

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC

31 October 2022

In re Application of	)
	)
CENTRO CRISTIANO DE VIDA ETERNA	) FRN 0017010596
	)
For Minor Modification of Licensed FM Translator	) FCC File No. 0000203006
Call Sign K223DH, Houston, TX	) Facility ID 148295

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 grant of the captioned application (“the application”). On October 28, 2022, Centro Cristiano de Vida Eterna (“CCVE”) submitted the application to modify licensed FM translator K223DH. Triangle objects because its grant would authorize a patently unnecessary same-area translator that cannot serve “the public interest, convenience and necessity.”<sup>1</sup>

In the application, proposes to move K223DH causing it to be co-located with K236AR (facility ID 142962). Daij Media, LLC's K236AR retransmits the same primary, KBRZ (AM, facility ID 12156) from the same site with a higher power from a higher elevation and a non-directional antenna.<sup>2</sup> It is readily apparent that K223DH would serve zero additional persons from this location. *A prima facie*

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<sup>1</sup> See 47 U.S.C. § 309(a) and 47 C.F.R. § 74.1233(c).

<sup>2</sup> See File No. BLFT-20130819AEK, a license granted March 18, 2014, indicating co-owned KBRZ as the primary station at it's Exhibit 4. See also File No. 0000141618, the 2021 license renewal still certifying KBRZ as the primary station.

lack of need now being established, the Bureau should require CCVE to demonstrate an actual technical need before authorizing the co-located station.

Multiple stations broadcasting the same programming to the same area results in an inefficient use of scarce spectrum. The Bureau should not authorize K223DH's duplication of K236AR.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steven L. White", with a long horizontal flourish extending to the right.

Steven L. White  
Director; *Triangle Access Broadcasting, Inc.*

7813 Highlandview Cir  
Raleigh, NC 27613-4109

## **Certification of Steven L. White**

I, Steven L. White, declare under penalty of perjury that I have reviewed the foregoing Informal Objection, and, to the best of my knowledge, the facts set forth therein are true and correct.

By: [Electronically Signed]\_\_\_\_\_  
Steven L. White

Dated: October 31, 2022

## Certificate of Service


I, Steven L. White, certify that a true and correct copy of the foregoing Informal Objection was sent, this 31st day of October, 2022, by first-class, postage paid mail to the following:

Martin Guevara  
Centro Cristiano de Vida Eterna  
8230 Antoine Dr  
Houston, TX 77088-2524

(Permittee/Applicant)

Dan J. Alpert  
The Law Office of Dan J. Alpert  
2120 21st Rd N  
Arlington, VA 22201-3602

(Counsel to Applicant)

By:   
Steven L. White