

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Application of)	
)	
COSTA-EAGLE RADIO VENTURES)	File No. BMLFT-20170330AAJ
LIMITED PARTNERSHIP)	Facility ID No. 26359
)	
For a license to cover FM Translator)	
W279DH, Haverhill, Massachusetts)	

To: The Secretary
Attention: Chief, Audio Division, Media Bureau

REPLY TO OPPOSITION TO PETITION FOR RECONSIDERATION

Horizon Christian Fellowship (“Horizon”), by its attorneys, submits its Reply to Costa-Eagle Radio Ventures Limited Partnership’s (“Costa-Eagle”) Opposition to Horizon’s April 24, 2017 Petition for Reconsideration.

I. BACKGROUND

Horizon petitioned for reconsideration of the Commission’s grant of the above-referenced license modification application (the “Modification Application”) on April 24, 2017. In doing so, Horizon submitted the sworn statements of two engineers, attesting that the transmitter power output (“TPO”) that Costa-Eagle stated in the Modification Application is in error by approximately 6 watts, and also that Costa-Eagle’s antenna orientation is in error.

Costa-Eagle filed an Opposition to the Petition for Reconsideration on May 1, 2017. In its Opposition, Costa-Eagle dismissed Horizon’s engineers’ claims as mere “estimates,” supposedly amounting to nothing more than “speculation and conjecture.” However, Costa-Eagle provided no verification that its antenna orientation or TPO is correct. Furthermore, the information necessary for Horizon to provide precise calculations is entirely within Costa-Eagle’s control.

Horizon's engineers' calculations demonstrate that the Modification Application likely contains errors. At the very least, Horizon has raised substantive issues that Costa-Eagle needs to address. And yet Costa-Eagle's Opposition was completely void of any calculations or legal analysis supporting the Modification Application.

For the foregoing reasons, the Commission should grant Horizon's Petition for Reconsideration.

Respectfully submitted,



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Dated: June 1, 2017

CERTIFICATE OF SERVICE

I, Michelle Brown Johnson, hereby certify that a true and correct copy of the foregoing
“Reply” was sent on this 1st day of June, 2017, via email, to the following:

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