

**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, Timothy Smith, and Mark Yandrich live within the 1 mV/m contour; Anthony Airhart, Kevin Flanagan, Tamara Schwender, and Ryan Von Bergen 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 1mV/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 1mV/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, President

October 2, 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 FILE NO. BNPFT-20180430AAV
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 seven (7) 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 7 regular K266BM listeners listen to K266BM within the translator application 1 mV/m. It is noted that all 7 regular K266BM listeners are mobile listeners within the translator application 1 mV/m contour with three (Darleen Freeman, Timothy Smith and Mark Yandrich) 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 7 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 7 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.

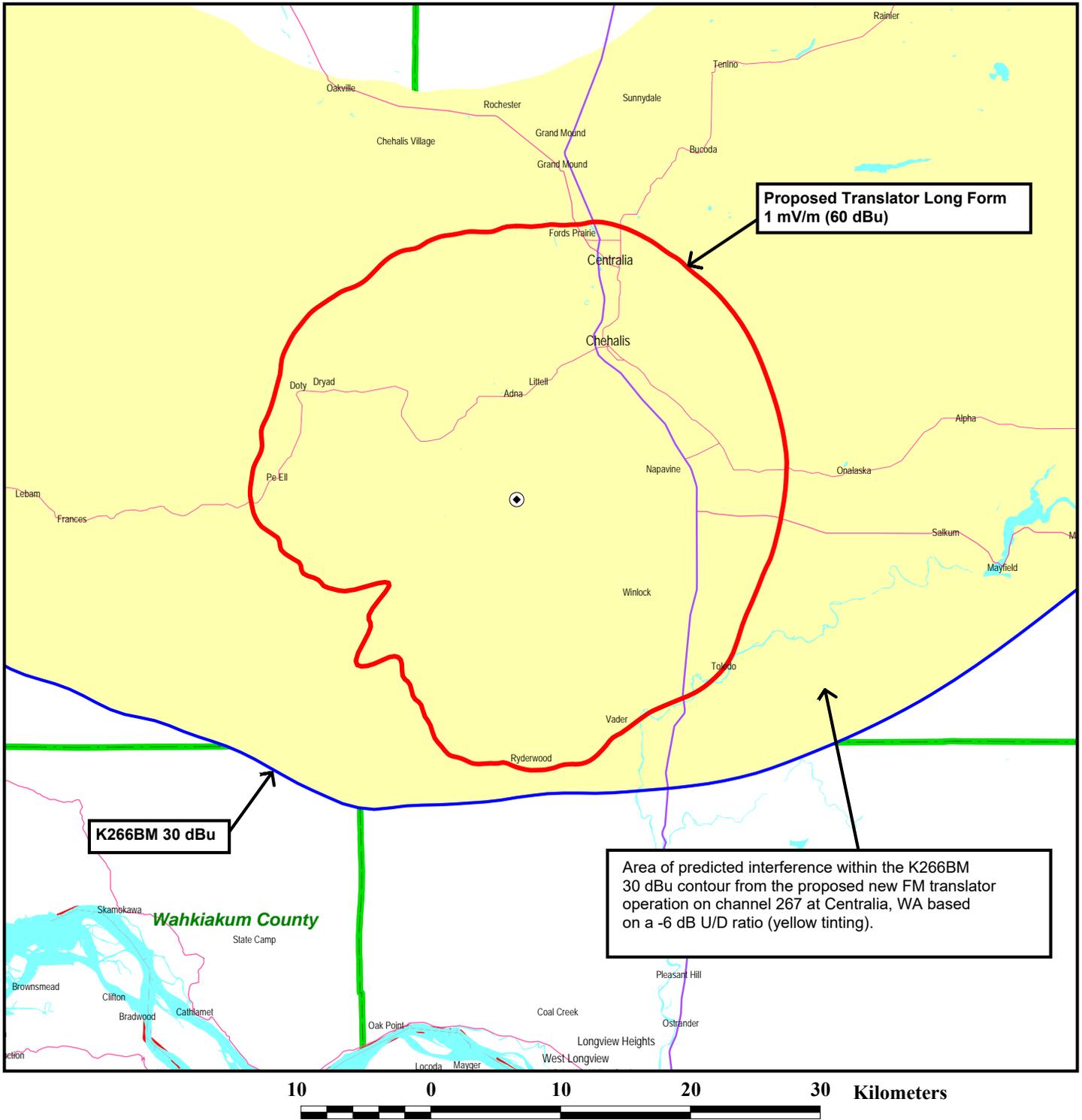


W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
3135 Southgate Circle
Sarasota, Florida 342388
(941) 329-6000
JEFF@DLR.COM

October 2, 2018

Figure 1



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

Exhibit B

Listener Declarations
And Maps

KGHO 101.1FM re: proposed Centralia translator station for KELA

My name is Darlene Freeman

I am a frequent listener to radio station KGHO on K266BM Olympia community translator 101.1FM. I have become aware that the Federal Communications Commission (FCC) is considering an application for another station on 101.3FM in my area. I am concerned if the FCC allows that new station on 101.3 FM, it would interfere with my ability to listen to KGHO where I live, work, or commute.

I am providing this declaration to inform the FCC where I regularly listen to KGHO and that I oppose allowing the proposed station that would cause interference.

I listen (check all that apply):

B. Commuting or driving through the affected area (see map). Please describe where and frequency (Example: I drive Highway X to destination Y 4-days a week).

I drive thru Centralia area to work daily plus trips to
 B. At home: Stoll, Dr. etc This is down Harrison/Main in Centralia and down I-5 to and from Chelalis

Address 202 Aurora Street
Centralia, WA 98531

C. At Work:

Address: _____

I declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and belief. I have no family or financial affiliation with radio station KGHO-LP nor K266BM licensee Northwest Rock 'N' Roll Preservation Society.

Signed: Darlene Freeman

Print name: Darlene Freeman

Address: 202 Aurora Street

Centralia, WA 98531

Phone: 360-689-0286

Email: Freeman6012@GMAIL.COM

KGHO 101.1FM re: proposed Centralia translator station for KELA

My name is TIMOTHY SMITH

I am a frequent listener to radio station KGHO on K266BM Olympia community translator 101.1FM. I have become aware that the Federal Communications Commission (FCC) is considering an application for another station on 101.3FM in my area. I am concerned if the FCC allows that new station on 101.3 FM, it would interfere with my ability to listen to KGHO where I live, work, or commute.

I am providing this declaration to inform the FCC where I regularly listen to KGHO and that I oppose allowing the proposed station that would cause interference.

I listen (check all that apply):

Commuting or driving through the affected area (see map). Please describe where and frequency (Example: I drive Highway X to destination Y 4-days a week).

I LISTEN IN MY CAR ON 101.1 FM - CENTRALIA (5 DAYS A WEEK)

IT BARELY COMES IN AT TIMES, BUT I PREFER KGHO OVER ANY OTHER STATION
LOVE THEIR VARIETY

B. At home:

Address _____

C. At Work:

Address: _____

I declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and belief. I have no family or financial affiliation with radio station KGHO-LP nor K266BM licensee Northwest Rock 'N' Roll Preservation Society.

Signed: [Signature]

Print name: TIMOTHY N. SMITH

Address: 1325 CRESCENT AVE #4
CENTRALIA, WA 98531

Phone: (360) 388-8195

Email: dadetim68@gmail.com

KGHO 101.1FM re: proposed Auburn/Federal Way translator station for KMIA

My name is MARK YANDRICH.

I am a frequent listener to radio station KGHO on K266BM Olympia community translator 101.1FM. I have become aware that the Federal Communications Commission (FCC) is considering an application for another station on 101.1FM in my area. I am concerned if the FCC allows that new station on 101.1 FM, it would interfere with my ability to listen to KGHO where I live, work, or commute.

I am providing this declaration to inform the FCC where I regularly listen to KGHO and that I oppose allowing the proposed station that would cause interference.

I listen (check all that apply):

A. Commuting or driving through the affected area (see map). Please describe where and frequency (Example: I drive through SR-161 to Federal Way 4-days a week).

ALL CENTRALIA & GALVIN AREA ON 101.1

B. At home:

Address 523 WOODLAND AVE APT L CENTRALIA WA.

C. At Work:

Address: CENTRALIA AREA

I declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and belief. I have no family or financial affiliation with radio station KGHO-LP nor K266BM licensee Northwest Rock "N" Roll Preservation Society.

Signed: Mark Yandrich

Print name: MARK YANDRICH

Address: P.O. Box 5 GALVIN WA 98544

Phone: (360) 736-5350

Email: ratchet1@gmail.com

KGHO 101.1FM re: proposed Centralia translator station for KELA

My name is ANTHONY AIRHART

I am a frequent listener to radio station KGHO on K266BM Olympia community translator 101.1FM. I have become aware that the Federal Communications Commission (FCC) is considering an application for another station on 101.3FM in my area. I am concerned if the FCC allows that new station on 101.3 FM, it would interfere with my ability to listen to KGHO where I live, work, or commute.

I am providing this declaration to inform the FCC where I regularly listen to KGHO and that I oppose allowing the proposed station that would cause interference.

I listen (check all that apply):

Commuting or driving through the affected area (see map). Please describe where and frequency (Example: I drive Highway X to destination Y 4-days a week).

I FREQUENTLY DRIVE BOTH HIGHWAY 12 AND I-5 THROUGH AREAS WHERE I LISTEN TO KGHO 101.1 FM - FREQUENCY VARIES - THESE TRIPS

B. At home: ARE FOR PLEASURE, SHOPPING & MEDICAL VISITS

Address _____

C. At Work: I ALSO HAVE CAUSE TO DRIVE HIGHWAY 12 & I-5 AT

Address: A PART OF MY WORK. FREQUENCY VARIES & IS LESS THAN FOR PERSONAL USE
514 E BROADWAY, MONTESANO, WA 98563

I declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and belief. I have no family or financial affiliation with radio station KGHO-LP nor K266BM licensee Northwest Rock 'N' Roll Preservation Society.

Signed: Anthony Airhart

Print name: ANTHONY AIRHART

Address: PO BOX 264
601 VALLEY RD ABERDEEN WA 98520

Phone: 360-580-2598

Email: 5225airhart@yahoo.com

KGHO 101.1FM re: proposed Centralia translator station for KELA

My name is Kevin Flanagan.

I am a frequent listener to radio station KGHO on K266BM Olympia community translator 101.1FM. I have become aware that the Federal Communications Commission (FCC) is considering an application for another station on 101.3FM in my area. I am concerned if the FCC allows that new station on 101.3 FM, it would interfere with my ability to listen to KGHO where I live, work, or commute.

I am providing this declaration to inform the FCC where I regularly listen to KGHO and that I oppose allowing the proposed station that would cause interference.

I listen (check all that apply):

Commuting or driving through the affected area (see map). Please describe where and frequency (Example: I drive Highway X to destination Y 4-days a week).

I-5 twice a day, 3 days per week

B. At home:

Address 11310 Shaw Rd SE, Yelm, WA 98597

C. At Work:

Address: _____

I declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and belief. I have no family or financial affiliation with radio station KGHO-LP nor K266BM licensee Northwest Rock 'N' Roll Preservation Society.

Signed: Kevin Flanagan

Print name: Kevin Flanagan

Address: 11310 Shaw Rd SE, Yelm, WA 98597

Phone: 360 458 0961

Email: kflan@protonmail.com

KGHO 101.1FM re: proposed Centralia translator station for KELA

My name is Tamara L Schwander

I am a frequent listener to radio station KGHO on K266BM Olympia community translator 101.1FM. I have become aware that the Federal Communications Commission (FCC) is considering an application for another station on 101.3FM in my area. I am concerned if the FCC allows that new station on 101.3 FM, it would interfere with my ability to listen to KGHO where I live, work, or commute.

I am providing this declaration to inform the FCC where I regularly listen to KGHO and that I oppose allowing the proposed station that would cause interference.

I listen (check all that apply):

Commuting or driving through the affected area (see map). Please describe where and frequency (Example: I drive Highway X to destination Y 4-days a week).

1-5 From/Olympia WA also Listen in car
To Napavine WA 2-3 x per Month Driving around Thurston Cty

B. At home:

Address 1903 11th Ave SE
Olympia WA 98501 - most days From 4 AM - To LATE AFTERNOON

C. At Work:

Address: N/A Retired

I declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and belief. I have no family or financial affiliation with radio station KGHO-LP nor K266BM licensee Northwest Rock 'N' Roll Preservation Society.

Signed: Tamara L Schwander

Print name: Tamara L Schwander

Address: 1903 11th Ave SE

Phone: 360-253-6324

Email: Queen of Cats1957@hotmail.com

KGHO 101.1FM re: proposed Centralia translator station for KELA

My name is Ryan Von Barga. I am a frequent listener to radio station KGHO on K266BM Olympia community translator 101.1FM. I have become aware that the Federal Communications Commission (FCC) is considering an application for another station on 101.3FM in my area. I am concerned if the FCC allows that new station on 101.3 FM, it would interfere with my ability to listen to KGHO where I live, work, or commute. I am providing this declaration to inform the FCC where I regularly listen to KGHO and that I oppose allowing the proposed station that would cause interference.

I listen (check all that apply):

Commuting or driving through the affected area (see map). Please describe where and frequency (Example: I drive Highway X to destination Y 4-days a week).

I drive from Olympia to exit 77 in Chehalis. I frequently ride the Willipa Trail and visit my cousin and her family in Chehalis. Also, I drive from Olympia through to Napavine to take the shortcut to Morton to get to Hwy 12. I don't know if it's really a short cut, but it is less traffic-y so, that's how I go.

B. At home:

Address _____

C. At Work:

Address: _____

I declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and belief. I have no family or financial affiliation with radio station KGHO-LP nor K266BM licensee Northwest Rock 'N' Roll Preservation Society.

Signed: Ryan Von Barga

Print name: Ryan Von Barga

Address: 1320 Mix St. NW. Olympia, WA 98502

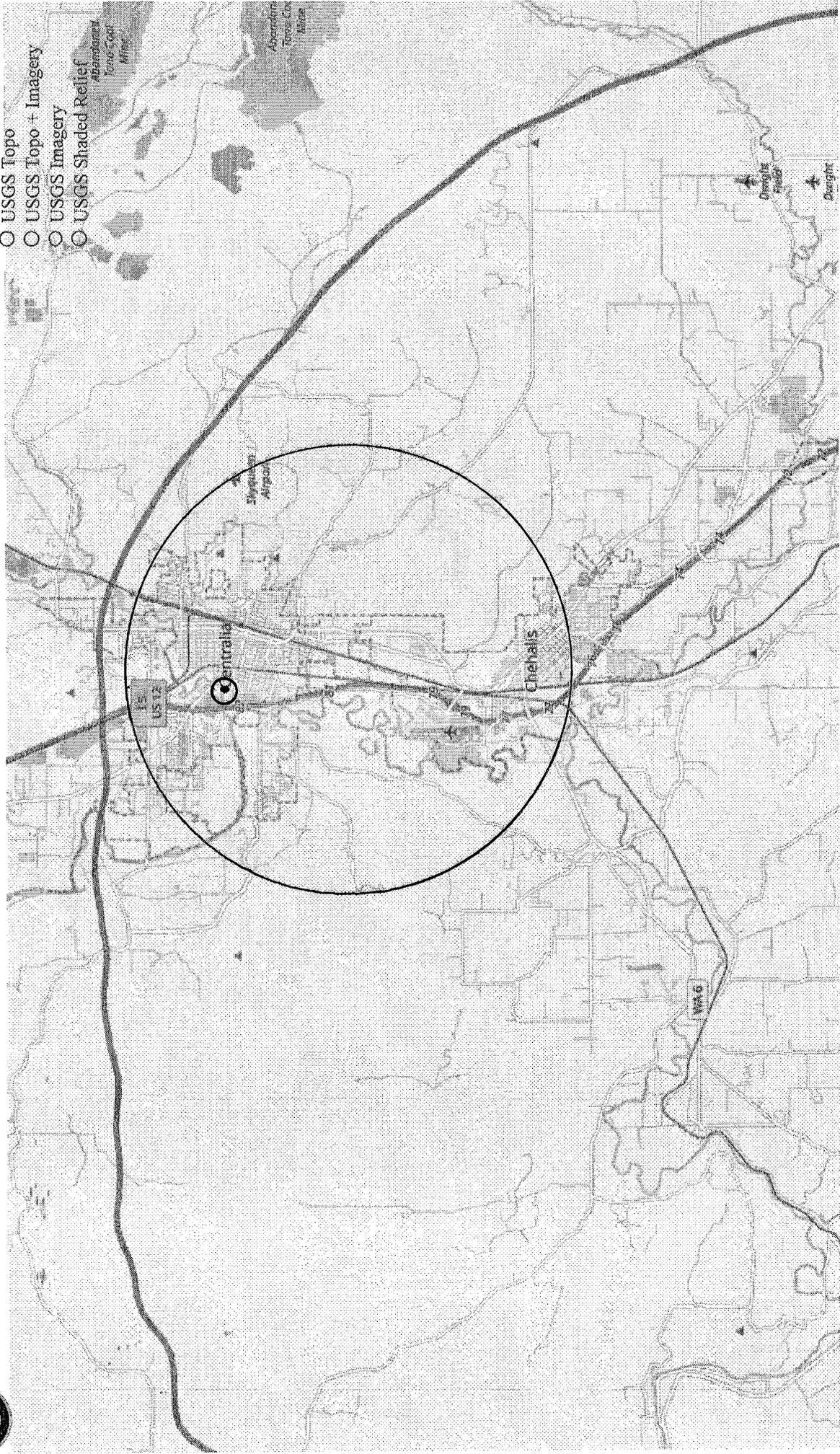
Phone: 360-870-6238

Email: ryanvonbarga@gmail.com



69.9 dBu Service Contour for NEW, Centralia, WA, 101.3 MHz BNPFT-20180430AAV

- Open Street Map
- USGS Topo
- USGS Topo + Imagery
- USGS Imagery
- USGS Shaded Relief

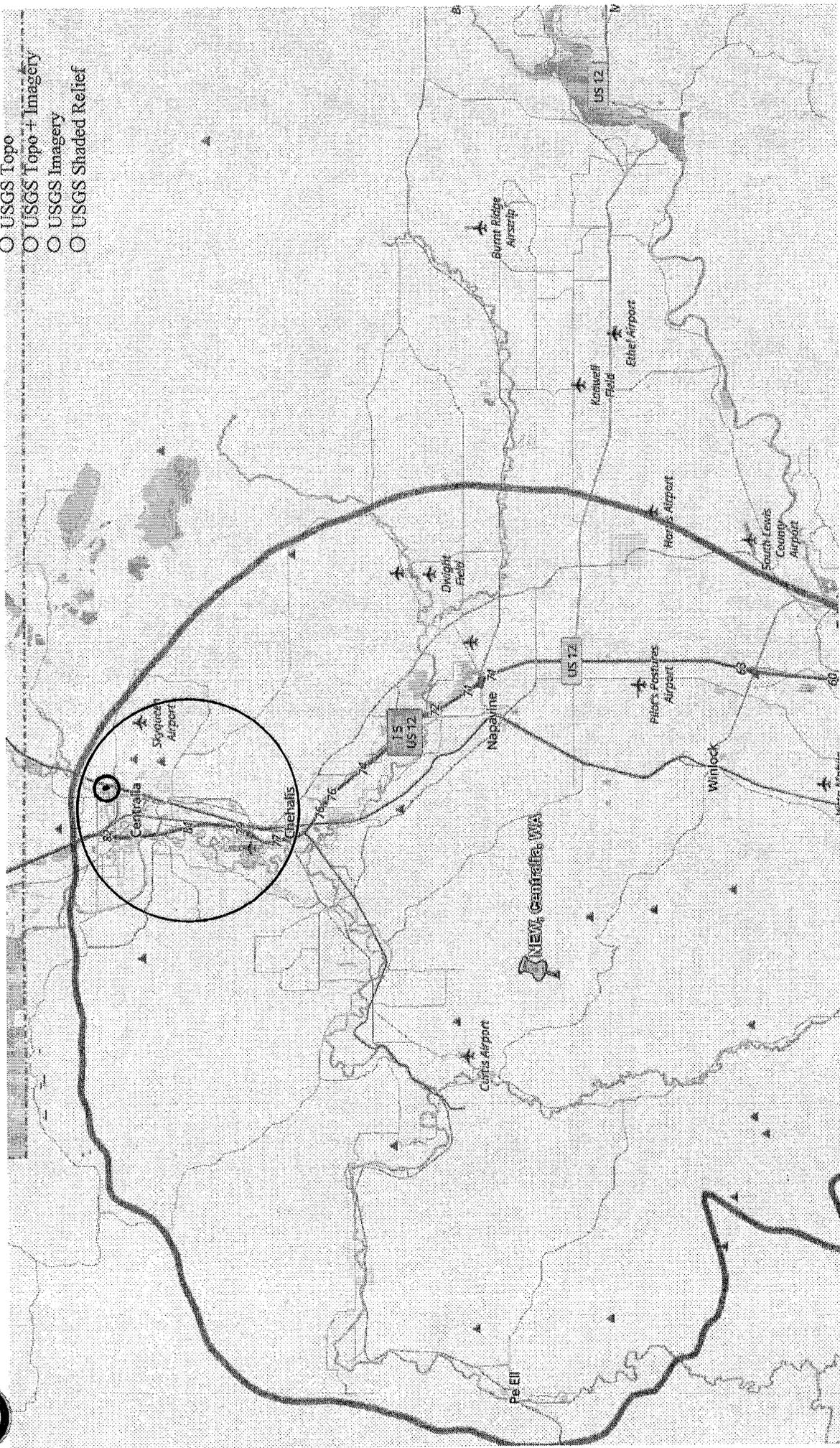


Darleen Freeman Lives in Centralia and drives through Chehalis daily, while listening to KGHO-LP on translator K266BM 101.1FM.



60 dBu Service Contour for NEW, Centralia, WA, 101.3 MHz BNPFT-20180129ABS

- Open Street Map
- USGS Topo
- USGS Topo + Imagery
- USGS Imagery
- USGS Shaded Relief

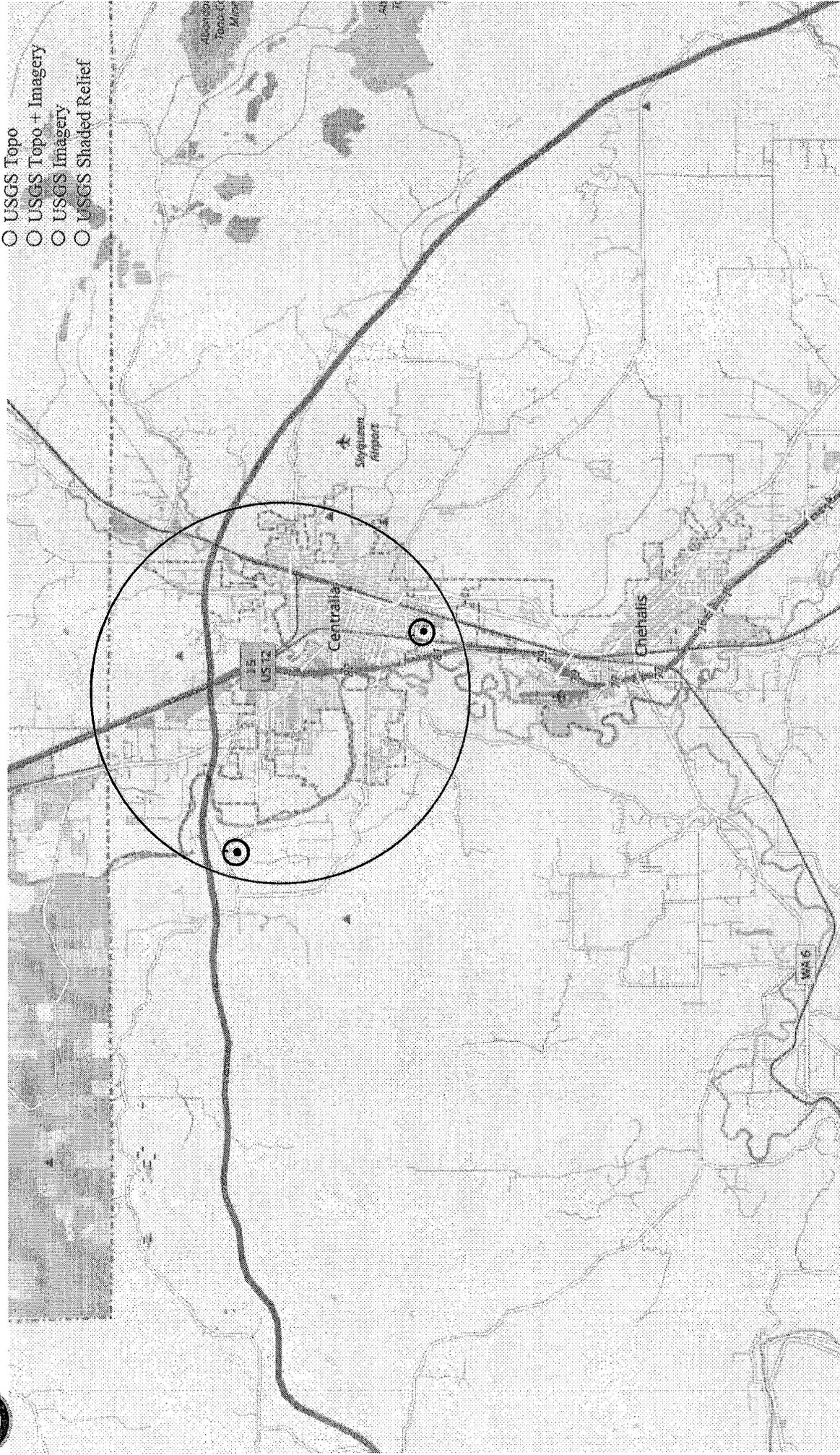


Timothy Smith lives in Centralia, and listens to KGH0-LP in translator K266BM 101.1FM while driving five days Each week.



60 dBu Service Contour for NEW, Centralia, WA, 101.3 MHz BNPFT-20180129ABS

- Open Street Map
- USGS Topo
- USGS Topo + Imagery
- USGS Imagery
- USGS Shaded Relief

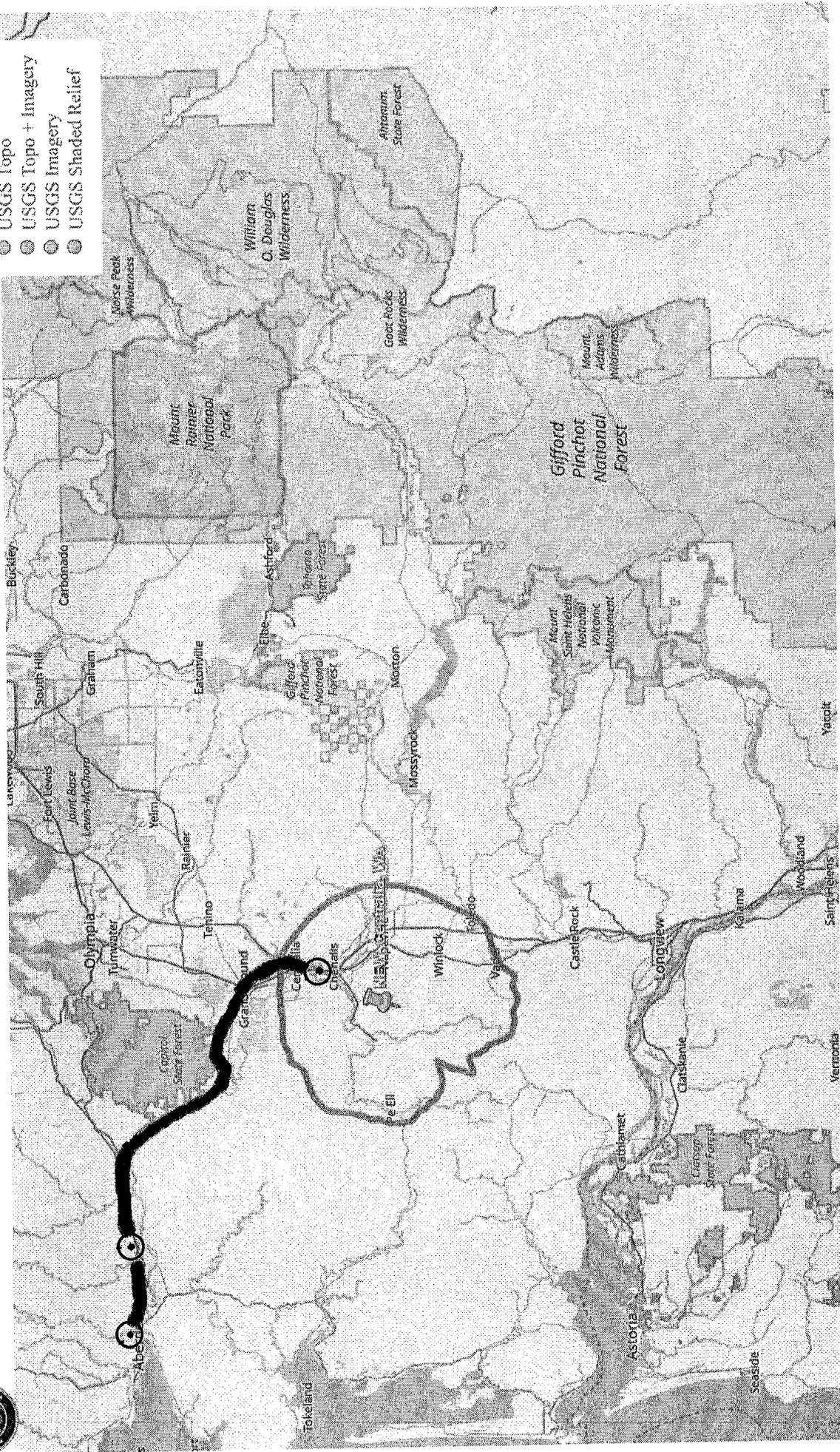


Mark Yandrich lives in Centralia and commutes and drives throughout Galvin and Centralia, while listening to KGH0-LP on translator K266EM 101.1FM.



60 dBu Service Contour for NEW, Centralia, WA, 101.3 MHz BNPFT-20180129ABS

- Open Street Map
- USGS Topo
- USGS Topo + Imagery
- USGS Imagery
- USGS Shaded Relief

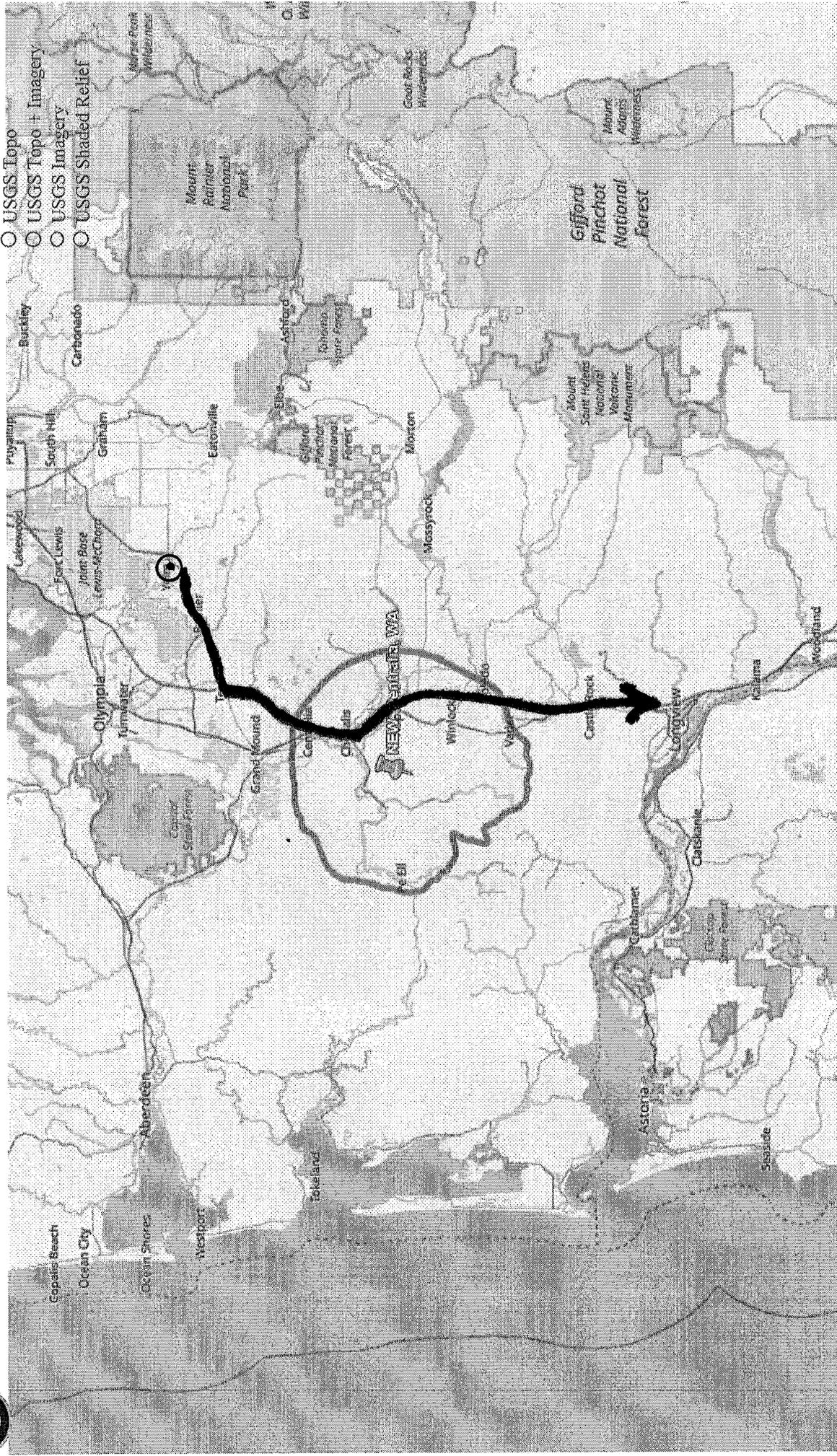


Anthony Alwhart drives from Aberdeen to Centralia-Chehalis area for shopping, medical, pleasure, and business.
 He listens to KGHO-LP on 101.1FM K266EM while driving in the Centralia-Chehalis area.



Home **600** dBu Service Contour for NEW, Centralia, WA, 101.3 MHz BNPFT-20180430AAV

- Open Street Map
- USGS Topo
- USGS Topo + Imagery
- USGS Imagery
- USGS Shaded Relief

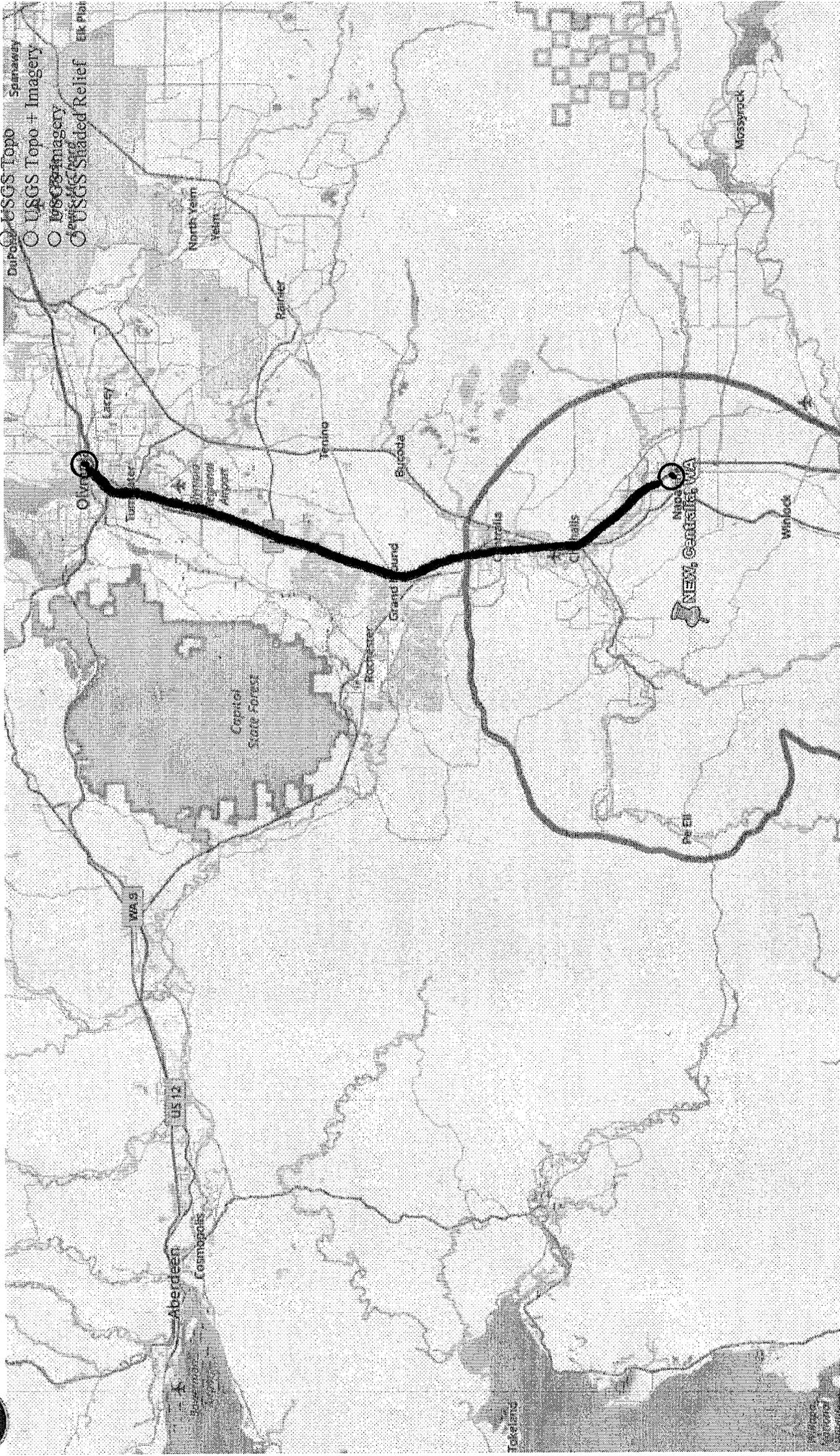


Kevin Flanagan travels 3 times each week from Yelm through Centralia-Chehalis area on I-5. He listens to KGH0-LP on translator K2666M 101.1FM while driving.



Home dBu Service Contour for NEW, Centralia, WA, 101.3 MHz BNPFT-20180129ABS

Open Street Map

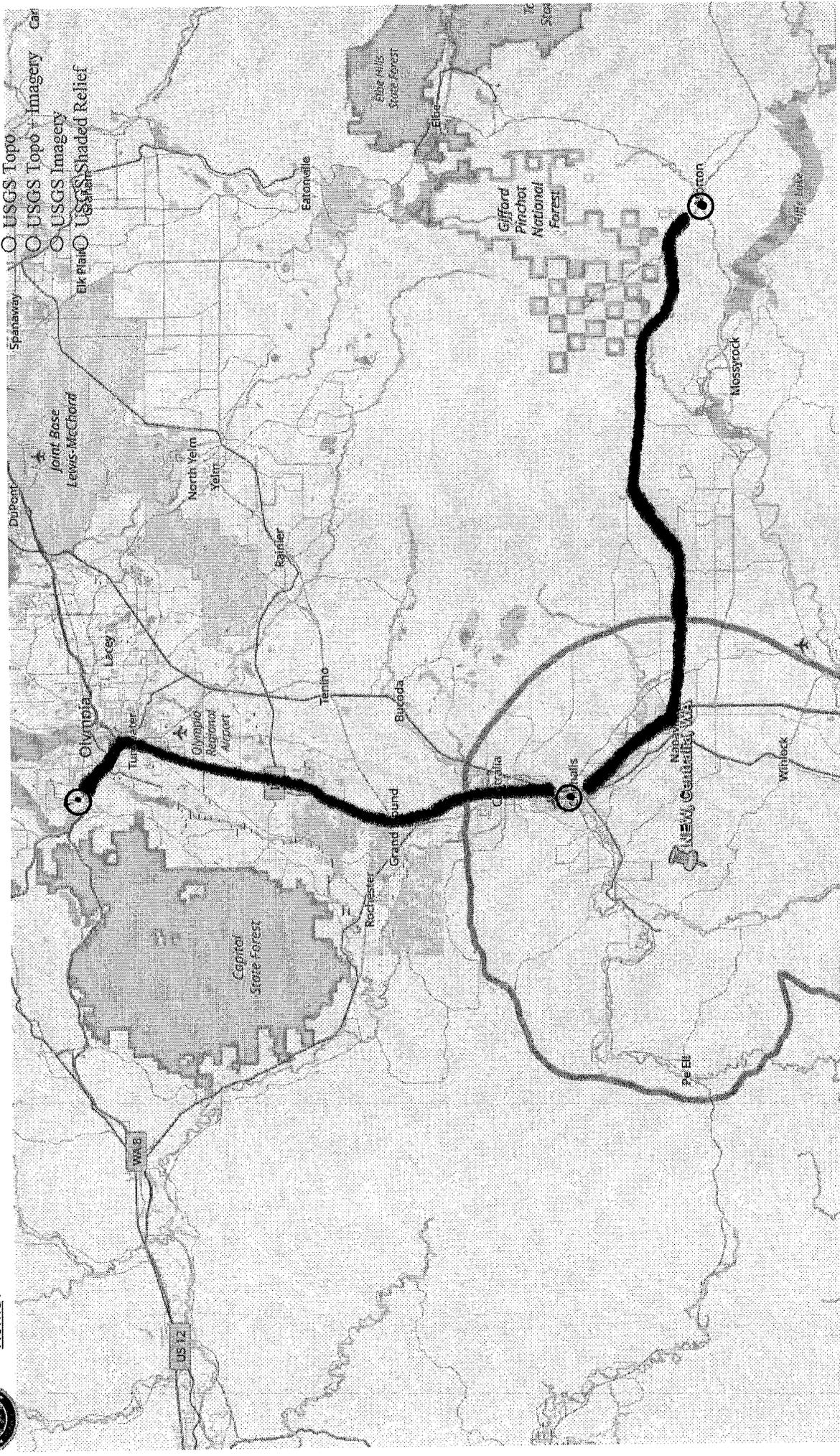


Tamara Schwender lives in Olympia and travels to Napavine 2 - 3 times each month, while listening to KGH0-LP on translator K266BM 101.1FM.



Home [60/dBu](#) Service Contour for NEW, Centralia, WA, 101.3 MHz BNPFT-20180129ABS

Open Street Map



Ryan Von Bargaen Drives from Olympia to destinations in Chehalis and Morton frquently. He listens to KCHO-LP on K266BM 101.1FM while driving.