

Before The

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the matter of:

Covenant Network

Application for Minor Change to a
Licensed Facility
FM Translator Station W248CH
Shrewsbury, Missouri

File no. BPFT-20160426ACG

Facility ID No. 144050

Accepted/Files

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

MAY 12 2016
Federal Communications Commission
Office of the Secretary

SUPPLEMENT TO
INFORMAL OBJECTION

Gateway Creative Broadcasting, Inc. ("Gateway"), licensee of KHZR-FM, Potosi, Missouri, , files this Supplement to its Informal Objection to the above pending application for minor change of Covenant Network ("Covenant"). Gateway operates KHZR, 97.7 FM in the St. Louis market. Covenant seeks a minor change to licensed facility W248CH and proposes to operate on channel 248, 97.5 MHZ, which is co-channel with KHZR.

In its Informal Objection, Gateway proffered two Declarations of individuals that "listen to FM radio station KHZR on 97.7 at [their] residence and the neighboring area." *See Informal Objection*, p. 2-3; and Exhibit B *Listener Statements*. At the time of filing, Gateway was in the process of obtaining additional listener declarations and advised the Commission that it would supplement its Informal Objection.

Gateway now offers twenty-seven (27) additional Listener Declarations of individuals who also reside and listen to Gateway's KHZR-FM within the proposed 60 dBu contour of

Covenant's translator. *See* May 10, 2016 Declaration of Sandi Brown, attached as Exhibit C; KHZR-FM Listener Map attached as Exhibit C-1; Listener Statements attached as Exhibit D.

These Declarations provide further convincing and independent evidence that Covenant's translator will interfere with the reception of KHZR-FM. *See The Association for Community Education, Inc.*, Memorandum Opinion and Order, 19 FCC Rcd 12682, 12685-6 (2004), *citing* Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations, 5 FCC Rcd 7212, 7230 (1990) ("*Translator Report and Order*"), *modified*, 6 FCC Rcd 2334 (1991), *recon. den.*, 8 FCC Rcd 5093 (1993).

WHEREFORE, Gateway again respectfully requests that the pending Covenant application be denied.

Respectfully submitted,

GATEWAY CREATIVE BROADCASTING, INC.

BY: 

A. Wray Fitch III
Christine Lambrou Johnson
Its Attorneys

Gammon & Grange, P.C.
8280 Greensboro Drive, 7th Floor
McLean, VA 22101-3807

Dated: May 11, 2016

DECLARATION

I, Sandi Brown, do hereby state as follows:

1. I am the General Manager and President of Gateway Creative Broadcasting, Inc., licensee of KHZR-FM.
2. I certify that every listener address (attached in Exhibit D) is inside the 60 dbu 50:50 contour of the W248CH pending application as submitted in Figure 2 (attached as Exhibit A-1). Also attached is a map overlay of W248CH's 60dbu with the locations of KHZR listener addresses identified (Exhibit C-1) all located within the W248CH 60 dbu contour.
3. None of the listeners providing listener statements are employees or otherwise associated with Gateway Creative Broadcasting, Inc. except as listeners.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5-11-16

Date

Sandi B. Brown

Sandi Brown

President and General Manager

Figure 2
Minor Change of W248CH

FMCommander Single Allocation Study - 04-25-2016 - NGDC 30 SEC
W248CH.A's Overlaps (In= -15.03 km, Out= 4.17 km)

W248CH.A CH 248 D DA
Lat= 38 34 49.8, Lng= 90 19 44.6
0.25 kW 263.3 m HAAT, 418 m COR
Prot.= 60 dBu, Intef.= 54 dBu

KHZR CH 249 C2 73.215 N BLH20061106ABW
Lat= 37 57 31.0, Lng= 90 45 47.0
26.5 kW 207 m HAAT, 483 m COR
Prot.= 60 dBu, Intef.= 54 dBu

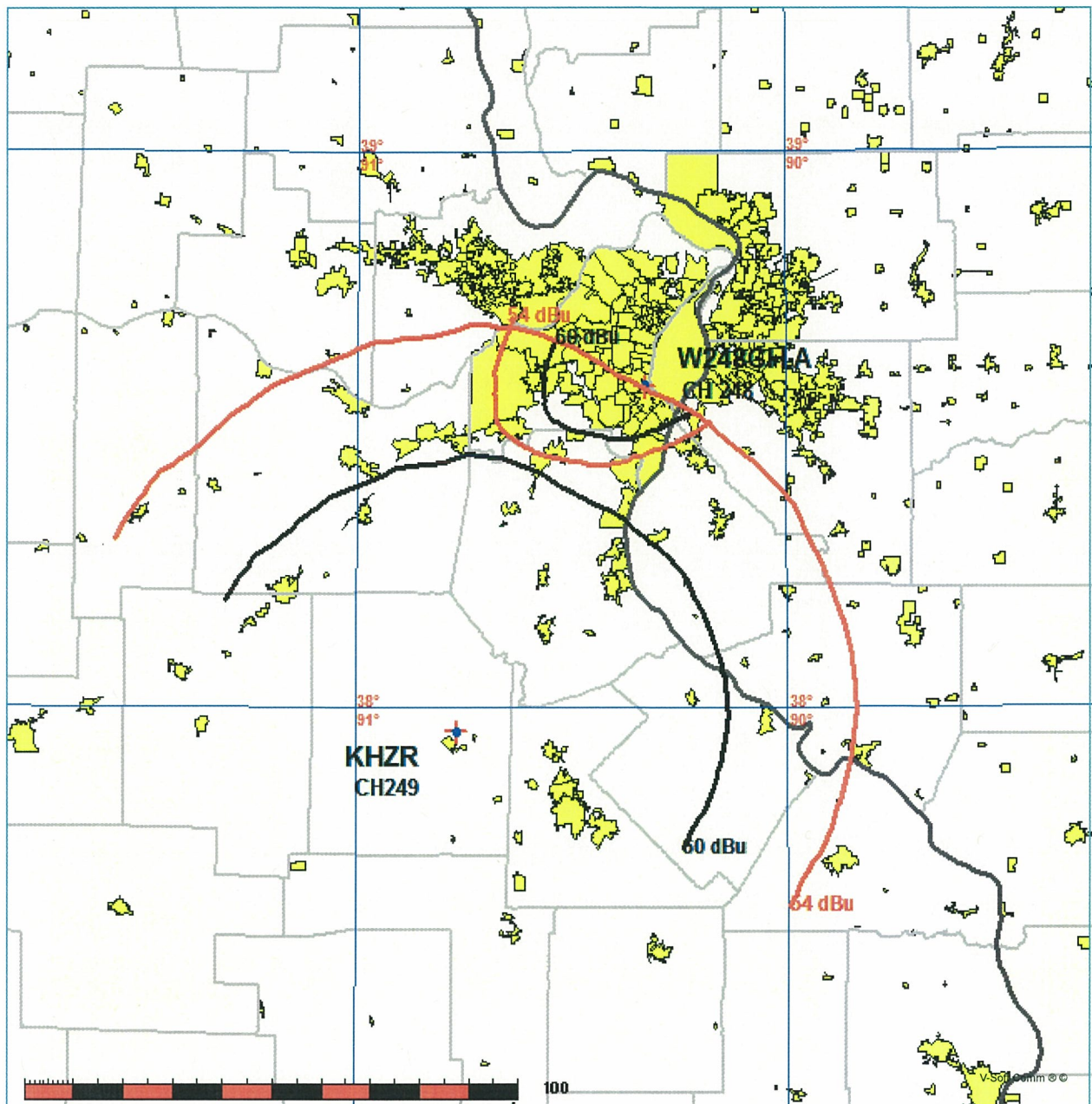
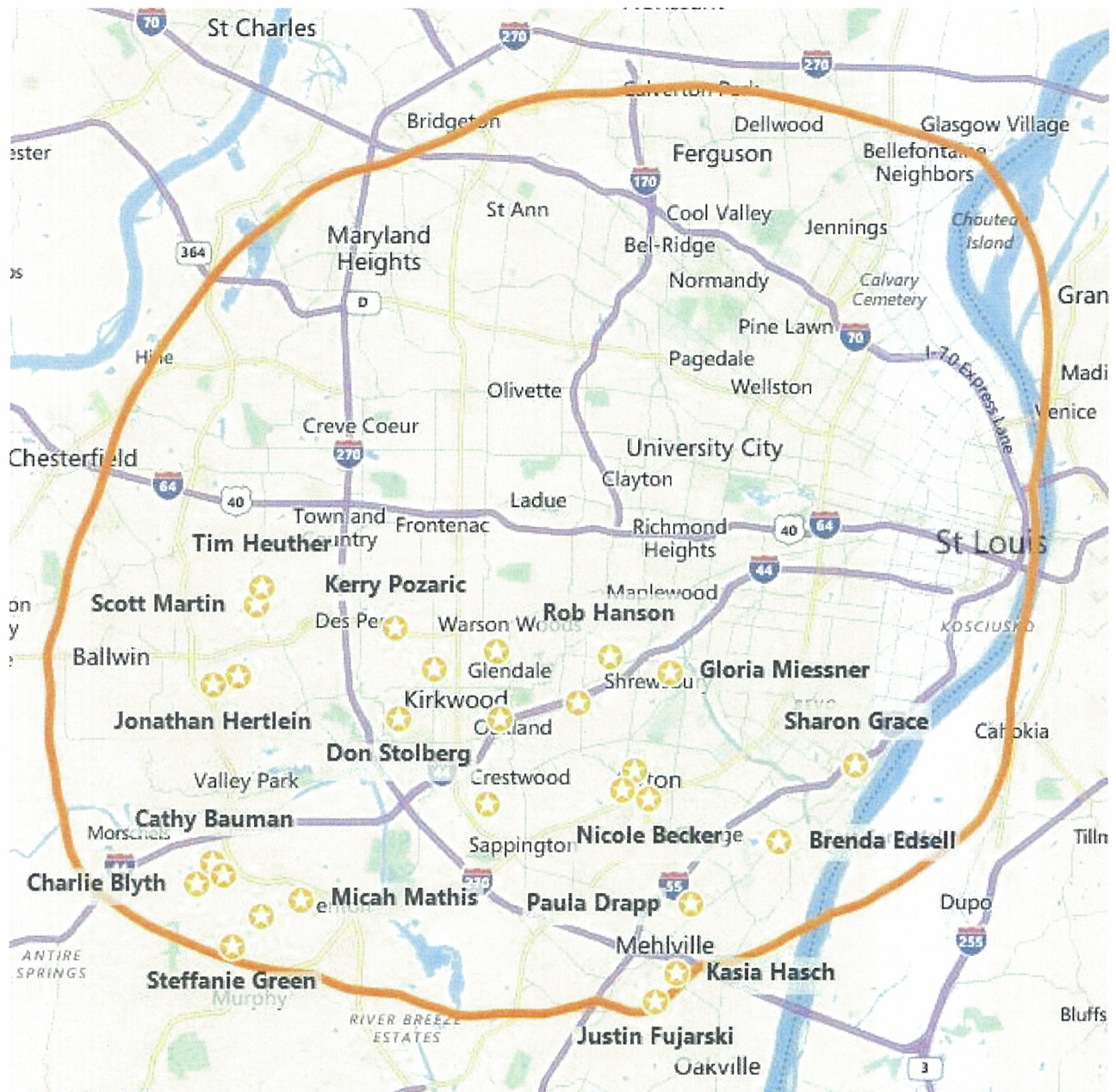


Exhibit C-1



LISTENER STATEMENT

My name is Tim Huether and I reside at

1646 Featherstone Dr. Downsview 63131
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/4/16
Date

Timothy J. Huether
Name

LISTENER STATEMENT

My name is JONATHAN HERTLEIN and I reside at

412 LINWOOD FOREST DR. MANCHESTER, MO 63021
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5-5-16

Date


Name

LISTENER STATEMENT

My name is Scott Martin and I reside at

1766 Bradburn Drive, St. Louis 63131
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

May 9, 2016
Date

Scott A Martin
Name

LISTENER STATEMENT

My name is Carol Farell and I reside at 20 Roseacre Lane, St Louis, MO 63119

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/9/16

Date

Carol Farell

Name

LISTENER STATEMENT

My name is Don Stolberg and I reside at

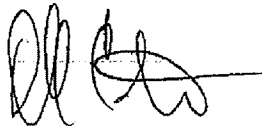
1235 Craigvale Ct. Kirkwood, MO 63122
Street City Zip Code

I listen to FM radio station KHZR-FM 97.7 MHz Potosi, Missouri "*Boost 101.9*" at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/9/2016

Date



Name


LISTENER STATEMENT

My name is Charlie Blyth and I reside at

2148 Avalon View
Dr Fenton 63026
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/9/16 Charlie Blyth 
Date Name

LISTENER STATEMENT

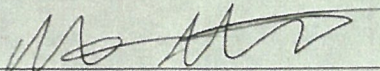
My name is Micah Mathis and I reside at

85 May Valley Ln Fenton Mo 63026
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/9/16
Date


Name

LISTENER STATEMENT

My name is Beronica Mead and I reside at

8907 Harwich Dr, St Louis, MO 63126
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/9/16

Date

Beronica Mead

Name

LISTENER STATEMENT

My name is _____ Julie Amos _____ and I reside at
662 Chelsea Ave. Kirkwood , MO 63122

Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/8/16
Date

Julie Amos
Name

LISTENER STATEMENT

My name is _____ Justin Fujarski _____ and I reside at

____ 4946 Karington Place Dr _____ Saint Louis _____ 63129 _____
Street City Zip Code

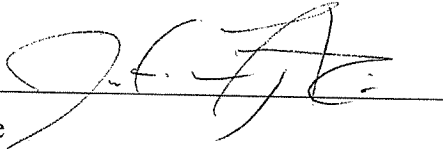
I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

____ 5-9-16 ____

Date

Name



LISTENER STATEMENT

My name is Abigail Pierce and I reside at

464 Redwood Forest Dr. Manchester, MO 63071
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/9/16
Date

Abigail A. Pierce
Name

LISTENER STATEMENT

My name is GLORIA MIESNER and I reside at

7324 WEIL AVE ST LOUIS MO 63119
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/9/16

Date

Gloria Miesner

Name

LISTENER STATEMENT

My name is Rob Hanson and I reside at

37 Joy Ave St. Louis Mo 63119
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5-9-16

Date

Rob Hanson

Name

LISTENER STATEMENT

My name is Brenda Edsell and I reside at

830 Regina Ave St Louis 63125
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/9/16

Date

Brenda Edsell

Name

LISTENER STATEMENT

My name is Roy Edsell and I reside at

830 Regina Ave St Louis 63125
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

6/6/16
Date

Roy Edsell
Name

LISTENER STATEMENT

My name is Sharon Michal Grace and I reside at

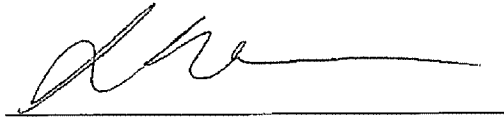
6320 Vermont Avenue St. Louis 63111.
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

05/09/1

Date



Name

Gmail works better with Chrome Yes, get Chrome now No, not interested

Gmail

COMPOSE

Profil

Inbox (61)

Starred

Important

Sent Mail

Drafts (4)

Circles

Junk

Personal

Travel

More

Something's not right.

We're having trouble
connecting to Google.
We'll keep trying...

This may be caused by
network or proxy issues.
[Learn more](#).

LISTENER STATEMENT

My name is Martha Menner and I reside at

766 Dennis Dr Fenton MO 63026
Street City Zip Code

I listen to FM radio station K11ZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/9/16
Date

Martha Menner
Name

Send

LISTENER STATEMENT

My name is Barbara Branham and I reside at

611 N. Geyer Kirkwood 63122
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5-10-16
Date

Barbara Branham
Name

My name is Nicole Becker and the full name is _____

9979 Chateau Poi Ct. Appleton 603123
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/10/16
Date

Nicole Becker
Name

LISTENER STATEMENT

My name is Janice Stuckmeyer and I reside at

77 Fortune Ln St. Louis MO 63122
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5-10-16
Date

Janice Stuckmeyer
Name

LISTENER STATEMENT

My name is Kasia Hasch and I reside at

930 Forder Glen Court St. Louis, MO 63129
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5-10-16

Date

Kasia Hasch

Name

LISTENER STATEMENT

My name is KERRY POZARIC and I reside at

1125 Vinetta Dr. St. Louis 63131
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/10/16
Date

Kerry Pozaric
Name

LISTENER STATEMENT

My name is Paula Drapp and I reside at

3747 Caled Dr. St Louis, MO 63125
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/10/16
Date

Paula Drapp
Name

LISTENER STATEMENT

My name is Cathy Baumann and I reside at

18 Salvation Ridge Ct. Fenton MO 63026
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/10/16
Date

Cathy Baumann
Name

LISTENER STATEMENT

My name is Steffanie Green and I reside at
1236 Pequeno Ct, Fenton, MO 63026
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5-9-16
Date

Steffanie Green
Name

LISTENER STATEMENT

My name is Jonah Savelle and I reside at

7101 Stafford Ct. Affton, MO. 63123
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made under penalty of perjury.

5/10/16
Date

Jonah Savelle
Name

LISTENER STATEMENT

My name is Aaron Wiegand and I reside at

7408 Whitehaven Drive St. Louis, MO 63123
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/10/2016
Date

Aaron Wiegand
Name

LISTENER STATEMENT

My name is Christina Diebold and I reside at

8 Apostle Ct Fenton 63026
Street City Zip Code

I listen to FM radio station KHZR on 97.7 at my residence and the neighboring area.

The foregoing statement is true and correct to the best of my knowledge and is made
under penalty of perjury.

5/10/16
Date

Christina Diebold
Name


CERTIFICATE OF SERVICE

I, T.J. Anderson, in the law offices of Gammon & Grange, P.C., do hereby certify that a copy of the foregoing Petition for Reconsideration was served by first class mail of the United States Postal Service, postage pre-paid, on this 12th day of May, 2016, on the following:

Dennis J. Kelly
Law Office of Dennis J. Kelly
PO Box 41177
Washington, DC 20018-0577

And by email on the following:

Robert Gates
Federal Communications Commission
robert.gates@fcc.gov



T.J. Anderson