

## Lawrence M. Miller

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**From:** Lawrence M. Miller  
**Sent:** Thursday, April 19, 2018 5:00 PM  
**To:** 'James Bradshaw'  
**Cc:** Brad Deutsch  
**Subject:** Translator NPRM

Jim –

This proposed rule doesn't make sense (at least to me):

**§ 74.1204 Protection of FM broadcast, FM Translator and LP100 stations.**

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(f) An application for an FM translator station will not be accepted for filing even though the proposed operation would not involve overlap of field strength contours with any other station, as set forth in paragraph (a) of this section, ~~if the predicted 1 mV/m field strength contour of the FM translator station will overlap a populated area already receiving grant of the authorization~~ **will result in interference to the reception of a regularly used, off-the-air signal of any authorized co-channel, first, second or third adjacent channel broadcast station, including previously authorized secondary service stations, including Class D (secondary) noncommercial educational FM stations within the 54 dBμ field strength contour of the desired station, as demonstrated and grant of the authorization will result in interference to the reception of such signal by six or more listener complaints, as defined in § 74.1201(k) of the part, as well as a map plotting specific listener addresses in relation to the relevant station contours.**

How could a determination be made not to accept an application for filing based on a demonstration of complaints that would arise only after a station was on the air?

Best,  
Larry

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