

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Amendment of Part 74 of the Commission's Rules)	MB Docket Mo. 18-119
Regarding FM Translator Interference)	

Comments of EME Communications

In the matter of proposed rule changes regarding interference to full service FM stations by FM translators, EME Communications offer the following comments.

Actual Interference vs. Protected Contours.

It is our opinion that the full-service station should not be allowed to claim interference outside it's 54 DBu (.5 mV/M) contour and the translators 60 DBu. If there is no overlap between the full service 54 DBu and the translators 60 DBu, The Commission Staff should see the complaint as bogus. I have seen many interference complaints filed and translators made to either shut down or reduce power to accommodate these complaints, many outside the full-service stations 54 and even 40 DBu contours.

We feel that the allowed interfering contours should be outlined as follows:

Co-channel – 54 DBu

First and Second Adjacent – 60 DBu

Third adjacent – Totally Ignored

EME communications applauds the Commissions effort to address this ever-growing problem in the translator service and thanks the Commission on the re-vitalization of the AM service by allowing the use of FM translators to re-broadcast the programing of AM facilities.

We strongly agree with modifying section 74.1233 (a)(1) allowing any bonfide complaint against any translator to move to any available channel as a minor change. This would not only benefit the full service facility but obviously the translator facility as well.

Respectfully offered:

/s/ Clyde Scott, Jr.

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