Before the Federal Communications Commission Washington, DC 20554

In the Matter of

WRPX, INC.

FM Translator Station W279DD Hudson, WI Facility ID No. 141819

To: Chief, Audio Division, Media Bureau

RESPONSE TO INTERFERENCE COMPLAINT

WRPX, Inc., licensee of Radio Station WDGY and FM Translator Station W279DD, Hudson, Wisconsin, by its attorneys, hereby responds to the Interference Complaint filed by Stewards of Sound, Inc., licensee of Radio Station WWIB, Hallie, Wisconsin. Pursuant to the FCC Staff's Interference Letter, dated October 16, this Response is timely filed.

As noted in the attached Engineering Exhibit, Station W279DD operated for eleven months before there was any suggestion of interference, which came in the form of a telephone call from WWIB's technical consultant in March 2017. No details were provided, and nothing further was heard until the filing of the Interference Complaint on August 24, 2014.

The Interference Complaint contained the identities of ten persons allegedly receiving interference from WDGY's translator. WDGY management contacted nine of these persons. The tenth could not be found; his telephone having been disconnected. The Engineering Exhibit contains the dates and results of each contact. All but one of the persons are either satisfied or have promised to contact WDGY if reception problems arise. In the case of Linda Nelson, WDGY has offered to install an outdoor antenna to improve here reception of WWIB. No response to this offer has yet been received.

Since all outstanding complaints have been satisfied, this matter should be considered closed. Should WWIB receive any listener complaints in the future, those listeners should be encouraged to contact WDGY for assistance in resolving reception problems.

Respectfully submitted,

WRPX, INC.

James A. Koerner Its Attorney

Koerner & Olender, P.C. 7020 Richard Drive Bethesda, MD 20817 (301)468-3336

· 12 3.4

November 13, 2017

Engineering Exhibit For WRPX, Inc. W279DD Hudson, Wisconsin November 2017

This engineering exhibit was prepared in response to a complaint filed on August 24, 2017 by Stewards of Sound, Inc. ("WWIB"), licensee of WWIB, Hallie, Wisconsin (FCC Facility ID 63428) alleging interference to the regularly received broadcast signal of WWIB by co-channel FM translator W279DD, Hudson, Wisconsin. The FCC subsequently issued an Interference Complaint letter dated October 16, 2017. This is the W279DD licensee's response to that letter.

Background

W279DD signed on the air April 28, 2016 and filed its FCC form 350 license application shortly thereafter on May 2, 2016. The station operated for the better part of a year with no complaints. W279DD carries the programming of class-D AM station WDGY, the only aural service licensed to Hudson, Wisconsin. The translator was moved to Hudson under the FCC's "Revitalization of the AM Radio Service" docket and allows WDGY, which has no nighttime authorization, to serve Hudson on a 24 hour basis. Hudson, Wisconsin is the St. Croix county seat and has grown to a population of 12,719 in 2010, an increase of 44.9% from the 2000 census figure of 8,775. Hudson has a thriving downtown and has developed a tourist industry with shops, hotels, bed and breakfasts, restaurants and nightlife. WRPX, Inc. has been the licensee of WDGY for more than three decades and through much effort and expense has improved the station to its current 5 KW facility. The addition of W279DD allows daytime-only WDGY to provide critical local service to its community of license on a 24 hour basis, which is one of the primary goals of MB Docket No. 13-249.

Mueller Broadcast Design 613 S. La Grange Road La Grange, Illinois 60525 (708) 352-2166

Interference Complaint

W279DD operated for 11 months prior to WWIB contacting its technical consultant (the writer) by phone in March 2017 about possible interference to WWIB from W279DD. The caller was instructed to provide information outlining the locations and listeners who had complained of said interference, and their contact information. That information was not provided. The writer is not an employee or agent of the W279DD licensee and WWIB did not contact WRPX, Inc. or WDGY until the interference complaint was filed with the FCC five months later, or 16 months after the translator commenced operation.

The FCC rules regarding translator interference to full-power FM stations defines interference thusly: "Interference will be considered to occur whenever reception of <u>a regularly</u><u>used signal</u> is impaired by the signals radiated by the FM translator" (§74.1203(a)(3), emphasis added). The 16 month period from W279DD's sign-on and WWIB contacting its licensee regarding interference to WWIB appears to reveal a lack of actual regular service by WWIB at these locations. W279DD is easy to identify due to the WDGY references many times per hour, and being a local business WRPX, Inc. is not difficult to find or contact. All the information necessary is in the FCC CDBS record for the translator, which is evidently where WWIB found the technical consultant's contact information. At best it appears that WWIB reception may have been sporadically impaired if at all, or that such alleged impairment was not significant enough to properly pursue. Also of note is the earliest complaint submitted by WWIB is not until January 30, 2017, a full eight months after W279DD began operation. No changes have been made to the translator's transmitter or antenna since April 2016.

The Interference Complaints

All but three of the ten alleged cases of interference were submitted in the August 24, 2017 filing without proper contact information. However, in order to investigate and resolve the complaints as required the management of WRPX, Inc. researched each and was able to find the phone number of each person. WRPX, Inc. successfully contacted all but one of the complainants and has resolved each complaint. The tenth person's phone is disconnected and there is no other contact information available.

WRPX, Inc. management has reached out to the following people and has resolved their concerns. WRPX, Inc. management has also documented and recorded video and audio at each location during September and October 2017. These video and audio records will be made available upon request. At each location the WWIB reception was monitored using three radios:

- 2015 Audi factory stock car radio #4G0035080G
- Insignia NS-HDRAD AM-FM-HD table radio #15C18A0000860
- SPARC SHD-P360 FM-HD portable pocket radio (nsn)

The following is a list of complainants and the current state of resolution for each case:

Brenda Cogbill, 405 Hwy 63, Clear Lake, WI 54005

On Sep. 27, 2017 9:43 AM management reached out to her via telephone and she stated that her reception of WWIB is great and she considers the case closed.

Tom Moe, 203 Cassel Acres, Glenwood City, WI 54013

Management reached out to Tom Moe via telephone Sept. 29 thru Oct. 5,2017 and he returned the calls and informed us that he receives WWIB at his house perfectly.

Fran Kromrey,2902 60th Ave., Wilson, WI 54027

Management stopped by her house Oct. 3, 2017 and they stated they receive WWIB with no issues.

Barbara Bartz, N12199 Co. Rd Q, Dowling, WI 54734

Management talked by phone Oct 25, 2017 9:15 AM and she informed us she had installed internet radio and was receiving WWIB that way.

Linda Nelson, N6852 490th St, Beldenville, WI 54003

Management contacted her via phone and visited her house Nov. 2, 2017 and improved the quality of WWIB on her kitchen radio but we are exploring further options to assist her, including the installation of an antenna at no cost to Ms. Nelson.

Marlys O'Keefe, N6869 570th St, Beldenville, WI 54003

Management spoke via phone Oct 24, 2017 and she stated she is receiving WWIB and is satisfied.

Roger Castleberg, 1860 190th Avenue, Maiden Rock, WI 54750

Management was unable to contact Roger because the phone number we have has been disconnected. WWIB reception was documented in front of his address.

Susie Monicken, 222 Co Rd BB, Baldwin, WI 54002

Management called on Oct 24, 2017 at 2PM and she stated she is receiving WWIB just fine and is satisfied. She stated if she has a problem she will contact us.

Karen Adams, E1943 1070th Ave, Boyceville, WI 54725

Management spoke with her Oct 27, 2017 4PM. We discussed her interference and offered to help and she stated she would discuss it with her husband and would get back to us if necessary.

Jerry Holman, 710 Hillcrest St, Baldwin, WI 54002

Management spoke with Jerry on Oct. 27, 2017 and he said he is fine with the current situation and considers the case resolved. If he has future problems he stated he would reach out to us.

Each of the individuals except for Mr. Castleberg were provided with direct contact

information for WRPX, Inc. management and were encouraged to reach out should they have any

further questions or need assistance receiving WWIB. Should valid contact information for Mr.

Castleberg become available he will be encouraged to do the same, but for now he is counted as

non-cooperating.

The operating parameters of W279DD have not changed since it was licensed and except for Ms. Nelson and Mr. Castleberg the complainants are satisfied with the current situation. WRPX, Inc. is in the process of installing an FM and TV antenna for Ms. Nelson which will be completed once the mounting details are worked out, and Mr. Castleberg has been unavailable. Therefore it is respectfully submitted that all ten of the interference complaints submitted by WWIB have been resolved to the extent required by 47 CFR § 74.1203.

This exhibit was prepared by me using first-hand information as well as information provided by WRPX, Inc. and is true and correct to the best of my knowledge and belief.

November 7, 2017

Mal C. Mueller Mark A. Mueller

CERTIFICATE OF SERVICE

I, James A. Koerner, do hereby certify that a copy of the foregoing "Response to

Interference Complaint" was served this 13th day of November, 2017, via first class US

mail, postage prepaid, upon the following:

Peter Tannenwald, Esq. Fletcher, Heald & Hildreth, P.L.C. 1300 N. 17th Street 11th Floor Arlington, VA 22209

Robert Gates (via email)(Robert.Gates@fcc.gov) Audio Division, Media Bureau Federal Communications Commission Washington, DC 20554

James A. Koerner