

Albert David  
2632 Kenilworth Ave., Berwyn, IL. 60402  
708-921-8091

February 21, 2022

Federal Communications Commission  
Washington D.C. 20554

cc: The Law Office of Dan J. Alpert  
Sent via USPS to:  
2120 N. 21<sup>st</sup> Rd.  
Arlington, VA 22201  
and via email to: dja@commmlaw.tv

Re: World Federation of Pastors and Ministers of the Full Gospel, Inc.  
Application for new NCE FM Construction Permit  
File No. 0000167179  
Facility ID No. 768120  
Informal Objection

Good morning,

I am writing to file an informal objection to World Federation of Pastors and Ministers of the Full Gospel, Inc.'s application for a construction permit for a new Noncommercial Educational FM station in Country Squire Lake, Indiana.

In their application, World Federation of Pastors and Ministers of the Full Gospel, Inc. responded yes to the fair distribution of service question, certifying that the applied for station would “provide first noncommercial 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.” To establish their fair distribution position, the applicant claimed in its attachment titled “IN Country Squires Lake NCE-FM WhiteGray Statement.pdf” that 12,780 people (16.5% of the total population covered) would receive first noncommercial aural service and 53,790 people (69.5% of the total population covered) would receive second noncommercial aural service with an aggregate first & second service population of 66,570 (86.0% of the total population covered). They did not include a contour map to support these claims. These assertions are severe errors, as an analysis of the 2010 census data shows that the actual number who would receive first noncommercial aural service is far fewer than the number that the applicant claimed. An analysis of the 2010 census data also revealed its claimed aggregate first & second service population to be greatly inflated. Noncommercial educational FM stations whose 60 dBu (1mV/m) service contours overlap the proposed facility's include WJLR, WKJD, WOJC, WYGS, WAUZ, WUOL-FM, and WFPL.

As a result of these errors, the population figures that were supplied are unreliable and are not acceptable to use as support for establishing the applicant's fair distribution position. As such, the applicant's claims for first noncommercial aural service and aggregated first and second noncommercial educational aural service should be dismissed.

Sincerely,

A handwritten signature in black ink that reads "Albert David". The script is cursive and fluid, with the first letters of "Albert" and "David" being capitalized and prominent.

Albert David