

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

In the Matter of

**ENTERCOM LICENSE, LLC**

License to Cover for  
FM Translator Station K277AE  
Seattle, WA

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

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)  
)  
) FCC File No. BLFT-20170818AAE  
) FCC Facility ID No. 18522  
)  
)  
)  
)

**INFORMAL OBJECTION**

1. Everett-Snohomish Broadcasting (hereafter “Everett-Snohomish”) licensee of FM station KMCQ, Oak Harbor, Washington (hereafter “KMCQ”) by its attorneys, pursuant to Sections 73.3587 and Sections 74.1203(a)(3) and 74.1203(b) of the Commission’s rules, hereby objects to a grant of the above captioned license application.

2. This license application is filed to cover construction permit BPFT-20170421AAM granted May 16, 2017 (the “CP”), the subject of unresolved interference complaints filed by Everett-Snohomish on June 19, 2017, seeking immediate remediation of the interference caused to its bona-fide listeners of the regularly-used co-channel KMCQ signal (the “Interference Complaint”). Everett-Snohomish hereby incorporates herein by reference the Interference Complaint and its exhibits. As shown in the Interference Complaint, Everett-Snohomish attempted to engage Entercom, licensee of K277AE, in cooperative efforts to resolve the interference issues, to no avail. Instead, Entercom, unilaterally filed the new CP, specifying no change of frequency and only a slight change of antenna pattern.

3. As stated in the Interference Complaint, the CP application made no mention of the interference K277AE was causing to KMCQ nor did it suggest the CP would provide

remediation for it. This was for good reason as the Interference Complaint provided studies that demonstrate that operation under the CP could not resolve the interference problem.

4. Despite these listener complaints and the engineering studies submitted by Everett-Snohomish, Entercom has apparently proceeded to build and has now filed the above-captioned application for license, the condition for operation under the CP. Therefore, K277AE must be presumed to be operating with its new facilities, despite the showing in the Interference Complaint that operation under this construction permit provides no remediation or relief for KMCQ. Accordingly, all of the allegations, engineering studies and interference complaints previously submitted with the Interference Complaint must be considered to be continuing and considered against the instant license application.


5. KMCQ continues to receive listener complaints of interference attributable to K277AE, the most recent of which is dated August 19, just two days before the K277AE license application was filed, and possibly while program tests had already begun with the new facility. Attached as Exhibit “A” are twelve new interference complaints from *bona fide* regular KMCQ listeners reporting interference from another radio station, described as co-channel 103.3 and as rap or hip-hop music. Those descriptions can only be a reference to K277AE. The full-power radio station associated with and being rebroadcast by K277AE is KHTP (FM). See Section 3A at BPFT-20170421AAM. KHTP, licensed to Tacoma Washington, identifies itself as “Hot 1037 Seattle” and programs hip hop style music. See Exhibit “B”, a screen shot of the KHTP web site. Clearly, this is the music identified by the listener complaints. Furthermore, several of these new complaints come from areas that corroborate and reaffirm the areas of interference described in previous complainants against K277AE.

## **CONCLUSION**

Considering the history of interference caused by K277AE to the regular listeners of KMCQ, Entercom's failure to remediate the past interference, the continuing receipt of new *bona fide* listener complaints from regular KMCQ listeners and the studies submitted with the Interference Complaint proving that K277AE operations under its new construction permit fail to provide any remediation to the interference, the instant license application should be rejected. Everett-Snohomish hereby requests that this application for license be denied and that pursuant to section 74.1203(b) of Commissions Rules, operation of K277AE be suspended and not resumed until it can be shown that the interference has been and will be eliminated into the future.

Respectfully submitted,

**EVERETT-SNOHOMISH BROADCASTING L.L.C.**

By  \_\_\_\_\_  
Gregg P. Skall  
Its Attorney

Womble Carlyle Sandridge & Rice, LLP  
1200 19<sup>th</sup> Street, N.W. Suite 500  
Washington, DC 20036  
(202) 857-4455

August 23, 2017

**CERTIFICATE OF SERVICE**

I, Gregg P. Skall, an attorney at the law firm of Womble Carlyle Sandridge & Rice, LLP, do hereby certify that a true copy of the foregoing document titled "Interference Complaint" was sent this 23<sup>rd</sup> day of August, 2017 by e-mail and U.S. Mail, postage prepaid, to the following

Carrie A. Ward, Esquire  
Entercom Communications Corp.  
401 East City Avenue  
Suite 809  
Bala Cynwyd, PA 19004  
cward@entercom.com

Sally A. Buckman  
Laura M. Berman  
Lerman Senter PLLC  
2001 L Street, N.W., Suite 400  
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Robert.gates@fcc.gov

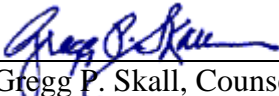
  
\_\_\_\_\_  
Gregg P. Skall, Counsel  
Everett-Snohomish Broadcasting, LLC

Exhibit “A”

Interference Complaints

Reference #	9478039
Status	Complete
Your Name	Stephen Kelly
Email	<a href="mailto:Atbackpacker@gmail.com">Atbackpacker@gmail.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	7/21/17
Please describe the type of interference you heard. (Please check all that apply)	<ul style="list-style-type: none"><li>• Scratchy or Noisy</li><li>• Another Radio Station at 103.3 FM</li></ul>
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	Ballinger Way NE and State route 522 intersection area
Last Update	2017-07-21 20:31:58
Start Time	2017-07-21 20:30:23
Finish Time	2017-07-21 20:31:58
IP	73.225.21.225
Browser	Chrome
OS	Windows
Referrer	<a href="http://countryq1033.com/">http://countryq1033.com/</a>

Reference #	9466434
Status	Complete
Your Name	Carter
Email	
Or Telephone	2067245514
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	Every day
Please describe the type of interference you heard. (Please check all that apply)	Scratchy or Noisy
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	Edmonds
Last Update	2017-07-13 16:19:36
Start Time	2017-07-13 16:18:44
Finish Time	2017-07-13 16:19:36
IP	107.77.205.4
Browser	Safari
OS	Mobile
Referrer	http://www.countryq1033.com/

Reference #	9472082
Status	Complete
Your Name	Kirt
Email	<a href="mailto:kirt.langer@gmail.com">kirt.langer@gmail.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	Everyday
Please describe the type of interference you heard. (Please check all that apply)	Scratchy or Noisy
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	I lose reception heading north out of Burlington. Please give us an option besides Canadian country radio in Bellingham!
Last Update	2017-07-18 09:08:06
Start Time	2017-07-18 09:05:18
Finish Time	2017-07-18 09:08:06
IP	70.199.139.169
Browser	Safari
OS	Mobile
Referrer	<a href="http://www.countryq1033.com/">http://www.countryq1033.com/</a>



Reference #	9517320
Status	Complete
Your Name	Chris Crocker
Email	<a href="mailto:cacrocker@gmail.com">cacrocker@gmail.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	August 15th, 2017
Please describe the type of interference you heard. (Please check all that apply)	<ul style="list-style-type: none"><li>• Scratchy or Noisy</li><li>• Another Radio Station at 103.3 FM. Please tell us the station name, slogans, personalities, type of music, or anything else you remember about the station below.</li></ul>
Item #26	There are a lot of stations around that range. A lot of bleed over when I leave my driveway. I live in the Edgewater neighborhood in Poulsbo.
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	It was spotty all along highway 3.
Last Update	2017-08-16 02:11:41
Start Time	2017-08-16 02:02:05
Finish Time	2017-08-16 02:11:41
IP	73.254.147.110
Browser	Chrome

Reference #	9518374
Status	Complete
Your Name	Brian
Email	<a href="mailto:fireaxe@msn.com">fireaxe@msn.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	2 minutes ago 200pm on 8.16/17  scratchy and fading sounds with background noise on SR526 between 84th ST SW in Mukilteo and Seaway Blvd exit (in front of Boeing)
Please describe the type of interference you heard. (Please check all that apply)	Scratchy or Noisy
Item #26	scratchy and fading sounds with background noise on SR526 between 84th ST SW in Mukilteo and Seaway Blvd exit (in front of Boeing)
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	scratchy and fading sounds with background noise on SR526 between 84th ST SW in Mukilteo and Seaway Blvd exit (in front of Boeing)
Last Update	2017-08-16 16:06:17
Start Time	2017-08-16 16:02:02
Finish Time	2017-08-16 16:06:17
IP	74.112.49.42
Browser	IE
OS	Windows

Reference #	9519624
Status	Complete
Your Name	Kolton Kellison
Email	<a href="mailto:Koltonkellison@gmail.com">Koltonkellison@gmail.com</a>
Or Telephone	3609695271
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	
Please describe the type of interference you heard. (Please check all that apply)	<ul style="list-style-type: none"><li>• Scratchy or Noisy</li><li>• Another Radio Station at 103.3 FM. Please tell us the station name, slogans, personalities, type of music, or anything else you remember about the station below.</li></ul>
Item #26	Sounds like bleeding through can't identify exact station
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	State route 20 and Wanamaker in Coupeville wa
Last Update	2017-08-17 10:53:11
Start Time	2017-08-17 10:51:01
Finish Time	2017-08-17 10:53:11
IP	107.77.205.48
Browser	Safari



Reference #	9520017
Status	Complete
Your Name	Christopher reed
Email	<a href="mailto:ctreed27@yahoo.com">ctreed27@yahoo.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	8/16/2017
Please describe the type of interference you heard. (Please check all that apply)	Another Radio Station at 103.3 FM. Please tell us the station name, slogans, personalities, type of music, or anything else you remember about the station below.
Item #26	Rap music came on. Also, on another note, could you guys play more Randy Travis? And a little less Taylor swift, I hear her songs a lot, and if I wanted to hear her being over played I'd just go back to 94.1 or 100.7 thanks
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	Shoreline wa
Last Update	2017-08-17 14:06:18
Start Time	2017-08-17 14:02:42
Finish Time	2017-08-17 14:06:18
IP	70.199.132.29
Browser	Other

Reference #	9521310
Status	Complete
Your Name	Todd slater
Email	<a href="mailto:ttslater@comcast.net">ttslater@comcast.net</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	8/18/2017
Please describe the type of interference you heard. (Please check all that apply)	Another Radio Station at 103.3 FM. Please tell us the station name, slogans, personalities, type of music, or anything else you remember about the station below.
Item #26	Another radio station was interfering but we couldn't tell the station. Also very staticky.
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	Highway 9 between Clearview and Maltby road.
Last Update	2017-08-18 11:20:51
Start Time	2017-08-18 11:17:13
Finish Time	2017-08-18 11:20:51
IP	73.109.62.155
Browser	Safari
OS	Mobile
Referrer	<a href="http://countryq1033.com/">http://countryq1033.com/</a>

Reference #	9521656
Status	Complete
Your Name	Ron Colwill
Email	<a href="mailto:ronwcolwill@gmail.com">ronwcolwill@gmail.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	August 15, 2017
Please describe the type of interference you heard. (Please check all that apply)	Another Radio Station at 103.3 FM. Please tell us the station name, slogans, personalities, type of music, or anything else you remember about the station below.
Item #26	Rap music
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	ORap music takes over in Mountlake Terrace on 236 st sw after crossing I-5 headed east and in Seattle by the QFC on Holman Road
Last Update	2017-08-18 15:05:53
Start Time	2017-08-18 15:01:20
Finish Time	2017-08-18 15:05:53
IP	107.77.205.127
Browser	Safari
OS	Mobile
Referrer	<a href="http://www.countryq1033.com/">http://www.countryq1033.com/</a>



Reference #	9521834
Status	Complete
Your Name	Jill Coffelt
Email	<a href="mailto:jmmcoffelt@comcast.net">jmmcoffelt@comcast.net</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	August 18, 2017
Please describe the type of interference you heard. (Please check all that apply)	<ul style="list-style-type: none"><li>• Scratchy or Noisy</li><li>• Another Radio Station at 103.3 FM. Please tell us the station name, slogans, personalities, type of music, or anything else you remember about the station below.</li></ul>
Item #26	103.7
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	164th st. SW heading into Mill Creek..
Last Update	2017-08-18 16:21:11
Start Time	2017-08-18 16:17:54
Finish Time	2017-08-18 16:21:11
IP	98.203.221.72
Browser	Safari
OS	Mobile

Reference #	9522155
Status	Complete
Your Name	Sarah Myers
Email	<a href="mailto:sahhr4444@yahoo.com">sahhr4444@yahoo.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	Every day 8/18/17
Please describe the type of interference you heard. (Please check all that apply)	<ul style="list-style-type: none"><li>• Scratchy or Noisy</li><li>• Another Radio Station at 103.3 FM. Please tell us the station name, slogans, personalities, type of music, or anything else you remember about the station below.</li></ul>
Item #26	When I hear another station it comes in as rap or hip hop.
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	Its scratchy in bothell where I live. Anywhere south of kirkland on 405 its impossible to get this station.
Last Update	2017-08-18 21:07:26
Start Time	2017-08-18 21:01:28
Finish Time	2017-08-18 21:07:26
IP	70.199.133.20
Browser	Safari



Reference #	9522496
Status	Complete
Your Name	Mike Welch
Email	<a href="mailto:welcher41@msn.com">welcher41@msn.com</a>
Or Telephone	
Please list the most recent date that you experienced the KMCQ signal interruption. If you do not recall the exact date, an approximation will be ok.	8/19/2017 @ 1056am signal much weaker5
Please describe the type of interference you heard. (Please check all that apply)	
Item #26	
Please tell us the location where the interference occurred. Please be as specific as possible, including street names, highway locations, etc.	APPLE Tree Point, Kingston, Wa
Last Update	2017-08-19 13:15:23
Start Time	2017-08-19 13:12:24
Finish Time	2017-08-19 13:15:23
IP	207.118.99.246
Browser	Chrome
OS	Mobile
Referrer	<a href="http://countryq1033.com/">http://countryq1033.com/</a>

Exhibit “B”  
KMCQ Website



**Suga Rae**  
6:00 PM TO 11:00 PM