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2014 AUG -5 A 7:03
July 18, 2014

ALDIP SERVICES DIVISION
Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

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FCC Mail Room

**PALA BAND OF
MISSION INDIANS**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
Phone 760-891-3500 | Fax 760-742-1411

Dear Sirs,

On behalf of a consortium of local tribes currently in the process of seeking an allocation on FM channel 245, we wish to object to the following application for a new LPFM:

Campfires for Christ USA
CDBS Application ID # 1594437
Facility ID # 197097
City of license - Temecula, CA

We object to the granting of a construction permit for the proposed LPFM for the following technical incompatibility reasons:

1. The LPFM proposed is collocated on a channel with a potential Class A allocation in the Temecula area
2. A consortium of local tribes is in the process of seeking this allocation with intent to pursue a construction permit based on the FCC's Tribal Preference policy.
3. The eventual class A allocation built as planned would have a primary service contour (1.0 mV/m or 60 dBu) completely encompassing that of Campfires for Christ's proposed primary service contour.
4. Co-locating an LPFM on channel 245 this close to a class A allocation serving the Pechanga Reservation would be prohibited by 47 CFR Section 73.315(a) minimum spacing and would, in practice result in both stations being unlistenable within most of the city of Temecula.
5. Should the LPFM applicant prevail and the Class A allocation be granted and built, the Class A operator would have the right to expect the FCC to shut down the LPFM for interference with a full service class station under 47 CFR Section 74.1203a.

We view this one remaining local Class A allocation as the last, best chance for our consortium of tribal leaders to reach nine small reservations in the area with what on eight of them would be the first and only full service class FM dedicated to the Native American population and wish to protect its viability for that purpose as well as helping a small LPFM broadcaster avoid unnecessary expense once interference issues requiring that LPFM to cease or modify arise.

Respectfully,

Robert Smith
Chairman of the Pala Band of Mission Indians