



March 1, 2019

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Womble Bond Dickinson (US) LLP

1200 Nineteenth Street, NW
Suite 500
Washington, DC 20036

**Re: Notice of Ex Parte Communication
MB Docket No. 18-119**

John F. Garziglia
Partner
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Dear Ms. Dortch:

Bayard H. ("Bud") Walters and Clarence E. ("Ed") Henson requested that I advise the Commission that, on February 26, 2019 they met with Alison Steger and Alexander Sanjenis, advisors to Chairman Pai, and on February 27, 2019 they met with Al Shuldiner, Chief, and James Bradshaw, Senior Deputy Chief, of the Audio Division, to discuss certain issues related to the above-referenced proceeding.

Mr. Walters and Mr. Henson in both meetings noted their commendation for the Commission's great job in authorizing FM translators to revitalize AM service and to deliver diverse programming from HD sub-channels. They expressed their concern that the new services from FM translators now provided to the public not be undercut by actions in this proceeding.

Mr. Walters and Mr. Henson advocated for an expeditious adoption of the Commission's proposal to define minor changes for FM translator facilities as a change to any channel in the non-reserved band. They observed that this facet of the proceeding is largely without opposition, and that changing the FCC's rules as proposed would allow for FM translators to quickly eliminate interference claims and better serve the public.

Mr. Walters and Mr. Henson also discussed what might be the appropriate contour for existing stations to be protected against interference from FM translators, beyond which contour no interference complaints regarding translators would be accepted. To facilitate this discussion, the attached Louisville, KY Translator Analysis was used as an example.

Sincerely,

John F. Garziglia

cc: Alison Steger, Esq.
Alexander Sanjenis, Esq.
Al Shuldiner, Chief, Audio Division
James Bradshaw

LOUISVILLE, KY TRANSLATOR ANALYSIS

FM translators in the non-reserved band serving the core Louisville market (within 25 km) were analyzed to determine the change required to disprove an interference complaint based on U/D ratio lodged by their closest facility (station, LPFM or translator) co-channel or first adjacent at its 54 dBu ,48 dBu or 39 dBu (50:50) contour.

Translator	Relevant facility	54 dBu limit	48 dBu limit	39 dBu limit¹
W222CD-CP (250W-DA-WAKY(AM))	W223DK (1 st adj.)	30W	0W	0W
W223DK-CP (99W-DA-WLRS(AM))	W222CD (1 st adj.)	0W	0W	0W
W236AN (200W)	WIKI (1 st adj)	73W	2W	0W
W241CK (250W-WXVW(AM))	WSTO (co)	OK	57W	0W
W250BD (250W DA)	WSLM (co)	OK	OK	0W
W257EM-CP (250W-DA-WKRD(AM))	WKMO (co)	4W	0W	0W
W261CO (250W DA-WAKY(AM))	WNGT (co)	65W	4W	0W
W270CR (150W WLRS(AM))	WKRQ (co)	OK	21W	0W
W274AM (55 W)	WOKH (1 st adj)	OK	24W	0W
W284AD (99 Watts-WLLV(AM))	WITZ-FM (co)	OK	9W	0W
W297BV (220W-DA-WFIA(AM))	WRZI (co)	13W	0W	0W

At the 54 dBu interference threshold, five of the eleven facilities would be unchanged while the remainder would be dramatically diminished. At the 48 dBu interference threshold four would not survive and six would be greatly diminished. None of the eleven facilities would survive in a viable form if a 39 dBu interference threshold were to be adopted.

February 22, 2019

Charles M. Anderson

¹ Facilities were evaluated using their authorized antenna system, FCC interference ratios and the Globe 30 terrain database.