

**Before the  
Federal communications commission  
Washington, District of Columbia 20554**

In re applications of:

Lotus Los Angeles Corp.	)		
For License to Cover	)		
For FM Translator K264CQ	)	File No.	BLFT-20170213ABM
Los Angeles, California	)	Facility ID:	141734

To: Chief, Media Bureau

**Revised Opposition to Petition for Reconsideration**

Lotus Los Angeles Corp., a California corporation (“**Lotus**”), licensee of FM Translator K264CQ, Los Angeles, California, Facility ID #141734 (the “**Translator**”), and AM Station KWKW, Los Angeles, California, Facility ID #38454, by its attorneys, opposes the May 1, 2017, Petition for Reconsideration (the “**Petition**”) filed by Ziggy Mrkich, who identifies herself as the Manager of KCLA-LP, 100.7 FM, San Pedro, California (“**KCLA**”). For the reasons specified below, the Petition is fatally deficient, procedurally and substantively, and should be dismissed out-of-hand.

1. As a threshold matter, the Petition is not entitled to consideration because it does not meet the requirements of Section 1.106 of the Commission’s rules.<sup>1</sup> These requirements speak for themselves, imposing procedural preconditions to filing a reconsideration request. For the reasons discussed in the Engineering Statement of Lohnes & Culver, LLC, attached as Exhibit A (the “**Engineering Statement**”), it is not clear how KCLA was able to broadcast from its licensed site at any time after the Translator began rebroadcasting.

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<sup>1</sup> 47CFR 1.106

In any event, KCLA is no longer broadcasting from that site and this change in circumstances makes the Petition moot.<sup>2</sup> Therefore, it should be dismissed.<sup>3</sup>

2. Substantively, it is not clear what type of entity the Petitioner is, where it was organized, or who its officers and directors are,<sup>4</sup> however, it does not appear to be the licensee of KCLA, which seems to be licensed to Civic Light Opera Cultural Arts Academy.<sup>5</sup> Therefore, since the Petition has no interest in KCLA the allowance of the application does no harm to the Petitioner.

3. As described in more detail in the Engineering Statement, it appears KLCA may never have broadcasted from its licensed location. KCLA's broadcasting from the antenna identified in its license does not seem technically feasible.<sup>6</sup> Further, the undersigned contacted T-Mobile, the identified owner of the tower, and T-Mobile confirmed that there has been no collocation on the tower at any time since at least 2016. Therefore, even assuming KCLA was broadcasting, it does not appear to have been doing so in compliance with its license, so it is not possible to determine whether the Translator was creating impermissible interference.

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<sup>2</sup> Petitioner filed a request for Special Temporary Authority to broadcast from a different site on May 9, 2017, which was granted that day. File Number: BSTA-20170503ABJ.

<sup>3</sup> 47 CFR 1.106(p)

<sup>4</sup> The Petition does not provide sufficient information about the Petitioner to determine its jurisdiction of formation. However, a search of the California Secretary of State's online entity database on May 9, 2017, indicates that this entity was not formed in California.

<sup>5</sup> The Petition states that it is filed by "broadcast licensee and petitioner Civic Light Opera of San Pedro, California, by its management" and the electronic form used to file the Petition indicates that the petitioner is KCLA LP FM. Further, the underlying license application lists Civic Light Opera Spiffest as the applicant. However, the FCC indicates that Civic Light Opera Cultural Arts Academy, which appears to be an entity organized in California, is the licensee.

<sup>6</sup> See, Affidavit of Jason Houts, attached as [Exhibit C](#).

4. The undersigned sent letters, copies of which are attached hereto as Exhibit C, to the persons identified in the Declarations attached to the Petition, and followed up with telephone calls, but has been unsuccessful in contacting any of these declarants to determine the exact nature of the interference they experienced, and whether it resulted from the Translator's operation. Lotus requests additional time for further attempts to contact these declarants and investigate their claims, and will make a supplemental filing to advise the FCC if any declarant responds by May 19, 2017, as requested in the letters.

**Wherefore**, Lotus respectfully submits that the Petition has no merit and should be dismissed or denied.

Respectfully submitted,  
**Lotus Los Angeles Corp.**

By: 

Eileen M. Breslin  
McLaughlin & Stern LLP  
1010 Northern Boulevard, Suite 400  
Great Neck, New York 11021  
516-467-5421  
Its attorneys

Engineering Statement

**TECHNICAL EXHIBIT  
RE: FM TRANSLATOR K264CQ  
FACILITY ID NO. 141734**

This technical exhibit was prepared on behalf of Lotus Los Angeles Corp. (“Lotus”), licensee of FM translator station K264CQ, Los Angeles, California, in support of its Opposition to the May 1, 2017 Petition for Reconsideration (the “Petition”) submitted by KCLA LP FM. KCLA LP FM is believed to be acting on behalf of Civic Light Opera Cultural Arts Academy, the licensee of low power FM (LPFM) radio station KCLA-LP (Facility ID No. 197367) (collectively “KCLA”).<sup>1</sup> The undersigned has reviewed the Petition and related materials and submits the following.

KCLA seeks reconsideration of the grant of Lotus’ license to cover application BLFT-20170313ABM. KCLA, in its petition, argues that impermissible interference is being caused to KCLA-LP. KCLA contends that the relocation of K264CQ creates a short-spacing to KCLA-LP and the constructed facility is not operating in accordance with the technical rules governing the use of directional antennas and station identification.

**BACKGROUND**

K264CQ is a new FM translator station. The original construction permit authorized the construction of a new station on Channel 241 in Oceanside, CA.<sup>2</sup> On

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<sup>1</sup> The Petition for Reconsideration states that “broadcast licensee and petitioner Civic Light Opera of San Pedro, California, by its management for KCLA-LP (“Petitioner”), hereby files this Petition for Reconsideration...” The electronic form used to file this document indicates that party filing the pleading is KCLA LP FM. Notwithstanding that the underlying license application for low power FM radio station KCLA-LP lists Civic Light Opera Spiffest as the applicant, the official station license issued by the FCC indicates that Civic Light Opera Cultural Arts Academy is the licensee of KCLA-LP. Further this entity is the registrant of Federal Registration Number (FRN) 0023-1323-01, which is the number currently associated with KCLA-LP.

<sup>2</sup> See BNPFT-20130823AAQ

July 29, 2016 Lotus submitted two applications, one for the assignment of the translator construction permit and another to change the translator's antenna location and channel.<sup>3</sup> The latter was filed in the second 250-mile modification window in connection with co-owned AM station KWKW in Los Angeles, CA.<sup>4</sup> There were no objections filed in connection with either of those applications and both were subsequently granted. Lotus further modified the translator construction permit to specify a different directional antenna on November 23, 2016.<sup>5</sup>

On February 13, 2017, Lotus filed a license application to cover the constructed facility and began operating under automatic program test authority.<sup>6</sup> The FCC granted the license application on February 22, 2017.

KCLA submitted the Petition on May 1, 2017 claiming that K264CQ causes impermissible co-channel interference to KCLA-LP within its normally protected 60 dBu contour. In support of that claim, KCLA provided letters from four listeners.

On May 3, 2017, KCLA filed a request for special temporary authorization (STA) to operate from a different antenna location.<sup>7</sup> In that request, KCLA indicated that KCLA-LP will resume operations at a location approximately 200 meters from the current licensed site until authority to permanently relocate the station is granted. On May 4, 2017, KCLA filed a second STA request for silent authority in which it was disclosed that the station had gone silent on April 30, 2017.<sup>8</sup> The FCC granted the first STA on May 9, 2017 and simultaneously dismissed the second as being moot. KCLA has not yet notified the FCC that operations have resumed at the interim location specified in the first STA.

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<sup>3</sup> See BAPFT-20160729AHQ and BMPFT-20160729AMU

<sup>4</sup> Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools, Public Notice, 30 FCC Rcd 14690 (MB 2015).

<sup>5</sup> BMPFT-20161123ABC

<sup>6</sup> See BLFT-20170313ABM. Also see 47 C.F.R. § Section 74.14(a) Service or Program Tests.

<sup>7</sup> See BSTA-20170503ABJ

<sup>8</sup> See BLSTA-20170504ABK

## DISCUSSION

### 1. **FM Translator K264CQ Cannot Cause Impermissible to Another Secondary Service Station That Has Gone Silent and Reportedly Vacated its Licensed Site.**

In the Petition, KCLA states that K264CQ is causing impermissible co-channel interference within the protected 60 dBu contour of KCLA-LP. In support of its claim, it provided a boiler-plate letter from four listeners. On May 2, 2017, Lotus sent an engineer to the area to check for interference. Lotus' engineer not only discovered that KCLA-LP is not on-air, but also that there is no FM antenna installed at the licensed transmitter site. Figure 1 is a photo taken by Lotus' engineer that shows the FCC registered structure referenced on KCLA-LP's license, which is a utility pole registered to T-Mobile West LLC.<sup>9</sup> It was confirmed by T-Mobile that aside from the two cellular antennas that are visible in the photo, there are no other collocated antennas on the pole.

Lotus' engineer also found that there is no space on the aforementioned utility pole for KCLA-LP's antenna, which is a Scala Model FMVMP 3-bay antenna. The utility pole is 38 ft. (11.6 m) tall. According to the manufacturer's specifications the authorized antenna is approximately 22 ft. in length hence the aperture space required is more than half the height of the pole. The KCLA-LP license authorizes a radiation center height of 26 ft. (8 m) above ground, which means the authorized 3-bay antenna mounted at the authorized height would be among power lines and within the aperture of T-Mobile's two cellular antennas. Notwithstanding KCLA's notification to the FCC that KCLA-LP had gone silent on April 30<sup>th</sup> and their statement that arrangements were underway to vacate the licensed site,<sup>10</sup> it doesn't appear that KCLA-LP's antenna could have been previously collocated on the pole.

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<sup>9</sup> Antenna Structure Registration Number 1268401

<sup>10</sup> See BLSTA-20170504ABK, Exhibit 1

An authorized translator station is not permitted to cause any actual interference to the direct reception by the public of the off-the-air signal of any previously authorized and operating co-equal secondary station, such as an LPFM station.<sup>11</sup> Given that KCLA-LP is no longer operating from its licensed site, it is impossible for K264CQ to be impairing the reception of a regularly used signal from that previously authorized facility. Therefore, K264CQ cannot be causing impermissible interference to KCLA-LP.

## **2. FM translator K264CQ Does Not Create a Short-spacing to KCLA-LP.**

KCLA asserts in its Petition that the authorized relocation of K264CQ is short-spaced with KCLA-LP. An FM translator is authorized based on the contour overlap requirements in 47 C.F.R Section 74.1203(a). Nevertheless, the minimum co-channel distance separation recommended for LPFM to an FM translator having a 60 dBu contour distance of 7.3 kilometers or less is 30 kilometers.<sup>12</sup> The distance between KCLA-LP's licensed site and K264CQ is 30.2 kilometers. Therefore, the two stations are not presently short-spaced.

## **3. FM Translator K264CQ and Primary AM Station KWKW are Co-owned.**

In the Petition, KCLA states that K264CQ and its associated primary AM station KWKW are not co-owned. KCLA does not dispute the fact that Lotus Los Angeles Corp. is the licensee of K264CQ, but somehow fails to recognize that Lotus Los Angeles Corp. is also the licensee of AM station KWKW. The statement by KCLA regarding the lack of common ownership between these stations is incorrect.

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<sup>11</sup> 47 C.F.R. § Section 74.1203(a)(3) – *“Interference is will be considered to occur whenever reception of a regularly used signal is impaired by the signals radiated by the FM translator or booster station, regardless of the quality of such reception, the strength of the signal so used, or the channel on which the protected signal is transmitted.”*

<sup>12</sup> 47 C.F.R. § Section 73.807(a)(1) – For co-channel operation the rule specifies a required minimum distance separation of 26 kilometers in the left-hand column and a minimum recommended spacing of 30 kilometers in the right-hand column for no interference received from a maximum class facility. In the case of K264CQ, the distance to the 60 dBu contour is 7.2 kilometers, which was determined based on 0.06 kW Maximum ERP and 64 meters HAAT.

KCLA further insinuates that K264CQ is not being properly identified. No proof or sworn affidavit attesting to such a violation was provided. Lotus' engineer reports to the contrary that the FM translator is identified every hour by its call sign. This is accomplished by frequency shifting key (FSK) in accordance with 47 C.F.R. Section 74.1283(c)(2)(i).

#### **4. FM Translator K264CQ is in Full Compliance with the Technical Rules.**

KCLA seems to believe that K264CQ is obligated to provide (1) a statement from a licensed surveyor that the installed antenna is properly oriented and (2) the results of an antenna proof-of-performance. This belief is contrary to the rules governing the use of directional antennas set forth in 47 C.F.R. Section 74.1235(g) through (i). Those three paragraphs are spelled out below:

(g) Either horizontal, vertical, circular or elliptical polarization may be used provided that the supplemental vertically polarized ERP required for circular or elliptical polarization does not exceed the ERP otherwise authorized. Either clockwise or counterclockwise rotation may be used. Separate transmitting antennas are permitted if both horizontal and vertical polarization is to be provided.

(h) All applications must comply with §73.316, paragraphs (d) and (e) of this chapter.

(i) An application that specifies use of a directional antenna must comply with §73.316, paragraphs (c)(1) through (c)(3) of this chapter. Prior to issuance of a license, the applicant must: (1) Certify that the antenna is mounted in accordance with the specific instructions provided by the antenna manufacturer; and (2) certify that the antenna is mounted in the proper orientation. In instances where a directional antenna is proposed for the purpose of providing protection to another facility, a condition may be included in the construction permit requiring that before program tests are authorized, a permittee: (1) Must submit the results of a complete proof-of-performance to establish the horizontal plane radiation patterns for both the horizontally and vertically polarized radiation components; and, (2) must certify that the relative field strength of neither the measured horizontally nor vertically polarized radiation component shall exceed at any azimuth the value indicated on the composite radiation pattern authorized by the construction permit.

The above requirements were adopted in 1990. The reference to 47 C.F.R. Section 73.316(c)(1) through (c)(3) referenced in Paragraph (i) were subsequently changed and therefore the revised paragraphs in that section that were not deleted do not apply.<sup>13</sup> Furthermore, the underlying construction permit for K264CQ does not contain a condition requiring the submission of an antenna proof-of-performance. Accordingly, K264CQ is in full compliance with the rules for using a directional antenna.

The type of antenna that K264CQ employs consist of two vertically stacked log-periodic antennas, Scala Model CL-FM(V). A single log-periodic is a highly directional antenna having a maximum gain of 5.01 (7.0 dBd). The use of two such antennas oriented 94 degrees apart results in less directivity, thus a lower maximum gain. Figure 2 is a copy of the directional composite pattern provided by the antenna manufacturer, which shows that the maximum gain for the directional composite array is 3.02 (4.8 dBd).

In response to KCLA's speculation that a transmitter power output (TPO) of 0.071 kW doesn't seem appropriate for the authorized multiple antenna array, the effective radiated power (ERP) calculation for K264CQ is provided below:

$$0.071_{TPO-KW} \times 3.02_{Gain} \times 0.282_{Efficiency} = 0.06_{ERP-KW}$$

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<sup>13</sup> In 1990 the requirements set forth in 47 C.F.R. Section 73.316(c)(1) through (c)(3) were as follows: "(c)(1) A complete description of the proposed antenna system, including the manufacturer and model number of the proposed directional antenna. It is not sufficient to label the antenna with only a generic term such as "dipole". A specific model number must be provided. In the case of individually designed antennas with no model number, or in the case of a composite antenna composed of two or more individual antennas, the antenna must be described as a "custom" or "composite" antenna, as appropriate. A full description of the design of the antenna must also be submitted; (c)(2) A relative field horizontal plane pattern of the proposed directional antenna. A single pattern encompassing both the horizontal and vertical polarization is required, rather than separate patterns for the horizontal and vertical polarization. A value of 1.0 must be used to correspond to the directional of maximum radiation. The plot of the pattern must be oriented such that 0° corresponds to the direction of maximum radiation or alternatively, in the case of an asymmetrical antenna pattern, the plot must be oriented such that 0° corresponds to the actual azimuth with respect to true North. The horizontal plane pattern must be plotted to the largest scale possible on unglazed letter-size polar coordinate paper (main engraving approximately 7" x 10") using only scale divisions and subdivisions of 1, 2, 2.5, or 5 times 10 to the Nth power. Values of field strength less than 10% of the maximum field strength plotted on that pattern must be shown on an enlarged scale. In the case of a composite antenna composed of two or more individual antennas, the pattern required is that for the composite antenna, not the patterns for each of the individual antennas; and, (c)(3) A tabulation of the relative field pattern required in paragraph (c)(2) of this section. The tabulation must use the same zero degree reference as the plotted pattern, and must contain values for at least every 10°. In addition, tabulated values of all maximas and minimas, with their corresponding azimuths, must be submitted."

The efficiency determination is based on the use of 800 ft. of Andrew LDF4-50A ½ inch Heliax transmission line and an FMC-1.5 Isocoupler.

### **CONCLUSION**

In view of the foregoing, the Petition filed by KCLA must be dismissed.

The undersigned, who has been engaged in the field of consulting radio and television engineering since 1985 and whose qualifications are a matter of record with the Federal Communications Commission, declares under penalty of perjury that all of the facts and data included in or attached to the foregoing statement are true and correct to the best of his knowledge and belief. This amended exhibit was executed on May 12, 2017.

Respectfully submitted,



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Scott Turpie  
Technical Consultant  
P.O. Box 881  
Silver Spring, MD 20918-0881  
Ph. 301-776-4488

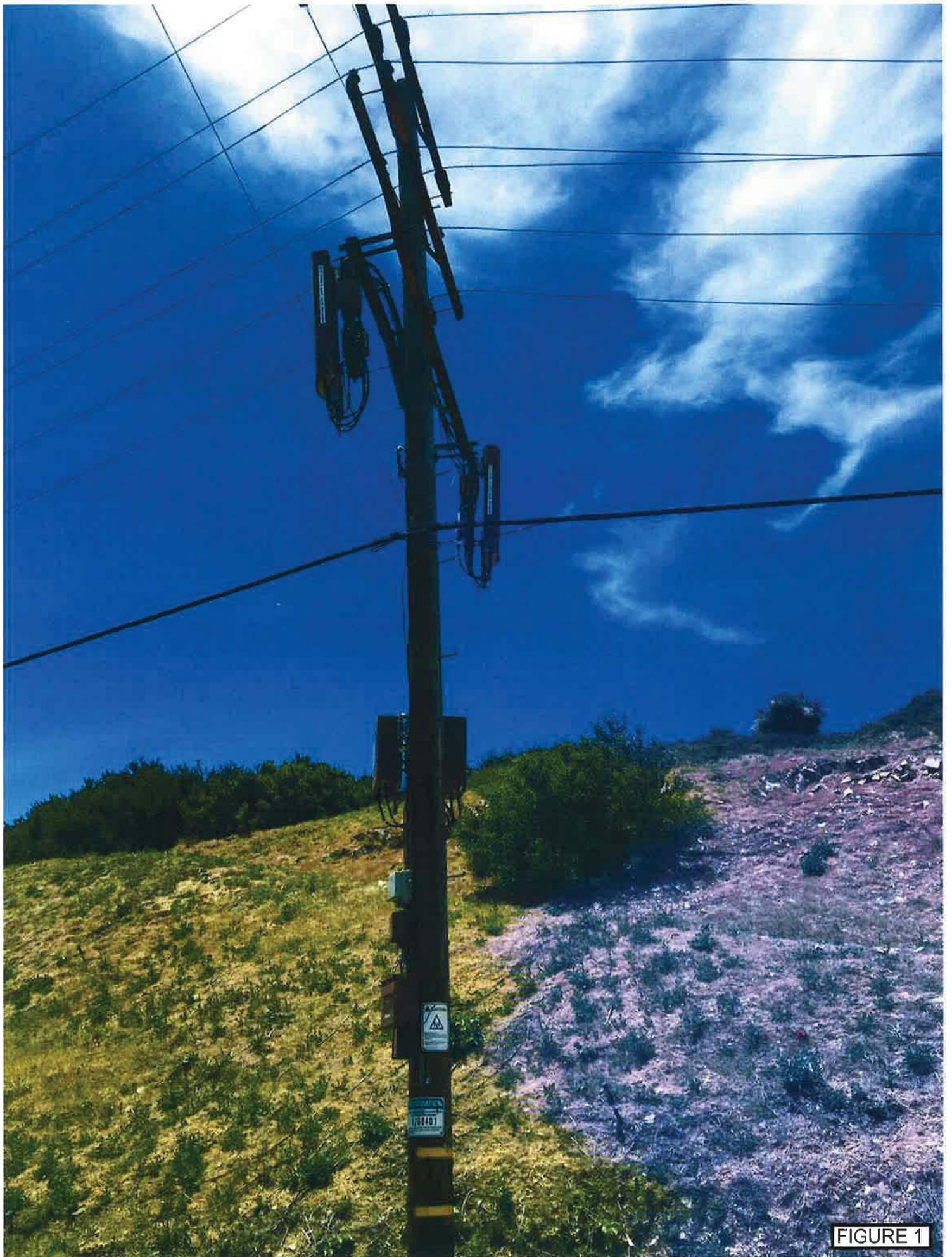
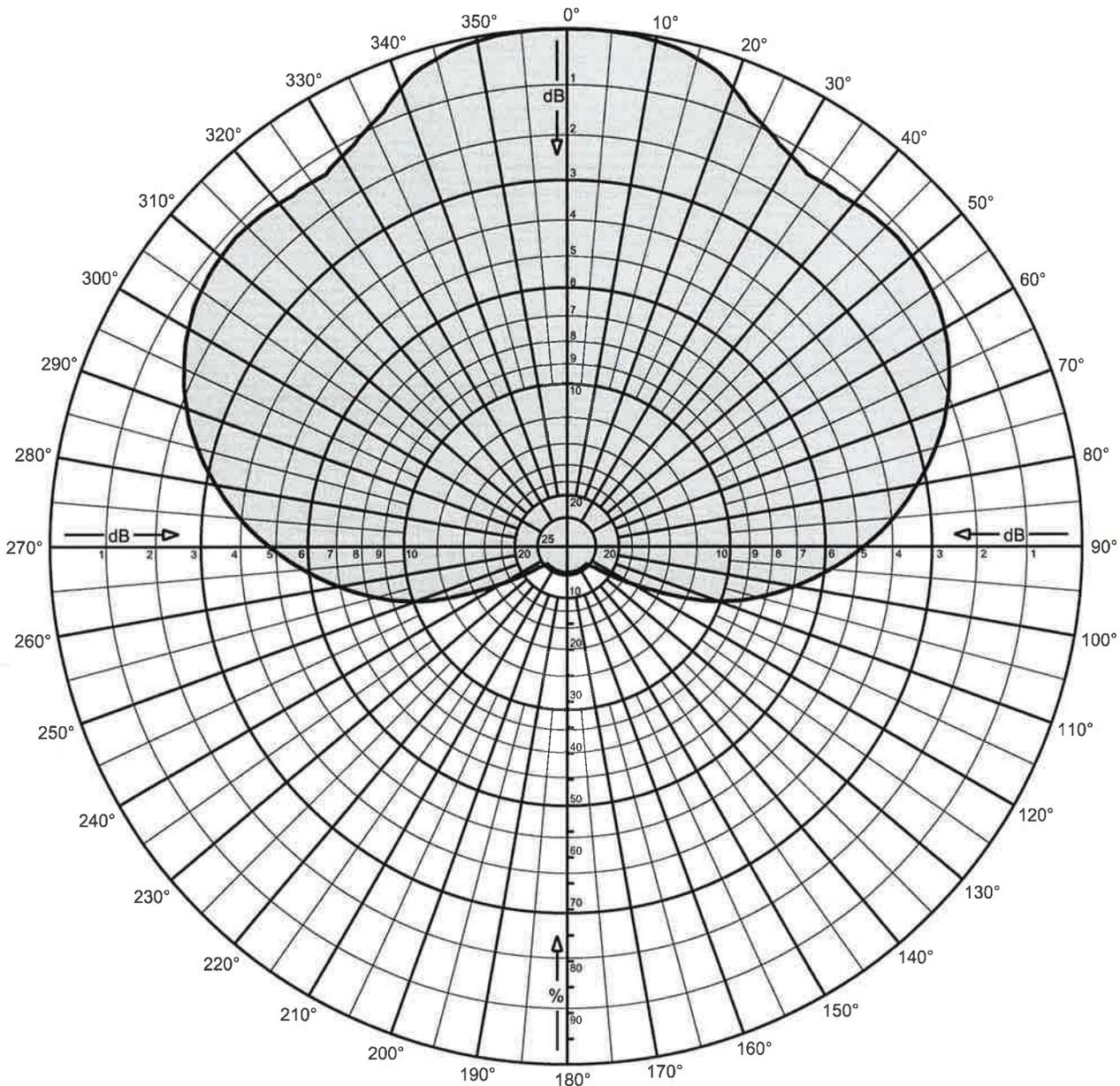


FIGURE 1



Two CL-FM/VRM/50N Log-periodic Antennas  
 Oriented at 47 & 313 Degrees  
 Frequency: 100/7 MHz  
 Gain: 4.8 dBd (x 3.0)  
 Vertical Polarization  
 Vertical stacked 0.94 wavelength  
 Horizontal plane Pattern

**KATHREIN**  
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 Medford, OR 97501 (USA) Fax:(541)779-3991  
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FIGURE 2

**Affidavit of Jason Houts**

**Affidavit of Jason Houts**

State of California )

ss:

County of Los Angeles )

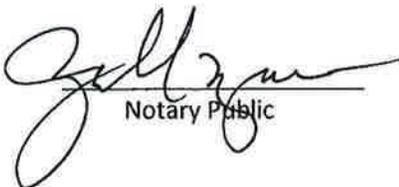
Jason Houts, being duly sworn, deposes and says:

1. I am the Director of Engineering for Lotus Los Angeles Corp., a California corporation (“Lotus”) with offices at 3301 Barham Boulevard, Los Angeles, California 90068, and licensee of FM translator K264CQ, Los Angeles, California, Facility ID #141734 (the “Translator”).
2. I submit this affidavit in support of Lotus’ Opposition to the Petition for Reconsideration (the “Petition”) filed by Civic Light Opera of San Pedro, California, to the grant of the License to Cover for the Translator on 100.7 FM, File No. BLFT-20170213ABM, alleging that Station KCLA-LP was experiencing interference from the Translator.
3. On May 2, 2017, I traveled to the San Pedro, California, area to investigate the interference reported in the Petition. From 12:35 PM – 1:20 PM , I tuned a standard receiver to 100.7 MHz, the frequency from which both KCLA-LP and the Translator transmit, and the frequency was not broadcasting KCLA-LP.
4. At 12:55 PM, on May 2, 2017, I visited the KCLA-LP licensed transmitter site, and again tuned a standard receiver to 100.7 MHz, and was only able to receive the signal of KFMB-FM in San Diego, California, Facility ID #42117. I observed that there was no FM antenna installed on the FCC registered structure indicated on the KCLA-LP license, which is a utility pole. I took several photos of the utility pole, 5 of which I attach to this affidavit.



Jason Houts

Sworn to before me this  
11th day of May, 2017.



Notary Public





**CAUTION**

Beyond this point, Radio frequency fields may exceed FCC rules for human exposure.

For your safety, stop if you notice any guidelines for limiting a radio frequency exposure.

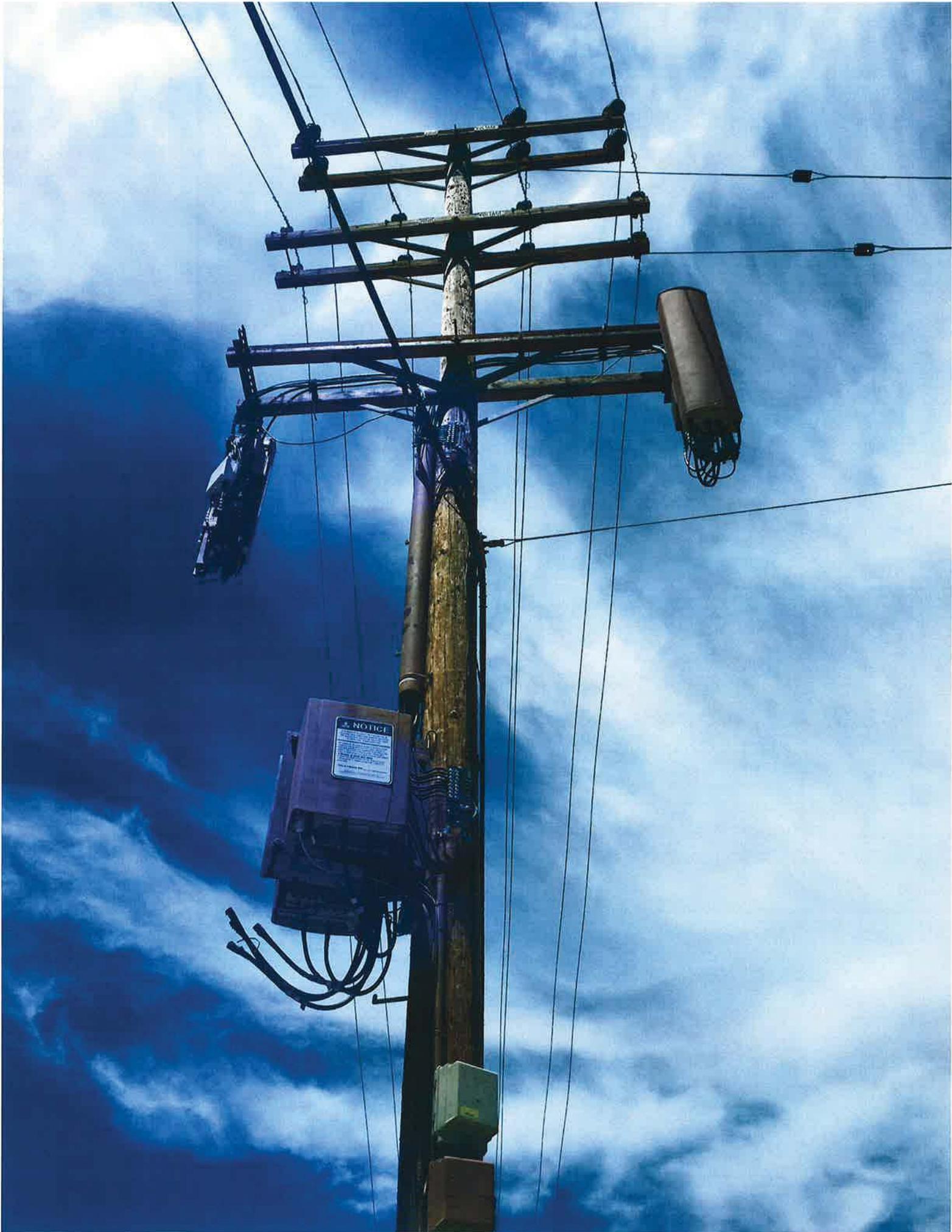
248785

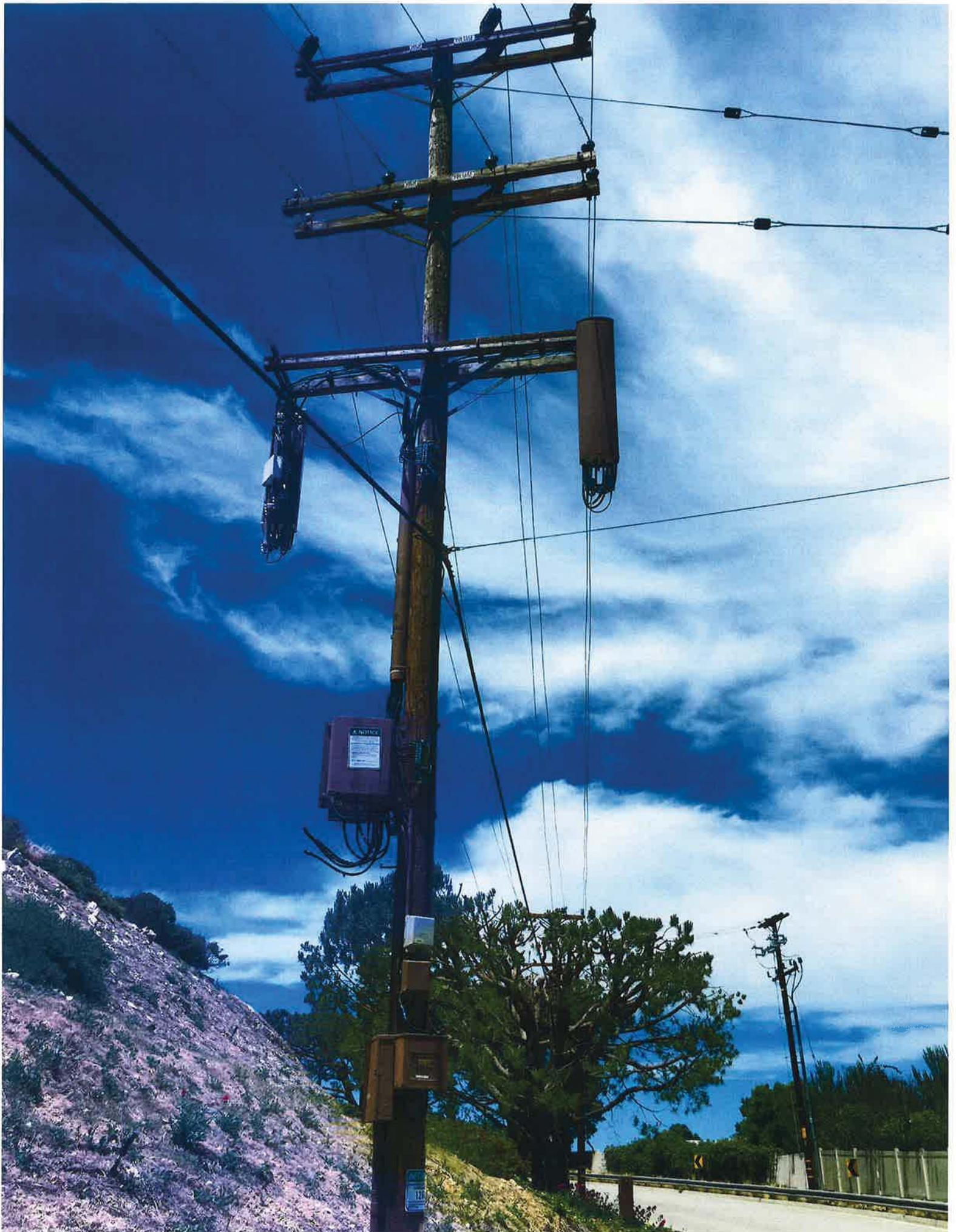
**INFORMATION**

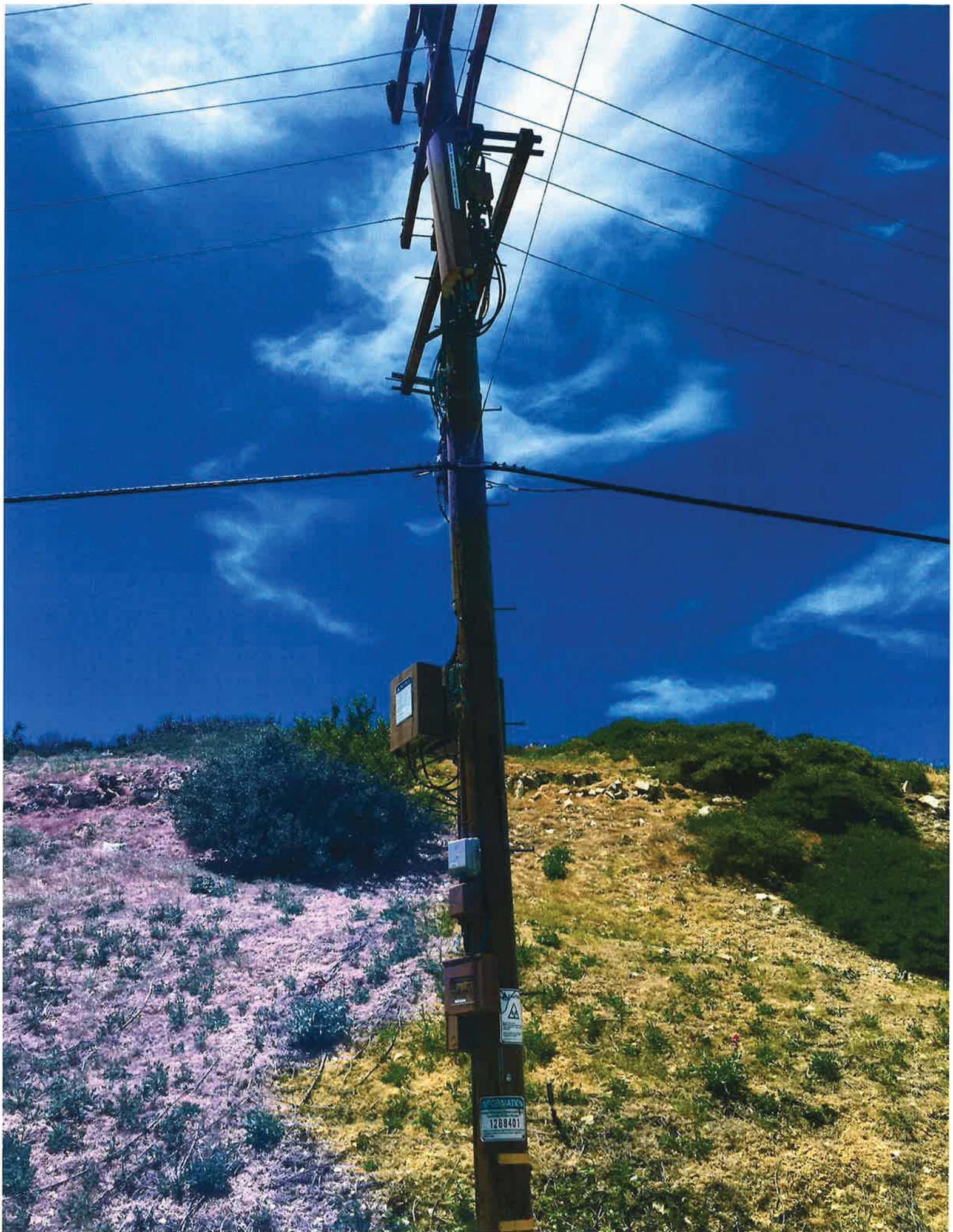
Federal Communications Commission  
Tower Registration Number  
**1268401**

Posted in accordance with Federal Communications Commission rules on antenna tower registration (47CFR 17.4(g))









1288401

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Letters to Declarants

# MCLAUGHLIN & STERN, LLP

FOUNDED 1898

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NEW YORK, NY  
MILLBROOK, NY  
WESTPORT, CT  
WEST PALM BEACH, FL  
NAPLES, FL

May 4, 2017

By Federal Express Tracking #8115-8660-5599

Mr. Clayton W. Barton  
424 6<sup>th</sup> Street  
San Pedro, California 90731

Dear Mr. Barton:

I am writing on behalf of Lotus Los Angeles Corp., licensee of FM Translator K264CQ, which is authorized by the FCC to operate on 100.7 at Los Angeles, California.

It is my understanding that you have notified radio station KCLA-LP, San Pedro, California, that you are a listener of that station, and that you have had problems receiving KCLA-LP under certain circumstances.

KCLA-LP has submitted your sworn statement about interference from K264CQ to the Federal Communications Commission (the "FCC") and it has become part of the official governmental record regarding alleged interference by the translator with the reception of KCLA-LP.

Interference to the reception of KCLA-LP could occur for several reasons unrelated to K264CQ. Atmospheric conditions occasionally affect the reception of FM stations. Hills and other terrain often block FM signals. A listener's distance from an FM station largely determines whether a listener will receive a good signal. The maximum distance the FCC expects a listener to hear KCLA-LP broadcasts is 3.5 miles from KCLA-LP transmitter site, which is at 3750 Crest Road, Rancho Palo Verdes, Los Angeles County, California 90275

If you are experiencing any interference to your regularly-received signal of KCLA-LP that is caused by K264CQ, we want to take measures to prevent it. To do that, we need to obtain information from you so that we can determine what action K264CQ is required to take, and try to correct the problem.

Please answer all the questions below so we can evaluate and resolve any problems. Please record your answers below, and either fax them back to me at 516-829-6966, scan and email it to me at [ebreslin@mclaughlinstern.com](mailto:ebreslin@mclaughlinstern.com) or mail them to me at the above address. This letter with your signed responses may become part of the official FCC records, as your Declaration did.

1. Do you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

2. If so, for how many months or years (approximately) had you regularly listened to KCLA-LP before today?

\_\_\_\_\_ **Months/Years (Circle One)**

3. Are you now having a problem receiving KCLA-LP at locations where you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

4. When did you first notice you were having trouble picking up the signal of KCLA-LP?

**Please Circle One:**

**On or Before February 13, 2017**

**After February 13, 2017**

5. When you first noticed you were having trouble receiving KCLA-LP, did you receive the signal of another station or did the KCLA-LP signal drop off?

**Please Circle One or Both (if both apply):**

**KCLA-LP's Signal Too Weak To Receive**

**Received Another Station's Signal Instead**

6. If the problem was interference from another station, please identify that station.

**Station Causing Interference, if applicable, was \_\_\_\_\_**

7. Did KCLA-LP tell you that K264CQ or a Spanish-language station is the source of the problem or did you ascertain that fact through listening?

Please Circle Any That Are Applicable:

Told By KCLA-LP Personnel

Ascertained Through Listening

Saw A Reference On The KCLA-LP Website (If so, Approximate date was \_\_\_\_\_)

Please Circle As Applicable

At Home/In Car/Other (Please Specify Addresses)

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

8. What caused you to call-in, email or mail a complaint to KCLA-LP?

Please Circle One:

On-Air Request/Website

Notice/Phone Call From KCLA-LP/Email From

KCLA-LP/Know KCLA-LP Owners or Station Personnel

Other: \_\_\_\_\_

9. Do you now have, or have you had in the past, any connection with KCLA-LP as a business, advertiser, vendor, merchant or employee, or other connection as a family member, relative or friend, including social media, of such:

Please Circle One: Yes/No

Please State the Connection If Answer Is "Yes": \_\_\_\_\_

10. If you believe you are receiving interference from another radio station while trying to listen to KCLA-LP, please list the specific radio devices receiving the interference, such as the type of device, manufacturer's name, and model number. This information will be helpful to the FCC.

Device #1: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device #1: \_\_\_\_\_

Location Where Problem Occurred (please be as specific as possible) \_\_\_\_\_

Device #2: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device # 2: \_\_\_\_\_

Location Where Problem Occurred (Please be as specific as possible) \_\_\_\_\_

**Please state when, before May 15, 2017, that one of our engineers can visit you so that you can re-create the interference condition on the radios listed above.** We will turn our radio station off and then turn it back on at the specific areas where you regularly listen to KCLA-LP and have received interference to determine if the interference is coming from K264CQ. If the interference is coming from K264CQ, we will attempt to correct it.

Date/Time for Visit: \_\_\_\_\_

Alternate Date/Time: \_\_\_\_\_

Phone Numbers Where You May Be Reached: \_\_\_\_\_

**I hereby certify as to the accuracy of the above responses:**

\_\_\_\_\_  
Date:

\_\_\_\_\_  
Print Name:

We appreciate your taking time to answer these questions. If an interference problem exists and is being caused by K264CQ, we need the above information to provide a solution. If we do not hear from you by May 19, we will assume you are no longer experiencing a problem, notify the FCC of that fact, and consider the matter closed.

Very truly yours,



Eileen Breslin

Counsel for Lotus Los Angeles Corp.



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Address 1010 NORTHERN BLVD STE 400 Dept./Floor/Suite/Room

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Internal Billing Reference Lotus LA

Recipient's name Clayton W. Barton

Address 424 6th Street Dept./Room

Address San Pedro State CA ZIP 90731

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Payment options: Sender, Recipient, Third Party, Credit Card, Cash/Check. Includes fields for Total Packages, Total Weight, Total Declared Value.

The liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and to the current FedEx Service Guide, including terms that limit our liability.



# MCLAUGHLIN & STERN, LLP

FOUNDED 1898

Eileen Breslin  
Partner  
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NEW YORK, NY  
MILLBROOK, NY  
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WEST PALM BEACH, FL  
NAPLES, FL

May 4, 2017

By Federal Express Tracking # 8115-8660-5614

Mr. Charles Klaus  
The Grand Emporium  
323 W. 7<sup>th</sup> Street  
San Pedro, California 90731

Dear Mr. Klaus:

I am writing on behalf of Lotus Los Angeles Corp., licensee of FM Translator K264CQ, which is authorized by the FCC to operate on 100.7 at Los Angeles, California.

It is my understanding that you have notified radio station KCLA-LP, San Pedro, California, that you are a listener of that station, and that you have had problems receiving KCLA-LP under certain circumstances.

KCLA-LP has submitted your sworn statement about interference from K264CQ to the Federal Communications Commission (the "FCC") and it has become part of the official governmental record regarding alleged interference by the translator with the reception of KCLA-LP.

Interference to the reception of KCLA-LP could occur for several reasons unrelated to K264CQ. Atmospheric conditions occasionally affect the reception of FM stations. Hills and other terrain often block FM signals. A listener's distance from an FM station largely determines whether a listener will receive a good signal. The maximum distance the FCC expects a listener to hear KCLA-LP broadcasts is 3.5 miles from KCLA-LP transmitter site, which is at 3750 Crest Road, Rancho Palo Verdes, Los Angeles County, California 90275

If you are experiencing any interference to your regularly-received signal of KCLA-LP that is caused by K264CQ, we want to take measures to prevent it. To do that, we need to obtain information from you so that we can determine what action K264CQ is required to take, and try to correct the problem.

Please answer all the questions below so we can evaluate and resolve any problems. Please record your answers below, and either fax them back to me at 516-829-6966, scan and email it to me at [ebreslin@mclaughlinstern.com](mailto:ebreslin@mclaughlinstern.com) or mail them to me at the above address. This letter with your signed responses may become part of the official FCC records, as your Declaration did.

1. Do you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

2. If so, for how many months or years (approximately) had you regularly listened to KCLA-LP before today?

\_\_\_\_\_ **Months/Years (Circle One)**

3. Are you now having a problem receiving KCLA-LP at locations where you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

4. When did you first notice you were having trouble picking up the signal of KCLA-LP?

**Please Circle One:**

**On or Before February 13, 2017**

**After February 13, 2017**

5. When you first noticed you were having trouble receiving KCLA-LP, did you receive the signal of another station or did the KCLA-LP signal drop off?

**Please Circle One or Both (if both apply):**

**KCLA-LP's Signal Too Weak To Receive**

**Received Another Station's Signal Instead**

6. If the problem was interference from another station, please identify that station.

**Station Causing Interference, if applicable, was \_\_\_\_\_**

7. Did KCLA-LP tell you that K264CQ or a Spanish-language station is the source of the problem or did you ascertain that fact through listening?

Please Circle Any That Are Applicable:

Told By KCLA-LP Personnel

Ascertained Through Listening

Saw A Reference On The KCLA-LP Website (If so, approximate date was \_\_\_\_\_)

Please Circle As Applicable

At Home/In Car/Other (Please Specify Addresses)

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

8. What caused you to call-in, email or mail a complaint to KCLA-LP?

Please Circle One:

On-Air Request/Website

Notice/Phone Call From KCLA-LP/Email From

KCLA-LP/Know KCLA-LP Owners or Station Personnel

Other: \_\_\_\_\_

9. Do you now have, or have you had in the past, any connection with KCLA-LP as a business, advertiser, vendor, merchant or employee, or other connection as a family member, relative or friend, including social media, of such:

Please Circle One: Yes/No

Please State the Connection If Answer Is "Yes": \_\_\_\_\_

10. If you believe you are receiving interference from another radio station while trying to listen to KCLA-LP, please list the specific radio devices receiving the interference, such as the type of device, manufacturer's name, and model number. This information will be helpful to the FCC.

Device #1: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device #1: \_\_\_\_\_

Location Where Problem Occurred (please be as specific as possible) \_\_\_\_\_

Device #2: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device # 2: \_\_\_\_\_

Location Where Problem Occurred (Please be as specific as possible) \_\_\_\_\_

***Please state when, before May 15, 2017, that one of our engineers can visit you so that you can re-create the interference condition on the radios listed above. We will turn our radio station off and then turn it back on at the specific areas where you regularly listen to KCLA-LP and have received interference to determine if the interference is coming from K264CQ. If the interference is coming from K264CQ, we will attempt to correct it.***

Date/Time for Visit: \_\_\_\_\_

Alternate Date/Time: \_\_\_\_\_

Phone Numbers Where You May Be Reached: \_\_\_\_\_

**I hereby certify as to the accuracy of the above responses:**

\_\_\_\_\_  
Date:

\_\_\_\_\_  
Print Name:

We appreciate your taking time to answer these questions. If an interference problem exists and is being caused by K264CQ, we need the above information to provide a solution. If we do not hear from you by May 19, we will assume you are no longer experiencing a problem, notify the FCC of that fact, and consider the matter closed.

Very truly yours,

  
Eileen Breslin

Counsel for Lotus Los Angeles Corp.



# **McLAUGHLIN & STERN, LLP**

**FOUNDED 1898**

**Eileen Breslin**  
Partner  
[ebreslin@mclaughlinstern.com](mailto:ebreslin@mclaughlinstern.com)

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May 4, 2017

By Federal Express Tracking #8115-8660-5588

Mr. Jeremy Meza  
505 W. 17<sup>th</sup> Street  
San Pedro, California 90731

Dear Mr. Meza:

I am writing on behalf of Lotus Los Angeles Corp., licensee of FM Translator K264CQ, which is authorized by the FCC to operate on 100.7 at Los Angeles, California.

It is my understanding that you have notified radio station KCLA-LP, San Pedro, California, that you are a listener of that station, and that you have had problems receiving KCLA-LP under certain circumstances.

KCLA-LP has submitted your sworn statement about interference from K264CQ to the Federal Communications Commission (the "FCC") and it has become part of the official governmental record regarding alleged interference by the translator with the reception of KCLA-LP.

Interference to the reception of KCLA-LP could occur for several reasons unrelated to K264CQ. Atmospheric conditions occasionally affect the reception of FM stations. Hills and other terrain often block FM signals. A listener's distance from an FM station largely determines whether a listener will receive a good signal. The maximum distance the FCC expects a listener to hear KCLA-LP broadcasts is 3.5 miles from KCLA-LP transmitter site, which is at 3750 Crest Road, Rancho Palo Verdes, Los Angeles County, California 90275

If you are experiencing any interference to your regularly-received signal of KCLA-LP that is caused by K264CQ, we want to take measures to prevent it. To do that, we need to obtain information from you so that we can determine what action K264CQ is required to take, and try to correct the problem.

Please answer all the questions below so we can evaluate and resolve any problems. Please record your answers below, and either fax them back to me at 516-829-6966, scan and email it to me at [ebreslin@mclaughlinstern.com](mailto:ebreslin@mclaughlinstern.com) or mail them to me at the above address. This letter with your signed responses may become part of the official FCC records, as your Declaration did.

1. Do you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

2. If so, for how many months or years (approximately) had you regularly listened to KCLA-LP before today?

\_\_\_\_\_ **Months/Years (Circle One)**

3. Are you now having a problem receiving KCLA-LP at locations where you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

4. When did you first notice you were having trouble picking up the signal of KCLA-LP?

**Please Circle One:**

**On or Before February 13, 2017**

**After February 13, 2017**

5. When you first noticed you were having trouble receiving KCLA-LP, did you receive the signal of another station or did the KCLA-LP signal drop off?

**Please Circle One or Both (if both apply):**

**KCLA-LP's Signal Too Weak To Receive**

**Received Another Station's Signal Instead**

6. If the problem was interference from another station, please identify that station.

**Station Causing Interference, if applicable, was \_\_\_\_\_**

7. Did KCLA-LP tell you that K264CQ or a Spanish-language station is the source of the problem or did you ascertain that fact through listening?

Please Circle Any That Are Applicable:

Told By KCLA-LP Personnel

Ascertained Through Listening

Saw A Reference On The KCLA-LP Website (If so, Approximate date was \_\_\_\_\_)

Please Circle As Applicable

At Home/In Car/Other (Please Specify Addresses)

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

8. What caused you to call-in, email or mail a complaint to KCLA-LP?

Please Circle One:

On-Air Request/Website

Notice/Phone Call From KCLA-LP/Email From

KCLA-LP/Know KCLA-LP Owners or Station Personnel

Other: \_\_\_\_\_

9. Do you now have, or have you had in the past, any connection with KCLA-LP as a business, advertiser, vendor, merchant or employee, or other connection as a family member, relative or friend, including social media, of such:

Please Circle One: Yes/No

Please State the Connection If Answer Is "Yes": \_\_\_\_\_

10. If you believe you are receiving interference from another radio station while trying to listen to KCLA-LP, please list the specific radio devices receiving the interference, such as the type of device, manufacturer's name, and model number. This information will be helpful to the FCC.

Device #1: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device #1: \_\_\_\_\_

Location Where Problem Occurred (please be as specific as possible) \_\_\_\_\_

Device #2: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device # 2: \_\_\_\_\_

Location Where Problem Occurred (Please be as specific as possible) \_\_\_\_\_

***Please state when, before May 15, 2017, that one of our engineers can visit you so that you can re-create the interference condition on the radios listed above.*** We will turn our radio station off and then turn it back on at the specific areas where you regularly listen to KCLA-LP and have received interference to determine if the interference is coming from K264CQ. If the interference is coming from K264CQ, we will attempt to correct it.

Date/Time for Visit: \_\_\_\_\_

Alternate Date/Time: \_\_\_\_\_

Phone Numbers Where You May Be Reached: \_\_\_\_\_

**I hereby certify as to the accuracy of the above responses:**

\_\_\_\_\_  
Date:

\_\_\_\_\_  
Print Name:

We appreciate your taking time to answer these questions. If an interference problem exists and is being caused by K264CQ, we need the above information to provide a solution. If we do not hear from you by May 19, we will assume you are no longer experiencing a problem, notify the FCC of that fact, and consider the matter closed.

Very truly yours,



Eileen Breslin

Counsel for Lotus Los Angeles Corp.

From *Please print and press hard.* Sender's FedEx Account Number **2105-0710-B**

Date **4 May 17** Sender's Name **Breslin** Phone **(516) 829-6900**

Company **MCLAUGHLIN & STERN**

Address **1010 NORTHERN BLVD STE 400**

City **GREAT NECK** State **NY** ZIP **11021-5330**

Your Internal Billing Reference **Lotus Los Angeles**

To Recipient's Name **Jeremy Meza** Phone ( )

Company

Address **505 W. 17th Street**

Address Use this line for the HOLD location address or for continuation of your shipping address.

City **San Pedro** State **CA** ZIP **90731**

0127049371

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- | Next Business Day  | 2 or 3 Business Days   |
|--|--|
| <input type="checkbox"/> <b>FedEx First Overnight</b><br>Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected. | <input type="checkbox"/> <b>FedEx 2Day A.M.</b><br>Second business morning.* Saturday Delivery NOT available.  |
| <input type="checkbox"/> <b>FedEx Priority Overnight</b><br>Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.                                   | <input type="checkbox"/> <b>FedEx 2Day</b><br>Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected. |
| <input type="checkbox"/> <b>FedEx Standard Overnight</b><br>Next business afternoon.* Saturday Delivery NOT available.   | <input type="checkbox"/> <b>FedEx Express Saver</b><br>Third business day.* Saturday Delivery NOT available.   |

**5 Packaging** \*Declared value limit \$500.  
 FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other

**6 Special Handling and Delivery Signature Options** Fees may apply. See the FedEx Services Guide.

- Saturday Delivery** NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- No Signature Required** Package may be left without obtaining a signature for delivery.
  **Direct Signature** Someone at recipient's address may sign for delivery.
  **Indirect Signature** If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

**Does this shipment contain dangerous goods?** *Use box number 1-4 on label.*

No  Yes (per attached Shipper's Declaration)  Yes (Shipper's Declaration not required)  Dry Ice (Icyces, I UN 1845) x \_\_\_\_\_ kg

Restrictions apply for dangerous goods — see the current FedEx Services Guide  Cargo Aircraft Only

**7 Payment SHI#:** Enter FedEx Acct. No. or Credit Card No. below.

Sender Acct. No. in Section 1 of label.  Recipient  Third Party  Credit Card  Cash/Check

FedEx Acct. No. Credit Card No. Exp. Date

Total Packages Total Weight Total Declared Value\*

\*Our liability is limited to USD500 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.



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Eileen Breslin  
Partner  
[ebreslin@mclaughlinstern.com](mailto:ebreslin@mclaughlinstern.com)

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May 4, 2017

By Federal Express Tracking #8115-8660-5603

Mr. Dirk Vandenberg  
424 6<sup>th</sup> Street  
San Pedro, California 90731

Dear Mr. Vandenberg:

I am writing on behalf of Lotus Los Angeles Corp., licensee of FM Translator K264CQ, which is authorized by the FCC to operate on 100.7 at Los Angeles, California.

It is my understanding that you have notified radio station KCLA-LP, San Pedro, California, that you are a listener of that station, and that you have had problems receiving KCLA-LP under certain circumstances.

KCLA-LP has submitted your sworn statement about interference from K264CQ to the Federal Communications Commission (the "FCC") and it has become part of the official governmental record regarding alleged interference by the translator with the reception of KCLA-LP.

Interference to the reception of KCLA-LP could occur for several reasons unrelated to K264CQ. Atmospheric conditions occasionally affect the reception of FM stations. Hills and other terrain often block FM signals. A listener's distance from an FM station largely determines whether a listener will receive a good signal. The maximum distance the FCC expects a listener to hear KCLA-LP broadcasts is 3.5 miles from KCLA-LP transmitter site, which is at 3750 Crest Road, Rancho Palo Verdes, Los Angeles County, California 90275

If you are experiencing any interference to your regularly-received signal of KCLA-LP that is caused by K264CQ, we want to take measures to prevent it. To do that, we need to obtain information from you so that we can determine what action K264CQ is required to take, and try to correct the problem.

Please answer all the questions below so we can evaluate and resolve any problems. Please record your answers below, and either fax them back to me at 516-829-6966, scan and email it to me at [ebreslin@mclaughlinstern.com](mailto:ebreslin@mclaughlinstern.com) or mail them to me at the above address. This letter with your signed responses may become part of the official FCC records, as your Declaration did.

1. Do you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

2. If so, for how many months or years (approximately) had you regularly listened to KCLA-LP before today?

\_\_\_\_\_ **Months/Years (Circle One)**

3. Are you now having a problem receiving KCLA-LP at locations where you regularly listen to KCLA-LP?

**Please Circle One:      Yes /No**

4. When did you first notice you were having trouble picking up the signal of KCLA-LP?

**Please Circle One:**

**On or Before February 13, 2017**

**After February 13, 2017**

5. When you first noticed you were having trouble receiving KCLA-LP, did you receive the signal of another station or did the KCLA-LP signal drop off?

**Please Circle One or Both (if both apply):**

**KCLA-LP's Signal Too Weak To Receive**

**Received Another Station's Signal Instead**

6. If the problem was interference from another station, please identify that station.

**Station Causing Interference, if applicable, was \_\_\_\_\_**

7. Did KCLA-LP tell you that K264CQ or a Spanish-language station is the source of the problem or did you ascertain that fact through listening?

Please Circle Any That Are Applicable:

Told By KCLA-LP Personnel

Ascertained Through Listening

Saw A Reference On The KCLA-LP Website (If so, Approximate date was \_\_\_\_\_)

Please Circle As Applicable

At Home/In Car/Other (Please Specify Addresses)

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

8. What caused you to call-in, email or mail a complaint to KCLA-LP?

Please Circle One:

On-Air Request/Website

Notice/Phone Call From KCLA-LP/Email From

KCLA-LP/Know KCLA-LP Owners or Station Personnel

Other: \_\_\_\_\_

9. Do you now have, or have you had in the past, any connection with KCLA-LP as a business, advertiser, vendor, merchant or employee, or other connection as a family member, relative or friend, including social media, of such:

Please Circle One: Yes/No

Please State the Connection If Answer Is "Yes": \_\_\_\_\_

10. If you believe you are receiving interference from another radio station while trying to listen to KCLA-LP, please list the specific radio devices receiving the interference, such as the type of device, manufacturer's name, and model number. This information will be helpful to the FCC.

Device #1: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device #1: \_\_\_\_\_

Location Where Problem Occurred (please be as specific as possible) \_\_\_\_\_

Device #2: (Type, such as portable radio, car radio, home stereo) \_\_\_\_\_

Manufacturer and Model Name or Number of Device # 2: \_\_\_\_\_

Location Where Problem Occurred (Please be as specific as possible) \_\_\_\_\_

**Please state when, before May 15, 2017, that one of our engineers can visit you so that you can re-create the interference condition on the radios listed above. We will turn our radio station off and then turn it back on at the specific areas where you regularly listen to KCLA-LP and have received interference to determine if the interference is coming from K264CQ. If the interference is coming from K264CQ, we will attempt to correct it.**

Date/Time for Visit: \_\_\_\_\_

Alternate Date/Time: \_\_\_\_\_

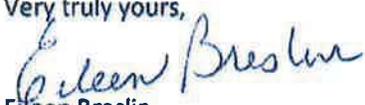
Phone Numbers Where You May Be Reached: \_\_\_\_\_

**I hereby certify as to the accuracy of the above responses:**

\_\_\_\_\_  
Date:

\_\_\_\_\_  
Print Name:

We appreciate your taking time to answer these questions. If an interference problem exists and is being caused by K264CQ, we need the above information to provide a solution. If we do not hear from you by May 19, we will assume you are no longer experiencing a problem, notify the FCC of that fact, and consider the matter closed.

Very truly yours,  
  
Eileen Breslin  
Counsel for Lotus Los Angeles Corp.



Package US Airbill

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Please print and press hard.

Sender's FedEx Account Number 2105-0710-8

Shipper's name Breslin Phone (516) 829-6900

Company MCLAUGHLIN & STERN

Address 1010 NORTHERN BLVD STE 400 Dept./Floor/Suite/Floor

CITY GREAT NECK State NY ZIP 11021-5330

Internal Billing Reference Lotus LA

Recipient's name Dirk Vandenberg

Address 424 W. 6th St. Dept./Floor/Suite/Floor

Address San Pedro State CA ZIP 90731

0127049371

MUR 1

Form ID No. 0215

4 Express Package Service

\* To most locations.

Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Service selection checkboxes: Next Business Day, FedEx First Overnight, FedEx Priority Overnight, FedEx Standard Overnight, FedEx 2Day A.M., FedEx 2Day, FedEx Express Saver.

5 Packaging

Package type checkboxes: FedEx Envelope, FedEx Pak, FedEx Box, FedEx Tube, Other.

6 Special Handling and Delivery Signature Options

Signature and handling options: Saturday Delivery, No Signature Required, Direct Signature, Indirect Signature, Dangerous Goods.

7 Payment B/E for:

Payment method checkboxes: Sender, Recipient, Third Party, Credit Card, Cash/Check.

Total Packages, Total Weight, Total Declared Value



Certificate of Service

**(Revised Opposition to Petition for Reconsideration: File No. BLFT-20170213ABM)**

I, Eileen Breslin, hereby certify that, on May 12, 2017, I caused to be served the Revised Opposition to Petition for Reconsideration of Lotus Los Angeles Corp., by first class mail, postage pre-paid, by Priority Mail, and by email, upon:

Peter Doyle, Chief  
Audio Division, Media Bureau  
Federal Communications Commission  
445 Twelfth Street S.W.  
Washington, District of Columbia 20554

and by email to: [Peter.Doyle@FCC.gov](mailto:Peter.Doyle@FCC.gov)

Ziggy Mrkich, Manager  
KCLP-LP FM 100.7 – San Pedro  
303 S. Pacific Avenue #102  
San Pedro, California 90731

and by email to: [ziggy.mrkich@gmail.com](mailto:<ziggy.mrkich@gmail.com)

Dated: May 12, 2017



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Eileen Breslin  
McLaughlin & Stern, LLP