

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

To: The Commission

Jaemin Chang and Hyunjoo Chang (the “Changs”), licensee of FM Translator Station K292HC, Woodlake, California, respectfully submits its Comments in response to the Commission’s Notice of Proposed Rule Making (“NPRM”)¹ in the above-referenced docket which seeks to bring more objectivity and expediency to the translator complaint process. The Changs generally support the FCC’s effort to eliminate the backlog of current unresolved interference complaints and prepare for the new translators scheduled to come on line in the next few years. There are a few issues the Changs would like to address in their Comments related to the specific rules proposed by the FCC.

¹ Notice of Proposed Rule Making, MB Docket No. 18-119, FCC 18-60, released May 10, 2018.

no legal, financial or familial affiliation with the primary station. The Changs propose these specific clarifications to the general proposals set forth by the Commission:

a. If the alleged interference occurs while the complainant is mobile, the complaint must specify the exact cross-street or specific address where the problem occurs.

b. Advertisers on a station should be viewed as having a financial affiliation with the station, so an advertiser on the primary station would not be able to file an interference complaint against a translator.

2. The Commission proposes removing the complainant from the proceeding immediately upon establishment of a prima facie interference complaint. A translator licensee will no longer be able to contact the person filing the complaint directly to validate the concern or offer equipment solutions that might resolve the problem. While the Changs understand the reasoning behind that proposal, they believe complainants should be held accountable for what they file. If, upon examination of the complaint, the translator licensee believes that an upgraded receiver or other equipment enhancement could cure the interference, then the translator licensee should have an opportunity to document that finding with field test measurements at the complainant's location. If the test is successful, the translator licensee should be able to purchase the necessary equipment for the complainant to resolve the complaint.

3. In those instances where better reception equipment would not resolve the interference, the Changs agree with the Commission's proposal to use a desired to undesired signal ratio to determine the existence of interference. The Changs urge the FCC to be mindful of all of the variables that could impact that kind of testing, including weather, time of day and even time of the year. Their hope is the engineering community will help the FCC reach a fair way to evaluate the testing data that balances the rights of primary FM stations with FM translators,

especially those granted to AM stations as part of the AM Revitalization Proceeding. Many AM licensees invested substantial time and money to acquire FM translators to help their ailing AM facilities, and everything possible should be done to preserve those translators. Further to that point, the Changs propose that once an AM Revitalization translator is constructed and licensed, it should be granted primary or incumbent status in the event a primary FM stations proposes a relocation of channel or location that would cause interference to the AM Revitalization translator.

4. The Changs fully support the FCC's proposal to expand a translator licensee's ability to change channels to resolve interference complaints. The current rules limit changes to only first, second or third adjacent channels or IF channels. This expansion will hopefully result in the resolution of many of interference complaints.

Respectfully submitted,

/s/ Scott C. Cinnamon
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