

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In re

NEW BEGINNINGS MOVEMENT,)	File No. BPFT-20180417AAE
INCORPORATED)	File No. BLFT-20151120AGX
)	
FM Translator Station W275BD)	Facility Identification Number 143744
Greenfield, Indiana)	

To: Federal Communications Commission
Attn: Media Bureau, Audio Services Division

COMMENTS

Reising Radio Partners Inc. (“Reising”), licensee of WXCH(FM), Columbus, Indiana (Facility Id. No. 16255), by its attorneys, hereby files these Comments with regard to the above-referenced construction permit to modify the facilities for W275BD. The Commission must order W275BD to cease operations immediately until the station commences operation with the proposed permitted facilities.

W275BD interferes with the listening public’s regular over the air reception of WXCH in direct violation of Section 74.1203(a) of the Commission’s Rules.¹ In December 2015 Reising first submitted documentary evidence of this interference to the Commission. Yet 29 months later, despite three letters from the Commission ordering then licensee Indiana Radio Community Corporation² to resolve the interference complaints, W275BD remains on the air causing interference to the over the air reception of WXCH. Reising Radio provided incontrovertible evidence that W275BD causes interference to reception of WXCH. Yet over 875 days later W275BD remains on the air.

¹ Reising incorporates by reference its filings made in response to the Commission’s grant of the application for license for W275BD, File No. BLFT-20151120AGX.

² New Beginnings Movement Incorporated is the successor in interest to Indiana Radio Community Corporation. *See* File No. BALFT-20180104AAR.

The underlying application tacitly acknowledges W275BD causes prohibited interference to WXCH. The combination of significantly reducing the 60 dBu contour for W275BD with using a directional antenna pointing the station's signal northwest in the exact opposite direction of the WXCH signal supports this conclusion. It appears the intent is to use the currently licensed facilities for FM translator station W286CM and the newly permitted facilities for W275BD to replicate as much as possible the presently licensed 60 dBu contour for W275BD. The two translator stations would rebroadcast the signal of WNOW-FM, licensed to Radio One of Indiana, LLC ("Radio One"). W275BD presently rebroadcasts the signal of WNOW-FM.

The Commission granted the permit application on April 30, 2018. Reising does not object to Commission approval of the instant application insofar as Reising hopes that operating W275BD with a reduced 60 dBu contour and a directional signal pointed away from WXCH will resolve the interference problem.³ Reising wishes Radio One and Indiana Community Radio Corporation had pursued this technical solution over two years ago. However, Reising is cognizant New Beginnings Movement has three years from grant of the construction permit to construct the new facilities for W275BD, during which time W275BD will continue to cause interference to WXCH from its presently licensed facilities.

Reising therefore requests the Commission order W275BD to cease operations immediately until such as time as W275BD commences operations with the newly permitted facilities. This is consistent with Commission precedent ordering a translator station to cease operations immediately for one unresolved interference complaint.⁴

³ Nothing in this pleading should be construed as a waiver on the part of Reising to bring a future complaint in the event the new facilities for W275BD should cause actual interference to the regular over the air reception of WXCH.

⁴ See *Letter to Mark B. Denbo, Esq. and Andrew Kersting, Esq. from James D. Bradshaw* at 5 (April 11, 2018) (ordering immediate suspension of operations of FM Translator Station for one unresolved interference complaint).

Respectfully Submitted,

REISING RADIO PARTNERS INC.

By: 

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May 1, 2018

Its Attorney

CERTIFICATE OF SERVICE

I, David G. O'Neil, hereby certify that a true and correct copy of the foregoing "Comments" was sent via first class mail (unless otherwise indicated) this 1st day of May 2018 to the following:

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