	Indicate reason for fee exemption:	Non Commercial Not-for-profit Licensee
	Is the applicant exempt from FCC regulatory Fees?	Yes
Waivers	Does this filing request a waiver of the Commission's rule (s)?	No
	Total number of rule sections involved in this waiver request:	

Applicant Information

Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
RADIO TRAINING NETWORK, INC. Doing Business As: RADIO TRAINING NETWORK, INC.	James L campbell PO Box 7217 LAKELAND, FL 33807 United States	+1 (863) 644- 3464	GOSRAD@AOL. COM	Company

Contact Representatives (2)

Contact Name	Address	Phone	Email	Contact Type
A Wray Fitch , III . GAMMON & GRANGE, P.C.	8280 GREENSBORO DRIVE, 7TH FLOOR MCLEAN, VA 22102 United States	+1 (703) 761- 5013	AWF@GG-LAW. COM	Legal Representative
TED MCCALL Radio Training Network, Inc.	2420 WADW HAMPTON BLVD GREENVILLE, SC 29615 United States	+1 (864) 292- 6040	TEDM@HISRADIO. NET	Technical Representative

Legal Certifications

Section	Question	Response
Obligations	Licensee/Permittee certifies that all terms, conditions, and obligations set forth in the underlying construction permit have been fully met.	

	Licensee/Permittee certifies that, apart from changes already reported, no cause or circumstance has arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect.	
Character Issues	<p>Applicant certifies that neither the applicant nor any party to the application has or had any interest in, or connection with:</p> <p>(a) any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or</p> <p>(b) any pending broadcast application in which character issues have been raised.</p>	Yes
Adverse Findings	Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any laws related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	Yes
Program Service Certification	Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.	Yes
Local Public Notice	Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	
Equal Employment Opportunity (EEO)	If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report.	N/A
Operational Compliance	Applicant certifies that it is not the licensee or permittee of the commercial primary station being rebroadcast and that neither it nor any parties to the application have any interest in or connection with the commercial primary station being rebroadcast? See 47 C.F.R. Section 74.1232(d).	
	Applicant certifies that the FM translator's (a) 1mV/m coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 1mV/m coverage contour is contained within the greater of either: (i) the 2 mV/m daytime contour of the commercial AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the commercial AM primary station's transmitter site.	
Support Compliance	The applicant, if for a commercial FM translator station with a coverage contour extending beyond the protected contour of the commercial primary station being rebroadcast, certifies that it has not received any support, before or after constructing, directly or indirectly, from the licensee /permittee of the primary station or any person with an interest in or connection with the licensee or permittee of the primary station, except for technical assistance as provided for under 47 C.F.R. Section 74.1232(e).	N/A
Rebroadcast Certification	For applicants proposing translator rebroadcasts that are not the licensee of the primary station, the applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted.	Yes
Station Ready for Operation	Applicant certifies that station is now in satisfactory operating condition and ready for regular operation.	

Programming	The applicant certifies that it is the licensee of the primary station or the applicant certifies that written authority has been obtained from the licensee of the primary station whose programming is to be retransmitted.	
Eligibility Certifications	The applicant certifies that it is a:	
	If the applicant is submitting multiple applications, is this application the "priority" application? See Creation of a Low Power Radio Service, Memorandum Opinion and Order on Reconsideration, 15 FCC Rcd 19208, 19239-40, 79-80, paras. 79-80 (2000).	
	The applicant certifies that the Commission has previously granted a broadcast application identified here by file number that found this applicant qualified as a noncommercial educational entity with a qualifying educational program, and that the applicant will use the proposed station to advance a program similar to that the Commission has found qualifying in applicant's previous application.	
	The applicant certifies that its governing documents (e.g., articles of incorporation, by-laws, charter, enabling statute, and/or other pertinent organizational document) permit the applicant to advance an educational program and that there is no provision in any of those documents that would restrict the applicant from advancing an educational program or complying with any Commission rule, policy, or provision of the Communications Act of 1934, as amended.	
Community-Based Criteria	Applicants must certify that they are local to be eligible for LPFM authorizations. An applicant must select "yes" to at least one of the certifications below to be eligible for an LPFM license. The applicant certifies that: it is a nonprofit educational institution or organization that is physically headquartered or has a campus within 16.1 kilometers (10 miles), if applicant is in the top 50 urban markets, or 32.1 kilometers (20 miles) if applicant is outside the top 50 urban markets, of the proposed transmitting antenna site set forth in this application	
	it is a nonprofit educational institution or organization that has 75 percent of its board members residing within 16.1 kilometers (10 miles), if applicant is in the top 50 urban markets, or 32.1 kilometers (20 miles) if applicant is outside the top 50 urban markets, of the proposed transmitting antenna site set forth in this application	
	it is a Tribe and its Tribal Lands, as that term is defined in Section 73.7000 of the Commission's rules, are within the service area of the proposed LPFM station; or it is a Tribal organization owned or controlled by a Tribe (or Tribes) and such Tribe's (or Tribes') Tribal Lands, as that term is defined in Section 73.7000 of the Commission's rules, are within the service area of the proposed LPFM station. See 47 C.F.R. Sections 73.853(c) and 73.7000.	
	it proposes a public safety radio service and has jurisdiction within the service area of the proposed LPFM station.	
Ownership	The applicant certifies that: no party to this application has an attributable interest in any low power FM broadcast station	
	1. no party to this application has an attributable interest in any non-LPFM broadcast station, including any full power AM or FM station, FM translator station, full or low power television station, or any other media subject to the Commission's broadcast ownership restrictions	

	2. no party to this application has pending an application for a low power FM, full power AM or FM station, FM translator station, or full or low power television station;	
	the applicant is in compliance with the Commission's policies relating to media interests of immediate family members; and	
	the applicant is in compliance with the Commission's policies relating to investor insulation and the non-participation of non-party investors and creditors.	
Unlicensed Operation	The applicant certifies, under penalty of perjury, that neither the applicant nor any party to the application has engaged in any manner, individually or with other persons, groups, organizations, or other entities, in the unlicensed operation of any station in violation of Section 301 of the Communications Act of 1934, as amended, 47 U.S.C. Section 301.	
Financial	The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.	
Holding Period Certifications	Applicant certifies that this application does not propose a modification to an authorization that was awarded on the basis of a preference for fair distribution of service pursuant to 47 U.S.C. Section 307(b).	
	Applicant certifies that this application does not propose a modification to an authorized station that received a credit for superior technical parameters under the point system selection method in 47 C.F.R. Section 73.7003.	
Fair Distribution of Service Pursuant to 47 U.S.C. Section 307(b)	Applicant certifies that the proposed station will provide a first rural (reception) service.	
	Applicant certifies that: (a) it is a Tribal Applicant, as defined in 47 C.F.R. Section 73.7000; (b) the facilities proposed in this Application will provide Tribal Coverage, as defined in 47 C.F.R. Section 73.7000, of Tribal Lands occupied by the applicant Tribe(s); (c) the proposed community of license is located on Tribal Lands, as defined in 47 C.F.R. Section 73.7000; and (d) the proposed facility would be the first local Tribal-owned noncommercial educational transmission service at the proposed community of license	
	Applicant certifies that the proposed station will provide a first noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour and (b) to a minimum of 2,000 people.	
	Applicant certifies that the proposed station will provide a second noncommercial educational aural service, or an aggregated first and second noncommercial educational aural service, to (a) at least 10 percent of the people residing within the station's 60 dBu (1 mV/m) service contour and (b) to a minimum of 2,000 people.	
Auction Authorization	If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.	

Tribal Priority – Threshold Qualifications	Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window?	
Petition for Rulemaking /Counterproposal to Add New FM Channel to FM Table of Allotments	This application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment. The petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.	

Channel and Facility Information

Section	Question	Response
Program Test Authority	The application is operating pursuant to automatic program test authority	
	The applicant is requesting program test authority	
Proposed Community of License	State	Florida
	City	LAKE WALES
	Channel	300
	Frequency	107.9
Facility Type	Facility Type	Commercial
Station Class	Station Class	D

Antenna Location Data

Section	Question	Response
Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1056603
Coordinates (NAD83)	Latitude	28° 00' 35.0" N+
	Longitude	081° 35' 57.0" W-
	Structure Type	TOWER-A free standing or guyed struct
	Overall Structure Height	131.1 meters
	Support Structure Height	121.9 meters
	Ground Elevation (AMSL)	68.6 meters
Antenna Data	Height of Radiation Center Above Ground Level	Horizontal:90 meters Vertical:90 meters
	Height of Radiation Center Above Average Terrain	Horizontal: Vertical:
	Height of Radiation Center Above Mean Sea Level	Horizontal:158.6 meters Vertical:158.6 meters
	Effective Radiated Power	Horizontal:0.1 Vertical: 0.1
	Transmitter Power Output	--
Proposed Allotment or Assignment - Coordinates (NAD83)	Latitude	--
	Longitude	--

**Antenna
Technical Data**

Section	Question	Response
Antenna Type	Antenna Type	Directional
Primary Station	Call Sign	WWRZ
	Facility ID	72687
	Frequency	98.3
	Channel	252
	Service Code	FM
	City	FORT MEADE
Delivery Method	State	FL
	Delivery Method	Via Other FX (W291AG)
	If Other, Please specify:	
Transmitting Antenna	Manufacturer:	Scala
	Model	Two CA2-FM/CP
	Antenna Number of Sections:	
	Antenna Spacing Between Sections:	

Directional Antenna Relative Field Value

Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.995	90	0.09	180	0.995	270	0.09
10	0.96	100	0.14	190	0.96	280	0.14
20	0.875	110	0.27	200	0.875	290	0.27
30	0.76	120	0.43	210	0.76	300	0.43
40	0.6	130	0.6	220	0.6	310	0.6
50	0.43	140	0.76	230	0.43	320	0.76
60	0.27	150	0.875	240	0.27	330	0.875
70	0.14	160	0.96	250	0.14	340	0.96
80	0.09	170	0.995	260	0.09	350	0.995

Additional Azimuths

Degree	Value
85	.08
355	1
265	.08
175	1

**Technical
Certifications**

Section	Question	Response
Environmental Effect	Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? (See 47 C.F.R. Section 1.1306)	No

Broadcast Facility	Does the proposed facility comply with the applicable engineering standards and assignment requirements of 47 C.F.R. Sections 73.203, 73.207, 73.213, 73.315, 73.509, 73.515, 73.525, and 73.1125?	
Contour Protection	Does the proposed facility request processing pursuant to the contour protection provisions of 47 C.F.R Section 73.215?	
Community of License Change - Section 307(b)	Is the application being submitted to change the facility's community of license? If 'Yes', an exhibit is required containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b))	
Proposal Compliance	Does the applicant certify that the proposal is for a fill-in translator or booster?	Yes
	Does the applicant certify that the proposal complies with Sections 74.1204, 74.1205, 74.1232, 74.1234 and 74.1235?	Yes
Interference	Does the applicant certify that the proposed facility complies with the engineering requirements of 47 CFR Section 73.807 (a) through (g), 73.825 and 73.827(a)?	
Transmitter Power Output	Does the operating transmitter power output produce the authorized effective radiated power?	
Constructed Facility	The facility was constructed as authorized in the underlying construction permit or complies with 47 C.F.R. Section 74.1251?	
Special Operating Conditions	Was the facility constructed in compliance with all special operating conditions, terms, and obligations described in the construction permit?	
Environmental	Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? (See 47 C.F.R. Section 1.1306)	

Certification

Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	

Authorized Party to Sign	<p>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</p> <p>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</p> <p>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND /OR FORFEITURE (U.S. Code, Title 47, §503).</p>	
	<p>I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.</p>	<p>James L Campbell <i>President</i></p> <p>12/16/2019</p>

Attachments

File Name	Uploaded By	Attachment Type	Description	Upload Status
<u>Directional Antenna Pattern.pdf</u>	Applicant	Technical Certifications	Directional Antenna Pattern	Done with Virus Scan and/or Conversion
<u>W300CY Channel seperation report Dec 2019.pdf</u>	Applicant	Technical Certifications	Channel Separation Report	Done with Virus Scan and/or Conversion
<u>W300CY Fillin Contour Map.pdf</u>	Applicant	Technical Certifications	Fill in Contour Map	Done with Virus Scan and/or Conversion
<u>W300CY-W240DB Overlap Service Area.pdf</u>	Applicant	Technical Certifications	Calculation of Overlapping Service area with W240DB	Done with Virus Scan and/or Conversion

Radio Training Network Inc.

P O Box 7217

Lakeland, Fl 33807-7217

W300CY

Same area service of translators W300CY, W240DB, and W291AG
With same Primary Station, WWRZ-HD3

W300CY has a small area of overlapping service with W240DB of 3.87 Sq km. This is 1.17% of the W240DB service area and 1.70% of the W300CY service area.

W240DB also has overlapping service with W291AG of 144.25 Sq km. This is 14.27% of the W291AG service area and 43.74% of the W240DB service area.

The modification of W300CY will result in W240DB having a total overlap of 148.12 Sq km (44.91 %) with other translators rebroadcasting WWRZ-HD3 as the primary station.

The 60 dbu 50:50 service contours, the area within, and area of overlap were calculated with ComStudy 2.2 using the FCC 30 sec. terrain data base.

Map of W300CY overlap with W240DB with same Programing

