



July 3, 2017

Chairman Ajit Pai
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Pai:

I am privileged to serve as CEO of Family Life Ministries, Inc. in Bath, NY. We've been blessed to have 24 full power FM stations and 41 FM translators broadcasting across the two-state area of New York and Pennsylvania. As many other station owners have already expressed, we are so grateful for your looking into antiquated FCC rules that hinders radio broadcasters from doing the best job that they can.

I would like to bring attention to one area that we believe should be addressed. It relates to rules that are currently in place between the FCC and Industry Canada. Rule 74.1235(d)(3) states: *Applications for translator or booster stations within 320 km of the Canadian border may employ an ERP up to a maximum of 250 watts, as specified in § 74.1235(a) and (b). The distance to the 34 dBu interfering contour may not exceed 60 km in any direction.*

We totally understand the need for international agreements to protect the frequencies of stations in each nation. We would suggest that the FCC leave the rule intact, but add an official Note to the rule such as: *"Note to 74.1235(d)(3): Requests for waiver of these contour restrictions will be considered and coordinated with Industry Canada when it can be demonstrated that no interference will result. An issued translator authorization obtained pursuant to such a waiver will include a condition that operation is contingent upon continued non-interference with Canadian stations."*

Family Life has been extremely limited with a few of our translators because of the current rule. In one case we applied for an omni-directional translator for Erie, PA that would go beyond the 60km distance over Canadian soil. Industry Canada told us that our application would cause no interference and that they would approve such an application. However, the FCC declined to process this application as they refused to send it to Industry Canada. Consequently, by having to cut back significantly with a directional antenna, the population reached in the Erie market dropped from 199,145 to 138,826 of 70dBu coverage, and 253,837 to 244,320 of 60dBu coverage. More importantly, there are major areas of downtown Erie that don't receive a quality signal because of this limitation.

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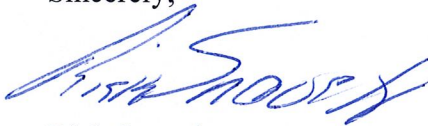
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We had asked for a waiver of the joint agreement between the US and Canada, stating Industry Canada's (IC) openness to accepting our application. IC had given us documentation showing how our application would not interfere with any of their signals if our 34dBu went beyond the 60km limit. We included IC's documentation of their acceptance of extending the 60km limit in our application. However, the application never made it to IC because the International Bureau of the FCC refused to send the application. In essence, our neighbors to the north are saying they are fine with granting us the right to improve our signals, but our own government is not allowing it to happen.

In another case, Canada has had on the books for over 20 years an unused allotment. IC engineers told us that there is very little likelihood that any entity will ever apply for it considering its location. IC gave us documentation that they are okay for us to not consider this allotment in our translator application with the caveat that if someone might apply for this frequency that we would have to adjust our translator. Once again, IC was okay with our application but the FCC would not send it to them for approval. Consequently, the population reached decreased from 69,164 to 19,760 of 70dBu coverage and from 133,124 to 52,318 of 60dBu coverage.

A waiver or variance in such cases only seems fair when IC approves such a request. We would strongly suggest that the FCC be open to such individual cases to better signals in the United States that are currently severely limited by being geographically so close to Canada.

Sincerely,



Rick Snavelly
CEO