

2018 JAN 30 PM 2:24

KOERNER & OLENDER, P.C.

**Attorneys at Law
7020 Richard Drive
Bethesda, Maryland 20817**

**Tel. (301) 468-3336
Fax (301) 468-3343
bkofcclaw@erols.com**

Robert L. Olender *
rolender.law@comcast.net
James A. Koerner
jkoerner.law@comcast.net

January 29, 2018

Accepted / Filed

JAN 29 2018

**Federal Communications Commission
Office of the Secretary**

*not admitted in MD

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals, TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

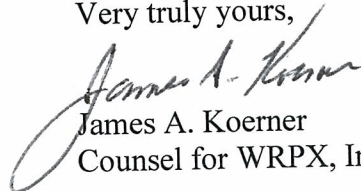
W279DD, Hudson, WI
File No. BLFT-20160502ABR
Facility ID No. 141819

Dear Ms. Dortch:

On behalf of WRPX, Inc., licensee of FM Translator Station W279DD, there are transmitted herewith an original and two (2) copies of its Further Response to Interference Complaint with respect to the above-referenced station.

Should additional information be necessary in connection with this matter, please communicate with this office.

Very truly yours,



James A. Koerner
Counsel for WRPX, Inc.

2018 JAN 30 PM 2: 24

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
WRPX, INC.)
FM Translator Station W279DD)
Hudson, WI)

Facility ID No. 141819

Accepted / Filed

JAN 29 2018

Federal Communications Commission
Office of the Secretary

To: Chief, Audio Division, Media Bureau

FURTHER RESPONSE TO INTERFERENCE COMPLAINT

WRPX, Inc., licensee of Radio Station WDGY and FM Translator Station W279DD, Hudson, Wisconsin, by its attorneys, hereby supplies a further response to the Interference Complaint filed by Stewards of Sound, Inc. ("Stewards"), licensee of Radio Station WWIB, Hallie, Wisconsin. This is to address certain matters contained in the Stewards Reply to Response to Interference Complaint, filed December 27, 2017.

Stewards contends that the results of the contacts by WDGY management reported in the Response should be disregarded as hearsay. Attached is a Declaration of Gregory O. Borgen, President and 100% stockholder of WRPX, Inc. He or another member of the management team personally contacted each of the available complainants. The Declaration confirms the statements contained in the previously-filed Response.

As noted in the Borgen Declaration, each of the complainants were asked to contact WDGY if his/her still had interference. With one exception, no one did.

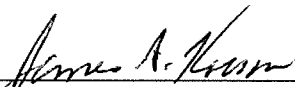
Stewards also attempts to explain away the fact that there were no complaints for over a year after the WDGY translator went on the air. It seems more realistic that a

person who suddenly cannot receive a beloved radio station would not hesitate more than a few days before contacting that station to inquire about the reason for such disappearance.

Since each complainant was asked to call WDGY if there were further reception difficulties, and only one did, WDGY was entitled to believe that the other complainants were satisfied, or as in the case of Susie Moniken, do not wish to be bothered. WDGY will continue to reach out to any WWIB listeners whose complaints about interference from WDGY are brought to its attention.

Respectfully submitted,

WRPX, INC.

By 
James A. Koerner
Its Attorney

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

January 29, 2018

DECLARATION OF GREGORY O. BORGEN

Gregory O. Borgen hereby declares under penalty of perjury as follows:

I am President and 100% stockholder of WRPX, Inc., licensee of AM Radio Station WDGY and FM Translator Station W279DD, Hudson, Wisconsin.

Each of the nine (9) complainants listed by Stewards of Sound, Inc. in its Interference Complaint was contacted by me or by my son who is also part of the station management. The tenth complainant was, and apparently still is, unavailable.

The results of the interactions with those complainants are correctly summarized in the Engineering Exhibit of Mark A. Mueller attached to the WRPX, Inc. Response to Interference Complaint.

In each case, the person contacted was told that if he/she was still experiencing interference, he/she could contact WDGY, and further efforts would be made to satisfy the complaint. With the exception of Linda Nelson, none of the complainants have, thus far, contacted WDGY. In the case of Ms. Nelson, WDGY is planning to install a new antenna as soon as weather permits.

Tom Moe only listed his home address in the initial complaint. After learning the location of his farm, we drove to that location, and found that the car radio was receiving WWIB clearly, with no interference.

With respect to Fran Kromery, WDGY had no reason to suspect that her husband could not be speaking for the household. Thus, WDGY had every reason to assume there was no problem.

Since Barbara Bartz told WDGY that she listened to WWIB via internet radio, and did not mention anything about an off-the-air radio, WDGY could only assume that she was not experiencing any interference.

It is obvious that Marlys O'Keefe does not regularly listen to WWIB in her car since she states that she had never tried to receive in the car previously. WDGY cannot explain why she now says she cannot get WWIB at home when she told us earlier that she could.

Susie Moniken admits that she told WDGY that she considered the case closed. She never contacted WDGY later to retract that statement. In any event, her response to the WWIB inquiry indicates that she does not wish to have any further contact with WDGY.

Karen Adams, after telling WDGY that she would "get back" to WDGY after discussing the matter with her husband, did not do so. Also, it appears that any interference is only intermittent, and it is not clear that WDGY is responsible for the interference.

Jerry Holman similarly stated that he would reach out to WDGY if he had problems with WWIB reception. However he never did. Further, his response to the WWIB inquiry only states that he wants to listen to WWIB, but makes no mention of interference limiting his ability to do so, or that he attempts to listen to WWIB.

Dated this 24 day of January, 2018.



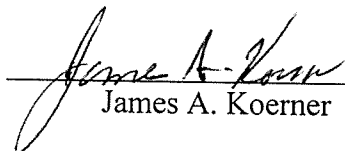
Gregory C. Borgen

CERTIFICATE OF SERVICE

I, James A. Koerner, do hereby certify that a copy of the foregoing "Further Response to Interference Complaint" was served this 29th day of January 2018, via first class US mail, postage prepaid (or by email as indicated), 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)
Paul Desai, Esq. (via email)(Paul.Desai@fcc.gov)
Audio Division
Media Bureau
Federal Communications Commission
Washington, DC 20554


James A. Koerner