

Petitioner supports the Commission's proposal to require a minimum number of listener complaints in support of a translator interference claim. The Commission suggests that six complaints be the standard. Petitioner agrees that six complaints be the minimum standard but suggests a population based standard in addition. "Radio Power" suggests 1/10th of 1 percent of the 60 dBu contour of the complaining station as a standard. Petitioner believes this number is

slightly high. Petitioner suggests the following: The minimum number of listener complaints in support of a translator interference claim be the greater of either; six or 1/20th of 1 percent of the 60 dBu contour of the complaining station.

The petitioner agrees that this required minimum number of listener complaints in support of a translator interference claim be applied to both FM translators and FM boosters. These complaints would need be filed within a six month period.

C. COMPLAINT REQUIREMENTS AND REMEDIATION PROCEDURES

Petitioner agrees with the Commission requiring certain information from any complainant. This information should include name, address, an accurate indication of the location the interference, and a signed declaration that the complainant is a “Bona Fide” regular listener (listens twice per month) with no affiliation with the complaining station.

Petitioner suggests continuing to allow the translator the option to provide better receiving equipment to the complainant. This would be at the option of the complainant. This method of interference resolution can actually resolve some translator interference complaints and should be left as an option, especially when the interference is not a co-channel interference situation as in many first, second, and third channel adjacent situations. Better receiving equipment and antennas can often resolve translator interference complaints with these non co-channel interference situations.

D. LIMITS ON ACTUAL INTERFERENCE COMPLAINTS

Petitioner agrees with the Commission's proposal to limit interference complaints to complaints that are located within a station's 54 dBu coverage contour. For many years the interference standard for stations within Zone 1 and 1A has been the 54 dBu contour for Class B FM's. This standard has worked well and a station's true coverage area tends to be primarily within this 54 dBu contour with very little listening outside this 54 dBu area. As this 54 dBu standard has been used for many years for Class B FM's, it is a known amount of coverage and a very reasonable standard to use in creating this interference complaint limit. This proposed 54 dBu complaint limit should be applied to Zones 1, 1A and 2; to all classes of stations.

CONCLUSION

The Commission's amendment of Part 74 of the Commission's rules regarding FM translator interference, MB Docket 18-119 having to do with FM translator interference remediation and general rules applicable to interference standards regarding FM translator interference is an excellent idea. The Petitioner is in favor of most of these rule amendments with a few minor improvements. It should be noted that the Petitioner himself holds a number of FM translator Licenses. The Petitioner is the President of Europa Communications, Inc. and the Director of Engineering for Shamrock Communications, Inc. which has operated FM translators and FM Boosters for decades across the US. The Petitioner is also the FM Technical Consultant to the Northeast PA Educational Television Association which is National Public Radio's Northeastern PA affiliate. As engineering consultant, the Petitioner has himself designed and constructed many FM translators and boosters throughout the USA.

Respectfully Submitted,

Kevin M. Fitzgerald
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