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To: Office of the Secretary

Attn: The Commission

April 30, 2019

Comments on MB Docket No. 18-119. Amendment of Part 74 of the Commission’s Rules Regarding FM Translator Interference.

I am president of W & B Broadcasting, licensee of WLVK, Fort Knox, WAKY, Radcliff, WAKY AM Louisville and translators W261CO, Louisville, W292FS, Louisville and W285ER, Middletown, all in Kentucky.

I appreciate the FCC’s effort to help AM broadcasters and their associated translators.

With the addition of translators, AM broadcasters in many small and medium markets have been able to survive, enabling them to provide unique programming to their communities that would likely not be offered by full power FM’s. In most markets, AM/translators live in a highly competitive media world and face a significant challenge from full power FM stations.

Many translator listeners may be poorly served by full power FM’s because they are in very small markets or because of the limited audience and potential ad sales from unique programming. These translator listeners are just pleased that they can receive their desired programming on **FM** and may not know or care what a translator is. Aside from a smaller coverage area, translator listeners may not see or hear any difference in their FM translator vs. a full power FM.

It should be noted that as it relates to serving the public’s needs and interest, for the translator listener, their station meets their needs and interest as well as a full power FM.

In addition, the cost of full power FM’s and the difficulty in securing financing make if very challenging for females, minorities and entry level broadcasters to enter ownership. AM/translators are often available at prices that provide these females, minorities and entry level broadcasters an opportunity to become radio station owners. Even then, these owners must have confidence that their translator will not receive interference from full power FM’s and that their translator is safe from interference challenges from full power FM’s. They cannot operate confidently if their translator license can be in jeopardy from interference complaints.

It has been my observation that the interference problem is not translators to full power FM’s, but instead interference from full power FM interference to translators.

AM/translator owners must have confidence that their translator license cannot be jeopardized because of unwarranted interference complaints. In addition, where translator interference does exist, the AM/translator owner must have acceptable remedies that do not force their translator off the air. The FCC Order regarding translator interference complaints proposes several changes that will be of benefit to broadcasters and AM/translator owners. Allowing translators to move anywhere in their band as a minor change, is a very positive tool in resolving complaints, and will benefit the translators and full power stations.

I would request that the Commission give AM/translator owners more equity in the proposed order with the following suggestions:

The second sentence of paragraph 33 of the Order reads: “It is our expectation that translator operators and complaining stations **WILL** work together…” This should be changed to: Translator operators and complaining station **SHALL** work together.

Establishing a contour beyond which interference complaints would not be considered is good. I believe that **the contour should be no less than 48 dBu**. There is a significant difference in the number of translators that would be affected by a 45 dBu contour as compared to the 48 dBu contour.

Paragraph 44 calls for a waiver of even the 45 dBu contour when there are 20 interference complaints. This waiver should be eliminated to avoid unwarranted and questionable interference complaints, especially in large markets.

Submitted by:

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