

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

COMMENTS OF RADIO 74 INTERNATIONALE

RADIO 74 INTERNATIONALE
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It's program and engineering service

August 31, 2018

RADIO 74 INTERNATIONALE hereby submits these comments in response to the *Notice of Proposed Rulemaking*, FCC 18-60 (rel. May 10, 2018) (“*NPRM*”), in the above-captioned proceeding.

RADIO 74 INTERNATIONALE (R74I) is deeply concerned by many of the comments we are reading on this issue and the direction these proceedings appear to be heading, and we are compelled to comment in the interest of our present and future listeners. The very survival of many of our FM radio stations and FM translators is at risk, most of them primarily serving rural areas.

We stand opposed to arbitrarily establishing a predicted signal contour of 54 dBu, a benchmark beyond which complaints from listeners (six or more complaints seems fair and reasonable) would permit an FM translator, existing or future, to interfere with the signals of a standard FM broadcasting station.

Much or most radio listening nowadays takes place in automobiles. Modern car radios are very sensitive and selective, as opposed to the inferior quality of most portable radios, boom boxes and clock radios typically used to receive FM stations in homes and businesses. When a frequency is clear of interference, listeners in cars can enjoy quality listening with signals of as little as 45 dBu or less. Many rural radio stations absolutely depend on this extended (fringe area) coverage.

The commission has a well-established policy of protecting rural stations which necessarily serve much larger areas on much lower budgets, often relying on much weaker signals in order to reach sufficient numbers of listeners to remain viable. Doesn't everyone deserve to enjoy the programming of the interference free FM radio service of his/her choice, even when the signal is weaker?

R74I owns and operates several non-commercial FM stations and a few FM translators around the country, all of which serve smaller communities and rural areas. While we rejoice in the principle of AM revitalization, as well as the use of FM translators to fill in shadows and extend service into areas with minimal radio services, it seems to us that when it comes to the major cities, where abundant choices already exist, that authorizing yet more FM translators has actually become a deterrent to radio broadcasting in nearby rural areas. A case in point is our non-commercial FM station, KSJL, licensed to Strasburg, CO.

KSJL, operating exclusively from listener donations, is to be the strongest station we own, a hard-earned CP to upgrade to Class C2, with fringe coverage of Denver. This project, plagued by a string of expensive and time consuming setbacks over the nearly 20 years since the first application was filed, is finally under construction. When completed, it will provide wide area coverage to a rural area some 80 miles in diameter, which contains 10,000 potential listeners within the 70 dBu contour, and less than 52,000 within the 60 dBu contour. But nearly 1.5 million people within the 48 dBu contour. Rural people too deserve to have a strong non-commercial educational radio station which is why two decades ago the Commission allocated an NCE channel in the non-reserved band to accommodate this need.

But now, just as we are about to invest a half million dollars of donated money on a new 400 foot tower, antenna and transmitter, we realize that a fill-in FM translator has moved in on our operating frequency inside Denver, blocking any hope of us ever being heard there.

Unless that translator can be made to go away, KSJL is financially doomed. Without at least modest financial support from listeners in Denver, the rural community we seek to serve will not be able to adequately support our station and will be deprived of its only local educational radio station.

In addition to listeners who live and work out in the country, a few thousand potential listeners drive into work in Denver each day. Accompanying these listeners between their homes and their jobs is important to the economic viability of KSJL. These people, along with a reasonable number of mobile listeners living in the Denver metro area, regularly donating, will assure the survival of KSJL.

While FM Translators might render a usable signal over a reduced area, in reality they leave much larger areas around them cluttered with interference, areas which a standard FM station could cleanly cover, even with reduced signal strength, if the FM translator wasn't there. Thus, for efficient use of the spectrum, FM translators should be an exception and not a rule.

As we see it, the present surge of FM translators in large cities is blocking out valuable peripheral signals from nearby rural stations which absolutely cannot exist without receiving at least a few crumbs that fall between the cracks of the tables of the kings and queens who dominate metro area broadcasting.

The current situation reminds me of the great historical figure of antiquity, King David, who though he had a flock of hundreds of wives and concubines, stole the "lamb" (the wife) of a man who only had one, and then murdered him to cover it up.

Denver, and all large market cities, has more than enough radio stations that focus primarily on the needs of city dwellers, while the rural belt around it, from 30 to 80 miles away remains largely ignored and underserved. KSJL's job is to provide radio service to these forgotten people. But KSJL will simply die if it can't be heard in cars in Denver.

Consequently, RADIO 74 INTERNATIONALE categorically opposes the arbitrary setting of a 54 dBu contour, beyond which interference complaints from our listeners, present and future, will be inactionable. If the Commission feels it must fix a contour, we urge protection out to at least the theoretical 45 dBu contour, and in addition to equally accept Langley Rice projections which more accurately predict subtleties in signal strengths over terrain that is not perfectly flat. In all cases, FM translators are a secondary service and must remain so. Full service stations should not be forced to suffer or even die at the hands of a secondary station.

Respectfully submitted,

RADIO 74 INTERNATIONALE

Ronald L. Myers,

Program and Engineering Services,

On behalf of our President and board

August 31, 2018