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November 11, 2019

VIA ELECTRONIC FILING AND EMAIL

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554
Attn: James Bradshaw

Re: W235CN, Providence, RI
Radio Sharon Foundation
File No. BLFT-20171124AAA
Facility ID 41191
Interference Complaint

Dear Ms. Dortch:

Red Wolf Broadcasting Corporation (“Red Wolf”), licensee of station WJFF(FM), Montauk, NY, replies to the Commission’s letter of September 30, 2019 (the “FCC Letter”). The FCC Letter requests that Red Wolf update the record in this proceeding to demonstrate that W235CN is still causing interference to WJFF(FM) under the FCC’s new FM translator interference rules.¹

Attached hereto as Attachment 1 are complaints from eight listeners of WJFF(FM) who state that they are still receiving interference from W235CN. These complaints are signed and dated and include each listener’s full name, address and phone number. They also contain (i) a clear, concise and accurate description of the location of the interference, (ii) a statement that the listener listens over-the-air at least twice a month, and (iii) a statement that the listener does not have any legal, financial, employment or familiar affiliation with WJFF(FM). Thus, these complaints comply with the requirements specified in the FM Translator Interference Order.

Attached hereto as Attachment 2 is the technical information requested in the FCC Letter. Red Wolf confirms that WJFF(FM) is operating with its licensed facilities. Red Wolf will reach out to Radio Sharon and use commercially reasonable efforts to attempt to resolve this interference matter.

If there are any questions about this letter, please contact undersigned counsel for Red Wolf.

¹ See *Amendment of Part 74 of The Commission’s Rules Regarding FM Translator Interference*, Report and Order, 34 Rcd. 3457 (2019) (“*FM Translator Interference Order*”).

W235CN, Providence, RI
Radio Sharon Foundation
File No. BLFT-20171124AAA
Facility ID 41191
Interference Complaint

Sincerely,

/s/

Scott Woodworth

cc: Lee Peltzman (lee@s-plaw.com)
Kim Varner (Kim.Varner@fcc.gov)
audiodivisionpleadings@fcc.gov

Attachment 1

TRANSLATOR INTERFERENCE COMPLAINT

I, William Gingerella Jr., declare as follows:

1. My name is William Gingerella Jr.
2. My address is 19 Beach St Westerly, RI 02891 and my phone number is
401-596-7931 (H); 401-741-1959 (cell)
3. I listen to WJF (FM) over the air at least twice a month.
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJF (FM) from W235CN (a station playing Spanish music) at the following location:

In my home, as well as driving throughout Rhode Island, especially on Rt. 138 and Rt. 95 in Wyoming, Exeter, West Greenwich, Coventry, Warwick, and West Warwick.

Signed: _____

October 7, 2019

TRANSLATOR INTERFERENCE COMPLAINT

I, Christine Warner, declare as follows:

1. My name is Christine Warner
2. My address is 128 Woodville Alton Rd. Hope Valley, RI 02832 and my phone number is

401-364-0027

3. I listen to WJJF (FM) over the air at least twice a month.
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJJF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJJF (FM) from W235CN (a station playing Spanish music) at the following location:

In my home, as well as driving throughout Rhode Island, especially on Rt. 138 and Rt. 95 in Wyoming, Exeter, West Greenwich, Coventry, Warwick, and West Warwick.

Signed: _____

Christine Warner

October 7, 2019

TRANSLATOR INTERFERENCE COMPLAINT

I, Michael Warner, declare as follows:

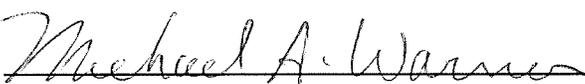
1. My name is Michael Warner
2. My address is 128 Woodville Alton Rd. Hope Valley, RI 02832 and my phone number is

401-364-0027

3. I listen to WJJF (FM) over the air at least twice a month.
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJJF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJJF (FM) from W235CN (a station playing Spanish music) at the following location:

In my home, as well as driving throughout Rhode Island, especially on Rt. 138 and Rt. 95 in Wyoming, Exeter, West Greenwich, Coventry, Warwick, and West Warwick.

Signed:



October 7, 2019

TRANSLATOR INTERFERENCE COMPLAINT

I, Debra Stokes, declare as follows:

1. My name is Debra Stokes
2. My address is 63 Cherokee Bend Charlestown, RI 02813 and my phone number is
401-364-8908

3. I listen to WJJF (FM) over the air at least twice a month.
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJJF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJJF (FM) from W235CN (a station playing Spanish music) at the following location:

In my home, as well as on Rt. 1 in Wakefield, RI

Signed: Debra J. Stokes
October 7, 2019

TRANSLATOR INTERFERENCE COMPLAINT

I, Jennifer Gudwin, declare as follows:

1. My name is Jennifer Gudwin
2. My address is 270C Moonstone Beach Rd South Kingstown, RI and my phone number is

401 – 792 - 4665

3. I listen to WJJF (FM) over the air at least twice a month.
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJJF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJJF (FM) from W235CN (a station playing Spanish music) at the following location:

Route 1- Narragansett, Wakefield, Charlestown, and Westerly RI
and North Kingstown RI.

Signed: _____
October 7, 2019

Jennifer Gudwin

TRANSLATOR INTERFERENCE COMPLAINT

I, Sandra Bristol, declare as follows:

1. My name is Sandra Bristol
2. My address is 18 Wildflower Dr. Westerly RI 02891 and my phone number is
401-322-1617

3. I listen to WJJF (FM) over the air at least twice a month.
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJJF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJJF (FM) from W235CN (a station playing Spanish music) at the following location:

Throughout the town of Westerly and in my home.

Signed: _____
October 7, 2019

Sandra Bristol

TRANSLATOR INTERFERENCE COMPLAINT

I, Robert Macek, declare as follows:

1. My name is Robert Macek
2. My address is 80 Middle Rd Preston, CT 06365 and my phone number is
860-912-7860

3. I listen to WJFF (FM) over the air at least twice a month.
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJFF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJFF (FM) from W235CN (a station playing Spanish music) at the following location:

Severe on my way to work in Newport on Rt. 138 through the towns of Griswold and Voluntown, CT and on Rt. 138 in Hopkinton, Richmond, South Kingstown, Jamestown, Newport, and Middletown. Also received interference on Rt. 165 in Preston, and Voluntown, CT and Exeter, North Kingstown, RI.

Signed: _____

October 7, 2019

Robert A. Macek

TRANSLATOR INTERFERENCE COMPLAINT

I, Todd Dumas, declare as follows:

1. My name is Todd Dumas
2. My address is 39 Brandywine Dr Westerly RI 02891 and my phone number is

401-348-9304

3. I listen to WJFF (FM) over the air ~~at least twice a month.~~ DAILY
4. I do not have any legal, employment, financial, or familiar affiliation or relationship with WJFF (FM).
5. I previously submitted a complaint of interference from W235CN. I continue to experience interference to my over the air reception of WJFF (FM) from W235CN (a station playing Spanish music) at the following location:

RI Rt. 3 from Hopkinton into Coventry AND AT TIMES INTO STONINGTON AND NORWICH, CT

Signed: 
October 7, 2019

Attachment 2

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
INFORMAL OBJECTION AND INTERFERENCE COMPLAINT
TO THE APPLICATION FOR LICENSE
FOR FM TRANSLATOR STATION W235CN
PROVIDENCE, RHODE ISLAND
FCC FILE NO. BLFT-20171124AAA
FCC FACILITY ID 41191

This technical exhibit was prepared on behalf of Red Wolf Broadcasting Corporation (“Red Wolf”), licensee of FM station WJFF on channel 235A (94.9 MHz) at Montauk, New York (BLH-20120302AAX) in support of an Informal Objection and Interference Complaint to the application for license for W235CN on co-channel 235 (94.9 MHz) at Providence, Rhode Island (“W235CN”, FCC File No. BLFT-20171124AAA, Facility ID 41191). Specifically, the purpose of this technical exhibit is to demonstrate, pursuant to Section 74.1203(a)(3), that W235CN causes actual, actionable interference to the required number of regular WJFF listeners.

Under the recently adopted translator interference complaint procedures, the FCC established the 45 dBU contour as the limit within which interference complaints will be considered actionable, established a minimum number of listener complaints proportionate to the population served by the complaining station and adopted a contour-based U/D ratio method as a threshold causation test to establish that the complaining listener is within a “zone of potential interference”.¹

Station W235CN operates on channel 292 (94.9 MHz) which is co-channel to WJFF’s licensed operation also on channel 292A (94.9 MHz). Co-channel interference is predicted to occur if the U/D signal strength ratio exceeds -20 decibels (dB). Therefore, interference from W235CN within the WJFF 45 dBU contour was calculated based on a -20 dB U/D ratio using the FCC’s F(50,50) curves for determination of WJFF’s desired signal and the F(50,10) curves for determination of W235CN’s undesired signal. The resulting zone of predicted interference within WJFF’s 45 dBU contour from W235CN has been depicted on Figure 1 with yellow tinting.

¹ See *Amendment of Part 74 of the Commission’s Rules Regarding FM Translator Interference, Report and Order, MB Docket No. 18-119, FCC 19-40 (rel. May 9, 2019 (FM Translator Interference Report and Order))* and Section 74.1203(a)(3).

It has been determined using the FCC's standard prediction method that the WJFF 60 dBu contour contains a 2010 Census population of 24,825 persons.² Therefore, based on Table 1 of Section 74.1203(a)(3), a minimum of six (6) listener complaints are required for an interference claim. Figure 2 provides a tabulation of seven (7) regular mobile and home WJFF listeners who submitted interference complaints and who receive interference within the zone of predicted interference depicted on Figure 1. The tabulation includes each listener's name, address, phone number and a description of where the interference occurs. The locations (i.e. route numbers, intersections, addresses, geographic coordinates, etc.) where each listener is receiving interference are identified on Figure 1.

As demonstrated above, W235CN causes actual, actionable interference to the required number of regular mobile and home/work WJFF listeners pursuant to Section 74.1203(a)(3).

I hereby declare under penalty of perjury that the forgoing is true and correct to the best of my personal knowledge and belief.



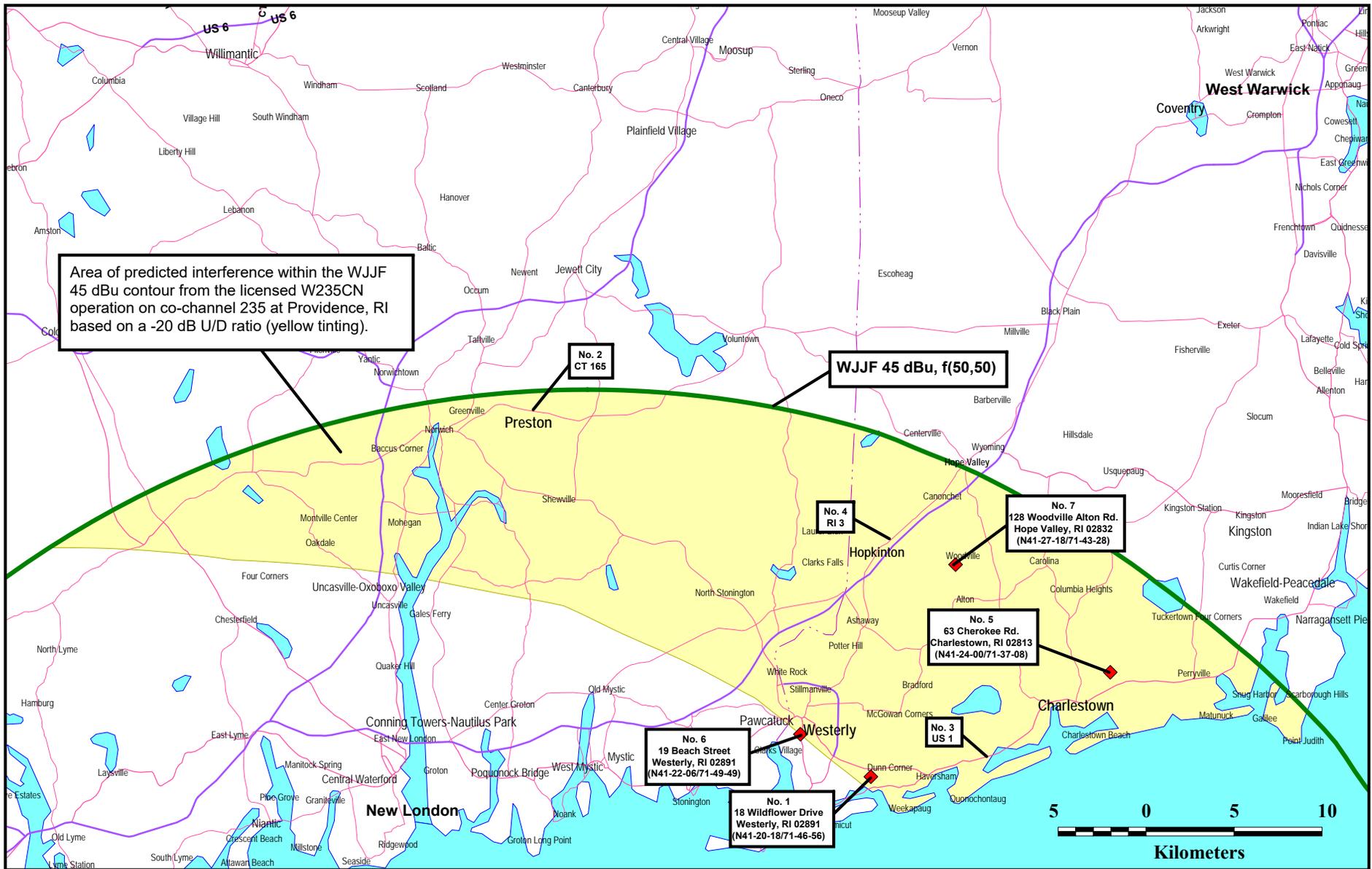
W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
3135 Southgate Circle
Sarasota, Florida 342389
(941) 329-6013
JEFF@DLR.COM

November 11, 2019

² The distances to the WJFF 60 dBu contour were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database using radials evenly-spaced every 1 degree of azimuth.

Figure 1



SECTION 74.1203(A)(3) ANALYSIS

FM TRANSLATOR STATION W235CN
PROVIDENCE, RHODE ISLAND
CH 235 (94.9 MHZ) 0.25 KW (DA)

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

COMPLAINANT CHART

<u>No.</u>	<u>Complainant</u>	<u>Address</u>	<u>Phone Number</u>	<u>Description of Location of Interference</u>
1	Sandra Bristol	18 Wildflower Drive Westerly, RI 02891	401-322-1617	Throughout the town of Westerly and in my home. 18 Wildflower Drive, Westerly, RI 02891 (Home) N41-20-48/71-46-56 (NAD83)
2	Robert Macek	80 Middle Rd. Preston, CT 06365	860-912-7860	On way to work in Newport on Rt. 138 in Hopkinton and on Rt. 165 in Preston.
3	Jennifer Gudwin	270C Moonstone Beach Rd. South Kingston, RI	401-792-4665	Route 1 Charlestown and Westerly, RI
4	Todd Dumas	39 Brandywine Dr. Westerly, RI 02891	401-348-9304	RI Rt 3 from Hopkinton into Coventry
5	Debra Stokes	63 Cherokee Bend Charlestown, RI 02813	401-364-8909	In my home, as well as on Rt. 1 in Wakefield, RI 63 Cherokee Bend, Charlestown, RI 02813 (Home) N41-24-00/71-37-08 (NAD83)
6	William Gingerella Jr.	19 Beach St. Westerly, RI 02891	401-596-7931	In my home 19 Beach ST., Westerly, RI 02891 (Home) N41-22-06/W71-49-49 (NAD83)
7	Christine Warner Michael Warner	128 Woodville Alton, Rd. Hope Valley, RI 02832	401-364-0027	In my home 128 Woodville Alton, Rd., Hope Valley, RI 02832 (Home) N41-27-18/W71-43-28 (NAD83)