

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 12<sup>th</sup> Street, SW**  
**Washington, DC 20554**

MEDIA BUREAU  
AUDIO DIVISION  
TECHNICAL PROCESSING GROUP  
APPLICATION STATUS: (202) 418-2730

PROCESSING ENGINEER: ROBERT GATES  
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DEC 20 2016

Educational Media Foundation  
5700 West Oaks Blvd  
Rocklin, CA 95765

In re: INTERFERENCE COMPLAINT  
W225AP, St. Paul, MN  
BLFT-20150212AAA  
Facility ID # 142406

Dear Licensee:

This refers to four interference complaints filed by Gabriel Media on December 1, 2016. All complaints must be resolved. Listener complaints can be filed at any time. The complaints allege that W225AP is interfering with the reception of KKJM, St. Joseph, Minnesota.

Pursuant to 47 C.F.R. § 74.1203, W225AP is required to eliminate any actual interference it causes. Therefore, it is necessary for W225AP to submit a detailed report on the attached complaint even if the complainant might have been addressed in a previous proceeding. For the complaint, the report must include: (1) the name and address of the complainant; (2) specific devices receiving the interference (i.e. type of device, manufacturer's name, model number, and serial number); and (3) any assistance provided by W225AP for each device allegedly receiving the interference and whether such interference persists. Each of the complaints must be addressed individually.

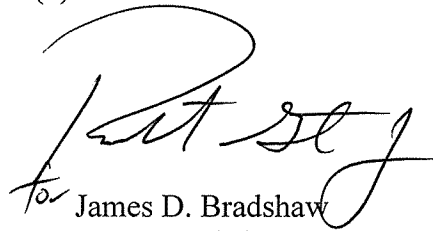
The Commission's Rules regarding FM translators restrict FM translator stations to operate strictly on a secondary basis and limit their service. Section 74.1203(a)(3) states that an FM translator station will not be permitted to continue to operate if it causes any actual radio signal interference to the direct reception by the public of the off-the-air signals of any authorized broadcast station.<sup>1</sup> Actual interference is based on listener complaints indicating that the signal they regularly receive is being impaired by the signal radiated by the FM translator station. Section 74.1203(b) states that if the

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<sup>1</sup> An FM translator station creating actual radio signal interference to any authorized broadcast station is obligated to eliminate the interference, regardless of the location where the impaired signal reception occurs.

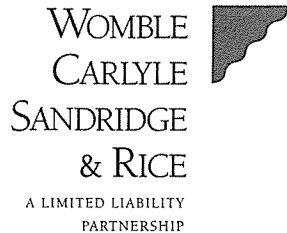
interference cannot be properly eliminated by the application of suitable techniques, the operation of the offending FM translator station shall be suspended and shall not be resumed until the interference has been eliminated.

Within thirty days of this letter, W225AP must take appropriate actions required by the provisions of 47 C.F.R. § 74.1203 to resolve all complaints of interference to fulfill its obligations. Further action on this complaint will be withheld for a period of thirty days from the date of this letter to provide W225AP an opportunity to respond. Failure to correct all complaints within this time may require W225AP to suspend operation pursuant to 47 C.F.R. §§ 74.1203(e) and 74.1232(h).

A handwritten signature in cursive script, appearing to read "James D. Bradshaw". The signature is written in black ink and is positioned above the typed name and title.

James D. Bradshaw  
Deputy Chief  
Audio Division  
Media Bureau

Cc: Gregg Skall (by email)  
Mary O'Connor (by email)



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Gregg P. Skall  
Direct Dial: 202-857-4441  
Direct Fax: 202-261-0041  
E-mail: GSkall@wcsr.com

December 1, 2016

Accepted / Filed

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW, Room TW-8325  
Washington D.C. 20554

DEC - 1 2016

Federal Communications Commission  
Office of the Secretary

**Re: INTERFERENCE COMPLAINT  
W225AP FAC. ID: 142406 St. Paul, Minnesota  
Educational Media Foundation**

Dear Ms. Dortch:

Gabriel Media, (“Gabriel”) licensee of FM Radio Station KKJM, St. Joseph, Minnesota, by its counsel and pursuant to Section 74.1203(a)(3) hereby files its interference complaint against the above referenced translator station W225AP, FAC. ID: 142406 St. Paul, Minnesota, licensed to Educational Media Foundation (“EMF”).

KKJM operates on Channel 225 at 92.9 MHz. It has operated on channel 225 since 1996, See BLH-19960510KA.

Since the February 12, 2015 commencement of W225AP, KKJM(FM) has experienced routine co-channel interference from the EMF Translator. Beginning at about that time, Gabriel began receiving complaints from its listeners of interference to their reception of KKJM identified as coming from W225AP. A number of those complaints are appended hereto as exhibits to the attached Engineering Statement.

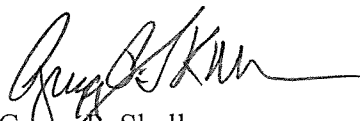
The attached Engineering Exhibit, amply demonstrates that the source of the interference to KKJM identified by its listeners is W225AP by calculating the reports of interference and by further engineering analysis of the undesired to desired interference contour relationships under the Commission’s own standard propagation method.

Pursuant to §74.1203(a)(1), an authorized FM Translator will not be permitted to continue to operate if it causes any actual interference to the transmission of any authorized broadcast station. §74.1203(a)(3) again reiterates an authorized FM Translator will not be permitted to continue to operate if it causes any actual interference to the direct reception by the public of the off-the-air signals of any authorized broadcast station. §73.1203(a)(3) further clarifies that interference will be considered to occur whenever reception of a regularly used

signal is impaired by the signals radiated by the FM Translator, regardless of the quality of such reception, the strength of the signal so used, or the channel on which the protected signal is transmitted.

Pursuant to Section 74.1203(a)(3) of the Commission's rules, Gabriel hereby demands that W225AP suspend operations and not resume broadcasting unless and until all interference caused to KKJM is completely eliminated.

Sincerely,



Gregg P. Skall  
Counsel, Gabriel Media

cc: James Bradshaw, Deputy Chief Audio Division  
Robert Gates, Audio Division  
Educational Media Foundation  
Mary M. O'Connor, Wilkinson, Barker, Knauer, LLP

**ENGINEERING STATEMENT  
IN SUPPORT OF A**

**§74.1203(a)(1&3)  
Interference Objection**

against

W225AP.L - St. Paul, MN  
License File No. BLFT-20150212AAA  
(Facility ID No. 142406)  
CH225D - 92.9 MHz

**CERTIFICATION OF TECHNICIAN**

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.


I declare under penalty of the laws of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

November 22, 2016

***MUNN-REESE***

385 Airport Drive, PO Box 220  
Coldwater, Michigan 49036

Telephone: 517-278-7339

By   
Bruce Bellamy, President

# **ENGINEERING STATEMENT**

This Engineering Statement supports a §74.1203(a)(1&3) based objection as submitted by Gabriel Media ("Gabriel"). This objection is being filed against FM Translator License BLFT-20150212AAA for W225AP.L - St. Paul, MN (Facility ID No. 142406). The licensee of W225AP.L is Educational Media Foundation ("EMF"). The Translator in question operates on CH225D (92.9 MHz) with 0.099 kW ERP at 504 meters AMSL. Gabriel station KKJM(FM) - St. Joseph, MN (Facility ID No. 62129), operates under License BLH-19960510KA with 25.0W ERP at 448 meters AMSL on CH225C3 (92.9 MHz). Therefore KKJM(FM) operates co-channel to the W225AP.L Translator.

Since the February 12, 2015 commencement of W225AP.L, KKJM(FM) has experienced routine co-channel interference from the EMF Translator<sup>1</sup>. As this ongoing interference has not been resolved to the satisfaction of the KKJM(FM) listening audience, Gabriel wishes to invoke its rights as outlined under §74.1203(a)(1&3).

Pursuant to §74.1203(a)(1), an authorized FM Translator will not be permitted to continue to operate if it causes any actual interference to the transmission of any authorized broadcast station. §74.1203(a)(3) again reiterates an authorized FM Translator will not be permitted to continue to operate if it causes any actual interference to the direct reception by the public of the off-the-air signals of any authorized broadcast station. §73.1203(a)(3) further clarifies that interference will be considered to occur whenever reception of a regularly used signal is impaired by the signals radiated by the FM Translator, regardless of the quality of such reception, the strength of the signal so used, or the channel on which the protected signal is transmitted.

At this time, Gabriel wishes to submit complaints from four (4) valid KKJM(FM) listeners representing eleven (11) individual and distinct locations of observed interference. Areas of observed interference included home addresses, public areas and defined sections of roads or highways. A summary of the locations of observed interference has been provided below. A map of the locations of observed interference has been provided in **Exhibit 1.1**. Copies of the actual interference declarations have been provided in **Exhibit(s) 2.1 to 2.4**.

<b>Name</b>	<b>Address</b>	<b>Contact Info Phone/email</b>	<b>Description of Interference</b>
Jenny Power	555 Broadway Ave Cokato, MN 55321	1(320)224-6760 Jenn828@hotmail.com	On Highway 12 from Waverly to Delano
Nancy Anderson	407 9th Street NE #4 Buffalo, MN 55313	1(763)350-1958 naa_us@yahoo.com	On Highway 52 from Monticello to St. Michael; On County Road 35 from St. Michael to Buffalo; On Highway 25 from Buffalo to Monticello
Gene Persian	3822 Colbert Ave NW Buffalo, MN 55313	1(763)229-6070 gapersian@yahoo.com	Home Address - 3822 Colbert Ave NW Buffalo, MN 55313
Ted Roberts	10398 61st Street NE Albertville, MN 55301	1(763)497-7145 teddybear91@icloud.com	Home Address - 10398 61st Street NE Albertville, MN 55301 Riverside Church - 20314 County Road 14 NW Big Lake, MN 55309 (general area of) Saint Michael, MN (general area of) Rogers, MN (general area of) Maple Grove, MN (general area of) Dayton MN

Within the **Exhibit 1.1** map, these eleven (11) individual locations of observed interference have been plotted. Areas of noted interference include three (3) stationary addresses; four (4) sections of roads; and four general areas (communities) of noted interference. The three stationary addresses have been identified by the physical mailing address as well as latitude and longitude coordinates expressed as Degree-Minutes-Seconds. The four general areas (communities) have been identified by the community center latitude and longitude coordinates expressed as Degree-Minutes-Seconds. The four segments of road based interference complaints have been highlighted in red. Based on the beginning and ending landmarks as noted from each complaint, and the proliferation of road mapping software available on the internet, the locations of each of these road based segments is considered to be a matter of record before the Commission. However further documentation of these road based segments will be supplied upon request.

<sup>1</sup> The objector would like to note that although W225AP.L has been operating since early 2015, co-channel interference to KKJM(FM) has continued to be an on-going issue since the initial commencement of the Translator. The timing of this §74.1203 based objection now is a function of the culmination of on-going interference, and also due to the objector being made recently aware of the §74.1203 interference resolution protocols of which it was formerly unfamiliar with.

## **ENGINEERING STATEMENT (continued)**

To assist in promulgating §73.1203(a)(1&3), the objector has chosen to address a series of four (4) criteria for this interference complaint as a whole. The criteria are:

**(1) The name and specific address of each affected listener.** The names and addresses of the four (4) KKJM(FM) - St. Joseph, MN listeners experiencing actual interference have been included both within this technical discussion as well as individually within the *Exhibit(s) 2.1 to 2.4* complainant declarations themselves.

**(2) Some demonstration that the address or area of each purported listener interference remains valid for reception of the signal in question.** The addresses, communities or sections of roads representing the interference areas in question have been plotted in *Exhibit 1.1*. The objector fully acknowledges the provisions of §74.1203 do not require any signal threshold other than "the reception of a regularly used signal". However, out of an overabundance of caution, the reception areas in question have been analyzed and represent a KKJM(FM) off-air reception signal strength ranging from 52.0 dBμ F(50:50) to 36.0 dBμ F(50:50). Such a reception signal strength is well with the scope of a listenable signal strength with regard to §74.1203. Therefore the Commission's own standard propagation method supports the notion that purported listener reception of the signal remains valid for this area in question. The relevant KKJM(FM) reception contours have been plotted in *Exhibit 1.1*.

**(3) A declaration from each of the affected listeners that he or she listens to the full-service station at the specified location and is experiencing interference from the Translator in question.** Declarations of the four (4) KKJM(FM) listeners have been included in *Exhibit(s) 2.1 to 2.4*. Each listener states he or she listens to KKJM(FM) at his or her home address, public area or defined section of road or highway, and is experiencing interference as noted there-in.

**(4) Some evidence that the authorized Translator has resulted in interference to the reception of the full-service station in question.** The addresses, communities or sections of roads representing the interference areas in question have again been plotted in *Exhibit 1.1*. The objector again fully acknowledges the provisions of §74.1203 do not require any interference signal threshold other than a listener experiencing "interference to the reception of a regularly used signal". Therefore the existence of the *Exhibit(s) 2.1 to 2.4* listener complaints are believed sufficient to meet this criteria. However, out of an overabundance of caution, the previously identified KKJM(FM) off-air reception signal strength area, ranging from 52.0 dBμ F(50:50) to 36.0 dBμ F(50:50), has been analyzed with regard to incoming Translator interference employing the FCC's standard method. The plotted "U to D", Undesired to Desired, contour relationships between KKJM(FM) and W225AP.L therefore requires a Translator interference signal ranging from 32.0 dBμ F(50:10) to 16.0 dBμ F(50:10) over this same area (based on a §74.1204(a) co-channel interference threshold of -20 dBμ). In all cases, the Translator interference contour signal strength toward KKJM(FM) meets or exceeds 38 dBμ over this entire range. Therefore the Commission's own standard propagation method supports the notion that purported listener interference to the KKJM(FM) signal remains valid for the area in question over and above the listener complaints as submitted in *Exhibit(s) 2.1 to 2.4*. The relevant W225AP.L interference contour has been plotted in *Exhibit 1.1*.

As a result of the documentation submitted here-in, specifically the existence of four (4) valid KKJM(FM) listeners representing eleven (11) individual and distinct locations of observed interference, the Commission is encouraged to immediately enforce the provisions of §74.1203(e) whereby EMF bears the responsibility, as the licensee of an FM Translator, to correct any condition of interference which results from the radiation of radio frequency energy by its equipment on any frequency outside the assigned channel. Also pursuant to §74.1203(e), the Commission is encouraged to notify the Translator station licensee in question, that as such interference is being caused, the operation of the FM Translator station should be suspended and should not be resumed until the interference has been eliminated.

**KKJM(FM)**  
BLH19960510KA  
Latitude: 45-38-19 N  
Longitude: 094-22-23 W  
ERP: 25.00 kW  
Channel: 225  
Frequency: 92.9 MHz  
AMSL Height: 448.0 m

**W225AP.L**  
BLFT20150212AAA  
Latitude: 44-58-36 N  
Longitude: 093-16-15 W  
ERP: 0.099 kW  
Channel: 225  
Frequency: 92.9 MHz  
AMSL Height: 504.0 m

10398 61st Street NE  
Albertville, MN 55301  
45-14-19 N; 093-40-37 W

20314 County Road 14 NW  
Big Lake, MN 55309  
45-18-37 N; 093-47-16 W

3822 Colbert Ave NW  
Buffalo, MN 55313  
45-12-20 N; 093-55-46 W

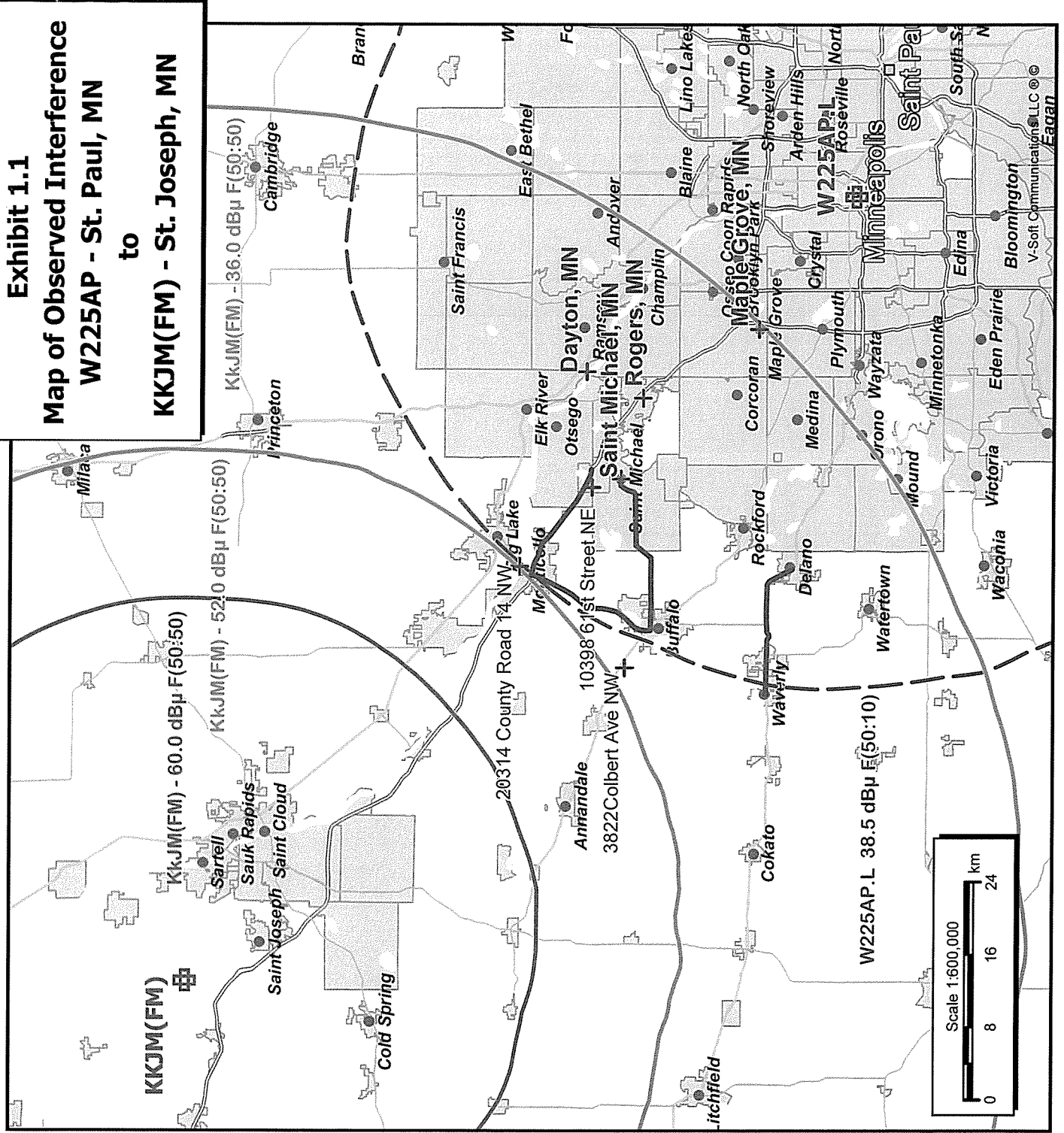
Dayton, MN  
45-14-38 N; 093-30-51 W

Maple Grove, MN  
45-04-24 N; 093-27-20 W

Rogers, MN  
45-11-18 N; 093-33-06 W

St. Michael, MN  
45-12-35 N; 093-39-55 W

**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
COLDWATER, MI 49036





# Exhibit 2.1 - Copies of KKJM(FM) Listener Interference Declarations



**Deb**

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**From:** Spirit 92.9 [deb@gabrielmedia.info]  
**Sent:** Saturday, November 05, 2016 10:03 AM  
**To:** Deb; Jessica Hart  
**Subject:** Spirit 92.9 Signal Interruption Report

## Spirit 92.9 Signal Interruption Report

**Your First & Last Name** Jenny Power  
**Street Address/City/State/Zip** 555 Broadway Ave  
Cokato, MN 55321  
**Email address** Jenn828@hotmail.com  
**Phone Number with Area Code** 3202246760  
**Please list most recent date you have experienced signal interruption (mm/dd/yyyy):** 11/4/2016  
**Where do you experience the interference? (Please be as specific as possible with location)** Waverly through Delano on Highway 12.  
**Please describe the interference with as much detail as possible:** Air One broadcasts on the exact same frequency, and I can't tune into Spirit or Air One. It basically sounds like you put a radio in a blender. It's pretty annoying.  
**Any additional comments?** It would be nice if Air One would have to change frequencies since Spirit was here first.

## Exhibit 2.2 - Copies of KKJM(FM) Listener Interference Declarations



Deb

**From:** Spirit 92.9 [deb@gabrielmedia.info]  
**Sent:** Sunday, October 30, 2016 3:41 PM  
**To:** Deb; Jessica Hart  
**Subject:** Spirit 92.9 Signal Interruption Report

### Spirit 92.9 Signal Interruption Report

**Your First & Last Name** Nancy Anderson  
**Street Address/City/State/Zip** 407 9th Street NE #4  
Buffalo, MN 55313  
**Email address** [naa\\_us@yahoo.com](mailto:naa_us@yahoo.com)  
**Phone Number with Area Code** 7633501958  
**Please list most recent date you have experienced signal interruption (mm/dd/yyyy):** 10/30/16  
**Where do you experience the interference? (Please be as specific as possible with location)** I travel daily between Monticello, St. Michael, and Buffalo. I used to receive the station very clearly. Now, I get it for very short spurts. Rarely through a full song.  
**Please describe the interference with as much detail as possible:** Now the sound just get static. In the few months before that, another station would bleed over. Ironically, it was Air 1  
**Any additional comments?** I miss having Spirit 92! Please fix it as soon as possible :)

## Exhibit 2.3 - Copies of KKJM(FM) Listener Interference Declarations



Deb

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**From:** Spirit 92.9 [deb@gabrielmedia.info]  
**Sent:** Monday, October 17, 2016 9:33 AM  
**To:** Deb; Jessica Hart  
**Subject:** Spirit 92.9 Signal Interruption Report

### Spirit 92.9 Signal Interruption Report

**Your First & Last Name** Gene Persian  
**Street Address/City/State/Zip** 3822 Colbert ave nw  
buffalo, mn. 55313  
**Email address** [gapersian@yahoo.com](mailto:gapersian@yahoo.com)  
**Phone Number with Area Code** 763-229-6070  
**Please list most recent date you have experienced signal interruption (mm/dd/yyyy):** 10-17-16  
**Where do you experience the interference? (Please be as specific as possible with location)** the above listed address  
**Please describe the interference with as much detail as possible:** reception fades in and out, static

## Exhibit 2.4 - Copies of KKJM(FM) Listener Interference Declarations



Deb

**From:** Spirit 92.9 [mailto:deb@gabrielmedia.info]  
**Sent:** Saturday, November 12, 2016 5:31 PM  
**To:** Deb; Jessica Hart  
**Subject:** Spirit 92.9 Signal Interruption Report

### Spirit 92.9 Signal Interruption Report

**Your First & Last Name** Ted Roberts  
**Street Address/City/State/Zip** 10398 61st Street NE  
Albertville, MN 55301-4313

**Email address** [teddyrbear91@icloud.com](mailto:teddyrbear91@icloud.com)

**Phone Number with Area Code** 763-497-7145

**Please list most recent date you have experienced signal interruption (mm/dd/yyyy):** 11/12/2016

**Where do you experience the interference? (Please be as specific as possible with location)** Everywhere around my house. In the car right around Monticello when I have tune in in the past 6months when I have gone to Riverside Church in Big Lake. Also I have had problems tuning in when I have been taken places such as Saint Michael, Rogers, and Maple Towards Maple Grove such as Dayton

**Please describe the interference with as much detail as possible:** I get interference from Air1 as they recently boosted the power on their translator station in Minneapolis. According to the Air1 app I should be getting 3 out of 5 bars reception for that signal. KTCZ owns that signal as they rebroadcast Air1 radio on KTCZ HD2 in Minneapolis. KTCZ is Cities 97. Air1 lost a signal to Hot 102.5 which is carried on 97.1 KTCZ HD3. Air1 got their 102.5 signal taken and given to Hot 102.5 that comes from somewhere out of state I think. I used to get Spirit 92.9 crystal clear in Albertville and now I get a lot of static on your radio station when I try to tune in. I have a Bose radio which is top of the line for FM reception quality so there is no excuse to not get your station in unless another station is interfering with the signal. Air1 is based out of Rocklin, California. Air1 is also a Christian station.