Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference	)	MB Docket No. 18-119
	)	
	)	

To: Office of the Secretary
Attn: The Commission

COMMENTS

WJFD-FM, Inc. ("WJFD"), licensee of station WJFD-FM, New Bedford, Massachusetts, files its comments in the above captioned proceeding.[1] While WJFD supports most of the proposals in the NPRM, it does not support the proposal to establish an outer contour limit. This specific proposal seems to ignore the fact that many stations, including WJFD, have a significant number of long-time listeners who live, work or commute outside of the protected contour. If an outer contour limit is adopted, it would cause many of these listeners to lose the service that they have listened to for a long-time for the benefit of fill-in translators, which are a secondary service. To the extent that the Commission determines that an outer counter limit is necessary, WJFD submits that (i) the outer contour limit should be the 34 dBu contour, (ii) the limit should be a presumption that can be rebutted by the full power station with a showing of a minimum number of listeners outside of such contour, and (iii) the limit should include a blanket exemption for certain stations (discussed below). In support hereof, WJFD states as follows:

[1] *In the Matter of Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Notice of Proposed Rule Making, FCC 18-60 (2018) (the "NPRM").

1. WJFD-FM (97.3 MHz) is the only 50,000-watts Class B FM radio broadcasting in the Portuguese language on a 24-hour basis since 1975 from New Bedford, Massachusetts. WJFD offers news directly from Portugal and positive and uplifting music to all listeners (whether they listen at home or work, or in their cars) from Portugal, Azores, Madeira, Brazil and Cabo Verde. WJFD presents issues of great interest to the communities it serves in Eastern Massachusetts, as well as announcements regarding religious and cultural feasts and events. WJFD represents a continuing and unifying link to and among the communities it serves and has done so for many years. Because of its 50,000 watts of FM power and its clear signal, WJFD reaches various noteworthy distant Portuguese-speaking communities, comprised of Portuguese (continental Portugal, Azores and Madeira), Brazilians, Cape Verdeans and others, throughout eastern Massachusetts. There are also distant communities in the Cambridge-Somerville areas, in Lowell-Peabody areas, in the Provincetown area, and in the Worcester area in Massachusetts that receive WJFD. Equally significant are the distant automobile listeners, who transit along the primary and secondary roadways and who have been faithful listeners of WJFD over the years.[2]

2. WJFD is the only full-power class B 50,000-watt FM radio station in New England, and perhaps in the United States, owned and operated by two Portuguese individuals, Henry and Paulina Arruda. Attached hereto as Exhibit 2 is a declaration from Henry and Paulina Arruda detailing the importance of WJFD to the communities in Massachusetts (including many outside of WJFD'FM's 54 dBu contour), the unique programming and history of WJFD-FM, and the station's experience with interference from FM translators outside of WJFD-FM's 54 dBu contour. If a contour limit is adopted (especially if a 54 dBu contour limit is adopted) many of

[2] More detailed information on the history of WJFD and the vital service it provides to the Portuguese community is attached hereto as Exhibit 1.

WJFD-FM's listeners will lose access to its unique and important programming. This is not just an abstract statement. WJFD has recently been involved in a number of translator interference proceedings over the past few years. These proceedings demonstrate that WJFD has a significant listener base well outside of its 54 dBu contour.

3. More specifically, WJFD opposed applications for fill-in translators in Worcester, Needham, and Medford, Massachusetts.[3] In each of these proceedings, WJFD-FM submitted statements/declarations from affected listeners (most outside of WJFD-FM's 54 dBu contour) who would lose service from WJFD-FM is the translator application were approved. Approximately 25 affected WJFD distant listeners supported WJFD's petition to deny fill-in translator W230AO in the Worcester proceeding and approximately 60 similarly-situated listeners supported WJFD's petition to deny fill-in translator W249CV in the Needham proceeding. In the pending Medford Application proceeding, approximately 50 distant WJFD listeners submitted declarations of predicted interference. These listener statements are attached hereto.[4]

4. These were not, as some commenters might argue "a handful of purported distant station listeners."[5] Rather, these are over a hundred individuals who have regularly listened to WJFD for years. Attached hereto as Exhibit 6 is a map that shows the communities served by

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[3] *See* In re Application of Northeast Gospel Broadcasting Inc., Gois Broadcasting LLC, Station W230AO, Worcester, Massachusetts, File No. BPFT-20160729ACL, Facility Id. No. 138941 (2016); In re Application of Northeast Gospel Broadcasting Inc., Money Matters Radio, Inc., Station W249CV, Needham, Massachusetts, File No. BMPFT-20160729AHF, Facility Id. No. 138293 (2016); In re Application of Salem Communications Holding Corporation, New FM Translator, Medford, Massachusetts, File No. BNPFT-20180508ACJ (2018) (the "Medford Application"). The Medford Application proceeding has not been decided and thus WJFD is serving the Medford Application applicant with a copy of these Comments.

[4] *See* Exhibit 3 (Worcester application statements); Exhibit 4 (Needham application statements); Exhibit 5 (Medford Application statements).

[5] Cite Aztec Petition. NPRM at para 26.

WJFD-FM and where these communities are located (and where WJFD-FM listeners reside) in relation to specific WJFD-FM contours. As these maps show, WJFD has a significant number of listeners well outside of its protected contour.

5. In addition, since the NPRM was released, WJFD has discussed the proposed contour limit with many of its listeners and other constituents, which has resulted in an outpouring of support for the station and concern that these listeners and constituents may lose WJFD-FM. WJFD asked these listeners and constituents to submit letters and statements to the FCC to voice their support for WJFD-FM and against any outside contour limit. Some of these letters were sent to the Commission and others were sent to WJFD and they are all attached hereto. Specifically:

- Letters from political and governmental persons/entities (Exhibit 7).
- Letters from educational institutions (Exhibit 8).
- Letters from Day of Portugal communities (Exhibit 9).
- Listener Statements from communities outside of WJFD-FM's 54 dBu contour:
    - Listeners primarily in areas outside WJFD-FM's 38 dBu contour (Beverly, Billerica, Hudson, Wilmington, Reading, Worchester, Lexington, Lowell, Gloucester, Hudson, Groveland, Danvers) (Exhibit 10).
    - Listeners primarily in areas between WJFD's 48-38 dBu contours (Peabody, Wakefield, Woburn, Salem, Medford, Melrose, Newton, Cambridge) (Exhibit 11).
    - Listeners primarily in or committing between WJFD-FM's 54 and 48 dBu contours (Exhibit 12).

6. As demonstrated above, WJFD-FM serves hundreds of listeners and community and governmental organizations outside of its 54 dBu contour. To limit any interference complaints from FM translator stations to any contour would result in these listeners and organizations losing access to vital and unique programming. Thus, WJFD-FM respectfully requests that the FCC not establish any outer contour limit for interference complaints from FM translators. The Commission has proposed a number of other rule changes in the NPRM designed to streamline and expedite interference complaint proceedings. WJFD-FM wholly supports these other rule changes and submits that these should be sufficient to meet the Commission's objectives in this proceeding. Nevertheless, if the Commission determines that an outer counter limit is necessary, WJFD submits that (i) the outer contour limit should be the 34 dBu contour, (ii) the limit should be a presumption that can be rebutted by the full power station with a showing of a minimum number of listeners outside of such contour, and (iii) the limit should include a blanket exemption for certain stations.

7. On the first point, WJFD-FM submits that limiting interference complaints to inside the 54 dBu contour would be not strike a balance between protecting existing stations' listenable signals and providing FM translators with more certainty. As the Commission notes in the NPRM, the common language of the FM translator rules prohibits interference to a "regularly used" broadcast signal.[6] As demonstrated herein, WJFD-FM has hundreds of listeners outside of its 54dBu contour and thus its station is "regularly used" in these areas. WJFD submits that, if the Commission adopts an outside contour limit a more appropriate contour would be the 34 dBu contour. As demonstrated on the map attached as Exhibit 6 and the listener statements attached as Exhibits 10- , WJFD-FM has listeners in the communities of Worcester, Hudson Lowell,

[6] NPRM at 27.

Andover, and Gloucester, to name a few. These communities reside roughly between WJFD-FM's 38 and 34 dBu contours. Adoption of the 34 dBu contour as the outer limit would ensure protection for these listeners and listeners of other similarly situated stations that have strong listener bases well outside of their 54 dBu contours.

8. In addition, if the Commission does adopt an outside contour limit, WJFD-FM submits that limit should not be an absolute bar on interference complaints. Rather, it should be a presumption that a station does not have listeners outside of the specified contour and that presumption could be rebutted by the full power station. Specifically, WJFD-FM proposes that the presumption could be rebutted by the full power station submitting listener complaints from double the number of listeners that the Commission adopts in this proceeding. For example, if the Commission adopts its proposal to have 6 listener complaints as the minimum to be submitted with any FM translator interference claim, to rebut the presumption that the station does not have listeners outside of the outer contour limit, the station would need to submit 12 listener complaints. WJFD-FM submits that this is the right balance to protect regular listeners of full power stations and provide translators with more certainty.

9. Finally, given the unique history, ownership and public service of WJFD-FM (and presumably other stations across the country), WJFD respectfully requests that the Commission adopt a blanket exemption for those stations that meet certain criteria. WJFD-FM suggests some combination of the following criteria: (1) the radio station must be owned by a single individual or a husband and wife combination or a family and must be the only radio station owned by such individuals; (2) the radio station must have been so owned for at least 40 years (although it does not need to be owned by the same set of individuals); (3) the radio station must have serviced and continue to serve a wide, unique and singular targeted audience for at least 40 years; and/or

(4) the radio station must be a 50,000-watt-FM radio station, covering the uniquely targeted audience.

WJFD-FM respectfully submits its comments.

Respectfully submitted,

WJFD-FM, Inc.

By: _____/s/_____

Scott Woodworth
Edinger Associates PLLC
1875 I Street NW, Suite 500
Washington, DC 20006

August 6, 2018

Its Attorney

Exhibit 1

WJFD Chronology of Major Events

1975

On June 23, 1975, WJFD-FM entered the air waves to carry on a Portuguese language radio format that already existed on an increasingly active basis on the 97.3 FM dial since approximately 1950, initially as WBSM-FM (1950-1972) (hour broadcasts) then as WGCY-FM (1972-1975).

24/7/365

To better serve the various Portuguese, Brazilian and Cape Verdean communities sprinkled throughout eastern New England, from Salem, NH, to Mystic, CT and from Boston to Worcester, with a significant presence of Portuguese in southeastern Massachusetts and the greater Providence area, WJFD commenced its broadcasting on a 24/7/365 basis.

1982

In 1982, to take full advantage of its 50,000-watts of power and to reach those various communities, WJFD starts to broadcast from a 580-foot tower in the New Bedford area.

1982 Onward

With more power, greater coverage and better programming, WJFD became the biggest Portuguese FM radio station outside of Portugal.

With programming focusing on music styles for all tastes, emphasizing community issues and events, highlighting sports, connecting live national and international news directly from Portugal on daily basis, WJFD become the most-listened-to Portuguese radio station in the area. It provides information and entertainment to thousands of listeners whether at work, at home or at drive-time on the roadways, commuting to-and-from Boston, Lowell, Peabody, Providence, New Bedford, Cape Cod, and Mystic, Connecticut and capturing approximately 400,000 thousand residents who report Portuguese, Brazilian and Cape Verdean as first ancestry (U.S. Census, 2006-2010 American Community Survey 5-Year Estimates).

Varied Listenership

Among our listeners, we identify the following:

1. Recent newcomers (Portuguese, Brazilians & Cape Verdeans);
2. Those who came to the United States on the immigration waive of the 60's and 70's;
3. Listeners of Portuguese-Brazilian-Cape Verdean-descent, who want to reconnect with their roots and listen to the radio station their parents and grandparents listened to; and finally
4. Non-Portuguese listeners who simply like Portuguese music of varying styles and world music (we also feature hits from France, Italy and Spain).

A Dual Link

WJFD has provided a dual link: (1) it links, to one-another, the various Portuguese-speaking listeners residing throughout the Boston, Lowell, Peabody, Worcester, Providence, New Bedford, Cape Cod, and Mystic, Connecticut areas and (2) it links those listeners to Portugal and the goings-on there, particularly the modernization of music in general, which appeals to a

younger generation, and the increasingly popularity of a modern Fado. Fado was recently added to UNESCO's list of the World's Intangible Cultural Heritage.

Exhibit 2

Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of:

	)	
	)	
Amendment of Part of Part 74 of the Commission's	)	MB Docket No. 18-119
Rules Regarding FM Translator Interference	)	
	)	

To: Office of the Secretary

Attn: The Commission

COMMENTS
OF
HENRY AND PAULINA ARRUDA
OWNERS OF WJFD-97.3 FM

We are writing to you in response to the Commission's proposed modification of Section 74.1203(a)(3) that would adversely affect many of WJFD's listeners, who have relied upon WJFD's uniquely important broadcasts for over 35 years.

We offer these comments on the basis of our personal knowledge and on the basis of our ownership of WJFD 97.3 FM. It is the sole radio station we own since approximately 2010.

WJFD, the only 50,000 watts FM radio station outside of Portugal, broadcasts in the 97.3 FM frequency in Portuguese 24/7/365. The 97.3 FM frequency has broadcast in the Portuguese language since 1950. Initially as WBSM (hourly Portuguese programs with an increasing presence from 1950-1972), then as WGCY (full Portuguese broadcasting, 1972-1975) and finally as WJFD (1975-Present).

WJFD's uniquely historic and important presence, with its vast and loyal audience beyond its 54 dBu contour coverage area, is worth preserving. Such preservation would be consistent with the FCC's dual concern of protecting small independent one-station operators with a truly local targeted audience. No other radio station can or will fill its shoes in the event a 54 dBu limitation is adopted.

If the FCC adopts such a limitation, for example, the pending Medford, Massachusetts translator application will prove fatal to WJFD's broadcasting in the Boston and North areas with a great

deal of predicted interference. The proposed 99-watt 97.3 FM Medford translator, while barely protecting WJFD's 54 dBu contour, will predictably create interference within WJFD's 54 dBu area of coverage and will equally and predictably receive interference from WJFD within Medford's 60 dBu predicted area to the extent of approximately seventy-five percent of its predicted listeners. Two realities will surely result: lots of interference with repeated future complaints of interference and enforcement actions by WJFD. A result that the FCC does not want to promote and encourage.

1. **WJFD has Long Reached the Portuguese Communities in the Worcester, Hudson, Boston, Peabody, Gloucester and Lowell Areas, Well Beyond Its 54 dBu Contour**

WJFD is located in the Southcoast area of Massachusetts, where there is a significant presence of Portuguese residents in the New Bedford, Fall River and Taunton areas ("the Southcoast Portuguese area"). Approximately four hundred thousand (400,000) residents in WJFD's primary report Portuguese, Cabe Verdean and Brazilian ancestry, while approximately one hundred thousand report the same ancestry in WJFD's distant and fringe areas of coverage (54-30 dBu area).

The Southcoast is home to major Portuguese feasts, specialty Portuguese restaurants, grocers, stores, travel agents, clubs and associations.

Large numbers of Portuguese newcomers, who were part of a wave of immigration during the 60's, 70's and 80's, also settled in the Boston, Cambridge and Somerville areas of Boston; the Hudson area; the Worcester area; the Salem-Gloucester area; and the Lowell and Peabody areas ("the Boston and North Portuguese area").

Because of the recent high cost of real estate experienced in the cities of Boston, Cambridge and Somerville, the Portuguese have moved to nearby cities and towns, where real estate is more affordable.

Because WJFD is a 50,000 watts radio station, and because of its clear signal, it has long reached the Boston and North Portuguese communities. Those communities are well outside of the 54 dBu contour coverage reach. Boston (50 dBu area), Arlington, Cambridge, Somerville, Medford, Chelsea, Revere and Nahant (46-42 dBu area), Melrose, North Reading, Reading, Peabody, Salem, Wakefield, and Woburn (42-38 dBu area), Worcester, Hudson, Danvers and Beverly (38 dBu area), Gloucester, Billerica, Lowell and Andover (38-34 dBu area).

In the Boston area, WJFD recently opposed two translators with significant number of supportive listener declarants: the Newton/Waltham translator (approximately 40 declarants) and the Medford translator (approximately 50 declarants).

In the 38-34 dbu coverage area declarants like Mr. Antonio Furtado and Jay Sousa are representative of the many drivers who regularly travel northerly along I-93 from Boston to New Hampshire while listening to WJFD through the town of Andover, Massachusetts. From

2012-2017, we made regular trips to New Hampshire while listening to WJFD through the same stretch of road.

In the 38-34 dbu area at least ten (10) regular listeners tune-in WJFD in the Gloucester area, others listen in the Billerica and Lowell areas. Ms. Filomena Gomez writes: "During my daily driving journey beginning in Litchfield, NH, I drive through . . . Lowell, MA, Billerica, MA and Bedford, MA until I reach my final destination, Lexington, MA."

Many listeners capture WJFD in the 38 dBu contour area. Recently in Worcester WJFD's successfully opposed two translator applications. We noticed that WPLM, also a 50,000 watt radio station from nearby Plymouth, Massachusetts prevailed recently in its opposition to a Worcester translator application. Of particular interest to WJFD are the numerous drivers travelling north/south along Route 146 from Providence, RI to the Massachusetts Turnpike in the Worcester area. Route 146 moves northerly from Woonsocket, RI (54 dBu area) to the Massachusetts Turnpike (46 dBu area). Paulina and I take this route on a frequent basis and appreciate the clarity of WJFD's signal.

Also in the 38 dBu contour, the Town of Hudson, Massachusetts draws a significant number of listeners, particularly among the High School students participating in Portuguese language studies. More than fifty (50) students recently visited the studios of WJFD. At least seventeen (17) declarants from Hudson, some in their own writing, attest to their regular listenership to WJFD as well as its importance to them and to that community.

Listeners also tune-in around Beverly and Danvers in the 38 dBu contour.

At least thirty-one (31) listeners regularly listen to WJFD in the Peabody, Massachusetts 42-38 dBu contour region. Also in the same area listeners rely on WJFD in Melrose, North Reading, Reading, Peabody, Salem, Wakefield, and Woburn. Reading's Karen Goncalves-Dolan writes: "I am an avid listener of WJFD 97.3 FM . . . The radio station has also provided an opportunity for my American 'irish' family to listen and learn the Portuguese language."

References made here to the number of listeners or to listener statements/declarations/letters are to those listener statements/declarations/letters appended to our counsel's comments and fully incorporated herein.

2. <u>WJFD is the Only 50,000 Watts Portuguese FM Radio Station Bringing Local Programming, and Announcing Local Goings-On, News, Cultural Feasts and Events to Listeners Well-Outside of its 54 dBu Coverage Area</u>

a. <u>News, Soccer Games</u>

WJFD is uniquely Portuguese. It partners with Portugal's "Radio Antenna One" to broadcast national and international news. It broadcasts the Portuguese soccer games among the three major rival teams (listeners are known to get in their parked cars in the Boston, Lowell and Peabody areas to better listen to the highly competitive games).

WJFD brings daily news from the Azores islands and from Cape Verde Islands. WJFD brings news from the New England area. North Reading's Jose Gonsalves states: "I obtain news, cultural event information and education from listening to WJFD 97.3 in my native Portuguese language."

Hudson's J. Vicente Cabral writes in his own handwriting: "[I] enjoy the news on top of the hour, also listen to the broadcast of the soccer games, have been a listener for over 30 years."

b. WJFD as Announcer of the Culturally-Rich Portuguese Events in the Southcoast

WJFD brings to those outside Portuguese communities, the uniquely Portuguese events of the Southcoast.

(1) Feasts

The New Bedford "Day of Portugal," The Fall River "Day of Portugal," The Providence "Day of Portugal," the Provincetown "Day of Portugal," Cape Cod. And, finally, the biggest of all Portuguese events in North America: "As Grandes Festas do Divino Espirito Santo da Nova Inglaterra," drawing people from all points in New England. WJFD is a sponsor of all these events, offering live broadcasts for those who cannot attend.

Providence Day of Portugal's Orlando Mateus wrote: "We had over 12,000 attendees during our 2-day festival and over 10,000 attendees for the Portuguese sponsored WaterFire on June 10, 2018. WJFD 97.3 FM, our official radio station, played a major role in bringing attendees to our event."

WJFD also sponsored Boston's Day of Portugal held in the same day. Rui Domingos notes: "WJFD 97.3 FM was one of the event's sponsors and promoters, and there is no question that, WJFD played a major role in bringing those large crowds to our important celebration."

(2) Portuguese Specialty Stores, Boutiques, Restaurants and Travel Agents

WJFD informs those communities, of the great deals to be held at the particular Portuguese, Azorian or Cape Verdian specialty grocers, shopkeepers, boutiques, restaurants and travel agents. Representative Cabral writes: "WJFD is a platform for Portuguese commercial products . . . to those outside of the 54 dBu area."

Worcester's Jose E. Moura comments: "I will also get information regarding the Portuguese specialty restaurants and grocers in the heavily Portuguese area of Fall River and New Bedford."

Peabody's Rita Costa opines: "This radio station has [p]rovided us with all the info . . . with . . . advertisements from travel[] agents, that help us schedule a getaway to Portugal."

c. WJFD as a Link to The Outside Portuguese Communities

All of those outside of the WJFD's 54dBu Portuguese communities have come to rely on WJFD, for over 35 years, as a link to Portugal, the Azores and Cape Verde; as a link to the vibrant Portuguese culture found in the Massachusetts South Coast and Providence, and for many, who are retired, or who are widowed, WJFD provides great companionship.

If any radio station is to be classified as a "community" radio station, then, WJFD is truly one, and has been so for over 35 years. To the many Portuguese in this WJFD radio community, particularly those outside of the Southcoast, the proposed rule will prove devastating.

d. The Nature of WJFD's Advertisers Inside and Outside of its 54 dBu Contour

A significant number of advertisers within WJFD's 54 dBu contour, particularly specialty entities, such as restaurants, grocers and other stores in the highly concentrated Portuguese in Fall River and New Bedford area, buy WJFD to precisely reach those listeners outside of its 54 dBu coverage as they advertise special deals and promotions. This has proved very successful to those advertisers in light of WJFD's reach, as many of the targeted listeners respond favorably. Limiting WJFD's reach to its 54 dBu contour will have a significant adverse effect upon those advertisers.

WJFD also counts on approximately twenty advertisers from outside of WJFD's 54 dBu area of coverage with a targeted area as far north as Lowell, Massachusetts. Limiting WJFD's reach to its 54 dbu contour will prove fatal to those advertisers.

3. The Adoption of the 54 dBu Limitation and the Acceptance of the 99-watt 97.3 FM Medford Translator will not only Prove Fatal to WJFD's Broadcasting in the Boston and North Portuguese Communities, But Also, Will Result in Lots of Interference as Well as Repeated Future Complaints of Interference and Enforcement Actions by WJFD

If the FCC adopts the 54 dBu limitation, for example, the pending Medford, Massachusetts translator application will prove fatal to WJFD's broadcasting in the Boston and North areas with a great deal of predicted interference. The proposed 99-watt 97.3 FM Medford translator, while barely protecting WJFD's 54 dBu contour, will predictably create interference within WJFD's 54 dBu area of coverage and will equally and predictably receive interference from WJFD within Medford's 60 dBu predicted area to the extent of approximately seventy-five percent of its predicted listeners. See Attached Map of Interference, Medford Translator's Application. Two realities will surely result: lots of interference with repeated future complaints of interference and enforcement actions by WJFD. A result that the FCC does not want to promote and encourage.

Concerning interference of translators, we support the comments of Steven R. Bartholomew, "Comments of Pueblo Broadcasting Group," filed with the FCC in connection with this matter.

4. **Not Only is WJFD's Uniquely Historic and Important Presence in the Boston and North Portuguese Communities Worth Preserving, But Also Such Preservation Is Consistent with the FCC's Dual concern of Protecting Small Independently-Owned One-Station Operators That Serve the Local Communities**

WJFD's uniquely historic and important presence, with its vast and loyal audience beyond its 54 dBu contour coverage area, is worth preserving. Such preservation would be consistent with the FCC's dual concern of protecting small independent one-station operators with a truly local targeted audience. No other radio station can or will fill its shoes in the event a 54 dBu limitation is adopted.

To that extent, and in the event that you should adopt a limitation, you pray that you adopt our requested exemption, as set forth in our counsel's comments.

On a personal and final note, WJFD's expansive coverage has not happened without the significant personal and financial investment that Paulina and I, and our predecessor, have made and will continue to make. Both Paulina and I, our predecessor, and our listeners have come to rely on our 50,000 watts FM radio station, a matter of a great deal of pride, that, just like any other 50,000 watt station, reaches far beyond its 54 dBu contour.

For the foregoing reasons, we hereby respectfully request that the Commission do not adopt the proposed modification to Section 74.1203(a)(3) "to state that no complaint of actual interference will be considered actionable if the alleged interference occurs outside the desired station's 54 dBu contour."

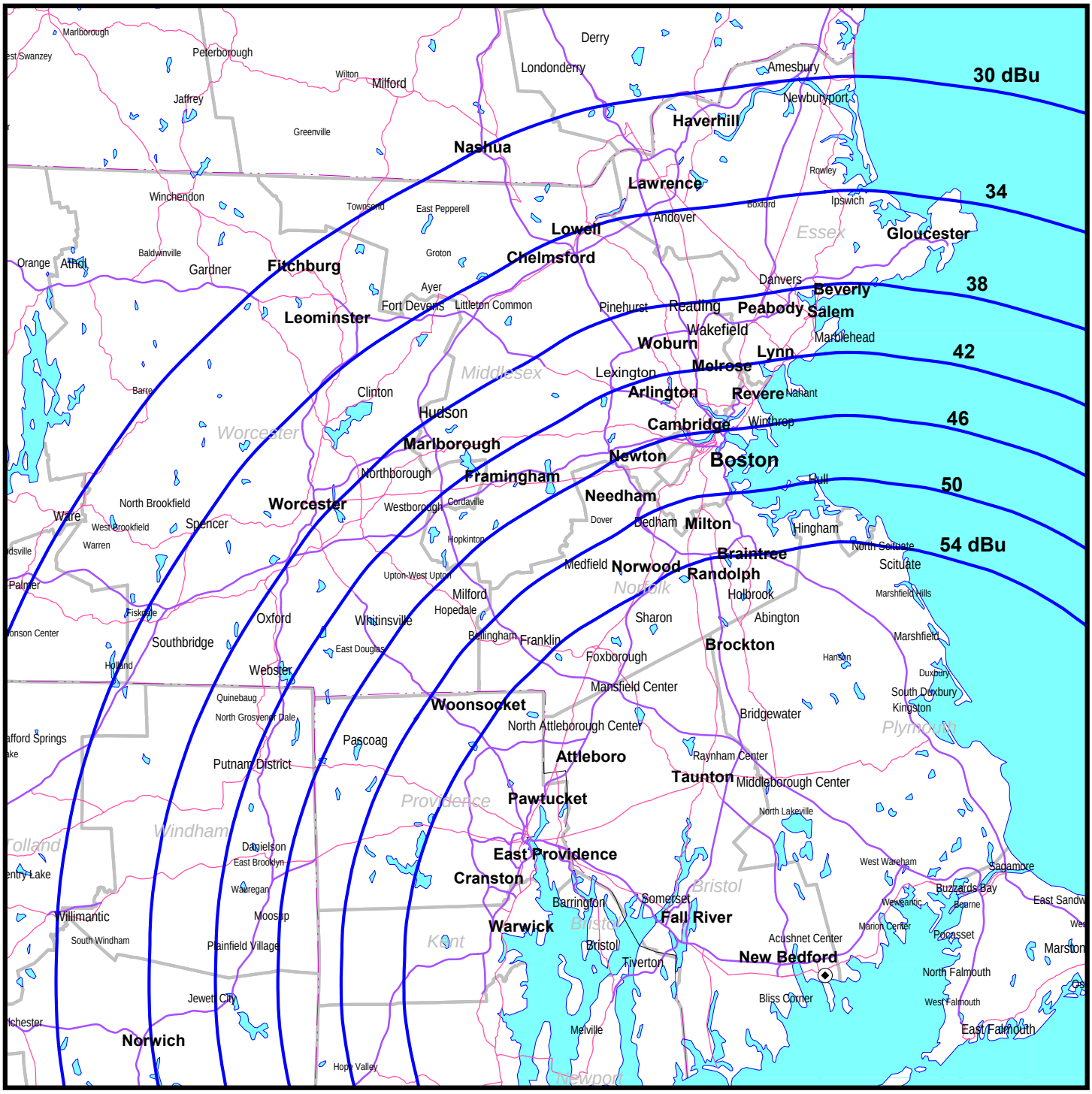
Respectfully Submitted,

_____/s_____
Henry Arruda
_____/s_____
Paulina Arruda
WJFD-FM, INC.
651 Orchard Street, Suite 300
New Bedford, MA 02744

August 6, 2018

Attachments: Map Depicting WJFD 30-54 dBu Contours
Map Depicting Interference re: Pending Medford 97.3 FM Translator

Figure 1



WJFD 30-54 DBU CONTOURS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

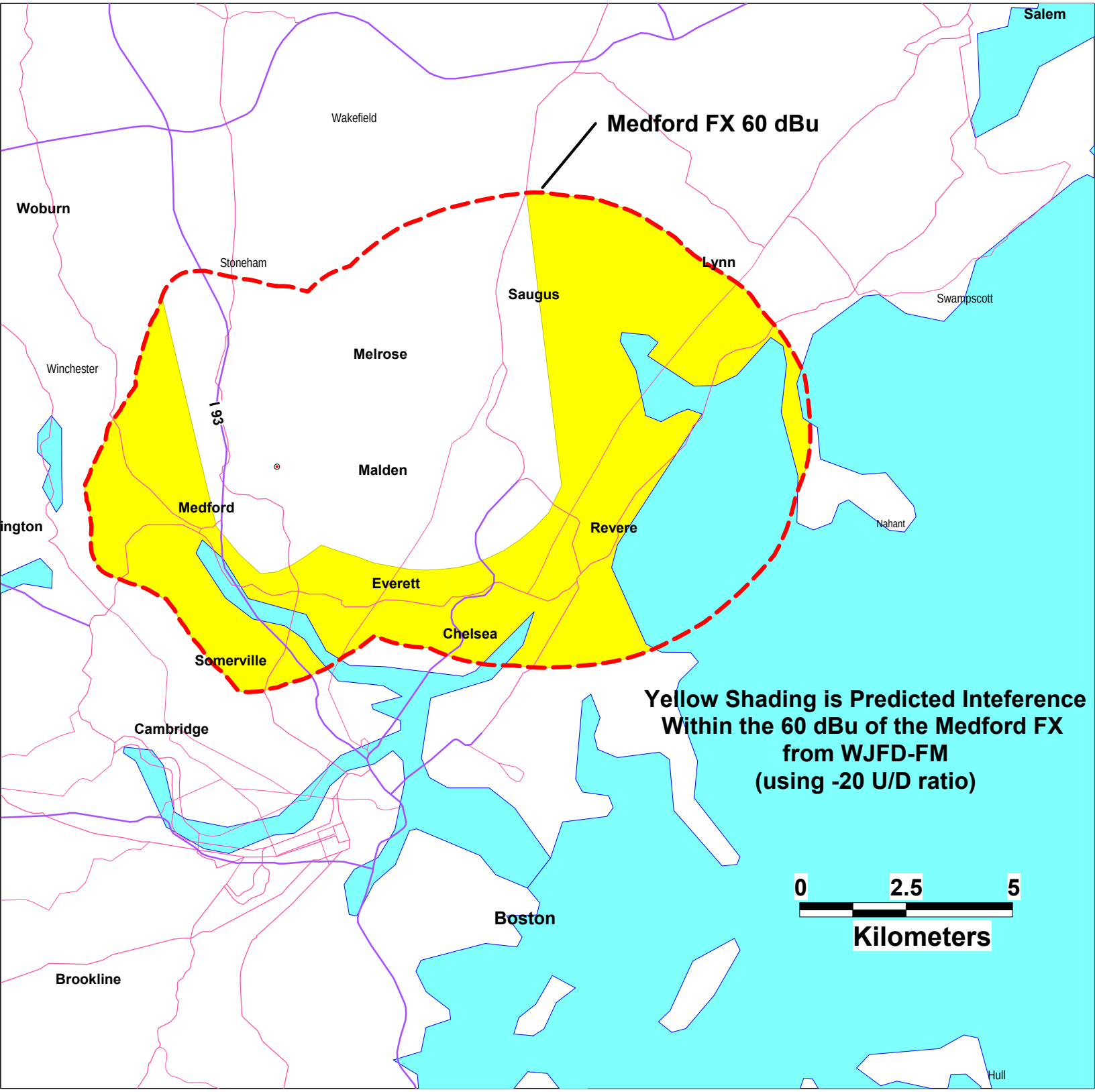

Salem
Wakefield
Medford FX 60 dBu
Woburn
Stoneham
Lynn
Saugus
Swampscott
Melrose
Winchester
I 93
Malden
Medford
ington
Revere
Nahant
Everett
Chelsea
Somerville
Yellow Shading is Predicted Inteference
Within the 60 dBu of the Medford FX
from WJFD-FM
(using -20 U/D ratio)
Cambridge
0
2.5
5
Kilometers
Boston
Brookline
Hull

Exhibit 3

STATEMENT

1. My name is Jose Moura and regularly I drive on the following major highways from my home located at 62 Venus Drive in the City of Worcester to my place of employment in Hudson, Massachusetts:

From my home, I drive to I-190 getting on it at the Ararat Street exit, going south. I then drive southerly and get on I-290 East driving easterly on I-290 along exits 19 through 23 and onward towards I-495

I reverse directions to return home from my place of employment.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: JMoura

Date: 8/11/2016

STATEMENT

1. My name is Marta Leitao and regularly I drive on Route 146 North and South along exits 9 and 10, in Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Marta Leitao

Date: 08 / 11 / 2016

STATEMENT

1. My name is Mariano Alves and I live at 101 Maple Avenue, Shrewsbury Massachusetts and I own a properties in the City of Worcester, including 50 Coburn Street, Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM at 50 Coburn Street, Worcester and on my drive from Shrewsbury to 50 Coburn Street, Worcester, and wish to continue to listen to WJFD-FM.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Mariano Alves

Date: 8/09/2016

STATEMENT

1. My name is Maria Veiga, and I live at 170 Austin Street, 3rd Floor, Worcester, Massachusetts.

2. I drive regularly from my home to New Bedford, Massachusetts taking route 146 South. I drive along exits 9 and 10 of Route 146 in Worcester southerly towards New Bedford.

3. I then reverse direction when I return home.

4. I am a regular listener of WJFD-FM at my home and along my drive and wish to continue to listen to WJFD-FM.

5. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Maria Jose Veiga

Date: 08/11/16

STATEMENT

1. My name is Manuel da Silva and regularly I drive on Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Manuel Da Silva

Date: 8-11-2016

STATEMENT

1. My name is Lourenco Oliveira, and I live at 170 Austin Street, 3rd Floor, Worcester, Massachusetts.

4. I am a regular listener of WJFD-FM at my home and wish to continue to listen to WJFD-FM.

5. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Lourenco Oliveira

Date: 08/11/2016

STATEMENT

1. My name is Jorge Silva and regularly I drive on Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Jorge Silva

Date: 08-11-2016

STATEMENT

1. My name is Joao Medeiros and regularly I drive on the following roads:

    a. Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts; and

    b. Route 146 North and South along exits 9 and 10, in Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8.12.16

STATEMENT

1. My name is Israel de Jesus and I live at 38 Dunbar Street, Worcester, Massachusetts.

2. I drive from my home to my place of employment as follows: I drive from my home to the Massachusetts interstate highway 290, Exit 10 near my home going East. I then drive between exits 10 and 21 along interstate 290 East towards Massachusetts interstate highway 495.

3. I reverse directions when returning home, driving back on Massachusetts interstate highway 290 going West from interstate 495. I drive along exits 21 and 10 along interstate 290 West, taking exit 10 near and towards my home.

3. I am a regular listener of WJFD-FM to and from my home and along exits 10 and 21, going East and West of Massachusetts interstate highway 290 in the Worcester area, and wish to continue to listen to WJFD-FM.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 08.09.16

STATEMENT

1. My name is Helder Branco and regularly I drive on Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Helder Branco

Date: 8-11-16

STATEMENT

1. My name is Gorete Reis and regularly I ride as a passenger in a vehicle travelling on Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my ride.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Gorete Reis

Date: 08 • 11 • 16

STATEMENT

1. My name is Geremias Mercadante and I live at 3A Havana Road, Worcester, Massachusetts.

2. I drive to and from my home to my workplace located at 630 Douglas Street, Uxbridge, Massachusetts via route 146 North and South.

3. I take the following streets in the City of Worcester, Massachusetts from my home to Route 146 South:

I make a right onto Stafford Street, a right onto James Street, a left onto Clover Street, a right onto Knox Street, a left onto Webster Street, a right onto Hope Avenue, a left onto Southbridge, a right onto Cambridge Street and a right onto Route 146 South.

4. I then drive on route 146 South along exits 9 and 10 towards my place of employment.

5. I then reverse directions when I return home.

6. I am a regular listener of WJFD-FM to and from my home substantially along the above streets in the City of Worcester and along Route 146 North and South exits 9 and 10, going and coming from my place of employment, and wish to continue to listen to WJFD-FM.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Jeremias Mercadante

Date: 8/9/16

STATEMENT

1. My name is Fernando Leitao and regularly I drive on Route 146 North and South along exits 9 and 10, in Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 08/11/2016

STATEMENT

1. My name is Fernanda Almeida and I live at 220 Salisbury Street, Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM at my home and wish to continue to listen to WJFD-FM.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Fernanda Almeida

Date: 08/10/2016

STATEMENT

1. My name is Arlene Falkowski and I live at 7 Cheshire Road, Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM at my home and wish to continue to listen to WJFD-FM.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 08/09/2016

STATEMENT

1. My name is Antonio Prata and regularly I drive on Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8-11-16

STATEMENT

1. My name is Victor Guerreiro and regularly I drive on the following roads:

   a. Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts;
   b. Route 146 North and South along exits 9 and 10, in Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8/12/16

STATEMENT

1. My name is Marian Martins and regularly I drive on the following major highway from my home located at 69 Camelot Drive, Shrewsbury, Massachusetts (where I also listen to WJFD) to Worcester Massachusetts:

From my home, I drive to I-290 getting on it at the Church Street exit (Exit 24), going westerly. I then drive westerly on I-290 along and among exits 23 through 8.

I reverse direction on the same I-290 route to return home.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: M Luiza Martins

Date: Aug-13-2016

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STATEMENT

1. My name is Leonardo Lindo and regularly I drive on Route 146 North and South along exits 9 and 10, in Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Leonardo Lindo

Date: 8/12/16

STATEMENT

1. My name is Jose Camara and regularly I drive on Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts.

2. I also regularly drive on Route 146 North and South, along exits 9 and 10 in the Auburn and Worcester municipal areas of Massachusetts.

3. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drives.

4. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Jose F. Camara

Date: 8-11-2016

STATEMENT

1. My name is Geraldo Queiroz and regularly I drive on the following roads:

   a. Massachusetts interstate 290 East and West, between exits 6 and 21, in the Auburn and Worcester municipal areas of Massachusetts;
   b. Route 146 North and South along exits 9 and 10, in Worcester, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Geraldo Queiroz

Date: 08-15-16

STATEMENT

1. My name is Christine M. Vieira and I live at 600 Main Street, Apartment 1704, 17th Floor, Worcester, Massachusetts and regularly I drive on Massachusetts interstate 290 East and West, between exits 10 and 21, in the Auburn and Worcester municipal areas of Massachusetts.

3. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive and at my home located at 600 Main Street, Worcester, Massachusetts.

4. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Christine Vieira

Date: 8/13/16

Exhibit 4

STATEMENT

1. My name is Sergio Anastacio and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Sergio Anastacio

Date: 8-11-16

STATEMENT

1. My name is Sandra Camara and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Sandra P. Camara

Date: 8/10/16

STATEMENT

1. My name is Paulo J. Martins and I live at 560 Parker Street, Newton, Massachusetts. My home is at the intersection of Parker and Dedham Streets.

2. I am a regular listener of WJFD-FM at my home and wish to continue to listen to WJFD-FM.

3. Also, I regularly drive on Dedham Street, in the westerly direction towards Massachusetts I-95, I get on I-95 (also known as Route 128), at exit 19 and drive along exits 20 through 23, either North and/or South, in the Newton and Needham municipal areas of Massachusetts.

4. I also wish to continue to listen to WJFD-FM on my drive.

5. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: Aug 10, 2016

STATEMENT

1. My name is Jorge Rebelo and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Jorge Rebelo

Date: 8-10-16

STATEMENT

1. My name is Joao Salgado and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Joao A Salgado

Date: 8-11-2016

STATEMENT

1. My name is Lois Faria and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 20, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Lois Faria

Date: 8/10/16

STATEMENT

1. My name is Abilio Carlos Azevedo and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Abilio C. Azevedo

Date: 8/10/16

STATEMENT

1. My name is Carlos Silva and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Carlos Silva

Date: 8-11-2016

STATEMENT

1. My name is Eddie Chaves and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachussetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Eddie Chaves

Date: 2/11/16

STATEMENT

1. My name is Mike Mello and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8/10/16

STATEMENT

1. My name is Michael Lima and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 08-11-2010

STATEMENT

1. My name is Mariano Correia and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8-11-16

STATEMENT

1. My name is Jose Xavier and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8-10-16

STATEMENT

1. My name is Jose Costa and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: Aug 11, 2016

STATEMENT

1. My name is John Rebelo and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Rebelo

Date: 08-10-16

STATEMENT

1. My name is Joao Alvaro Silva and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Joao Silva

Date: 8/11/2016

STATEMENT

1. My name is Jack Couto and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8/1/2018

STATEMENT

1. My name is Helio Melo and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Helio M Melo

Date: 8-12 2016

STATEMENT

1. My name is Helena Santos-Martins, MD, and I live at 560 Parker Street, Newton, Massachusetts. My home is at the intersection of Parker and Dedham Streets.

2. I am a regular listener of WJFD-FM at my home and wish to continue to listen to WJFD-FM.

3. To get to my office in Lynn, Massachusetts, I regularly drive on Dedham Street, in the westerly direction towards Massachusetts I-95. I get on I-95 North (also known as Route 128), at exit 19 and drive north along exits 20 through 23, in the Needham and Newton municipal areas of Massachusetts. I reverse direction when I return home.

4. I wish to continue to listen to WJFD-FM on my drive.

5. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: Aug 10, 2016

STATEMENT

1. My name is Helder Branco and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Helder Branco

Date: 8-11-16

STATEMENT

1. My name is Duarte Nuno Carreiro and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: AUG 12, 2016

DF.
FERRARA

STATEMENT

1. My name is Dina Ferreira and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Dina Ferrara

Date: 8/11/16

STATEMENT

1. My name is Claudio Carreiro and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8/10/16

STATEMENT

1. My name is Avelino Silva and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Avelino F. DeSilva

Date: 08-11-16

STATEMENT

1. My name is Andrea Fagundes Lima and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Andrea Lima

Date: 08/11/2016

STATEMENT

1. My name is Victor Guerreiro and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Victor Guerreiro

Date: 8/12/16

STATEMENT

1. My name is Nuno Soares and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: NUNO SOARES

Date: 08/13/16

STATEMENT

1. My name is Mario Arruda* and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 08-13-16

* No familial relation to either Henry M. Arruda or Paulina R. Arruda, officers of WJFD-FM, INC.

STATEMENT

1. My name is Mariano Ferreira and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Mariano Ferreira

Date: 8-12-2016

STATEMENT

1. My name is Luisa Pereira and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Luisa Pereira

Date: 8/12/16

STATEMENT

1. My name is Luis Vieira and regularly I drive on Route 9 (also known as Boylston Street) East and West, in the municipalities of Newton and Brookline, Massachusetts. I regularly drive on Route 9 in and along those municipalities to and from interstate I-95 in Needham, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Luis Vieira

Date: 8-20-16

STATEMENT

1. My name is José Rui Velez Caroço and I reside at 295 Nahanton Street, Newton, Massachusetts. My place of employment is located at 31 St. James Street, Boston, Massachusetts.

2. I listen to WJFD at my home and on my drive to my place of employment. I regularly take Route 9 (also known as Boylston Street) near my home, and drive easterly in the municipalities of Newton and Brookline towards Boston, Massachusetts on my way to my place of employment.

3. I reverse direction on my return home.

4. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM at my home and on my drive to and from work.

5. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8. 18. 2016

STATEMENT

1. My name is Jose Avila and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 8/11/16

STATEMENT

1. My name is Helder Costa Rita and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Helder Costa Rita

Date: 7-10-2016

STATEMENT

1. My name is Eugenio Pereira and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Eugenio Pereira

Date: 8/16/16

STATEMENT

1. My name is Emmanuel Santos and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I regularly take exit 20 to my place of employment located at 15 Riverdale Avenue, Newton, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive and at my place of employment located at 15 Riverdale Avenue, Newton, Massachusetts.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Emmanuel Santos

Date: 8-13-16

STATEMENT

1. My name is David Sa and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I regularly take exit 20 to my place of employment located at 15 Riverdale Avenue, Newton, Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive and at my place of employment located at 15 Riverdale Avenue, Newton, Massachusetts.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: David Sa

Date: 8-13-16

STATEMENT

1. My name is Carlos Silva and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Carlos Silva

Date: 8/11/16

STATEMENT

1. My name is Antonio Vieira and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 19 and 23, in the Newton and Needham municipal areas of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Antonio Vieira

Date: 8-13-16

STATEMENT

1. My name is Albert Costa and I reside at 1735 Beacon Street, Newton, Massachusetts. My place of employment is located at 681 Main Street, Waltham, Massachusetts.

2. I listen to WJFD at my home and on my drive to my place of employment. I regularly take Beacon Street westerly towards I-95 North, getting on I-95 North near exit 21 and driving Northerly on I-95, along exits 22 and 23 towards exit 26 to my place of employment in Waltham, Massachusetts.

3. I reverse direction on my return home.

4. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM at my home and on my drive to and from work.

5. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Albert Costa

Date: AUGUST 17, 2016

STATEMENT

1. My name is Francisco Castro and I reside in Swansea, Massachusetts. I provide landscaping services to private residences located in the municipalities of Newton and Brookline, Massachusetts. Those private residences are scatered in Newton from Spiers Road (in the two hundreds numbered area) northeasterly towards Eastbourne Street (in the one hundreds area) and easterly to Ward Street (in the three hundreds section). To the town of Brookline, I drive easterly towards Fairway Road (in the teens area) in Brookline.

2. I listen to WJFD on my drive to those localities and between and among those locations. I regularly travel on I-95 north and take exit 19 in Needham, Massachusetts towards Newton and Brookline.

3. I reverse direction on my return home.

4. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM at the various locations mentioned above and on my drive to and from work.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Francisco de Castro

Date: 8-21-16

STATEMENT

1. My name is Sergio Anastacio and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Sergio Anastacio

Date: 9-8-16

STATEMENT

1. My name is Mike Mello and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 9/8/16

STATEMENT

1. My name is Mariano Correia and regularly I drive on the following roadways:

   1.1. Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

   1.2. Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 9-11-16

STATEMENT

- My name is Jose Xavier and regularly I drive on the following roadways:

  - Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

  - Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

- I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

- I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 9-8-16

STATEMENT

- My name is Jose Xavier and regularly I drive on the following roadways:

  - Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

  - Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

- I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

- I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: 9-8-16

STATEMENT

. My name is Jose Costa and regularly I drive on the following roadways:

1.1. Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

1.2. Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Jose Costa

Date: Sep 08, 2016

STATEMENT

1. My name is Jorge Rebelo and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Jorge Rebelo

Date: 9-8-16

STATEMENT

1. My name is John Rebelo and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Rebelo

Date: 09-08-16

STATEMENT

1. My name is Joao Salgado and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Joao Salgado

Date: 9-8-2016

STATEMENT

1. My name is Joao Alvaro Silva, I reside at 18 West Pine Street, Newton, Massachusetts and regularly I drive on the following roadways:

   1.1. Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

   1.2. Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

2. I am a regular listener of WJFD-FM from my home and toward those roadways, and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Joao Silva

Date: 9/9/2016

STATEMENT

1. My name is Helio Melo and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Helio Melo

Date: 9-8-2016

STATEMENT

1. My name is Helder Costa Rita and regularly I drive on the following roadways:

1.1. Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

1.2. Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: _____

Date: Sep. 9/2016

STATEMENT

1. My name is Helder Branco and regularly I drive on the following roadways:

   1.1. Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

   1.2. Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Helder Branco

Date: 9-13-16

STATEMENT

1. My name is Gabriel Duarte, and regularly I drive from my home located at 108 Midland Drive, Waltham, Massachusetts to my place of work located at 180 Elm Street, Waltham, Massachusetts.

2. I am a regular listener of WJFD-FM at my home and on my way to work.

3. To get to my work I regularly drive from my home southerly towards Trapelo Road, Waltham, MA in the direction of I-95 South. I get on I-95 South, Exit 28 and get off at Exit 27, travelling Southeast on Totten Pond Road, to Lexington Street, then to Main Street, and finally Elm Street, 180 Elm Street (all streets are located in Waltham, Massachusetts).

4. I reverse direction when I return home.

5. I wish to continue to listen to WJFD-FM at my home and on my drive.

6. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Gabriel Duarte

Date: 9-7-2016

STATEMENT

1. My name is Eddie Chaves and regularly I drive on the following roadways:

   1.1. Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts; and

   1.2. Route 2, to/from I-95, Exit 29, traveling westerly/easterly to/from Alewife Brook Parkway in the Cambridge, Massachusetts area.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Eddie Chaves

Date: 09/08/2016

STATEMENT

1. My name is Dina Ferrara and regularly I drive on Massachusetts interstate 95 North and South, also known as Route 128 North and South, between exits 24 and 28, in the Waltham municipal area of Massachusetts.

2. I am a regular listener of WJFD-FM and wish to continue to listen to WJFD-FM on my drive.

3. I understand that this statement may be submitted to the Federal Communications Commission.

Signature: Dina Ferrara

Date: 9-8-16