

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In re Application of:)	
Intelli, LLC)	File No. 0000161926
For Renewal of License)	Facility ID No. 20355
For Station KKOL(AM))	PLEADING Nos. 0000178506, 0000180625,
Seattle, WA)	0000182809, 0000184566, and 0000184611

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

Date: February 22, 2022

**Response to
Intelli LLC's Consolidated Opposition to Petitions to Deny
Filed February 7, 2022**

We, David and Andrea Knight, hereby state the following under penalty of perjury.

The following is in response to Intelli, LLC's *Consolidated Opposition to Petitions to Deny* dated February 7, 2022 to our Petition to Deny and Declaration submitted on January 3, 2022 and subsequent Supplements filed January 21, 2022, January 29, 2022, February 7, 2022 and February 8, 2022.

1. Intelli failed to submit its Opposition to Petitions to Deny by the date required by FCC regulations. Section 73.3584(b) states "the times for filing such oppositions and replies shall be those provided in § 1.45 except that as to a Petition to Deny an application for renewal of license, an opposition thereto may be filed within 30 days after the Petition to Deny is filed" (emphasis added). Intelli was required to file their Opposition by end-of-day February 2, 2022. Instead, Intelli filed on February 7, 2022.

Since Intelli failed to file on time and also failed to request a waiver of the rule, the Opposition should not be accepted. The record should be noted as complete without their submission. We request the FCC order Intelli to immediately reduce power to a level that does not cause BLANKETING INTERFERENCE.

2. In the Intelli Opposition response they referred only to the three Declarants in the original Knight Petition to Deny dated January 3, 2022. The Supplements filed on January 21 and January 29 added 37 additional Declarants bringing the total to 39 valid complaints. Intelli ignored the fact that there are now 39 unique Declarants swearing under oath that their households are still experiencing BLANKETING INTERFERENCE. The BLANKETING INTERFERENCE is damaging a variety of household equipment and causing these households to spend money and time repairing or replacing the ruined equipment.

We are now aware of many more households that could be added to the Petition to Deny. The BLANKETING INTERFERENCE problem is far bigger than 39 households. The BLANKETING INTERFERENCE problem is serious and widespread. It appears to us that Intelli does not recognize the severity of the problem or has intentionally refused to admit its scope and scale.

The fact that Intelli in their Opposition response doesn't even acknowledge that the Petition to Deny includes 39 *household* Declarants proves they are intentionally obfuscating the significance of the BLANKETING INTERFERENCE problem. Intelli implies they have resolved the BLANKETING INTERFERENCE issues. This couldn't be farther from the truth. The problem is constant, considerable, and damaging.

Intelli's lack of commitment to solve the BLANKETING INTERFERENCE problems coupled with their refusal to even acknowledge the problem exists proves they are not acting in the public interest. We are the public. Intelli has continuously violated FCC Sections 73.88 and 73.318.

Section 73.88 states "The licensee of each broadcast station is **required** to satisfy *all reasonable complaints of BLANKETING INTERFERENCE* within the 1 V/m contour" (emphasis added). In Intelli's Opposition filing they did NOT state, imply or infer that any of the complaints were unreasonable. Therefore, even Intelli recognizes the BLANKETING INTERFERENCE complaints and Declarations are reasonable.

Consequently, the FCC **must require** the reduction in power, or turn off the power completely until all BLANKETING INTERFERENCE problems are resolved, and **must do so immediately**.

Consider the details described in the City of Bainbridge Island's Petition to Deny coupled with the experiences described in the *Knights et al* Petition to Deny with Supplements. Intelli has violated local building codes, twice. They reduced the power levels when they knew households were considering whether to prepare a Declaration complaint claiming it was for routine maintenance. They ignore the Declarants' clear and present problems.

Taken together, Intelli has demonstrated a pattern of abuse. They do not deserve to operate the KKOL (AM) radio station.

3. The attached Exhibit A is the list of the 36 Declarants not acknowledged by Intelli in their Opposition response. Please carefully review each Declarants' complaint previously submitted by us including ours and the two others submitted with ours. Each Declaration is provided under penalty of perjury.

It is our opinion that Inspiration Media/Salem Media and Intelli, LLC are overwhelmed by the BLANKETING INTERFERENCE, are being obstructionist as a defensive tactic, and have acted and are acting in bad faith. Individually and together, they are not good corporate citizens, and their actions are not in the public interest. They have not earned the right to benefit from a renewal of the Intelli license or sale of Intelli's license to Inspiration Media/Salem Media.

We request the FCC deny Intelli, LLC's renewal application. They have not met their obligation to resolve the BLANKETING INTERFERENCE caused by broadcasting at 50KW. Intelli has bungled their renewal application by missing the filing deadline, and by not resolving all reasonable BLANKETING INTERFERENCE problems.

Additionally, we request the FCC deny the sale of the Intelli, LLC license to Inspiration Media/Salem Media.

We hereby state these statements are true, correct and complete to the best of our knowledge and belief and are made in good faith.



David M. Knight



Andrea J. Knight

EXHIBIT A

Declarations

The following list of additional Declarants provided their complaints under oath.

1. David E. Schutz
2. Linda & Norman Bruce
3. Candace DeLeo and Mark Berger
4. Mike & Renae Matson
5. Keith Brofsky
6. Kenneth Woods & Cory Harris
7. Alan Funk
8. Christine Spencer & Clyde Hanson
9. Myra & Thomas Hudson
10. Deborah Baker
11. Linda Sohlberg & Marc Williamson
12. Debra & Jeffery Robert
13. Susan & Brian Putnam
14. Sylvia McNeely
15. Barbara Kittell
16. Marc & Brandi Marconi
17. Marina Smith
18. Jennifer & Clinton Pells
19. Sydney Thiel
20. Joel Soisson
21. Kathy & Paul Cooper
22. Marc Andre Kamber
23. Lisa Woods & Trevor Flake
24. Lisa & Bill Biscombs
25. Denise Pajak & Christi Brewer
26. Levi & Jen Larson
27. Hal Bringman
28. Kirk & Lee Robinson
29. Ryan & Thuy Lisa Mauer
30. Jacob & Melissa Bang-Knudsen
31. Joyce Bentley
32. Kim Wilkes
33. Paul & Suzann Demainew
34. Mark & Guinevere Maxwell
35. Kimberly Brown
36. Marisa Robba

CERTIFICATE OF SERVICE

I, David Knight, hereby certify that a copy of the "Response to Intelli LLC's Consolidated Opposition to Petitions to Deny dated February 7, 2022" was sent via email on February 22, 2022 and first class mail, postage prepaid on February 23, 2022 to the following:

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