

Parrell

LAW OFFICES

MILLER AND NEELY, P.C.

SUITE 203

3750 UNIVERSITY BLVD. W.

KENSINGTON, MD 20895

JERROLD D. MILLER
JOHN S. NEELY*

*ADMITTED PA AND DC ONLY

PHONE: (301) 933-6304
FAX: (301) 933-6306
MANDNLAW@GMAIL.COM

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January 9, 2015

Received & Inspected

Marlene H. Dortch, Secretary
Federal Communications Commission
445-12th Street, S.W.
TW-A325
Washington, DC 20554

JAN 12 2015

FCC Mail Room

re: WEVI-FM, Frederiksted, VI, FAC ID No. 86811

WNVE(FM), Ceiba, PR, FAC ID No. 3250
Western New Life, Inc., BPH-20140717ACI

Dear Ms. Dortch:

Lifeline, LLC., licensee of FM station WEVI, Frederiksted, VI, ("WEVI"), by its attorney,¹ respectfully opposes the proposal of Western New Life, Inc., licensee of WNVE, Ceiba, PR (WNVE") to change WEVI's frequency from Channel 271A to Channel 267A to accommodate a channel change desired by WNVE. By letter dated December 15, 2014, the Commission directed WEVI to show cause within 30 days why its license should not be modified as proposed by WNVE. This response is thus timely.

As the Commission is aware, this is the second channel change WNVD has sought for WEVI within a short time. By letter dated April 10, 2013, and at the request of WNVE, the Commission ordered WEVI to change from Channel 271A to Channel 269A. WEVI acceded to the directive despite the resulting inconvenience and confusion to its listeners, and has been operating on Channel 269A since filing its application for license on Channel 269 in October 2013, just slightly over one year ago. The further listener confusion and disruption which would be caused by a second channel change for WEVI should occur only if substantial public interest benefits would result. However, WNVE, which has the burden of proving that its proposal will serve the public interest, fails to show any cognizable benefits and thus fails to meet its burden.

¹ Lifeline, LLC acquired the license of WEVI from Frontline Missions International, Inc.. on October 24, 2013, pursuant to grant of application file no. BALH-20130822ADO.

Marlene H. Dortch, Secretary
January 9, 2015
p. 2

WNVE's desire to change from its present Channel 269A to 268A, requires that WEVI change its frequency to accommodate WNVE's change. However, WNVE fails to demonstrate any public benefit from its change. In support of its proposal, WNVE states that "the usable area for Channel 268 is much different from Channel 269" and "a transmitter site has been located that will greatly expand the service" of its station. WNVE fails to provide any justification for needing a different usable area for its transmitter site or that its service area will "greatly expand" from the proposed new transmitter site.

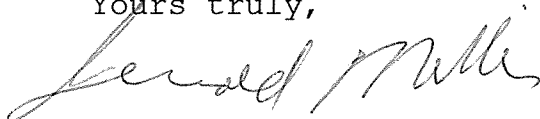
WNVE offers no facts to support its claim of an expanded service area. It fails to compare the population and land service areas within the present and proposed 60 dBu contours, nor does it show the number of services in the areas which would gain and lose service from its proposed transmitter site change. The only relevant technical information WNVE offers is a map showing that it will put a city-grade signal over Ceiba. It is clear from this map that much of the station's signal from its proposed site will fall over water. Hence, it appears that moving the station's transmitter site from the island of Puerto Rico to the island of Vicquez will reduce WNVE's service population and land area, as well as removing significant area on the Island of Puerto Rico WNVE's current service area. If this be the case, the public interest would not be served and the Commission must deny or dismiss WNVE's application, thus allowing WEVI to remain on its present channel.

In making a determination on an FM rule making proposal, the Commission must consider whether the goals of Section 307(b) of the Communications Act of 1934 will be met. Absent definitive service area and population coverage comparisons, the Commission is unable to determine if WNVE's proposal serves the goals of this section. The Commission may not effect WNVE's request without a definitive finding that Section 307(b) goals will be met therefrom. Moreover, as WNVE's proposal requires two stations, WWKS as well as WEVI, to change channels, the Section 307(b) benefits should be substantial to make up for the repeated disruption caused to WEVI's listeners.

Marlene H. Dortch, Secretary
January 9, 2015
p. 3

Accordingly, as the record fails to demonstrate the WNVE's proposal serves the public interest, the Commission must deny or dismiss its pending application, BPH-20140717ACI.

Yours truly,

A handwritten signature in cursive script, appearing to read "Jerrold Miller".

Jerrold Miller
Counsel for Lifeline, LLC

cc: Lee J. Peltzman