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# BEFORE THE

**FEDERAL COMMUNICATIONS COMMISSION**

**Washington, D.C. 20554**

In the Matter of:

RIVIERA BROADCASTING, LLC

Application for Minor Modification K241BQ  
(Facility ID#33804) at Fort McDowell, AZ

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) File No. BPFT-20170718ACI

TO: Office of the Secretary

Attn: Chief, Audio Division, Media Bureau:

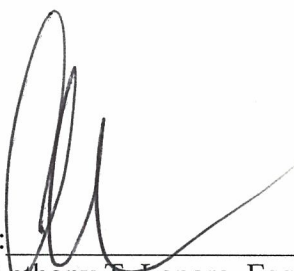
## INFORMAL OBJECTION

CRC Broadcasting Company, (“CRC”) the licensee of K257GI, Tempe, AZ (Facility ID#156059), by counsel, hereby files pursuant to 47 C.F.R. §73.3587 its Informal Objection<sup>1</sup> to the above captioned application of K241BQ to change its modify its operations on Channel 241 (the “*Mod Application*”). K257GI has a modification application pending before the Commission (BPFT-20170718AAG) to specify operation on Channel 241 and as demonstrated below, the *Mod Application* should be dismissed because the *Mod Application* fails to comply with long standing Commission policy and interpretation of 47 CFR §74.1204 that any Class D facility modification application must protect BOTH the incoming and outgoing interference contours from a pending application. In the instant case, the pending application in question is

for K241CS (Facility ID#156046), under File No: BPFT-20170206ACK (the “*Pending Application*”). Although Exhibit 7 in the Comprehensive Technical Exhibit for the *Mod Application* does reference K241CS, it fails to appropriately address the requisite protection of both incoming and outgoing interference contours. Attached hereto as Exhibit “1” is a technical exhibit illustrating the conflict between the *Mod Application* and the *Pending Application* which illustrates the prohibited overlap.

Accordingly, for the foregoing reasons, the *Mod Application* should be dismissed for its demonstrated prohibited overlap with the *Pending Application*.

Respectfully Submitted,

By:   
Anthony T. Lepore, Esq.

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July 27, 2017

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<sup>1</sup> This informal objection is timely filed as Section 73.3587 sets no time limits on the filing of same other than filing prior to Commission action on the subject application.

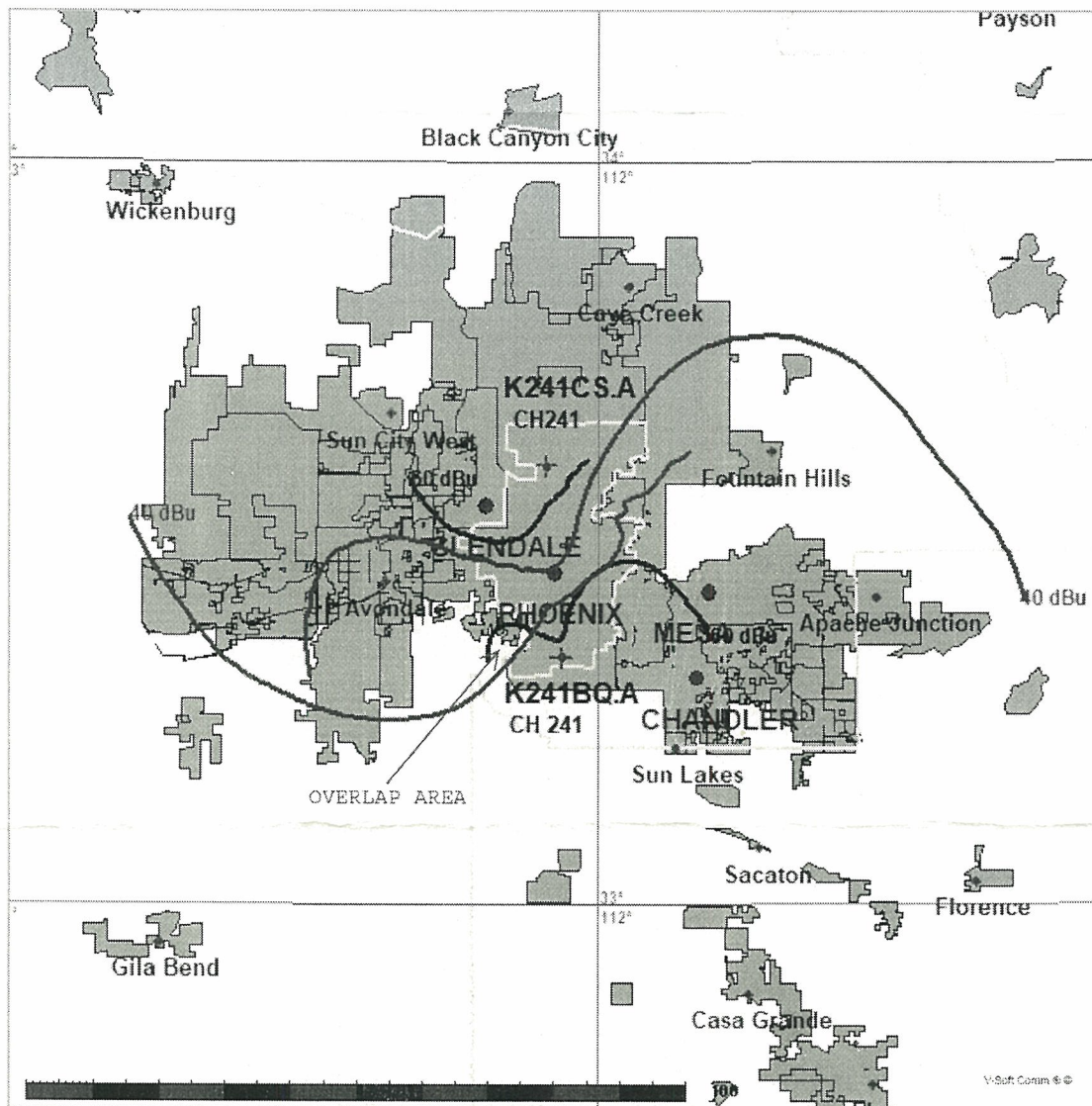
## EXHIBIT "1"

### K241BQ CONTOUR OVERLAP STUDY WITH PENDING K241CS APPLICATION

FMCommander Single Allocation Study - 07-26-2017 - NGDC 30 SEC  
K241BQ.A's Overlaps (In= 5.66 km, Out= 10.03 km)

K241BQ.A CH 241 D DA  
Lat= 33 20 05.0, Lng= 112 03 39.0  
0.14 kW 0 m HAAT, 803 m COR  
Prot.= 60 dBu, Intef.= 40 dBu

K241CS CH 241 D DA BPFT20170206ACK  
Lat= 33 35 39.0, Lng= 112 05 08.0  
0.25 kW 0 m HAAT, 663 m COR  
Prot.= 60 dBu, Intef.= 40 dBu



**CERTIFICATE OF SERVICE**

I, Anthony T. Lepore, principal of the law firm of RADIOTVLAW ASSOCIATES, LLC,  
hereby certify that a copy of the foregoing "Informal Objections" was served this 27th day of  
July, 2017 by first class United States Mail, postage prepaid, upon the following:


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Anthony T. Lepore

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