

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In re Application of	)	
	)	
<b>GALAXY UTICA LICENSEE LLC</b>	)	FCC File No. BNPFT-20180418AHD
For a New FM Translator	)	
BNPFT-20180418AHD	)	
Utica, New York	)	

To: Office of the Secretary  
Attn: Media Bureau – Audio Division

**SUPPLEMENT TO REPLY TO OPPOSITION TO PETITION TO DENY**

WOLF Radio, Inc. (“WRI”), licensee of WMVN(FM), Sylvan Beach, NY (Fac. ID 85534) hereby submits additional information in support of its Reply to the Opposition to Petition to Deny filed by Galaxy Utica Licensee LLC (“Galaxy”). The additional information is relevant to the matter at hand and could not have been provided in the short period of time normally provided for a Reply.<sup>1</sup>

WRI has secured the responses of eleven WMVN listeners within the 60 dBu contour of the first-adjacent channel FM translator proposed by Galaxy (See Exhibit 1A).

Exhibit 1A lists the name, specific address, location, and geographic coordinates for each listener as well as the decibel margin above the point at which interference would be caused to WMVN. Exhibit 1B is a map showing the location of each of the home listeners, two of whom also listen at work. Exhibit 2 contains copies of the form each listener filled out and submitted through email to WMVN station manager Samuel Furco with a timestamp and verification of each listener’s IP address.

---

<sup>1</sup> Petitioner states that if this Supplement cannot be considered as part of the overall Petition to Deny, it respectfully requests that its submission be treated as an Informal Objection.

As these WMVN listeners are all established within the proposed translator's 60 dBu contour, they will all experience interference defined as where the undesired signal of a first-adjacent channel station would exceed a ratio of -6 dB compared with that of the desired signal. At each specified WMVN listener location, the proposed translator's signal on 100.1 MHz would be greater than minus 6 dB of the desired WMVN signal on 100.3 MHz and would be predicted to cause interference.

In the case of Listener 7, the WMVN signal level is 55.65 dBu. Any first adjacent signal greater than 49.65 dBu (50,10) would cause interference. At this location, the proposed translator's signal would have a signal level of 61.1 dBu or 11.45 dB higher than the minimum signal level that would cause interference.

At Listener 8's location, the WMVN signal level is 49.41 dBu. The proposed translator's signal would be 82.2 dBu or 38.79 dB greater than the threshold level for interference.

At Listener 9's location, the WMVN signal level is 48.72 dBu while the proposed translator's signal level would be 66.1 dBu or 23.38 dB greater than the minimum that would cause interference.

All other listener locations fall between the levels of listeners 8 and 9 stated above and would all experience the same destructive interference. The specific levels are listed in Exhibit 1A. It is noted that it is not uncommon for a station to have regular listeners at a signal level of 48 dBu as that equals .25 mv/m or 50 percent of the .5 mv/m field strength that Class B stations are protected to.

In summary, granting of the Galaxy application must be denied as the new FM translator, as proposed, would have a permanent detrimental effect on WRI, WMVN and its established audience.

Respectfully submitted,

**WOLF RADIO, INC.**

By: Craig Fox  
Craig Fox, President

Date: 6/19/2018

**Declaration of Craig Fox**

I, Craig Fox, declare under penalty of perjury as follows:

1. I am the President of WOLF Radio, Inc. My engineering qualifications are a matter of record with the Commission.
2. I have prepared the attached exhibits.
3. The information contained in the foregoing "Supplement to Reply to Opposition to Petition to Deny" is true and correct to the best of my knowledge.

Craig Fox, President of WOLF Radio, Inc., hereby verifies that he has signed the foregoing Supplement to Reply to Opposition to Petition to Deny as President of WOLF Radio, Inc., that his address is: 4853 Manor Hill Dr., Syracuse, NY 13215, and that he has read the document, prepared by him; that to the best of his knowledge, information and belief there is good ground to support it; and that it is not interposed for delay.

WOLF Radio, Inc. has standing to file this Supplement to Reply to Opposition to Petition to Deny based on the interference that will be caused by WMVN(FM) by the proposed translator as detailed in the foregoing Petition to Deny.

  
\_\_\_\_\_  
Craig Fox

Dated: June 19, 2018

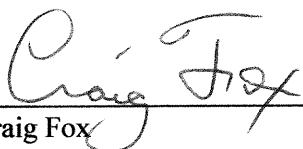
**CERTIFICATE OF SERVICE**

I, Craig Fox, hereby certify that on this 19<sup>th</sup> day of June, 2018, I caused copies of the foregoing Supplement to Reply to Opposition to Petition to Deny to be delivered via first-class prepaid mail to the following:

Galaxy Utica Licensee LLC  
235 Walton Street  
Syracuse, NY 13202-1351

Sally A. Buckman, Esq.  
Lerman Senter PLLC  
2001 L Street, NW, Suite 400  
Washington, DC 20036  
*Counsel to Galaxy Utica Licensee LLC*

James Bradshaw  
Senior Deputy Chief  
Audio Division  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

  
\_\_\_\_\_  
Craig Fox