

MOUNTAIN COMMUNITY TRANSLATORS, LLC

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Mountaincommunitytranslators.com

October 20, 2022

James D. Bradshaw
Senior Deputy Chief, Audio Division
Media Bureau
Federal Communications Commission
Washington, DC 20554

1TV.com, Inc.
c/o John Neely, Esq.
Miller and Neely, PC
3750 University Blvd., West
Suite 203
Kensington, MD 20895

In re: **K243BN Laveen, AZ**
Facility ID 92373

**Interference Complaint, Petition
For Reconsideration, and Informal
Objection**

Dear Mr. Bradshaw,

This letter is response to the Commissions letter dated September 8th, 2022 (1800B3-KV) regarding Mountain Community Translator, LLC's ("MCT") FM translator station, K243BN Laveen, Arizona, facility ID 92373.

The letter ordered that MCT submit to the Bureau, within 60 days of the letter, basically the results of interference tests conducted in response to Interference Complaints filed by 1TV.com, Inc. ("1TV") regarding their KIKO-FM Claypool, AZ, facility ID 11894 which operates co-channel to the operation of K243BN.

MCT has conducted field strength measurements of KIKO-FM in the several areas of concern as outlined in the multiple interference complaints filed by 1TV. These measurements were conducted while the operation of K243BN was suspended for short periods of time. The

results of these measurements basically concluded that one of the main contributors for any interference problems to KIKO-FM stem mostly from the less than expected field strength being produced by the current operation of KIKO-FM. While MCT cannot explain as to the specific cause for this lack of predicted signal strength, FCC records indicate that KIKO-FM operates with highly directional antenna system and with a less than desirable horizontal only polarized antenna system. This may be a contributor to the lack of predicted signal. Measurements were made utilizing a Potomac Instruments FIM-71 FM field strength meter at multiple locations.

With the operation of K243BN turned back on with the one (1) watt Effective Radiated Power ("ERP") level with its directional antenna system with circular polarization, there was some minor areas of interference imposed to the KIKO-FM signal reception. But once again, its MCT's belief that if KIKO-FM were operating up to its normally predicted field strength levels (F50,50), this interference might not exist.

On July 5, 2022, 1TV filed a supplement to its Interference Complaint and Petition for Reconsider listing 22 new listener complaints. MCT has yet had the opportunity to address these additional complaints.

REMEDIATION PROPOSAL

MCT is in the belief that its initial remediation efforts of interference towards KIKO-FM have been adequately addressed with its reduction in ERP and modification of its directional antenna system. However, it seems that 1TV is intent on having K243BN cease operation on its current channel with its multiple and ongoing filings against the operation K243BN even with any proposed lower ERP and/or use of a more restrictive directional antenna system.

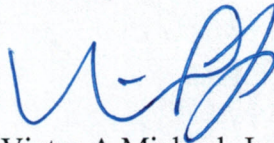
Thus, in the spirit of cooperating with 1TV, MCT has identified a new potential transmitter location that will allow it to change its channel of operation from the current channel of 243D to 240D. This proposed change would be considered a minor change since the new proposed operation of K243BN would be on a 3rd adjacent channel, and it would 60 dB μ overlap with the currently licensed operation of K243BN (BLFT-20171005ACG). MCT filed a minor change application on October 4th, file number 0000201900, to specify this new proposed operation on channel 240. Since the new proposed operation is well outside of the 60 dB μ contour of KIKO-FM on the 3rd adjacent channel, it should eliminate any interference concerns. There will be no prohibitive contour overlap with this new proposed operation and KIKO-FM. Notification of 1TV's counsel of this new proposed technical operation by K243BN on channel 240D was made on October 6th via email. A response was received on October 7th basically agreeing to this proposal if K243BN remains silent until such time it can build out the new proposed operation of K243BN on Channel 240.

MCT has taken silent until such time action can be taken with this recently filed modification of operation K243BN to eliminate any inference concerns with KIKO-FM (STA application number 0000201901). MCT will promptly rebuild and resume normal broadcasting by K243BN as soon as action is taken on its pending modification application.

CONCLUSION

MCT submits this proposed remediation plan and feels it should eliminate any further interference concerns or issues in regards 1TV and its operation of KIKO-FM. MCT has taken the currently licensed operation of K243BN silent and will remain silent until such time that a new proposed operation of K243BN can hopefully be approved by the Commission.

Sincerely,



Victor A Michael, Jr.

Sole Member/Technical Consultant

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Sent via email:

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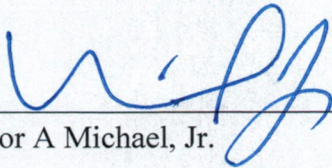
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DECLARATION OF VICTOR A MICHAEL, JR.

I, Victor A Michael, Jr, do hereby submit this Declaration that the statements contained in this letter being submitted on October 20, 2022, are truthful and are to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read 'W. Michael, Jr.', is written over a horizontal line.

Victor A Michael, Jr.