

**BEFORE THE
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Bicoastal Media Licenses IV, LLC)	File No. BNPFT-20180430AAV
)	Facility ID # 202510
Application for a new FM Translator)	
On Channel 267 Centralia, Washington)	

To: Honorable Marlene H. Dortch
Secretary of the Commission

Attn: Chief, Audio Division, Media Bureau

Informal Objection

Northwest Rock 'N' Roll Preservation Society ("NWR"), pursuant to Title 47 USC Section 309(d) and the Commission's Rules, hereby respectfully files the Informal Objection directed against the above captioned application ("Application").

NWR is the licensee of K266BM Olympia, Washington (Facility ID No. 150021) (the Station") and has standing to file this Petition. The Station is first-adjacent with the proposed facility. The Application should be dismissed because the proposed translator overlaps a populated area receiving the regularly used signal of the Station, and will cause interference to the reception of K266BM by established listeners within the 60 dBu contour of the proposed translator.

Section 74.1204(f) of the Commission's Rules provides:

An application for an FM translator station will not be accepted for filing even though the proposed operation would not involve overlap of the field strength contours with any other station ..., if the predicted 1 mV/m field strength contour of the FM translator station overlap a populated area already receiving a regularly used, off-the-air signal of any authorized co-channel, first, second, or third adjacent channel broadcast station, and grant of the authorization will result in interference to the reception of such a signal.

Here, the 1 mV/m contour of the facility proposed in the Application will cover areas where the Station has an established listener base. These are populated areas and include several major arterials: Interstate 5 (I-5), US Highway 12, State Routes 6, 505, 506, 507, and 508.

Attachment A hereto contains an engineering consultant statement from Jeff Reynolds of du Treil, Lundin & Rackley. Also included are maps that plot areas within the 1 mV/m contour of the proposed translator where listeners regularly listen to the Station (see listener declarations referenced below in Attachment B). The engineering statement clearly demonstrates that operation of the proposed FM Translator on Channel 267 at Centralia will result in interference to reception of the Station to listeners at these locations.

Attachment B hereto includes declarations from individuals who regularly listen to the Station within the proposed 1 mV/m contour of the proposed FM Translator. Darleen

Freeman, Dan Mohny, Pat Parker, Timothy Smith, and Mark Yandrich (five listeners) live within the 1 mV/m contour; Anthony Airhart, Kevin Flanagan, Patrick Mootz, Tamara Schwender, and Ryan Von Bergen (five listeners) regularly travel into or through the 1 mV/m contour.

NWR also has maps for regular listeners who either live within or travel through the 1 mV/m contour, whose declarations have not yet been received. They also would be adversely affected with interference from the proposed FM Translator. Additionally, many listeners outside the proposed 1 mV/m contour will be adversely affected, especially in Thurston County including listeners within the City of Olympia.

Under the Commission Rules, the captioned Application cannot be accepted for filing and must be dismissed.

Respectfully submitted,

Northwest Rock 'N' Roll Preservation Society

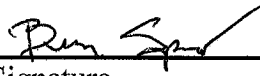
By: Brian Spencer
Brian Spencer, President

October 5, 2018

DECLARATION

I, Brian Spencer, hereby declare under penalty of perjury as follows:

1. I am President of Northwest Rock 'N' Roll Preservation Society
2. I have reviewed the Informal Objection to which this declaration is attached and the fact set forth therein, except those which are attested to by another, are true and correct to the best of my knowledge, information and belief and is not interposed for delay.



Signature

October 5, 2018

Exhibit A

Technical Exhibit and Map

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
AN INFORMAL OBJECTION TO THE
APPLICATION FOR CONSTRUCTION PERMIT
FOR A NEW FM TRANSLATOR STATION
CENTRALIA, WASHINGTON
FCC FACILITY ID 202510

This technical exhibit was prepared on behalf of Northwest Rock N Roll Preservation Society., licensee of station K266BM on channel 266 (101.1 MHz) at Olympia, Washington (BLFT-20130402ACL) in support of an Informal Objection to the application for construction permit for a new FM translator station on channel 267 (101.3 MHz) at Centralia, Washington, ("translator application", BNPFT-20180430AAV). Specifically, the purpose of this technical exhibit is to provide convincing evidence under Section 74.1204(f) that the translator application will result in interference to regular K266BM listeners at home as well as mobile K266BM listeners.

Attached to this Informal Objection are declarations from ten (10) regular K266BM listeners who listen to K266BM within the 1 mV/m (60 dBu) contour of the translator application. Also attached are maps of the translator application's 1 mV/m contour obtained from the FCC's webpage which indicate the locations where the 10 regular K266BM listeners listen to K266BM within the translator application 1 mV/m. It is noted that all 10 regular K266BM listeners are mobile listeners within the translator application 1 mV/m contour with five (Darleen Freeman, Timothy Smith, Dan Mohny, Mark Yandrich and Pat Parker) also listening at homes which are also located within the translator application 1 mV/m contour. Calculations based on the undesired-to-desired ("U/D") signal strength ratio methodology have determined that operation of the translator application's facilities will cause interference to the direct reception of the 10 regular K266BM listeners within the translator application 1 mV/m.¹

¹ See *The Association for Community Education, Inc.*, FCC 04-155, Para. 13, (rel. July 8, 2004).

Figure 1 is a FCC map of the translator application 1 mV/m contour. The translator application proposes to operate on channel 267 (101.3 MHz) which is a first adjacent to K266BM's licensed operation on channel 266 (101.1 MHz). First adjacent channel interference is predicted to occur if the U/D signal strength ratio exceeds -6 decibels (dB). It has been determined that the K266BM 30 dBu, F(50,50) contour completely encompasses the translator application's 1 mV/m (60 dBu) contour as indicated on Figure 1. Therefore, interference from the translator application within the K266BM 30 dBu contour was calculated based on a -6 dB U/D ratio using the FCC's F(50,50) curves for determination of K266BM's desired signal and the F(50,10) curves for determination of translator application's undesired signal. The area of predicted interference within K266BM's 30 dBu contour from the translator application has been depicted on Figure 1 with yellow tinting. As can be seen on Figure 1, the 1 mV/m for the translator application is entirely within the translator application's predicted area of interference to K266BM. Therefore, it is unquestionable that the translator application is predicted to cause interference to the 8 regular listeners of K266BM under Section 74.1204(f).

Pursuant to Section 74.1204(f), an FM translator station will not be accepted for filing if its authorization will result in interference to the reception of a "regularly used, off-the-air signal". This includes mobile listeners. Specifically, the FCC has long held that mobile receivers, such as automobile radios, should not be subject to interference from the operation of an FM translator or booster station.² Furthermore, for the purposes of analysis of "lack of population" under Section 74.1204(d), the FCC considers locations where people work and drive.³

² See *The Association for Community Education, Inc.*, FCC 04-155, Para. 15, (rel. July 8, 2004) and, *Forus Broadcasting of New York, Inc.*, 7 FCC Rcd 7880, 7882 (M.M. Bur. 1992).

³ See *Living Way Ministries*, Memorandum Opinion and Order, 17 FCC Rcd 17054, 17056 (2002), Para. 11.

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

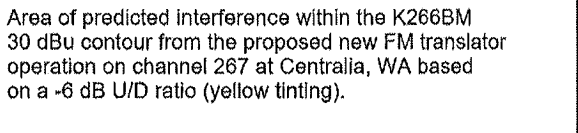


W. Jeffrey Reynolds

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Sarasota, Florida 342388
(941) 329-6000
JEFF@DLR.COM

October 5, 2018

Proposed Translator Long Form
1 mV/m (60 dBu)



SECTION 74.1204(F) ANALYSIS

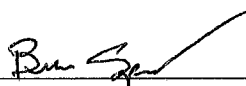
NEW FM TRANSLATOR STATION
FCC FILE NO. BNPFT-20180430AAV
CENTRALIA, WASHINGTON CH 267
(101.3 MHZ) 0.135 kW (ND)

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

Certificate of Service

It is hereby certified that a true copy of the forgoing Informal Objection was served by first-class United States mail, postage prepaid, on the 5th day of October, 2018, upon the following:

Melodie A Virtue, Esq.
1000 Potomac Street, N.W.
Suite 200
Washington, DC 20007-3501

By: _____
Brian Spencer