

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

In re Applications of)	Accepted/Files
)	
CALVARY CHAPEL OF TWIN)	JAN 23 2014
FALLS, INC.)	
)	Federal Communications Commission
For Renewal of License for the)	Office of the Secretary
following broadcast stations in the)	
State of Oregon:)	
)	
✓ K247AQ (139138))	File No. BRFT-20130926AQD
)	
✓ KDJC-FM (121839))	File No. BRED-20130926AMU
)	
✓ K203DY (88518))	File No. BRFT-20130926AQC
)	
✓ K201DV (77718))	File No. BRFT-20130926AQA
)	
✓ K202DT (91875))	File No. BRFT- 20130926APZ
)	
✓ K218DP (90439) <i>NO Pet. filed</i>)	File No. BRFT-20130926APY
)	
✓ K216EH (91971))	File No. BRFT-20130926APX
)	
✓ KJCH-FM (90263))	File No. BRED-20130926AMV
)	
✓ K212AK (72002))	File No. BRFT-20130926APU
)	
✓ K273AJ (91973))	File No. BRFT-20130926APS
)	
✓ K205DM (92498))	File No. BRFT-20130926APQ
)	
✓ K202EH (90256))	File No. BRFT-20130926APP
)	
✓ K213CF (82789))	File No. BRFT-20130926APO
)	
✓ KQDL-FM (174458))	File No. BRED-20130926AMY
)	

KPIJ-FM (92491) ✓)	File No. BRED-20130926ANG
)	
K246BB (139146) ✓)	File No. BRFT-20130926APL
)	
K220II (122157) ✓)	File No. BRFT-20130926APJ
)	
K296BS (71972) ✓)	File No. BRFT-20130926APH
)	
K276EO (139145) ✓)	File No. BRFT-20130926APG
)	
K201DH (77128) ✓)	File No. BRFT-20130926APE
)	
K220IN (121763) ✓)	File No. BRFT-20130926APD
)	
K288FT (138942) ✓)	File No. BRFT-20130926AOX
)	
* KKJA-FM (92285) ✓)	File No. BRED-20130926ANA
)	
K214CM (77106) ✓)	File No. BRFT-20130926APC
)	
K290BK (138665) ✓)	File No. BRFT-20130926APB
)	
K280BK (71989) ✓)	File No. BRFT-20130926APA
)	
K205EG (91527) ✓)	File No. 20130926AOY

To: Office of the Secretary
 Attn: The Commission

OPPOSITION TO PETITION TO DENY

Calvary Chapel of Twin Falls, Inc. ("CCTF"), by counsel, and pursuant to Section 1.45 of the Commission's Rules, hereby opposes the "Petition to Deny" filed January 2, 2014 by Colin Innes ("Innes) against the above-captioned pending license

* K291BL

renewal applications.¹ For the reasons explained below, CCTF submits that the Innes petition is replete with substantially false conclusions of fact and a total lack of knowledge of longstanding thoughtful FCC policy. Innes has not supplied one factually correct statement to support the denial of any of the CCTF license renewal applications, nor has Innes correctly applied established FCC policy. The Innes petition is nothing more than a complaint about certain broadcast policies of the Commission. Those matters should be addressed in the context of a Petition for Rule Making rather than against the license renewal applications of CCTF. In support hereof, CCTF submits the following:

Background

By way of brief summary, the introductory paragraph of the Innes petition states that CCTF neglects coverage of community issues, abuses the main studio waiver rules and provides redundant and abused translator service. Innes states immediately thereafter that CCTF's facilities prevent the use of LPFM channels for local community use, and he questions how any studio-waived station can provide local public service programming to the satellite station community. *See, initial page of the Innes petition.*

On the third page of his petition, Innes asks the FCC to define "serving the public interest." Innes wrongfully concludes that CCTF's stations "merely play music, provide biased editorials, promote calls to action and contains no local public affairs coverage."

On the fourth and fifth pages Innes complains that the FCC does not audit main studio waivers, and he concludes that CCTF does not qualify as an NCE licensee. Innes

¹ Public Notice of the Innes petition issued on January 7, 2014. *See, Public Notice Report No. 28150.*

concludes his petition by stating that CCTF's large number of translator stations is "excessive."

The Truth of These Matters Completely Contradict Innes' Allegations

At the outset, the Commission should recognize that none of the allegations raised in the Innes petition are supported by actual facts. Attached hereto as Exhibit No. 1 is the Declaration of Mike Stocklin, the Chief Executive Officer of CCTF. Mr. Stocklin's sworn statement states the following:

1. The programs broadcast over the CCTF network are all produced by various ministries throughout the country and the programming topics include salvation, marriage, counseling, anti-abortion, raising children, human health, mental illness and hundreds of other topics. None of the programs are musical in nature. A representative weekly program schedule is attached to Mr. Stocklin's Declaration.
2. CCTF's regular radio programming includes content that originates from ministries located in Oregon. Every Monday through Friday at 12:30 pm Mountain Time CCTF broadcasts "Searchlight" with Pastor Jon Courson from Applegate, Oregon. And every Monday through Friday at 5:00 pm Mountain Time CCTF broadcasts "The Way, the Life, the Truth" with Pastor Matt Foxx from Coos Bay, Oregon.
3. CCTF has received no complaints from Oregon residents about its radio programming, and CCTF has over 300 Oregon residents noted on its

Donor's List.

4. With regard to maintaining proper main studio waivers, where applicable, Mr. Stocklin's Declaration includes a second attachment that shows the required protocols undertaken by CCTF – the maintenance of a toll free telephone number, access to the station public file at no charge, local representatives that hold meetings and advise CCTF on local issues, local on-air promotions for community and church events, and other outreach efforts.

All in all, the facts demonstrate that all of the Innes allegations that relate to the programming record and public service efforts of CCTF are fundamentally and completely incorrect. It is no surprise that nowhere in the Innes petition does it state that Innes actually listens to CCTF programming. The Commission's limited time and resources should not be expended on such uninformed opinions.²

The Opinions of Innes Contradict Thoughtful Longstanding Policies of the FCC

The FCC's FM Translator Policies: Contrary to the opinion of Innes, during the past forty-three years the FCC has developed a thoughtful FM translator policy, and CCTF has availed itself of that policy to provide meaningful, spiritual and positive programming throughout the United State. By way of FCC policy background, the FM

² In the second paragraph of his petition, Innes claims that CCTF's licenses prevent the use of LPFM channels for local community use. Not only is that argument technically untrue, but it also shows the real motivation behind his petition. The FCC designed the LPFM service to co-exist with existing full power FM and existing FM translator stations, not to replace them. See generally, *Creation of Low Power Radio Service, Report & Order, 15 FCC Rcd 2205 (2000)*.

Translator service was instituted in 1970 as a means to supplement the primary service provided by full facility FM stations. See, *Report and Order in Docket No. 17159, 20 RR 2d 1538 (1970)*. The translator rules initially adopted by the Commission restricted both commercial and noncommercial FM translators to the rebroadcast of signals received directly over-the-air from their primary stations or another translator. Subsequently the Commission accepted a Petition for Rule Making and commenced a Rule Making proceeding in *Notice of Proposed Rule Making in MM Docket No. 86-112, 104 FCC 2d 318 (1986)*. On the basis of the record developed in that proceeding, the Commission modified Section 74.1231(b) to provide for a Noncommercial Educational FM ("NCE-FM") translator station that is operating on a reserved channel and is owned and operated by the licensee of the primary NCE-FM station it rebroadcasts to use alternative signal delivery means, including but not limited to, satellite and terrestrial microwave facilities. See *Amendment of Part 74 of the Commission's Rules to Provide for Satellite and Terrestrial Microwave Feeds to Noncommercial Educational FM Translators Report and Order, 3 FCC Rcd 2196 (1988)*("1988 Report and Order"); *recon. granted in part, 4 FCC Rcd 6459 (1989)*.

In expanding upon the over-the-air reception option that was previously provided for translator signal delivery, the *1988 Report and Order* found it desirable to provide NCE licensees operating in the reserved band full discretion to choose the means of input signal delivery most suitable to their particular circumstances in delivering signals to their commonly-licensed translators. The Commission found that such expanded licensee discretion would serve the public interest by expanding opportunities for

providing quality FM service to unserved and underserved areas, without altering the secondary status of NCE translators *vis-a-vis* full service FM stations.³

Over time, and in response to changes in the broadcast industry and technological advancements, the Commission provided additional modest refinements to its translator policies. For example, by *Letter Ruling* dated November 7, 2000 (in re BPFT-19981023TB; Lawton, Oklahoma) the Commission decided that the satellite feed from a parent NCE-FM station to its commercial frequency translator station may emanate directly from the programming production facilities of the parent NCE-FM station, rather than directly from the parent NCE-FM station's transmitter. The Commission concluded that simultaneous satellite signal delivery from the programming production facilities to both the parent NCE-FM station and its translator was permissible so long as the translator ceased operating when the parent NCE-FM station ceased operating for any reason.

The Commission also modified another longstanding FM Translator policy in the above-referenced Lawton, Oklahoma case. Until that time, the Commission would not consider authorizing an FM Translator station on the same frequency as its Primary Station. However, when BPFT-19981023TB was granted on November 7, 2000, FM Translator Station K210DJ was authorized to carry Primary Station KWKL-FM (Channel 210) from Grandfield, Oklahoma. See, *FCC Construction Permit BPFT-19981023TB for K210DJ, issued November 7, 2000*. So the FCC will consider co-channel Primary

³ The 1988 *Report and Order* recognized that this rule change increased the likelihood that translator networks would be created, but held fast that a network of only translators would not be permitted.

Station / Translator situations if the Translator Station does not operate in the immediate vicinity of the Primary Station.

In keeping with the longstanding tradition that FM translator stations be utilized to expand the areas and population coverage of full power radio stations, the Commission more recently took another bold step forward when it changed the FM translator rules to allow certain FM translator stations to rebroadcast certain AM broadcast stations. See, *Report and Order in MB Docket No. 07-172, FCC 09-59, issued June 29, 2009.*

CCTF submits that the FM translator policy that Innes objects to is unquestionably in concert with the public interest. CCTF, like numerous other broadcast licensees, availed itself of these policies to provide both regional and national coverage of its religious and educational programming. Many of CCTF's FM translator stations serve just a few thousand people, and they provide religious and spiritual programming to rural areas that receive no other similar alternative radio programming. And this is exactly what the FM translator service was designed to do. So, to the extent Innes wants these policies reviewed by the Commission, such matters should be addressed in a formal rule making proceeding and not within the context of a license renewal challenge.⁴

⁴ Innes alleges that CCTF's FM translator network provides redundant programming. See, *Innes petition at Page 1.* Such allegations run completely in the face of the Commission's analysis when it authorizes a new or modified FM translator station. FCC Form 349 includes a Section III-A certification about "multiple translators." An FM translator will not be authorized if that licensee has another FM translator station that serves substantially the same area and rebroadcasts the same full power FM primary signal. Although CCTF provides substantial coverage of the United States with its large number of FM translator stations, such service is anything but redundant.

The Main Studio Waiver Policy: Although Section 73.1125(a) of the Commission's Rules requires each broadcast station to maintain a main studio within the station's community of license, or within the principal community contour of any other broadcast station licensed to the same community, or within 25 miles of the center of the community of license, this requirement will be waived where good cause exists. Each waiver request by an NCE station seeking to operate as a satellite of another NCE station is considered on a case-by-case basis. The Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding⁵, and thus found good cause exists to waive the main studio location requirement where satellite operations are proposed. See, *Review of the Commission's Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations ("Reconsideration Order")*, 13 FCC Rcd 15691 (1998); recon. granted in part, 14 FCC Rcd 11113 (1999). Generally the Commission requires the licensee of a studio-waived station to appoint a local representative in the satellite community area, hold meetings in the satellite community area to ascertain programming interests and needs, to subscribe to or monitor local publications and to maintain a toll-free telephone number for residents of the satellite community to call the licensee. The Commission's main studio waiver policy is well-established and time tested. See, *Nebraska Educational Television Comm.*, 4 RR 2d 771 (1965); *Georgia State Board of Education*, 70 FCC 2d 948 (1979), recon. Denied, 71 FCC 2d 227 (1979); *Sound of Life, Inc.* 4 FCC

⁵ To a large degree, NCE-FM broadcast stations have limited funding since they can only broadcast underwriting announcements for for-profit entities. Traditionally underwriting announcements generate less revenue than commercial advertisements.

Rcd 8273 (1989); The Cedarville College, 6 FCC Rcd 538 (1991); Letter to Roy R. Russo, Esq. (dated January 24, 1994); Letter to WPVA-FM (dated November 13, 2003).

Dozens of educational and religious broadcasters have availed themselves of the main studio waiver policy with little complaint from the public. By doing so, the Commission recognizes that there are numerous ways to provide local public interest programming. As noted in the above-referenced Declaration of Mike Stocklin, CCTF maintains the necessary protocols to sustain each main studio waiver in compliance with Commission rules and policies.

FCC Programming Policies To Serve Community Interests & Needs

The Innes petition generally questions how any studio-waiver station can provide programming that is responsive to the interests and needs of the local community. Unfortunately Innes fails to recognize established FCC policy in this area. Innes exhibits a narrow view of these matters that not only demonstrates his lack of fundamental knowledge of FCC policy but also shows his prejudice against religious programming as a whole.

Long ago the Commission declared that “[i]n serving the needs of his community, the broadcaster is not required to meet all community problems; rather, a licensee may determine in good faith which problems merit treatment by the station. In making this determination, it may consider the particular format of the station, the composition of its audience and the programming offered by other stations in the community. *Taft Broadcasting Company, 38 FCC 2d 770, 790; 26 RR 2d 269 (1973); Miami Valley*

Broadcasting Corp., 48 FCC 2d 177, 187; 30 RR 2d 1742 (1974).

In a more recent ruling it was stated that “the Commission has specifically noted that programming not produced in or targeted at a local community may nonetheless serve the needs and interests of the community. Indeed, the issues selected by a licensee to be addressed may be determined by the interests and nature of its audience and the availability of other program services, including national programs.” See, *KGAN Licensee, LLC*, 25 FCC Rcd 2549, 2557 (2010); *WHYY Licensee, LLC*, DA 10-1352 (released July 23, 2010). Although licensees have a duty to respond to local needs by choosing appropriate programming, they also have broad discretion to determine, in good faith, the issues they believe to be of concern to their communities and the manner in which to address those issues. See, *Time-Life Broadcast, Inc.*, 33 FCC 2d 1081, 1092 (1972); *Philadelphia Station License Renewals*, 8 FCC Rcd 6400, 6401 (1993); *Radio License Holding VII, LLC*, DA 13-2106 (released October 31, 2013). The Commission will not intervene unless a licensee has abused this discretion and has consistently and unreasonably ignored matters of public concern. See, *Columbia Broadcasting System, Inc.*, 51 FCC 2d 273, 280 (1975); *D & H Media, LLC*, DA 13-1699 (released August 2, 2013).

The Commission’s general policy to leave format issues to the discretion of the licensee is particularly so with regard to NCE stations. The Commission historically has had the appropriately limited role of facilitating the development of the public broadcasting system rather than determining the content of its programming. See, *Revision of Programming Policies and Reporting Requirements Related to Public Broadcasting Licensees, NPRM*, 87 FCC 2d 716, 732 (1981); *College of Staten Island*, DA 07-1249 (released March 13, 2007).

The Commission is prohibited from exercising any power of censorship over

broadcast stations with respect to content-based programming decisions. A licensee has broadcast discretion – based on its right to free speech – to choose the programming that it believes serves the needs and interests of the members of its audience. See, *KFBB(AM), Sacramento and KSTE(AM), Rancho Cordova, California, Letter*, 22 *FCC Rcd* 4804, 4805 (MB 2007); 47 U.S.C. §326; *Radio License Holding VII, LLC, DA 13-2106* (released October 31, 2013)

In light of the foregoing FCC policy and in consideration of CCTF's diverse programming schedule that is derived from input from various ministries throughout the country – including some programming that is locally produced and originated in Oregon -- Innes' allegations that CCTF does not serve the interests and needs of various Oregon communities is completely without merit.

The Commission's Standard of Review Supports CCTF

In cases involving a petition to deny, the Commission applies a two-step analysis under the public interest standard. The Commission must first determine whether the petition contains specific allegations of fact sufficient to show that granting the application(s) in question would be *prima facie* inconsistent with the public interest. The first step "is much like that performed by a trial judge considering a motion for directed verdict: if all of the supporting facts alleged in the [petition] were true, could a reasonable fact finder conclude that the ultimate fact in dispute had been established." See, *Gencom, Inc. v. FCC*, 832 F.2d 171, 181 (D.C. Cir. 1987). If the Innes petition meets this first step, the Commission must determine whether on the basis of the CCTF license renewal applications, the pleadings filed, or other matters which the Commission may officially take notice, Innes has raised a substantial and material question of fact as to whether grant of the license renewal applications would service the public interest.

See, Astroline Communications Co., Ltd. Partnership v. FCC, 857 F.2d 1556 (D.C. Cir. 1988).


CCTF submits that Innes has failed to meet his burden. The Innes petition is completely comprised of false statements of fact and a fundamental lack of knowledge of applicable FCC policy. The Innes petition is nothing more than a complaint about existing FCC policy. An attack on CCTF's license renewal applications is not the proper means to address such matters.

Conclusion

The foregoing premises considered, CCTF submits that the Innes petition be DENIED in its entirety, and that each of CCTF's above-captioned license renewal applications be GRANTED.

Respectfully submitted,

CALVARY CHAPEL OF TWIN FALLS, INC.

By: 

Cary S. Tepper

Its Attorney

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Suite 100
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(301) 718-1818

January 23, 2014

Exhibit No. 1

**Declaration of Mike Stocklin
(and supporting attachments)**

Declaration of Mike Stocklin

I am Mike Stocklin, the Chief Executive Officer of Calvary Chapel of Twin Falls, Inc. ("CCTF"). My office is located at 4002 N. 3300 E., Twin Falls, Idaho 83301.

I offer this Declaration in response to the "Petition to Deny" filed January 2, 2014 by Colin Innes against numerous CCTF license renewal applications for FM broadcast stations and FM translator stations located in the State of Oregon.

Colin Innes has completely mischaracterized CCTF's radio programming. The programs broadcast over the CCTF network are all produced by various ministries throughout the country and the programming topics include salvation, marriage counseling, anti-abortion, raising children, human health, mental illness and hundreds of other topics. None of the programs are musical, although an occasional song might be included in a certain discussion program. Attached please find a copy of a current weekday programming schedule from December 2013. The diversity of CCTF's programming is self-evident.

CCTF's regular radio programming includes content that originates from ministries located in Oregon. Every Monday through Friday at 12:30 pm Mountain Time we broadcast "Searchlight" with Pastor Jon Courson from Applegate, Oregon. Every Monday through Friday at 5:00 pm Mountain Time we broadcast "The Way, the Life, the Truth" with Pastor Matt Foxx from Coos Bay, Oregon.

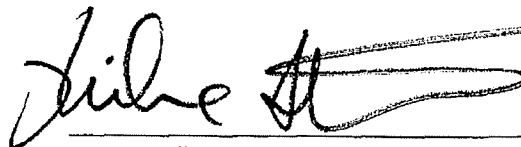
We have received no complaints from Oregon residents about our radio programming, and we have over 300 Oregon residents noted on our Donor's List.

With regard to CCTF's responsiveness to each satellite-waiver community, also attached is a summary sheet of the local public service efforts we conduct. We maintain a local toll free telephone number. We provide access to the station's public file at no charge. We have a local representative who holds meetings and advises us on local issues. We broadcast local promotions for community and church events, and we reach out in a number of other ways.

The foregoing statements are true to the best of my information and belief, and are made under the penalty of perjury.

1/15/2014

Date



Mike Stocklin



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Where God's Word is heard

Program Schedule

Updated November 4, 2013

Weekday Schedule

Program / Speaker	Hawaiian	Alaskan	Pacific	Mountain	Central	Eastern
Truth For Life / Alistair Begg	10:00pm(Su-Th)	11:00pm(Su-Th)	12:00am	1:00am	2:00am	3:00am
Walk In The Word / James MacDonald	11:00pm(Su-Th)	12:00am	1:00am	2:00am	3:00am	4:00am
Spirit Truth / Jerry Chaddick	1:00am	2:00am	3:00am	4:00am	5:00am	6:00am
Sharing The Light / Alan Wright	1:30am	2:30am	3:30am	4:30am	5:30am	6:30am
Destined For Victory / Paul Sheppard	2:00am	3:00am	4:00am	5:00am	6:00am	7:00am
Compassion Radio / Norm Nelson	2:30am	3:30am	4:30am	5:30am	6:30am	7:30am
Turning Point / David Jeremiah	3:00am	4:00am	5:00am	6:00am	7:00am	8:00am
Love Worth Finding / Adrian Rogers	3:30am	4:30am	5:30am	6:30am	7:30am	8:30am
Power Point / Jack Graham	4:00am	5:00am	6:00am	7:00am	8:00am	9:00am
Family Talk / James Dobson	4:30am	5:30am	6:30am	7:30am	8:30am	9:30am
A New Beginning / Greg Laurie	5:00am	6:00am	7:00am	8:00am	9:00am	10:00am
Walk In The Word / James MacDonald	5:30am	6:30am	7:30am	8:30am	9:30am	10:30am
Truth For Life / Alistair Begg	6:00am	7:00am	8:00am	9:00am	10:00am	11:00am
The Connection / Skip Heitzig	6:30am	7:30am	8:30am	9:30am	10:30am	11:30am
Jay Sekulow (Live)	7:00am	8:00am	9:00am	10:00am	11:00am	12:00pm
The Simple Life / Ron Vietti	7:30am	8:30am	9:30am	10:30am	11:30am	12:30pm
Living On The Edge / Chip Ingram	8:00am	9:00am	10:00am	11:00am	12:00pm	1:00pm
From His Heart / Jeff Schreve	8:30am	9:30am	10:30am	11:30am	12:30pm	1:30pm
A New Beginning / Greg Laurie	9:00am	10:00am	11:00am	12:00pm	1:00pm	2:00pm
Searchlight / Jon Courson	9:30am	10:30am	11:30am	12:30pm	1:30pm	2:30pm
Winning Walk / Dr. Ed Young	10:00am	11:00am	12:00pm	1:00pm	2:00pm	3:00pm
Pathway To Victory / Robert Jeffress	10:30am	11:30am	12:30pm	1:30pm	2:30pm	3:30pm
Thru The Bible / J. Vernon McGee	11:00am	12:00pm	1:00pm	2:00pm	3:00pm	4:00pm
Growing Thru Grace / Jack Abeelen	11:30am	12:30pm	1:30pm	2:30pm	3:30pm	4:30pm
Man In The Mirror / Patrick Morley	11:57am	12:57pm	1:57pm	2:57pm	3:57pm	4:57pm
66/40 / Chuck Missler	12:00pm	1:00pm	2:00pm	3:00pm	4:00pm	5:00pm
Chapter By Chapter / Sandy Adams	12:27pm	1:27pm	2:27pm	3:27pm	4:27pm	5:27pm
Focal Point / Mike Fabarez	12:30pm	1:30pm	2:30pm	3:30pm	4:30pm	5:30pm
To Every Man an Answer (Live call-in program)	1:00pm	2:00pm	3:00pm	4:00pm	5:00pm	6:00pm
The Way, The Life & The Truth / Matt Fox	2:00pm	3:00pm	4:00pm	5:00pm	6:00pm	7:00pm
Beyond Imagination / Shana Schutte	2:27pm	3:27pm	4:27pm	5:27pm	6:27pm	7:27pm
Somebody Loves You / Raul Ries	2:30pm	3:30pm	4:30pm	5:30pm	6:30pm	7:30pm
Cross The Bridge / David McGee	3:00pm	4:00pm	5:00pm	6:00pm	7:00pm	8:00pm
Compassion Radio / Norm Nelson	3:30pm	4:30pm	5:30pm	6:30pm	7:30pm	8:30pm
Know The Truth / Philip De Courcy	4:00pm	5:00pm	6:00pm	7:00pm	8:00pm	9:00pm
Telling The Truth / Stuart, Jill & Pete Briscoe	4:30pm	5:30pm	6:30pm	7:30pm	8:30pm	9:30pm
The Alternative / Tony Evans	5:00pm	6:00pm	7:00pm	8:00pm	9:00pm	10:00pm



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Program Schedule

Updated November 4, 2013

Saturday Schedule

Program / Speaker	Hawaiian	Alaskan	Pacific	Mountain	Central	Eastern
Road To Reality / K.P. Yohannan	3:00am	4:00am	5:00am	6:00am	7:00am	8:00am
Family Talk / James Dobson	4:00am	5:00am	6:00am	7:00am	8:00am	9:00am
Spirit Truth / Jerry Chaddick	5:00am	6:00am	7:00am	8:00am	9:00am	10:00am
Issues In Education / Bob & Geri Boyd	5:30am	6:30am	7:30am	8:30am	9:30am	10:30am
Caring Cares / Jerel & Merrily Hagerman	6:00am	7:00am	8:00am	9:00am	10:00am	11:00am
Jay Sekulow Weekend	7:00am	8:00am	9:00am	10:00am	11:00am	12:00pm
Parenting Today's Teens / Mark Gregston	8:00am	9:00am	10:00am	11:00am	12:00pm	1:00pm
A Chosen Generation / Derald Skinner	9:00am	10:00am	11:00am	12:00pm	1:00pm	2:00pm
Joshua Springs / Jerel Hagerman	9:30am	10:30am	11:30am	12:30pm	1:30pm	2:30pm
Understanding The Times / Jan Markell	10:00am	11:00am	12:00pm	1:00pm	2:00pm	3:00pm
Pure Milk Of The Word / Tom Luitwieler	11:00am	12:00pm	1:00pm	2:00pm	3:00pm	4:00pm
Grace Intervention / Bill Giovannetti	1:00pm	2:00pm	3:00pm	4:00pm	5:00pm	6:00pm
Israel In The News	1:27pm	2:27pm	3:27pm	4:27pm	5:27pm	6:27pm
Road To Reality / K.P. Yohannan	3:00pm	4:00pm	5:00pm	6:00pm	7:00pm	8:00pm
Live Service / Calvary of Albuquerque	4:00pm	5:00pm	6:00pm	7:00pm	8:00pm	9:00pm
Saturday Night Lifeline	5:00pm	6:00pm	7:00pm	8:00pm	9:00pm	10:00pm

Sunday Schedule

Program / Speaker	Hawaiian	Alaskan	Pacific	Mountain	Central	Eastern
Issues In Education / Bob & Geri Boyd	3:30am	4:30am	5:30am	6:30am	7:30am	8:30am
Worship Generation / Joey Buran	4:00am	5:00am	6:00am	7:00am	8:00am	9:00am
Truth For Life / Alistair Begg	4:30am	5:30am	6:30am	7:30am	8:30am	9:30am
The Lutheran Hour / Greg Seltz	5:00am	6:00am	7:00am	8:00am	9:00am	10:00am
Wings Of Healing / Thomas R. Wyatt	6:00am	7:00am	8:00am	9:00am	10:00am	11:00am
Live Service / The River Christian Fellowship	7:00am	8:00am	9:00am	10:00am	11:00am	12:00pm
Let My People Think / Ravi Zacharias	9:00am	10:00am	11:00am	12:00pm	1:00pm	2:00pm
Joshua Springs / Jerel Hagerman	9:30am	10:30am	11:30am	12:30pm	1:30pm	2:30pm
Cross Talk / Randy Weiss	11:00am	12:00pm	1:00pm	2:00pm	3:00pm	4:00pm
The Field Report / George Bryson	12:30am	1:30pm	2:30pm	3:30pm	4:30pm	5:30pm
Spirit Truth / Jerry Chaddick	1:00pm	2:00pm	3:00pm	4:00pm	5:00pm	6:00pm
A Word for the Church / Scott Parker	2:00pm	3:00pm	4:00pm	5:00pm	6:00pm	7:00pm
Live Service / The River Christian Fellowship	4:30pm	5:30pm	6:30pm	7:30pm	8:30pm	9:30pm
Surfing The Word / Steve Rex	6:00pm	7:00pm	8:00pm	9:00pm	10:00pm	11:00pm



Public Service for CSN Oregon Stations

KDJC Baker City, OR | KPIJ Junction City, OR | KKJA Redmond, OR

Our toll free phone number is published in the local phone book

Our public file is available at no charge to the community

We have a local representative who communicates quarterly to advise us of issues and conduct meetings

We hold quarterly meetings in the city of license to ascertain the issues important to the community

Announcement for this meeting is published in the local newspaper prior to the meeting

(Advanced notice is also broadcast locally on KDJC)

We maintain our list of public issues that we identify and address via our on air programming

We broadcast local promotion for events and churches in the community at a reduced cost

We comply with all broadcast rules including EAS

We regularly broadcast our contact information and invitations for the community to get in touch with us via mail, email or telephone

KQDL Hines, OR

Our toll free phone number is published in the local phone book

Our public file is available at no charge to the community

We have a local representative who communicates quarterly to advise us of issues and conduct meetings

We hold quarterly meetings in Hines to ascertain the issues important to the community

Announcement for this meeting is published in the local newspaper prior to the meeting

We maintain our list of public issues that we identify and address via our on air programming

We have an active affiliation with the local news publication, the Burns Times Herald that sends us news stories that we broadcast daily on KQDL. The Herald only publishes once a week, KQDL broadcasts news on a daily basis.

We broadcast weather reports twice a day

We broadcast local promotion for events and churches in the community at a reduced cost

We comply with all broadcast rules including EAS

We regularly broadcast our contact information and invitations for the community to get in touch with us via mail, email or telephone

CERTIFICATE OF SERVICE

I, Cary S. Tepper, Esquire, hereby certify that on this 23rd day of January, 2014, I have served a copy of the foregoing **"Opposition to Petition to Deny"** first-class, postage-prepaid, on the following:

*Peter Doyle
Chief, Audio Services Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.; Room 2-A360
Washington, D.C. 20554

Colin Innes
868 NE Liberty
Portland, OR 97211



Cary S. Tepper, Esq.

*/ indicates delivery by hand