

Kathleen A. Kirby  
202.719.3360  
kkirby@wiley.law



Wiley Rein LLP  
2050 M St NW  
Washington, DC 20036  
Tel: 202.719.7000

**wiley.law**

September 29, 2022

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 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)**

Inspiration Media, Inc. ("Inspiration"), the proposed assignee of radio station KKOL(AM), Seattle, WA, FCC Facility ID No. 20355 (the "Station"), hereby further supplements the responses filed by Inspiration and Intelli LLC ("Intelli") (the current licensee of the Station), with regard to the above-referenced matters and complaints filed pertaining to the Station. Inspiration is a wholly owned subsidiary of Salem Media Group, Inc. ("Salem"), one of the nation's leading broadcasters and a long-standing Commission licensee.

Salem again states for the record that it is well-aware of the blanketing and other interference complaints filed pertaining to the Station and has worked cooperatively with Intelli to address them for well over a year. Salem reiterates that, upon grant of the long-pending KKOL renewal (File No. 0000161926) and assignment (File No. 0000150697) applications (the "Applications"), Salem will step into Intelli's shoes and work with residents of the City of Bainbridge Island to resolve issues they experience with covered electronic equipment caused by blanketing interference from KKOL going forward. Salem also pledges to investigate and, insofar as is reasonable and feasible, assist Bainbridge Island residents with difficulties regarding non-covered devices that are alleged to be caused by KKOL's operation. Salem respectfully submits that no legal basis exists for designating the license for hearing or otherwise withholding grant of these applications and that further delay is serving only to exacerbate the financial distress of the current licensee without any countervailing public interest objective.

By an order of magnitude, Salem and Intelli have made every effort to work with members of the community to resolve issues with their electronic equipment they perceive to be caused by blanketing interference. Recently, Salem's team turned to a respected outside engineering consulting firm, Hatfield and Dawson, to obtain additional engineering expertise and an objective assessment of what problems truly could be the result of blanketing interference from KKOL. The statement of Stephen S. Lockwood, PE, PMP is attached as [Exhibit A](#). As Mr. Lockwood observes, this AM broadcast facility has existed at its present site for many years in compliance with local, state, and federal law. He states that the Station has resolved reported issues caused by RF interference and has also addressed numerous problems with non-RF devices, replacing consumer equipment at its own cost -- even though not obligated to do so under the Commission's rules -- in the interest of being a good neighbor. Further, Mr. Lockwood underscores that many of the issues residents have complained about (many of

which Intelli/Salem engineers have resolved) simply are not RF-related and are far outside the scope of the Commission's rules.<sup>1</sup>

The Commission's rules were designed to strike an appropriate balance between the interest attendant to preserving radio broadcast service to local communities and mitigating disruption to local residents choosing to live nearby. Salem has pledged to abide by both the letter and spirit of those rules once it becomes the licensee of KKOL. Finding resolutions as contemplated by the Commission's rules, however, is premised on coexistence of the radio station and the community, and this paradigm calls for cooperation among all parties.

That level of cooperation is what both Intelli and Salem have amply demonstrated through their actions. It has become increasingly clear that a handful of residents in the area will continue to lodge complaints with the Commission pertaining to "non-RF devices" that are not covered by the FCC's blanketing rules, and whether the problems they are experiencing are plausibly linked to blanketing interference or not. For the Commission to continue to delay action on a proposed transaction -- one that not only will preserve the status quo as far as responsiveness to complaints but also afford seller much-needed funds to invest in other of its struggling radio stations -- cannot be said to serve the public interest.

Salem again respectfully submits that the best course is to for the Commission to grant the renewal and to allow the sale of the Station to go through. Salem's Executive Chairman, Edward G. Atsinger III, has pledged that, once it is licensee of Station KKOL, Salem will comply with its obligations under the Commission's blanketing interference rules and, additionally, will work to assist the Knights and their neighbors in implementing reasonable and feasible solutions to diminish problems with non-covered devices that are found to be associated with KKOL's RF emissions.

---

<sup>1</sup> On August 22, 2022, David and Ann Knight, from whom the majority of complaints have been received, filed a response to Salem's letter to the FCC pledging the company's continued cooperation in resolving blanketing interference. Mr. and Mrs. Knight assert that the FCC's blanketing interference rule itself is insufficient and that KKOL should be held financially liable for myriad problems with their home electronics and car—problems they say they are "certain" the Station is causing. Mr. Lockwood's statement addresses these issues. Of course, the instant proceedings involving the renewal and assignment applications for KKOL are not the appropriate forum of implementing revisions to the Commission's blanketing interference rules. Moreover, as the Commission is aware, the Intelli/Salem team has made repeated visits to the Knights' home and corrected issues both related and unrelated to blanketing interference in good faith. In addition, on September 2, 2022, the Knights filed a letter on behalf of Denise Pajak and Christi Brewer asserting that difficulties with Zoom calls and a garage door opener were the result of blanketing interference from KKOL. Neither Ms. Pajak nor Ms. Brewer contacted the Station about this problem and so Intelli/Salem were unable to diagnose and offer a solution. The Intelli/Salem team has also been responsive to Mr. and Mrs. Tom Nicol, who filed a complaint on September 6, 2022.

In sum, Salem assures the Commission that upon grant of the Applications and consummation of the underlying transaction, it will continue to provide technical information and assistance to complainants. Salem urges the Commission to grant the Applications expeditiously.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Kirby". The signature is fluid and cursive, with a large initial "K" and "C".

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

cc: Dan J. Alpert, Esq.  
Scott Woodworth, Esq.  
Albert Shuldiner, FCC  
James Bradshaw, FCC  
David M. Knight  
Debra Marie Robert  
Eileen and Tom Nicol  
Denise Pajak  
Christine E. Spencer  
Richard Weaver  
Diana Trump  
Nancy and Steve Paul  
Leah Applewhite

**EXHIBIT A**

STEPHEN S. LOCKWOOD, PE, PMP

THOMAS M. ECKELS, PE  
THOMAS S. GORTON, PE

JAMES B. HATFIELD, PE  
BENJAMIN F. DAWSON III, PE  
ERIK C. SWANSON, PE, PMP  
DAVID J. PINION, PE  
STEPHEN PUMPLE, M.Eng, MBA, PMP  
CONSULTANTS

HATFIELD & DAWSON  
CONSULTING ELECTRICAL ENGINEERS  
9500 GREENWOOD AVE. N.  
SEATTLE, WASHINGTON 98103

TELEPHONE (206) 783-9151  
FACSIMILE (206) 789-9834  
E-MAIL hatdaw@hatdaw.com

MAURY L. HATFIELD, PE  
(1942-2009)  
PAUL W. LEONARD, PE  
(1925-2011)

27 September 2022

Scott Foster  
Senior Vice President of Engineering  
Salem Media Group  
4880 Santa Rosa Road  
Camarillo, CA 93012

Email: Scott Foster <Scott.Foster@SalemMedia.com>

RE: Blanketing Interference Issues at Bainbridge AM Broadcast Site

Dear Mr. Foster;

You have asked for my input about the operation of radio station KKOL (KKOL or the Station), which is triplexed on the historical AM transmitter site on Bainbridge Island and complies with all federal and local regulations. The use of this site for an AM broadcast facility pre-dates many of the other land uses in this area. The towers have not changed over the years and have been maintained and inspected as required. In 1957, this site was a rural area with few neighbors. The vast majority of the homes in the area have been built since that time. I understand that Inspiration Media, Inc., a subsidiary of Salem Media Group (Salem) is the proposed buyer of the Station, and that the Station's license renewal application and the application seeking consent to the assignment of the Station to Salem are being held by the FCC because of complaints filed by local residents alleging blanketing interference.

Areas near transmitter sites are subject to elevated Radio Frequency (RF) fields. Broadcast facilities produce RF fields designed to cast signal over a large area to provide the radio service that has been part of the expected public service and broadcasting business for the last 100 years. The FCC has requirements for dealing with RF interference (RFI) within the area close to the transmitter facilities. For AM radio, the area that exceeds RF fields of 1 V/m is subject to the FCC rules governing "blanketing interference." Those rules are as follows:

*47 CFR § 73.88 Blanketing interference.*

*The licensee of each broadcast station is required to satisfy all reasonable complaints of blanketing interference within the 1 V/m contour.*

*Note: For more detailed instructions concerning operational responsibilities of licensees and permittees under this section, see § 73.318 (b), (c) and (d).*

*47 CFR § 74.318 FM Blanketing interference.*

.....

*(b) After January 1, 1985, permittees or licensees who either (1) commence program tests, or (2) replace their antennas, or (3) request facilities modifications and are issued a new construction permit must satisfy all complaints of blanketing interference which are received by the station during a one year period. The period begins with the commencement of program tests, or commencement of programming utilizing the new antenna. Resolution of complaints shall be at no cost to the complainant. These requirements specifically do not include interference complaints resulting from malfunctioning or mistuned receivers, improperly installed antenna systems, or the use of high gain antennas or antenna booster amplifiers. Mobile receivers and non-RF devices such as tape recorders or hi-fi amplifiers (phonographs) are also excluded.*

*(c) A permittee collocating with one or more existing stations and beginning program tests on or after January 1, 1985, must assume full financial responsibility for remedying new complaints of blanketing interference for a period of one year. Two or more permittees that concurrently collocate on or after January 1, 1985, shall assume shared responsibility for remedying blanketing complaints within the blanketing area unless an offending station can be readily determined and then that station shall assume full financial responsibility.*

*(d) Following the one year period of full financial obligation to satisfy blanketing complaints, licensees shall provide technical information or assistance to complainants on remedies for blanketing interference.*

Under the rules, licensees are neither obligated to satisfy complaints regarding “non-RF devices” nor are they required to satisfy complaints that are “outside the realm of reasonableness”.<sup>1</sup> In my experience, as a practical matter, broadcasters have found that it is beneficial to be good neighbors and work with nearby residents to assess and resolve complaints of perceived interference, whether covered by the FCC’s blanketing interference rules or not.

In reviewing the record concerning the KKOL assignment and renewal applications, including the information the Station has logged about on-site visits with complainants, it appears that the licensee of KKOL, with Salem’s cooperation and assistance as the proposed buyer, has been investigating complaints it receives that are alleged to be caused by blanketing interference from KKOL and solutions have been provided to solve the electronic problems. I have spoken with David Raetner, Salem’s Seattle, WA market engineer, who has been assisting the Station’s licensee in responding to complaints. As I expect they would be, most of the issues that are in fact related to radiofrequency emissions from the KKOL antenna site have been resolved by adding RF filters on the affected device’s power and signal cables that are behaving as AM antennas. These filters are 3” ferrite toroids (aka “chokes”) around which the cables are coiled. Clamp-on toroids were also used in some cases. Both of these devices suppress the RF currents in the cables and were successfully deployed on electronic devices in 21 homes.

Notably, except for one radio and several garage door openers, all of the items that have been investigated, and equipment that has been replaced, have been “non-RF devices” that are not covered by the FCC’s blanketing interference rules. Even though not required to do so, KKOL has in numerous instances provided replacement non-RF devices to complaining residents, as listed below:

Name	Equipment Replaced
David Knight	Two new laptop computers One wireless keyboard and mouse One video monitor Ten RF chokes on various home appliances
Ken Woods	Two new computer speakers
Tom Nicol	New Power Line 240 VAC EMI filter for Wolf stove
Candace Deleo	One new electronic keyboard
Diana Trump	One new thermostat for the HVAC system

<sup>1</sup> FCC Docket 82-186 FM Broadcast Station Blanketing Interference, 8 November 1984 – Section 14.

In essence, based on my conversations with Salem engineering personnel and my review of KKOL's remedial efforts, it appears to me that the great majority of the difficulties being complained of are unrelated to blanketing interference and outside of the scope of the Commission's rules. As just one example, Bainbridge Island residents David and Andrea Knight recently complained to Salem that KKOL's operation had caused a malfunction in the Knight's HVAC system. Ultimately, the problem was traced to a circuit that had not been properly hooked up by the system installer.

Mr. Knight's recent problems with his Audi A3 Sportback e-tron hybrid automobile are further examples of difficulties where, in my view, it is far from clear that emissions from KKOL are the cause. Mr. Knight's alleged Audi problems included a malfunctioning charging system and doors which spontaneously locked and unlocked. As a threshold matter, it is unclear whether the charging system includes any sort of RF device which could be covered under the FCC rule. This 2016 Audi A3 Sportback e-tron, as with any modern vehicle, is a complex electro-mechanical system which can be subject to any number of design flaws, software bugs, and electrical system malfunctions<sup>2</sup>. I do not believe the vehicle's charging system should be susceptible to malfunction in elevated RF fields, but even if that were the case, I would consider it more likely attributable to a manufacturer design flaw and not fairly charged to KKOL's operation. As to spontaneous locking and unlocking of the vehicle, modern vehicles generally employ key fobs which contain small RF transmitters. Because Part 15 FCC rules include standards for emissions - transmitted interference - but not susceptibility to external RF emissions - received interference - (unlike, for example, European Union regulations<sup>3</sup>), the performance of devices such as key fobs in stronger RF environments is likely to vary widely depending on the device's design and quality. As these systems are inherent to the car's security system repairing and modifying them to be more tolerant of RF fields exceeds the ability of all but the vehicle's design engineers and factory personnel.

I was called to help investigate an RFI complaint at the residence of Mr. Nicol. The affected device was a Wolf stove and the control system was misbehaving when KKOL was on high power. This stove is a lovely device, and while very expensive, the designers of the electronic control system did not

---

<sup>2</sup> See, for example, the "e-tron Forum" website discussion board, with over 200 individual message threads regarding e-tron complaints, issues, and problems.

<https://www.e-tronforum.com/forums/e-tron-complaints-issues-and-problems.105/>

<sup>3</sup> 3 DIRECTIVE 2014/30/EU.

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014L0030&from=EN>

adequately design this for use in this environment. A licensed electrician installed an “off-the-shelf” RF filter. This solved the problem.

In general terms, we have found that most current production electronics are reasonably tolerant of RFI. Digital systems are inherently more tolerant of interfering signals than analog, and as the vast majority of current devices are digital, this has become less of a problem. This is a result of the requirement to have more robust design standards. Computers and other electronics operate at frequencies in the GHz range (AM radio operates around 1 MHz -1,000,000 cycles per second 1 GHz is 1,000,000,000 cycles per second). This requires the basic design of the device to be more robust and consider shielding, filtering, and other basic design considerations. This class of electronics is also designed to be sold worldwide and complies with the susceptibility standards of Europe. Wired internet devices use cables designed for higher frequency use and have been designed to reject unwanted signals. Wireless internet WIFI operates at 2.4 and 5.6 GHz frequencies that are well removed from the AM radio band. Home entertainment systems have become more reliant on WIFI for signal distribution, so they have become less susceptible to RFI. We encounter RFI problems in computer peripheral devices such as audio systems where the final product is an analog signal in a speaker. Power supplies and speaker cables behave as antennas and demodulate the AM signal. Electronic systems with distributed wiring, such as security systems, fire alarms, surveillance cameras, and other systems, can be troublesome when the wires behave as AM antennas. Not all electronic failures are caused by RFI. We have all become used to dropped cellphone calls and internet connection failure. There can be many sources of failure of internet connections that would cause a video streaming service to lock up or an internet conference connection to fail.

Unfortunately, users of electronic devices understand the frustrations of configuring and using modern electronic devices correctly, whether they be computers, security systems, or automobiles. In fact, there are many poorly-designed electronic devices available for sale in the United States. Not all problems with electronic equipment are caused by blanketing interference, and in my opinion, that is the case with the majority of the complaints that have been lodged with the FCC with respect to KKOL. Nevertheless, where an AM station is causing blanketing interference, the problem is usually easily remedied by adding RF filters (chokes) on the power cables and other connections to the device, such as the speaker cables. I understand that Salem, once the Commission approves the license transfer, remains willing to assist with all RFI complaints from the community.

---

This facility fully complies with all Federal, State, and local engineering requirements.

We have examined this facility and believe that it fully complies with all Federal, State, and local engineering requirements. Please let us know if there are any additional questions.

Sincerely,

Stephen S. Lockwood, P.E.

---

