

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

In the Matter of)	
)	
Amendment of Part 74 of the)	F M B Docket No. 18-119
Commission's Rules regarding)	
F M Translator Interference)	

To: The Office of the Secretary,
For the Attention of the Chief, Audio Division, Media Bureau

SUPPLIMENTAL REPLY COMMENTS ON NPRM (MB Docket No. 18-119)

Radio Sharon Foundation, the Licensee of the translator W235CN in Providence, RI. Facility FCC ID # 41191 hereby submits Supplemental Reply Comments in the above captioned Proceeding.

Specifically, Radio Sharon wishes to address reply comments of Beasley Media Group, LLC, Cox Media Group, LLC, Entercom Communications Corp., Gradick Communications, LLC, iHeartCommunications, Inc., Neuhoﬀ Corp., Radio One Licenses, LLC, Urban One, Inc., Withers Broadcasting Companies submitted on 9-5-2108 (The Combined Reply Comments). The Combined Reply Comments propose, what is in effect, a new proposal. Specifically, they propose adoption of a new and different protected contour of 42dBu rather than the 54dBu proposed by the FCC.

Because The Combined Reply Comments propose a new standard that has not been opened for appropriate comment, they should not be considered as part of this proceeding. If the Combined Commenters wish to propose a completely different standard, then they should be addressed in a new NPRM where the proposal can be fully vetted by both the FCC and the public.

To the extent that The Combined Reply Comments might be considered in this proceeding, these Supplemental Reply Comments are being filed to show that the arguments supporting proposed 42dBu standard are both shallow and inconsistent with the public interest.

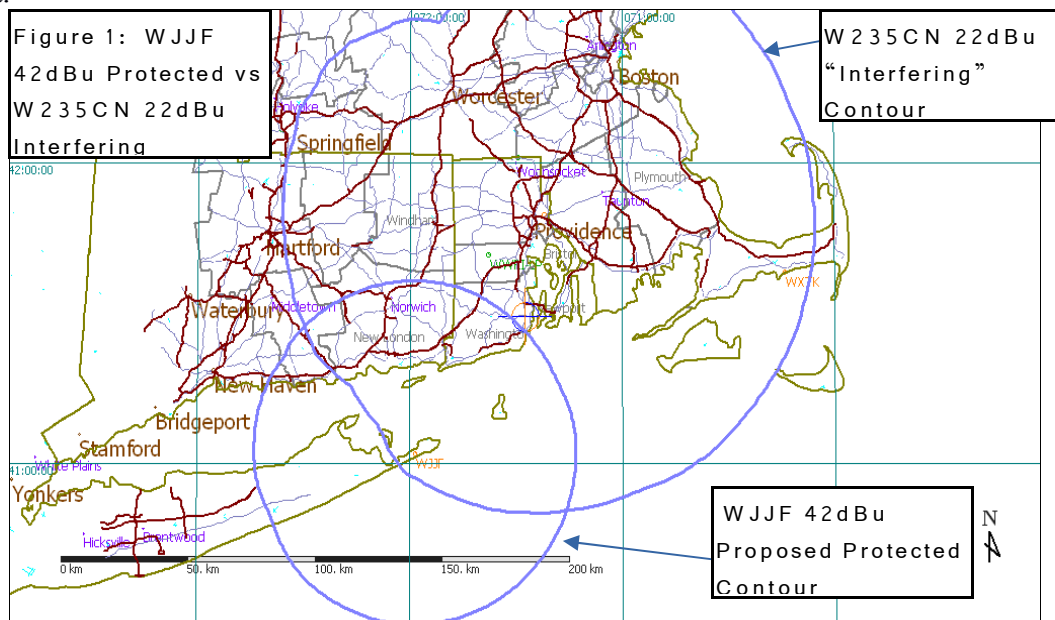
Using an existing situation already discussed in our previously filed reply comments, we show that the Combined Commenters' expectation of service coverage to the 42dBu contour is unrealistic, unsupported by proper technical documentation and inconsistent with other services, including secondary services like LPFM.

In our Reply Comments, Radio Sharon discusses an ongoing situation between our translator, W235CN and class A station WJFF. Our situation is one of many similar situations. Because we feel that our scenario is typical, we use ourselves as an example.

Our extensive Off-On tests have conclusively determined that no interference from W235CN is occurring to WJFF. We have repeatedly demonstrated that in places where WJFF can be heard, there is no interference from W235CN. In places where W235CN can be heard, WJFF, generally, cannot be heard. Video evidence of the testing has been documented and submitted to the FCC.

The FCC's proposed 54dBu limit matches our experience with WJFF quite well. We found that WJFF can be heard pretty well within the 54dBu contour and that there was no effect of our translator on WJFF within the WJFF 54dBu contour.

However, if we use the proposed 42dBu contour for WJFF, then our translator's 22dBu contour would be the interfering threshold. As one can see by figure 1 below, our translator would be subject to numerous frivolous complaints originating over a huge area.

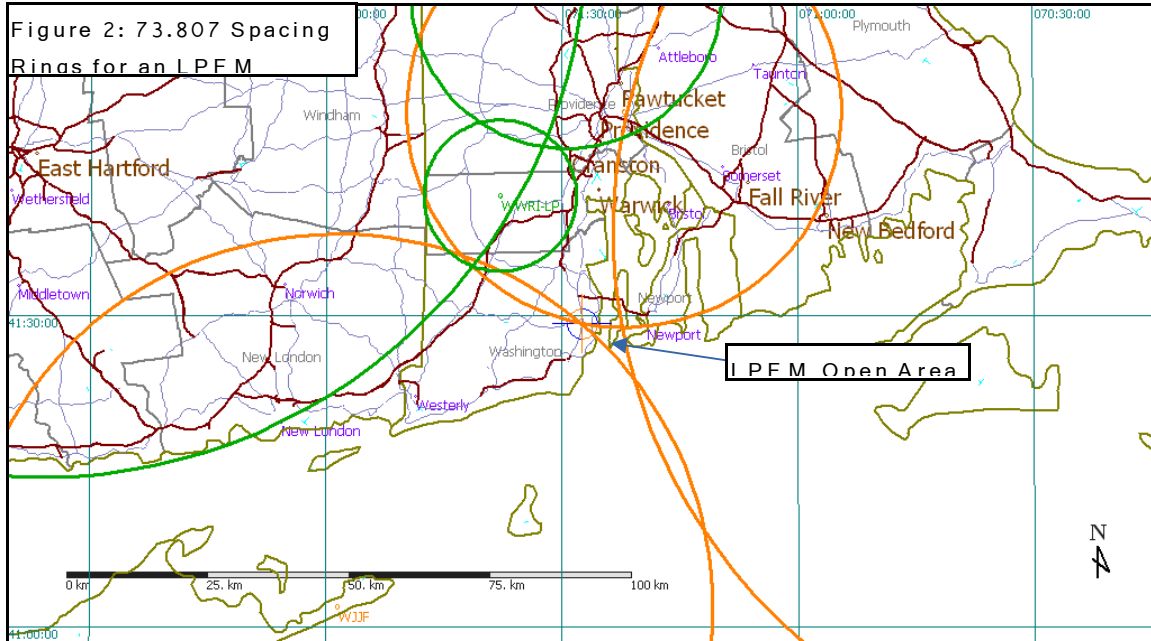


We know that these complaints would be frivolous because we have already received many complaints within the WJFF 42dBu contour and have tested every one of them and found no interference. This process has been as expensive as it was needless.

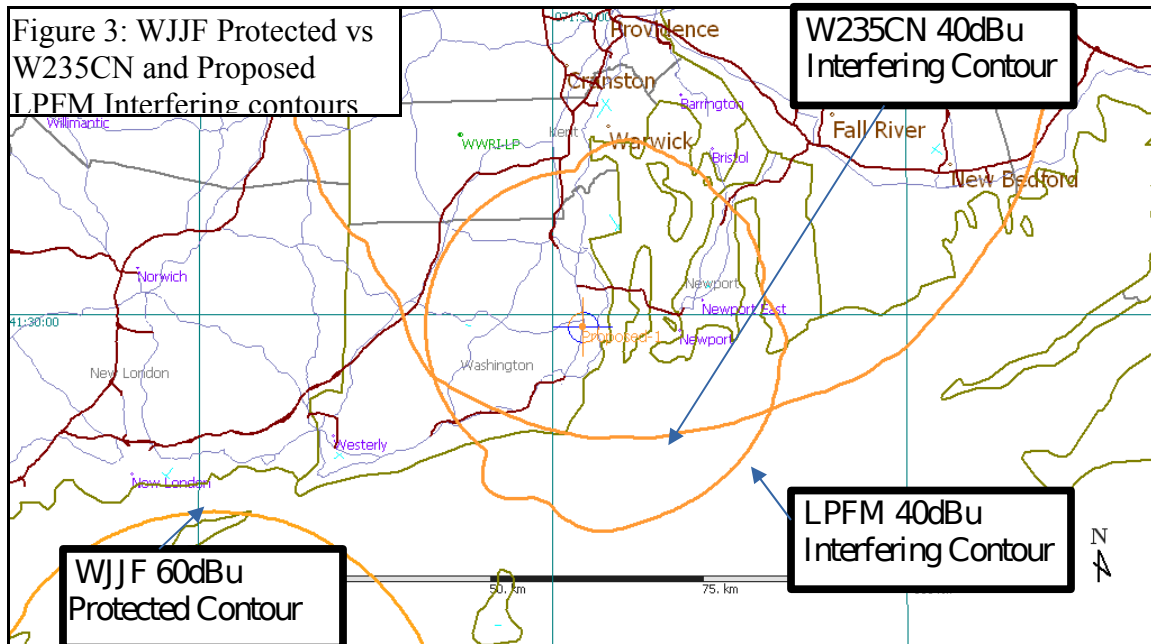
Further, the The Combined Reply Comments propose that the 42dBu contour should not be a hard limit. Effectively, the The Combined Reply Comments propose to keep the same unlimited service area as before. Were the Commission to adopt The Combined Comments, then stations could have listeners out to infinity and the listener's complaint, signed under penalty of perjury, would be all that was needed to silence the translator, and the listener would not have to cooperate with the translator to even discover if the

interference was real. To suggest that this proposal is, in any way a workable solution to promote FM Translators or AM improvement is simply absurd.

In our example of WJFF vs W235CN, the distance is great enough that an LPFM could be licensed much closer to WJFF than our W235CN translator is (figure 2). The LPFM would cover many of the areas where we have been forced to analyze complaints. Naturally, our theoretical LPFM would also cause interference to WJFF in these areas and beyond. However, a fully spaced LPFM would not be subject to co-channel interference complaints caused by proper operation.



Effectively, an LPFM would be permitted to operate and cause “interference” where a translator with a weaker interfering signal could be forced off the air (see figure 3).



W235CN has received dozens of frivolous interference complaints from areas that would be within the interfering contour of the theoretical LPFM station. In fact, many of the complaints came from areas that would have been within the 60dBu service contour of the LPFM station. So, we have to ask ourselves: If an LPFM station could exist in this area and that LPFM station would not be subject to co-channel interference complaints caused by its proper operation, then why should a translator like W235CN find itself subject to these complaints? Although LPFM and translators are not the same service, they do share many common traits and both are classified as secondary services. Is the LPFM a higher class of secondary service? If LPFMs and translators are co-equal, then shouldn't there be some equivalent spacing or contour protection that affords a translator comparable protection to an LPFM station? Clearly, the protected station's 42dBu contour cannot possibly afford translators a comparable protection to the LPFM protections since a fully spaced LPFM can exist in locations that would clearly interfere with reception in the affected station's 42dBu contour.

Summary:

To the extent that The Combined Reply Comments actually constitute a new proposal that has not been properly set forth for public scrutiny and comment, they should not be considered. To the extent that any part of The Combined Reply Comments might be considered, we offer a brief and by no means exhaustive discussion of the shortcomings that are immediately obvious in The Combined Reply Comments.

Respectfully Submitted,

S
 Quilvio Perdomo (Frankie)
 Principal-memeber
 Radio Sharon Foundation