

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In Re Application of	)	
	)	File No. 0000214217
iHM Licenses, LLC	)	Facility ID No. 202298
	)	
For a License to Cover for	)	
FM Translator Station K221GV, Fort Worth, TX	)	

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

**REQUEST TO DELAY PROCESSING**

LKCM RADIO LICENSES, L.P. (“LKCM”), licensee of KTFW-FM, Glen Rose, TX, by its undersigned counsel, hereby submits its Request to Delay Processing (“Request”) the pending application of iHM Licenses, LLC (“iHM”) for a License to Cover K221GV, Fort Worth, TX.

With respect thereto, the following is stated:

1. Section 74.1204(f) of the Commission’s rules states, in relevant part:

(f) An application for an FM translator station will not be accepted for filing even though the proposed operation would not involve overlap of field strength contours with any other station, as set forth in paragraph (a) of this section, if grant of the authorization will result in interference to the reception of a regularly used, off-the-air signal of any authorized co-channel, first, second or third adjacent channel broadcast station, including previously authorized secondary service stations within the 45 dBu field strength contour of the desired station. Interference is demonstrated by:

- (1) The required minimum number of valid listener complaints as determined using Table 1 to § 74.1203(a)(3) of this part and defined in § 74.1201(k) of this part;
- (2) A map plotting the specific location of the alleged interference in relation to the complaining station's 45 dBu contour;
- (3) A statement that the complaining station is operating within its licensed parameters;
- (4) A statement that the complaining station licensee has used commercially reasonable efforts to inform the relevant translator licensee of the claimed interference and attempted private resolution; and

- (5) U/D data demonstrating that at each listener location the undesired to desired signal strength exceeds  $-20$  dB for co-channel situations,  $-6$  dB for first-adjacent channel situations or  $40$  dB for second- or third-adjacent channel situations, calculated using the methodology set out in paragraph (b) of this section.

47 C.F.R. § 74.1204(f). Station KTFW-FM operates as a Class C1 FM station on co-channel Channel 221.<sup>1</sup> LKCM is already aware of interference complaints from listeners within KTFW's  $45$  dB $\mu$  contour.<sup>2</sup> Documentation concerning these affected listeners will be filed as a supplement to this Request in the near future. That documentation will fully satisfy the documentation required for Section 74.1204(f) objections as set forth therein, specifically that:

- The required minimum number of listener complaints as set forth in Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference, Report and Order, 34 FCC Rcd 3457 (2019) (Report and Order) will be provided as noted above;
- A map plotting the specific location of the alleged interference in relation to KTFW-FM's  $45$  dBu contour.;
- A statement confirming KTFW-FM is operating within its licensed parameters;
- A statement that KTFW-FM has used commercially reasonable efforts to inform iHM of the claimed interference and attempted private resolution and - U/D data demonstrating that at each listener location the undesired to desired signal strength exceeds  $-20$  dB for co-channel situations, calculated using the methodology set out in paragraph (b) of Section 74.1204.

---

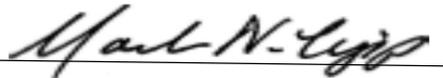
<sup>1</sup> The distance between KTFW-FM and K221GV is approximately 64.13 miles.

<sup>2</sup> Approximately 62,000 people live within the interference area.

2. In order to avoid the grant of an application that will adversely affect the operations of KTFW-FM and its existing listeners and service, pending the presentation to the Bureau of this additional evidence, it is requested that the iHM application for a License to Cover the K221GV Construction Permit be held in abeyance until the supplemental material can be submitted and reviewed.

Respectfully submitted,

LKCM RADIO LICENSES, L.P.

By: 

Mark N. Lipp  
Fletcher, Heald & Hildreth, PLC  
1300 N. 17<sup>th</sup> Street, Suite 1100  
Arlington, VA 22209  
703-812-0445  
[lipp@fhhlaw.com](mailto:lipp@fhhlaw.com)

April 28, 2023

**CERTIFICATE OF SERVICE**

I, Michelle Brown Johnson with Fletcher, Heald & Hildreth, PLC, hereby certify that on April 28, 2023, I mailed copies of the "Request to Delay Processing" via first class mail, postage pre-paid to the following:

Troy Langham  
VP, Technical Regulatory Affairs  
IHM Licenses, LLC  
7136 S. Yale Avenue  
Suite 501  
Tulsa, OK 74136

A handwritten signature in blue ink that reads "Michelle Brown Johnson". The signature is written in a cursive style and is positioned above a horizontal line.

Michelle Brown Johnson