

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of Application of:)
)
WINCHESTER RADIO) File No. BNPFT-20180501ABU
BROADCASTERS, LLC) Facility No. 202519
)
For Original Construction Permit for)
NEW FM Translator at Front Royal, VA)

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

SUPPLEMENT TO PETITION TO DENY

Tidewater Communications, LLC (“Tidewater”), by its counsel and pursuant to the request of the Commission staff¹ and Sections 73.5006 and 74.1204(f) of the Commission’s Rules, hereby respectfully files this Supplement to its Petition to Deny filed May 22, 2018 against the captioned application (“Application”) filed by Winchester Radio Broadcasters, LLC (“WRB”) for a construction permit for a new FM translator on Channel 221 at Front Royal, Virginia. Tidewater is licensee of co-channel W221CF, Harrisonburg, Virginia. As Tidewater has previously requested, the Application must be dismissed. In support whereof, the following is shown.

As indicated in Footnote 1, this supplement submits information in compliance with the new rules adopted in the *Translator Interference Order*. The Audio Division’s letter requires Tidewater to submit:

1. Detailed information on the protected contour of W221CF and the population located

¹ On September 4, 2019, the Audio Division sent Tidewater a letter ordering Tidewater to submit, within 30 days, supplemental information to comply with new Translator Interference Rules (Report and Order, FCC 19-40, 34 Rcd 3457 (2009) (“*Translator Interference Order*”).

- therein;
2. The minimum number of listener complaints as determined by the population located within the W221CF protected contour. In this case, because there are 89,584 persons² within the protected contour, a minimum of six complaints are required. Submitted with the Technical Report, attached hereto and made a part hereof, are copies of 18 complaints, a number far in excess of the number mandated by the Translator Interference Order;
 3. A clear, concise, and accurate description of the location where interference is occurring;
 4. A statement from each listener that he or she listens over-the-air to W221CF at least twice a month;
 5. A statement from each listener that he or she had no financial, employment, or familial affiliation or relationship with W221CF or Tidewater;
 6. A map plotting the specific locations of the interference in relation to the 45 dB μ contour of W221CF;
 7. A statement that W221CF is operating within its licensed parameters;
 8. A statement that Tidewater has used commercially reasonable efforts to inform WRB and attempted resolution; and
 9. Undesired/Desired data demonstrating that at each listener location the ratio of undesired to desired signal strength exceeds -20 dB for co-channel situations (as this is) calculated using the Commission's standard contour prediction methodology.

The Technical Report furnishes the information requested by the Audio Division.

² See Attachment 1, Technical Report of Asher Broadcast Consulting, LLC ("Technical Report").

Item 8 above requires Tidewater to use commercially reasonable efforts to inform WRB and attempt a resolution of the matter. Attachment 2 is a copy of an email exchange between Tidewater's local General Manager, Kim Mitchell, and Edward A. (Ted) Schober, who is Chief Executive Officer of WRB. On September 24, 2019, Ms. Mitchell emailed Mr. Schober and asked WRB to vacate Channel 221 "due to anticipated co-channel interference with Tidewater's W221CF." Ms. Mitchell encouraged WRB to pursue a channel change "in an attempt to privately resolve this issue."

On September 26, 2019, Mr. Schober emailed Ms. Mitchell and noted that a prior construction permit (BPFT-20150710ACY) had expired³ and that an August 2019 amendment WRB made to its application showed that all listeners claimed in Tidewater's Petition fall outside the licensed W221CF F(50,50) 45 dB μ contour.

Mr. Schober added that "absent a showing of predicted interference to listeners of the licensed W221CF in accordance with the present rules, we are disinclined to modify our proposal to another channel without a clear showing that there actually are listeners to W221CF meeting the requirements of Section 74.1204(f) likely to be likely [sic] receive interference from our proposal."

Mr. Schober also indicated, *inter alia*, that WRB was planning to amend its application to specify a simpler antenna "which will produce reduced radiation toward W221CF." However, WRB did not provide any evidence in support. Thus, neither Tidewater nor the Commission can confirm whether such statement is correct.

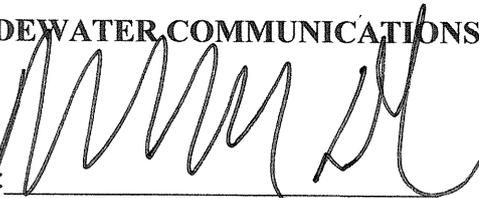
Consistent with Section 74.1204(f) of the Commission's rules, Tidewater has made a reasonable effort to inform WRB of the potential interference and has asked WRB to change the

³ The expiration of the construction permit is irrelevant to the issues at hand. Tidewater is concerned with interference to the licensed facilities of W221CF.

channel associated with its new FM translator. WRB has refused. Tidewater also has complied with the Audio Division's request for additional information. Accordingly, the only solution to resolve the interference complaint is for the Commission to DISMISS the Application.

Respectfully submitted,

TIDEWATER COMMUNICATIONS, LLC

By: 

Gary S. Smithwick
Mark B. Denbo
Its Attorneys

Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, NW
Suite 301
Washington, DC 20016

202-363-4560

October 3, 2019

ATTACHMENT 1

COPY OF TECHNICAL REPORT

Technical Statement
In Support of a
47 C.F.R. Section 74.1204(f)
Based Petition to Deny

against

*CH221D.A - Front Royal, VA
BNPFT-20180501ABU
(Facility ID: 202519)
CH221D - 92.1 MHz*

*47 C.F.R. Section 74.1204(f)
Dismissal of FM Translator Application
due to predicted interference within the
affected 45 dB μ Service Contour.*

September 2019

EXPLANATION OF STATEMENT: This Technical Statement has been prepared to support a 47 C.F.R. Section 74.1204(f) based *Petition to Deny* as submitted by Tidewater Communications, LLC ("Tidewater"), licensee of Translator W221CF.L - Harrisonburg, VA. This *Petition to Deny* is being filed against FM Translator Application BNPFT-20180501ABU for CH221D.A - Front Royal, VA (Facility ID No. 202519). This Application is held by Winchester Radio Broadcasters, LLC ("Winchester"). The Application in question proposes operation on CH221D (92.1 MHz) with 0.250 kW ERP at 666 meters AMSL. Tidewater Translator W221CF.L - Harrisonburg, VA (Facility ID No. 151081), operates under License BMLFT-20180124AAO with 0.250 kW ERP at 572 meters AMSL on CH221D (92.1 MHz). Therefore W221CF.L operates co-channel to the CH221D.A Translator Application.

Support: In accordance with 47 C.F.R. Section 74.1204(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 a grant of the authorization will result in interference to the reception of a regularly used, off-the-air signal of any authorized broadcast station within the 45 dBu field strength contour of the desired station. In implementing 47 C.F.R. Section 74.1204(f), the Commission has established five (5) criteria necessary to demonstrate a grant of an FM Translator Construction Permit Application "*will result in interference to the reception*" of an existing station. As noted herein, these five (5) criteria have been documented. Therefore, the Translator Proposal in question is no longer acceptable for filing and thus subject to immediate dismissal. The necessary criteria, as previously established by the Commission, have been addressed below.

Criteria 1 - The required minimum number of valid listener complaints as determined using Table 1 of §74.1203(a)(3) and as defined in §74.1201(k). Affected existing Translator W221CF serves a population of 89,597 within its Class D, 60 dBμ F(50:50) Service Contour. Table 1 of §74.1203(a)(3) mandates a minimum of six (6) listener complaints for populations ranging from 1-199,999. There are eighteen (18) total listeners participating in this 47 C.F.R. Section 74.1204(f) based *Petition to Deny*. Information concerning the affected station's service contours has been included in the ***Exhibit 1.1*** map showing. Each location has also been noted on the ***Exhibit 1.1*** map showing. The name and contact information of each listener also appears in the Listener Complaints as found in ***Exhibit(s) 2.1 to 2.18***. A summary of each location has been provided below.

Technical Statement

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Name	Home Address Contact information	Description of (Claimed) Listening Area
Marcia A. Joseph	181 Old Kiln Ln; Mount Jackson, VA 22842 540-869-5959 mjandduke@gmail.com	Home Address: 181 Old Kiln Ln; Mount Jackson, VA (38-43-54.40 N; 078-46-21.90 W or 1a on map)
Richard W. Joseph	181 Old Kiln Ln; Mount Jackson, VA 22842 540-869-5959 mjandduke@gmail.com	Other Location(s): Mile Marker 266 on Interstate 81 (38-39-42.60 N; 078-40-02.40 W or 2a on map)
John N Graff Jr	25 Beatrice Ct; Fishersville, VA 22939 540-290-5537 jgraff003@yahoo.com	Other Location(s): Intersection of I-81 and SR-211 (I-81 Exit 264) (38-38-53.20 N; 078-40-34.50 W or 3a on map)
Warren R. Roshob	46 Gentry Rd; Weyers Cave VA 24486 540-238-0252 rusty62@msn.com	Other Location(s): Intersection of SR-831 and SR-767 (Quicksburg, VA)(38-41-32.20 N; 078-40-51.50 W or 4a on map)
Michelle Koontz	PO Box 193; Mount Jackson, VA 22842 540-477-9646 koontz@shentel.net	Other Location(s): Intersection of SR-263 and SR-42 (38-46-11.00 N; 078-44-44.10 W or 5a on map)
Geraldine Click	11304 Orkney Grde; Mount Jackson, VA 22842 540-477-2262 ---	Home Address: 11304 Orkney Grde; Mount Jackson, VA (38-45-09.80N; 078-39-39.30 W or 6a on map) Other Location(s): Intersection of SR-614 and SR-263 (38-45-20.10N; 078-40-12.00 W or 6b on map)
Jennifer Hart Barb	4954 Alum Springs Rd; Edinburg, VA 22824 540-607-0636 pnkmojo@gmail.com	Other Location(s): Intersection of SR-42 and SR-614 (Forestville, VA)(38-39-04.20 N; 078-40-10.90 W or 7a on map)
Clint Bennett	1710 Shipwreck Drive; New Market, VA 22844 540-740-3412 bennetcw@jmu.edu	Home Address: 1710 Shipwreck Drive; New Market, VA (38-40-44.30 N; 078-40-25.40 W or 8a on map)
Steve Rohrer	1851 Adair Way; Rockingham, VA 22802 540-908-5624 adairwtr@gmail.com	Other Location(s): Intersection of US-11 and US-211 (New Market, VA)(38-39-04.20 N; 078-40-10.90 W or 9a on map)
James P. Raines	3587 Smith Creek Rd; New Market, VA 22844 540-333-0003 ---	Home Address: 3587 Smith Creek Rd; New Market, VA (38-38-50.80 N; 078-38-30.10 W or 10a on map)
Marcia S. Raines	3587 Smith Creek Rd; New Market, VA 22844 540-333-0003 ---	Other Location(s): Mile Marker 268 on Interstate 81 (38-41-22.00 N; 078-39-21.30 W or 11a on map)
Annabelle Short	32D-9091 N. Congress St; New Market, VA 22844 540-740-2713 ---	Home Address: 32D-9091 N. Congress St; New Market, VA (38-39-19.20 N; 078-40-04.70 W or 12a on map)
Glenwood Short	32D-9091 N. Congress St; New Market, VA 22844 540-740-2713 ---	Other Location(s): Mile Marker 267 on Interstate 81 (38-40-32.00 N; 078-39-41.30 W or 13a on map)
Josh Stephens	4091 Ridge Road; Quicksburg, VA 22847 540-398-8822 Stephens22847@gmail.com	Home Address: 4091 Ridge Road; Quicksburg, VA (38-41-36.00 N; 078-41-08.20 W or 14a on map)
Wayne W. Frye	1076 Garber Rd; Mount Jackson, VA 22842 540-477-2099 ---	Home Address: 1076 Garber Rd; Mount Jackson, VA (38-44-46.30 N; 078-42-25.50 W or 15a on map) Other Location(s): 702 Lutz Hollow Rd; Mount Jackson, VA 22842 (38-46-22.30 N; 078-42-46.10 W or 15b on map)
Robert King	165 Tee Court; New Market, VA 22844 540-740-3296 dcfirebk@shentel.net	Home Address: 165 Tee Court; New Market, VA (38-37-53.90 N; 078-39-54.40 W or 16a on map)
Meredith Lee Sine	398 Crider Lane; Woodstock, VA 22664 540-459-5245 mpsine@shentel.net	Other Location(s): Intersection of I-81 and SR-833 (I-81 Exit 269) (38-42-16.70 N; 078-39-23.80 W 17a on map)
Vicki Mongold	9567 Brocks Gap Road; Fulks Run, VA 22830 540-896-2129 Mongold.victoria@gmail.com	Other Location(s): Intersection of SR-729 and SR-263 (Mt. Clifton, VA) (38-45-42.6 N; 078-42-54.6 W or 18a on map)

Within the *Exhibit 1.1* Listener Map, these eighteen (18) listener declarations have been plotted. Listener areas include stationary home or other addresses and sections of roads or highways. The home and other stationary locations have been identified by the physical mailing address as well as latitude and longitude coordinates expressed as Degree-Minutes-Seconds. The segments of road-based listenership have been highlighted on the map as well. *Based on the beginning and ending landmarks as noted from each complaint (and the proliferation of road mapping software available on the internet), the locations of each of these road-based segments is considered a matter of record before the Commission. Therefore, no further documentation is believed required. However additional coordinate or other identifying documentation of these road-based segments will be supplied upon request.*

Pursuant to current Commission Policy regarding listener documentation¹, each listener statement includes (1) the complainant's full name, address, and phone number or email address; (2) a clear, concise, and accurate description of the location where the interference is alleged to occur; (3) a statement that the complainant listens to the desired station using an over-the-air signal at least twice a month, to demonstrate the complainant is a regular listener; and (4) a statement that the complainant has no legal, employment, financial, or familial affiliation or relationship with the desired station, to demonstrate the complainant is disinterested.

Criteria 2 - A map plotting the specific location of the alleged interference in relation to the complaining station's 45 dBu contour. A map plotting the specific location of each interference complaint location in relation to the affected station's 45 dBu F(50:50) service contour has been included in *Exhibit 1.1*. In this case, more than the minimum number of six (6) individual complaint locations within the 45 dB μ contour have been shown.

Criteria 3 - A statement that the complaining station is operating within its licensed parameters. A declaration that the affected station is operating within its licensed parameters has been included in *Exhibit 3.1*.

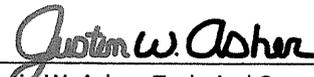
Criteria 4 - A statement that the complaining station licensee has used commercially reasonable efforts to inform the relevant translator licensee of the claimed interference and attempted private resolution. A declaration that the affected station has used commercially reasonable efforts to inform the Translator licensee of the claimed interference and attempted private resolution has been included in *Exhibit 4.1*.

¹ *Report & Order MB Docket No. 18-119*; "Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference"; Adopted and Released May 9, 2019; See Paragraph 17.

Criteria 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 Commission's standard contour prediction methodology set out in 47 C.F.R. Section 73.313. The plotted "U to D", Undesired to Desired, contour relationship between the affected station and the offending Translator has been outlined on the attached **Exhibit 1.1** map showing. In all cases, W221CF reception throughout the proposed Translator's U to D calculated interference contour(s) remains subject to co-channel interference greater than 20 dB as outlined in 47 C.F.R. Section 74.1204(a).

SUMMARY OF STATEMENT. As a result of the documentation submitted herein, specifically the existence of eighteen (18) valid W221CF listeners representing a substantial number of distinct locations of observed interference, the Commission is encouraged to immediately enforce the provisions of 47 C.F.R. Section 74.1204(f) whereby Winchester's FM Translator Application BNPFT-20180501ABU for CH221D.A - Front Royal, VA (Facility ID No. 202519) may no longer be deemed acceptable and is therefore subject to immediate dismissal pursuant to 47 C.F.R. Section 74.1204(f).

CERTIFICATION OF TECHNICAL CONSULTANT: *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty years of experience as a broadcast technical consultant before the Federal Communications Commission ("the FCC"); and am familiar with the Code of Federal Regulations Title 47 ("the Rules") as pertaining to this report and its contents here-in. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*



Justin W. Asher, Technical Consultant
September 30, 2019

NED 03 SEC Terrain Database
US Census 2010 PL Database

Strasburg

Topis Brook
Mauertown

CH221D.A

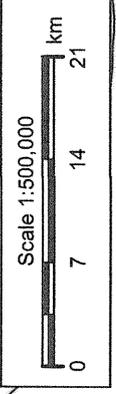
Exhibit 1.1 Map of Projected 47 C.F.R. Section 74.1204(f) Listener Interference from CH221D.A - Front Royal, VA

W221CF.L to CH221D.A
52.5 dBµ F(50:50) to 32.5 dBµ F(50:10)
50.0 dBµ F(50:50) to 30.0 dBµ F(50:10)
47.5 dBµ F(50:50) to 27.5 dBµ F(50:10)
45.0 dBµ F(50:50) to 25.0 dBµ F(50:10)

W221CF.L
Harrisonburg, VA
BMLFT20180124AAO
Facility ID: 151081
Latitude: 38-27-08 N
Longitude: 078-54-32 W
ERP: 0.25 kW
Channel: 221D (92.1 MHz)
AMSL Height: 572.0 m
Horiz. Pattern: Omni

60 dBµ F(50:50) Contour
Total Population: 89,597
Total Area: 721.9 sq. km

CH221D.A
Front Royal, VA
BNPFT20180501ABU
Facility ID: 202519
Latitude: 38-57-36 N
Longitude: 078-19-52 W
ERP: 0.25 kW
Channel: 221D (92.1 MHz)
AMSL Height: 666.0 m
Horiz. Pattern: Directional



V-Soft Communications LLC ©

CH221D.A - 60 dBµ F(50:50) Contour

W221CF.L - 60 dBµ F(50:50) Contour

- 15b
- 5a
- 18a
- 6b
- 15a
- 7a
- 17a
- 14a
- 11a
- 13a
- 8a
- 12a
- 9a
- 16a

Study Notes: W221CF reception will be subject to co-channel "U to D" (Undesired to Desired) interference greater than 20 dB per 47 C.F.R. §74.1204(a).

Asher Broadcast Consulting LLC
justinasher@consultant.com
1 (202) 875-2986



Exhibit 2.1
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

181 Old kiln lane Mount Jackson VA 22842

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- | | | | | |
|---|--|---|-----------------------------------|--|
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Intersection of I-81 & SR-211 (Exit 264) | <input checked="" type="radio"/> Yes <input type="radio"/> No | New Market, VA US-11 & US-211 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Mile Marker 266 on I-81 | <input checked="" type="radio"/> Yes <input type="radio"/> No | Forestville, VA SR 42 & SR-614 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Mile Marker 267 on I-81 | <input checked="" type="radio"/> Yes <input type="radio"/> No | Quicksburg, VA SR-831 & SR-767 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Mile Marker 268 on I-81 | <input checked="" type="radio"/> Yes <input type="radio"/> No | Mount Clifton, VA SR-729 & SR-263 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Intersection of I-81 & SR-730 (Exit 269) | <input checked="" type="radio"/> Yes <input type="radio"/> No | Intersection of SR-263 & SR-42 | Intersection of _____ & _____ in _____ |

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: Sep 23 2019

Signed: Marcia A. Joseph Printed Name: Marcia A. Joseph

Address: 181 Old kiln lane Phone: 896-5959
Mount Jackson, VA Email: mjandduke@gmail.com
22842



Exhibit 2.2
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

181 Old Kiln Lane, Mount Jackson, VA 22842

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- Yes/No radio intersection questions: Intersection of I-81 & SR-211 (Exit 264), Mile Marker 266 on I-81, Mile Marker 267 on I-81, Mile Marker 268 on I-81, Intersection of I-81 & SR-730 (Exit 269), New Market, VA US-11 & US-211, Forestville, VA SR 42 & SR-614, Quicksburg, VA SR-831 & SR-767, Mount Clifton, VA SR-729 & SR-263, Intersection of SR-263 & SR-42, and three blank intersection questions.

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: Sep 23, 2019

Signed: Richard W Joseph Printed Name: Richard W Joseph

Address: 181 Old Kiln Lane Mount Jackson, VA 22842 Phone: 896-5959 Email: mjandduke@gmail.com



Exhibit 2.3
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="radio"/> Yes <input type="radio"/> No	New Market, VA US-11 & US-211	Intersection of _____ & _____ in _____
<input type="radio"/> Yes <input type="radio"/> No	Mile Marker 266 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Forestville, VA SR 42 & SR-614	Intersection of _____ & _____ in _____
<input type="radio"/> Yes <input type="radio"/> No	Mile Marker 267 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of _____ & _____ in _____
<input type="radio"/> Yes <input type="radio"/> No	Mile Marker 268 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of SR-263 & SR-42	Intersection of _____ & _____ in _____

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 9/20/19

Signed: [Signature]

Printed Name: John N Graff, Jr

Address: 25 Beatrice Ct
Fishersville VA 22939

Phone: 540-290-5537

Email: JGraff003@yahoo.com



Exhibit 2.4
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

I Travel up and down I-81 for my job and
I rely on WSVa for traffic reports,

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input type="radio"/> Yes <input type="radio"/> No	New Market, VA US-11 & US-211	Intersection of _____ & _____ in _____
<input type="radio"/> Yes <input type="radio"/> No	Mile Marker 266 on I-81	<input type="radio"/> Yes <input type="radio"/> No	Forestville, VA SR 42 & SR-614	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 267 on I-81	<input type="radio"/> Yes <input type="radio"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of _____ & _____ in _____
<input type="radio"/> Yes <input type="radio"/> No	Mile Marker 268 on I-81	<input type="radio"/> Yes <input type="radio"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of _____ & _____ in _____
<input type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input type="radio"/> Yes <input type="radio"/> No	Intersection of SR-263 & SR-42	Intersection of _____ & _____ in _____

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 9-17-19

Signed: Warren R. Roshgeb

Printed Name: WARREN R. ROSHGE B

Address: 46 GENTRY RD,

Phone: 540-234-0252

Email: RUSY62R@msn.com



Exhibit 2.5
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

10652 Old Valley Pike, Mt Jackson VA 22842

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="radio"/> Yes <input type="radio"/> No	New Market, VA US-11 & US-211	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 266 on I-81	<input type="radio"/> Yes <input type="radio"/> No	Forestville, VA SR 42 & SR-614	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 267 on I-81	<input type="radio"/> Yes <input type="radio"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 268 on I-81	<input type="radio"/> Yes <input type="radio"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of SR-263 & SR-42	Intersection of _____ & _____ in _____

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 9/17/19

Signed: Michelle Koontz Printed Name: Michelle Koontz

Address: PO Box 193 Phone: 540-477-9646

Mt Jackson VA 22842 Email: koontz@shentel.net



Exhibit 2.6
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

My whole family are regular listeners of WSVA. First thing in morning - since I am retired after other go to work I listen a lot - we spend on traffic reports going and coming in our roads of VA - now up with what we do hold

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="radio"/> Yes <input type="radio"/> No	New Market, VA US-11 & US-211	Intersection of <u>811</u> & <u>263</u> in <u>263</u>
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 266 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Forestville, VA SR 42 & SR-614	Intersection of <u>614</u> & <u>263</u> in <u> </u>
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 267 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of <u>42</u> & <u>614</u> in <u> </u>
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 268 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of <u> </u> & <u> </u> in <u> </u>
<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of SR-263 & SR-42	Intersection of <u> </u> & <u> </u> in <u> </u>

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: _____

Signed: Geraldine Click Printed Name: Geraldine Click

Address: 11304 Oakway Lane Phone: (540) 477-2262

Mt. Jackson, Virginia Email: _____



Exhibit 2.7
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

4954 Alum Springs Road Edinburg VA 22824

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	New Market, VA US-11 & US-211	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of Alum Springs Rd & Jerone Rd in Edinburg, VA
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mile Marker 266 on I-81	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Forestville, VA SR 42 & SR-614	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of 42 & Conicville Rd in Conicville, VA
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mile Marker 267 on I-81	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Quicksburg, VA SR-831 & SR-767	<input type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of _____ & _____ in _____
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mile Marker 268 on I-81	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mount Clifton, VA SR-729 & SR-263	<input type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of _____ & _____ in _____
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of SR-263 & SR-42	<input type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of _____ & _____ in _____

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 9/24/19

Signed: Jennifer Hart Barb Printed Name: Jennifer Hart Barb

Address: 4954 Alum Springs Rd Phone: 540-607-0636

Edinburg, VA 22824 Email: pnkmojo@gmail.com



Exhibit 2.8
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

1710 Shipwreck Dr. New Market VA

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- | | | | | |
|---|--|---|-----------------------------------|--|
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Intersection of I-81 & SR-211 (Exit 264) | <input checked="" type="radio"/> Yes <input type="radio"/> No | New Market, VA US-11 & US-211 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Mile Marker 266 on I-81 | <input type="radio"/> Yes <input checked="" type="radio"/> No | Forestville, VA SR 42 & SR-614 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Mile Marker 267 on I-81 | <input type="radio"/> Yes <input checked="" type="radio"/> No | Quicksburg, VA SR-831 & SR-767 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Mile Marker 268 on I-81 | <input type="radio"/> Yes <input checked="" type="radio"/> No | Mount Clifton, VA SR-729 & SR-263 | Intersection of _____ & _____ in _____ |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | Intersection of I-81 & SR-730 (Exit 269) | <input type="radio"/> Yes <input checked="" type="radio"/> No | Intersection of SR-263 & SR-42 | Intersection of _____ & _____ in _____ |

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 9-23-19

Signed: Clint Bennett Printed Name: Clint Bennett

Address: 1710 Shipwreck Dr. Phone: 540-740-3412

New Market VA 22844 Email: bennetcw@jmu.edu



Exhibit 2.9
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

Rt 81 - Rt 11 - Rt 211

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- Yes/No options for various road intersections including I-81 & SR-211, Mile Marker 266, 267, 268, I-81 & SR-730, New Market, VA, Forestville, VA, Quicksburg, VA, Mount Clifton, VA, and SR-263 & SR-42.

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: September 22, 2019

Signed: Steve Rohrer Printed Name: Steve Rohrer

Address: 1851 Adair Way Phone: 540-908-5624

Rockingham Va 22802 Email: adairwtr@gmail.com



Exhibit 2.10
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

3587 SMITH CREEK ROAD, NEW MARKET, VA
22844

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="radio"/> Yes <input type="radio"/> No	New Market, VA US-11 & US-211	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 266 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Forestville, VA SR 42 & SR-614	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 267 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 268 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of SR-263 & SR-42	Intersection of _____ & _____ in _____

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: September 23, 2019
 Signed: James P. Raines Printed Name: JAMES P. RAINES
 Address: 3587 SMITH CREEK ROAD Phone: 540-333-0003
NEW MARKET, VA Email: N/A
22844



Exhibit 2.11
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

3587 SMITH CREEK ROAD
NEW MARKET, VA. 22844

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="radio"/> Yes <input type="radio"/> No	New Market, VA US-11 & US-211	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 266 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Forestville, VA SR 42 & SR-614	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 267 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 268 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of SR-263 & SR-42	Intersection of _____ & _____ in _____

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: Sept. 23 2019

Signed: Marcia S. Raines Printed Name: MARCIA S. RAINES

Address: 3587 SMITH CREEK RD Phone: 540 - 333-0003

NEW MARKET, VA. Email: NA
22844



Exhibit 2.12
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

ANNABELLE F. SHORT - APT. 32-D
9091 N. CONGRESS ST.
NEW MARKET, VA - 22844

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- Yes/No Intersection of I-81 & SR-211 (Exit 264)
Yes/No Mile Marker 266 on I-81
Yes/No Mile Marker 267 on I-81
Yes/No Mile Marker 268 on I-81
Yes/No Intersection of I-81 & SR-730 (Exit 269)
Yes/No New Market, VA US-11 & US-211
Yes/No Forestville, VA SR 42 & SR-614
Yes/No Quicksburg, VA SR-831 & SR-767
Yes/No Mount Clifton, VA SR-729 & SR-263
Yes/No Intersection of SR-263 & SR-42

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: SEPTEMBER 21, 2019

Signed: AnnaBelle Short Printed Name: ANNABELLE SHORT

Address: APT. 32-D 9091 N. CONGRESS ST. Phone: 540-740-2213
NEW MARKET, VA - 22844 Email: NONE



Exhibit 2.13
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

GLENWOOD W. SHORT - APT. 32-D
9091 N. CONGRESS ST.
NEW MARKET, VA - 22844

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- Yes No Intersection of I-81 & SR-211 (Exit 264)
Yes No Mile Marker 266 on I-81
Yes No Mile Marker 267 on I-81
Yes No Mile Marker 268 on I-81
Yes No Intersection of I-81 & SR-730 (Exit 269)
Yes No New Market, VA US-11 & US-211
Yes No Forestville, VA SR 42 & SR-614
Yes No Quicksburg, VA SR-831 & SR-767
Yes No Mount Clifton, VA SR-729 & SR-263
Yes No Intersection of SR-263 & SR-42

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: SEPTEMBER 21, 2019

Signed: Glenwood W. Short Printed Name: GLENWOOD W. SHORT

Address: APT. 32-D, 9091 N. CONGRESS ST., NEW MARKET, VA - 22844 Phone: 540-240-2713 Email: NONE



Exhibit 2.14
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

4091 Ridge Rd. Quicksburg, VA 22847
629 Kelly Rd. Mt. Jackson, VA 22842

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="radio"/> Yes <input type="radio"/> No	New Market, VA US-11 & US-211	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 266 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Forestville, VA SR 42 & SR-614	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 267 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Mile Marker 268 on I-81	<input checked="" type="radio"/> Yes <input type="radio"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of _____ & _____ in _____
<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="radio"/> Yes <input type="radio"/> No	Intersection of SR-263 & SR-42	Intersection of _____ & _____ in _____

ALL OVER SHENANDOAH COUNTY

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 9/20/19

Signed: *Josh Stephens*

Printed Name: Josh Stephens

Address: 4091 Ridge Rd.
Quicksburg, VA 22847

Phone: (540) 398-8822

Email: stephens22847@gmail.com



Exhibit 2.15
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

702 LUTZ HOLLOW RD MT. JACKSON, VA
22842

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- | | | | | |
|---|--|--|-----------------------------------|--|
| <input type="radio"/> Yes <input checked="" type="radio"/> No | Intersection of I-81 & SR-211 (Exit 264) | <input type="radio"/> Yes <input type="radio"/> No | New Market, VA US-11 & US-211 | Intersection of <u>263 SR</u> & <u>614 SR</u> in <u>MT Jackson</u> |
| <input type="radio"/> Yes <input checked="" type="radio"/> No | Mile Marker 266 on I-81 | <input type="radio"/> Yes <input type="radio"/> No | Forestville, VA SR 42 & SR-614 | Intersection of <u>703 SR</u> & <u>614 SR</u> in <u>MT Jackson</u> |
| <input type="radio"/> Yes <input checked="" type="radio"/> No | Mile Marker 267 on I-81 | <input type="radio"/> Yes <input type="radio"/> No | Quicksburg, VA SR-831 & SR-767 | Intersection of <u>720 SR</u> & <u>US 11</u> in <u>MT Jackson</u> |
| <input type="radio"/> Yes <input checked="" type="radio"/> No | Mile Marker 268 on I-81 | <input type="radio"/> Yes <input type="radio"/> No | Mount Clifton, VA SR-729 & SR-263 | Intersection of <u>263 SR</u> & <u>US 11</u> in <u>MT Jackson</u> |
| <input type="radio"/> Yes <input checked="" type="radio"/> No | Intersection of I-81 & SR-730 (Exit 269) | <input type="radio"/> Yes <input type="radio"/> No | Intersection of SR-263 & SR-42 | Intersection of <u>716 SR</u> & <u>SR 42</u> in <u>MT Jackson</u> |

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 9-25-2019

Signed: Wayne W Frye Printed Name: Wayne W Frye

Address: 1076 Garber RD Phone: 540-477-2099

MT Jackson, VA 22842 Email: _____



Exhibit 2.16
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

165 TEE CT. NEW MARKET, VA.

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- Yes No Intersection of I-81 & SR-211 (Exit 264)
Yes No Mile Marker 266 on I-81
Yes No Mile Marker 267 on I-81
Yes No Mile Marker 268 on I-81
Yes No Intersection of I-81 & SR-730 (Exit 269)
Yes No New Market, VA US-11 & US-211
Yes No Forestville, VA SR 42 & SR-614
Yes No Quicksburg, VA SR-831 & SR-767
Yes No Mount Clifton, VA SR-729 & SR-263
Yes No Intersection of SR-263 & SR-42
Intersection of & in

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: SEPT. 25, 2019

Signed: [Signature] Printed Name: ROBERT KING

Address: 165 TEE CT. Phone: 540-740-3296

NEW MARKET, VA 22844 Email: dcfirebk@jhtel.net



Exhibit 2.17
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

398 Crider Lane, Woodstock Va. 22664

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of I-81 & SR-211 (Exit 264)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	New Market, VA US-11 & US-211	Intersection of _____ & _____ in _____
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mile Marker 266 on I-81	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Forestville, VA SR 42 & SR-614	Intersection of _____ & _____ in _____
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mile Marker 267 on I-81	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Quicksburg, VA SR-831 & SR-767	Intersection of _____ & _____ in _____
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mile Marker 268 on I-81	<input type="checkbox"/> Yes <input type="checkbox"/> No	Mount Clifton, VA SR-729 & SR-263	Intersection of _____ & _____ in _____
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of I-81 & SR-730 (Exit 269)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intersection of SR-263 & SR-42	Intersection of _____ & _____ in _____

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: September 24, 2019

Signed: Meredith Lee Sine Printed Name: MEREDITH LEE SINE

Address: 398 CRIDER LANE Phone: 540-459-5245

WOODSTOCK, VA, 22664 Email: MPSINE@SHENTEL.NET



Exhibit 2.18
Copy of Listener Declaration(s)

Listener Declaration:

I am a regular listener of "WSVA - News/Talk 92.1" which broadcasts on 92.1 MHz FM to the northcentral Virginia area.

Soon a new radio station may begin broadcasting on 92.1 MHz. I am concerned this station may interfere with my regular listening to "WSVA - News/Talk 92.1".

I regularly listen to "WSVA - News/Talk 92.1" at least twice a month at my home; or at least twice a month at the following addresses: which I fear will be subject to future interference:

In addition, I regularly listen to "WSVA - News/Talk 92.1" at least twice a month in my car along the follow mobile routes or through the following road intersections:

- | | | | | |
|--|--|---|-----------------------------------|--|
| <input type="radio"/> Yes <input type="radio"/> No | Intersection of I-81 & SR-211 (Exit 264) | <input type="radio"/> Yes <input type="radio"/> No | New Market, VA US-11 & US-211 | Intersection of _____ & _____ in _____ |
| <input type="radio"/> Yes <input type="radio"/> No | Mile Marker 266 on I-81 | <input checked="" type="radio"/> Yes <input type="radio"/> No | Forestville, VA SR 42 & SR-614 | Intersection of _____ & _____ in _____ |
| <input type="radio"/> Yes <input type="radio"/> No | Mile Marker 267 on I-81 | <input type="radio"/> Yes <input type="radio"/> No | Quicksburg, VA SR-831 & SR-767 | Intersection of _____ & _____ in _____ |
| <input type="radio"/> Yes <input type="radio"/> No | Mile Marker 268 on I-81 | <input checked="" type="radio"/> Yes <input type="radio"/> No | Mount Clifton, VA SR-729 & SR-263 | Intersection of _____ & _____ in _____ |
| <input type="radio"/> Yes <input type="radio"/> No | Intersection of I-81 & SR-730 (Exit 269) | <input checked="" type="radio"/> Yes <input type="radio"/> No | Intersection of SR-263 & SR-42 | Intersection of _____ & _____ in _____ |

I am providing this declaration to ask the Federal Communications Commission in Washington D.C. to take action to resolve this potential interference. Other than being a regular, over the air listener, I have no legal, employment, financial, or familial affiliation or relationship with "WSVA - News/Talk 92.1"

I declare under penalty of perjury that this Listener Declaration is true and correct to the best of my knowledge and belief.

Executed this Date of: 25 Sep 2019

Signed: Vicki Mangold Printed Name: Vicki Mangold

Address: 9567 Brocks Gap Rd Phone: 540-896-2129

Fulks Run, VA 22830 Email: mangold.victoria@gmail.com

Exhibit 3.1
Copy of Statement of Licensed Operation



Re: W221CF, Harrisonburg, VA

To Whom it may concern:

Tidewater Communications, LLC, licensee of FM Translator W221CF, Harrisonburg, VA (FIN 151081), pursuant to 47 C.F.R. Section 74.1204(f)(3) of the FCC's Rules, hereby declares that W221CF is and has been operating at the authorized parameters as outlined in current license BMLFT-20180124AAO. The licensed parameters currently in operation are as follows:

Frequency: 92.1 MHz (CH221D)
Antenna Coordinates: North Latitude: 038 deg 27 min 08 sec
West Longitude: 078 deg 54 min 32 sec
Effective radiated power (Watts): 250 watts (H&V)
Height of radiation center above ground (Meters): 127 meters
Height of radiation center above mean sea level (Meters): 572 meters
Antenna Description: NIC Model BKG77/2L (2 bay)(non-directional)
Transmitter output power: 0.565 kW

I declare under penalty of perjury that this Declaration is true and correct to the best of my knowledge and belief.


(Matt Richardson)
(Chief Engineer/Harrisonburg Radio Group)
(1820 Heritage Center Way)
(09/26/2019)

Exhibit 4.1
Copy of Relevant Translator Licensee Notification & Email Exchange

From: Ted Schober [mailto:ted@wxva.com]
Sent: Thursday, September 26, 2019 4:50 PM
To: Kim Mitchell <KMitchell@HarrisonburgRadioGroup.com>
Subject: Re: Front Royal, VA - CH221D BNPFT-20180501ABU Notification

CAUTION: This email originated from outside of Saga Communications. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Mitchell

Tidewater Communications, LLC's previous filing indicated potential interference between your then outstanding construction permit for increase of facilities for W221CF (BPFT-20150710ACY) and our proposal.

That construction permit has expired, and is no longer in consideration. Exhibit Figure 4 of our August 2019 amendment to our proposal clearly shows that all of the listeners claimed in Tidewater's original petition as potentially receiving interference fall outside of the licensed W221CF F(50,50) 45 dbu contour.

FCC rules Section 74.1204(f) protects stations only within the protected station's W221CF F(50,50) 45 dbu contour. Absent a showing of predicted interference to listeners of the licensed W221CF in accordance with the present rules, we are disinclined to modify our proposal to another channel without a clear showing that there actually are listeners to W221CF meeting the requirements of Section 74.1204(f) likely to be likely receive interference from our proposal.

Our position may be different if Tidewater were to identify a channel which would be equivalent or superior in serving Front Royal and north, or were to identify the requisite number of potential listeners that are likely to actually receive interference according to Section 74.1204(f) of the FCC Rules.

For reasons of antenna cost, we are planning to amend our application to specify a simpler antenna which will produce reduced radiation toward W221CF. The antenna we plan to specify will not cause overlap of the proposed F(50,10) 25 dbu contour with the licensed W221CF F(50,50) 45 dbu contour. (Establishing conclusively that for all locations inside the W221CF 45 dbu contour, that the D/U ratio is not violated). If this satisfies your objection, please let us know your intention to withdraw your objections to the FCC and we will promptly amend our application in this respect.

Sincerely,

Edward A. (Ted) Schober, PE

Executive Manager

Exhibit 4.1
Copy of Relevant Translator Licensee Notification & Email Exchange

On 9/24/2019 17:24:03, Kim Mitchell wrote:

Front Royal, VA – CH221D
BNPFT-20180501ABU
Facility ID: 202519
WINCHESTER RADIO BROADCASTERS, LLC
GOVT@WXVA.COM
TED@WXVA.COM

Mr. Edward Schober,
Pursuant to 47 C.F.R. Section 74.1204(f)(4), Tidewater Communications, LLC licensee of FM Translator W221CF – Harrisonburg, VA (Facility ID: 151081) requests you vacate CH221D (92.1 MHz) due to anticipated co-channel interference with Tidewater's W221CF. In accordance with recent rule changes to §74.1233(a)(1), certain non-adjacent channel changes are now permitted to resolve anticipated interference issues such as this. We encourage you to pursue such a channel change in an attempt to privately resolve this issue.
Kim Mitchell

Kim Mitchell
General Manager/Sales Manager
Harrisonburg Radio Group
1820 Heritage Center Way
Harrisonburg, VA 22801
Office: 540-434-0331
Fax: 540-434-7087

This email message, including attachments, may contain confidential and/or privileged material. Any unauthorized use, disclosure or distribution is prohibited. If you have received this in error, please delete it. Saga Communications, Inc. and all its subsidiaries and stations that it owns or operates prohibit all forms of discrimination in advertising contracts. We do not, and shall not, discriminate on the basis of race, ethnicity, or gender regarding advertising practices. All advertising agencies warrant, where applicable, that all radio commercials provided to our stations are properly licensed to be broadcast on radio stations and the associated internet streams.

ATTACHMENT 2

COPY OF EMAIL EXCHANGE WITH WRB

ATTACHMENT 2
EMAILS BETWEEN TIDEWATER AND WRB

From: Ted Schober [mailto:ted@wxva.com]
Sent: Thursday, September 26, 2019 4:50 PM
To: Kim Mitchell <KMitchell@HarrisonburgRadioGroup.com>
Subject: Re: Front Royal, VA - CH221D BNPFT-20180501ABU Notification

Dear Ms. Mitchell

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Sincerely,

Edward A. (Ted) Schober, PE

Executive Manager

On 9/24/2019 17:24:03, Kim Mitchell wrote:

Front Royal, VA – CH221D
BNPFT-20180501ABU
Facility ID: 202519
WINCHESTER RADIO BROADCASTERS, LLC
GOVT@WXVA.COM
TED@WXVA.COM

Mr. Edward Schober,
Pursuant to 47 C.F.R. Section 74.1204(f)(4), Tidewater Communications, LLC licensee of FM Translator W221CF – Harrisonburg, VA (Facility ID: 151081) requests you vacate CH221D (92.1 MHz) due to anticipated co-channel interference with Tidewater's W221CF. In accordance with recent rule changes to §74.1233(a)(1), certain non-adjacent channel changes are now permitted to resolve anticipated interference issues such as this. We encourage you to pursue such a channel change in an attempt to privately resolve this issue.
Kim Mitchell

Kim Mitchell
General Manager/Sales Manager
Harrisonburg Radio Group
1820 Heritage Center Way
Harrisonburg, VA 22801
Office: 540-434-0331
Fax: 540-434-7087

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CERTIFICATE OF SERVICE

I, Sherry L. Schunemann, a secretary in the law offices of Smithwick & Belendiuk, P.C., do hereby certify that a copy of the foregoing "Supplement to Petition to Deny" was either emailed (as marked with an asterisk), or mailed by First Class U.S. Mail, postage prepaid, this 3rd day of October, to the following:

*Albert Shuldiner, Esquire
Chief, Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Mr. James Bradshaw
Deputy Chief, Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Mr. Robert Gates
Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Kim Varner, Esq.
Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Winchester Radio Broadcasters, LLC
P. O. Box 367
Haddon Heights, NJ 08035-0367



Sherry L. Schunemann