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March 9, 2018

RECEIVED - FCC

MAR - 9 2018
Federal Communications Commission
Bureau / Office

James D. Bradshaw, Deputy Chief
Audio Division, Media Bureau
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Interference Complaints
W235CN, Greenfield, Indiana
File No. BLFT-20171124AAA
FCC Facility ID No. 41191**

Dear Mr. Bradshaw:

This letter is submitted by Radio Sharon Foundation ("Radio Sharon"), licensee of Station W235CN, Providence, Rhode Island.¹ This letter responds to the February 7, 2018 letter from James D. Bradshaw, Deputy Chief, Audio Division (the "FCC Letter") regarding allegations of interference submitted by Red Wolf.

¹ The Commission issued a construction permit to Radio Sharon for Station W300AC, on July 7, 2016 (BPFT-20160627ABL). The FCC granted a License Application filed by the Radio Sharon translator (BLFT-20171124AAU), but rescinded its approval when the Commission became aware of the previously filed December 24, 2017 "Informal Objection and Interference Complaint" ("Complaint"), filed by Red Wolf Broadcasting Corporation ("Red Wolf"), licensee of Stations WKKB, Middleton (Providence), Rhode Island and WJFF, Montauk, New York against the Radio Sharon License Application. One month later, on January 23, 2018, Red Wolf filed a "Supplement to Informal Objection and Interference Complaint" ("Supplemental Complaint"). For ease of reference, Red Wolf's "Complaint" and "Supplemental Complaint" shall be referred to herein as Red Wolf's "Objection." The Radio Sharon translator appears in the Commission's CDBS database under the call sign W235CN, and that is how it will be referred to herein.

ORIGINAL

The FCC Letter asks Radio Sharon to submit a detailed report on the allegations of interference, asking that the report 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 each device allegedly receiving the interference. The FCC Letter requested appropriate action from Radio Sharon within thirty (30) days of the letter, which works out to March 9, 2018. This responsive letter addresses the interference remediation status of the purported WJFF listeners.

Radio Sharon sent two (2) letters offering interference remediation on February 20 and 22, 2018² to each of the purported WJFF listeners after Radio Sharon's receipt of the FCC Letter (Exhibit 1). A response to the most recent Radio Sharon letter was requested by March 5, 2018, so that Radio Sharon would have time to begin to engage in interference remediation efforts and submit a timely reply to the FCC's letter.

The Radio Sharon letter asked when there might be a convenient time for a visit from Radio Sharon to attempt to remedy the interference. In addition to offering interference remediation, the letter asked for information on the type of device experiencing interference, the manufacturer and model name or number of the device, the serial number of the device, the

² Immediately after Radio Sharon sent out its initial letter, Red Wolf complained loudly in an email to Commission staff that Radio Sharon had engaged in "nothing more than harassment and intimidation," specifically citing the fact that the letter asked a total of 33 questions. Red Wolf requested that Radio Sharon be directed to withdraw its letter and contact listeners "in a more appropriate and less threatening manner." In an attempt at cooperation, Radio Sharon sent out a new letter asking that the purported listeners discard the earlier letter categorized by Red Wolf as harassing and, instead, respond to what would hopefully be viewed as "less threatening" inquiries. If Radio Sharon hoped that its effort at cooperation would be appreciated by Red Wolf, it was soon shown otherwise. Apparently, unable to come up with new language, Red Wolf, again, complained to Division staff by a February 27, 2018 email in almost a word-for-word verbatim repetition of its earlier attack on Radio Sharon.

location at which the device experiences interference, the connections, if any, between those associated with Red Wolf and the complainant,³ as well as the regularity of listening to WJFF.

It is beyond explanation how Red Wolf could categorize Radio Sharon's conduct as "harassment" and "intimidation" when it is Red Wolf that has regularly engaged in these tactics against Radio Sharon. Red Wolf has made an offer to Radio Sharon prior to Station W235CN going on the air at its current site to purchase the very translator which it now claims is interfering with one of its stations. Apparently, the "interference" complained about by Red Wolf would be easier for it to live with if Red Wolf was the licensee of W235CN and rebroadcasting WSTL.

Moreover, shortly after Radio Sharon initiated program tests with its translator, Red Wolf threatened legally a principal of Radio Sharon. As of yet, no lawsuit has been brought, but the threat remains. Finally, shortly after Radio Sharon filed its License Application to cover its Providence translator construction permit, Red Wolf assisted listeners in filing complaints against Radio Sharon and Station W235CN. It is not coincidental that Red Wolf station WKKB, licensed to Middletown, Rhode Island, broadcasts the same format as WSTL, rebroadcast by Station W235CN. Apparently, if Red Wolf and its owner and President, John Fuller, cannot own

³ Contrary to what Red Wolf would argue, the Commission requires that a complainant alleging interference by a translator station be "disinterested" to be entitled to interference remediation. *See The Association for Community Education, Inc.*, 19 FCC Rcd 12682 at note 37 (2004) ("We approve of the staff practice that has required that the complainant be 'disinterested,' *e.g.* a person or entity without a legal stake in the outcome of the translator station licensing proceeding.").

the translator, Red Wolf will spare no amount of time, money and effort in ensuring that no one else broadcasts on Station W235CN.

Further, recently, in late February, in a good faith effort by Radio Sharon to determine if a reduction in station facilities would make a material difference, Radio Sharon filed an STA Request (BLSTA-20180220AAA) to reduce power at W235CN by two-thirds.

What follows is a detailed report addressing each of the individual complainants in the Objection.

- 1) Glenn Sulmasy
Bryant University/Provost Residence
1150 Douglas Pike
Smithfield, RI 02917

Mr. Sulmasy received the interference remediation letters but did not respond. Moreover, Mr. Sulmasy, according to the geographic coordinates provided by Red Wolf, is located over 65 miles (65.3 miles) from the WJFF site (Exhibit 2). Since Station WJFF is a Class A facility, it is beyond belief that an individual residing over 65 miles from that station could be a regular listener.

- 2) Jenna Rose Lima, Joseph Lima, Juliana Lima and Kimberly Ruggieri-Lima
309 Little Pond County Road
Cumberland, RI 02864

The Lima family received the interference remediation letters but did not respond. Moreover, the Lima family, according to the geographic coordinates provided by Red Wolf, is located almost 65 miles (64.8 miles) from the WJFF site (Exhibit 3). Since Station WJFF is a Class A facility, it is beyond belief that individuals residing 65 miles from that station could be regular listeners.

- 3) Thomas Carrol
6 Garwaine Dr.
Lincoln, RI 02865

Mr. Carrol received the interference remediation letters but did not respond. Moreover, Mr. Carrol, according to the geographic coordinates provided by Red Wolf, is located almost 65 miles (64.5 miles) from the WJFF site (Exhibit 4). Since Station WJFF is a Class A facility, it is beyond belief that an individual residing 65 miles from that station could be a regular listener.

- 4) Mikayla Labbe
2 Fox Meadow Dr.
Johnston, RI 02919

Ms. Labbe received the interference remediation letters but did not respond. Moreover, Ms. Labbe, according to the geographic coordinates provided by Red Wolf, is located almost 59 miles (58.8 miles) from the WJFF site (Exhibit 5). Since Station WJFF is a Class A facility, it is beyond belief that an individual residing 59 miles from that station could be a regular listener.

- 5) David Mossberg
94 Underwood Dr.
Warwick, RI 02888

Mr. Mossberg received the interference remediation letters but did not respond. Moreover, Mr. Mossberg, according to the geographic coordinates provided by Red Wolf, is located almost 60 miles (58 miles) from the WJFF site (Exhibit 6). Since Station WJFF is a Class A facility, it is beyond belief that an individual residing almost 60 miles from that station could be a regular listener.

- 6) John Botello Jr.
9 Davis Street
West Warwick, RI 02893

Mr. Botello Jr. received the interference remediation letters but did not respond. Moreover, Mr. Botello Jr., according to the geographic coordinates provided by Red Wolf, is located almost 52 miles (51.6 miles) from the WJFF site (Exhibit 7). Since Station WJFF is a Class A facility, it is beyond belief that an individual residing 52 miles from that station could be a regular listener.

- 7) Miranda Chapman
11 Canterbury Dr.
Bradford, RI 02808

Ms. Chapman received the interference remediation letters but did not respond. Moreover, Ms. Chapman, according to the geographic coordinates provided by Red Wolf, is located almost 50 miles (49.5 miles) from the WJFF site (Exhibit 8). Since Station WJFF is a

Class A facility, it is beyond belief that an individual residing 50 miles from that station could be a regular listener.

- 8) Ronan Lacey
69 Stanton Lane
Mystic, CT 06355

Mr. Lacey received the interference remediation letters and did respond. However, besides stating that Red Wolf assisted him in filing his complaint, he stated that he did not wish to meet with a representative of Radio Sharon to address possible technical solutions to the alleged interference problem. Moreover, he did not provide any information regarding the model, manufacturer or serial number of his receiver (Exhibit 9). Section 74.1203(b) of the FCC's rules specifically states that "if a complainant refuses to permit the FM translator or booster licensee to apply remedial techniques...the licensee of the FM translator or booster is absolved from further responsibility for that complaint." Further, it is set in law that the Commission will base its conclusions regarding alleged FM translator interference on verifiable complaints. *See The Association of Community Education*, 19 FCC Rcd 12682 at note 37.

- 9) Marina Speck
10 David Avenue
Westerly, RI 02891

The letters offering interference remediation were delivered to Ms. Speck. No response was received from Ms. Speck.

- 10) Russell DiNoto
61 Woodmark Way
Wakefield, RI 02879

The letters offering interference remediation were delivered to Mr. DiNoto. No response was received from Mr. DiNoto.

- 11) Martin McKinney
8 Totem Lane
Griswold, CT 06351

The letters offering interference remediation were delivered to Mr. McKinney. No response was received from Mr. McKinney.

- 12) Charles DiLuglio
34 Nun Avenue

Jamestown, RI 02835

The letters offering interference remediation were delivered to Mr. DiLuglio. No response was received from Mr. DiLuglio.

- 13) John Ruggieri
26 B Woody Hill Rd.
Hope Valley, RI 02832

The letters offering interference remediation were delivered to Mr. Ruggieri. No response was received from Mr. Ruggieri.

- 14) Norman Forcier
194 Maxson Hill Rd.
Ashaway, RI 02804

The letters offering interference remediation were delivered to Mr. Forcier. No response was received from Mr. Forcier.

- 15) James Christiana
8 Hydro Dr.
Westerly, RI 02818

The letters offering interference remediation were delivered to Mr. Christiana. No response was received from Mr. Christiana.

- 16) Craig Lustig and Madison Lustig
200 Clarke Road, Apt. 210
Narragansett, RI 02882

The letters offering interference remediation were delivered to Craig and Madison Lustig. No responses were received from Craig or Madison Lustig.

- 17) Ken Thomas
112 Clift Street
Mystic, CT 06355

The letters offering interference remediation were delivered to Mr. Thomas. No response was received from Mr. Thomas.

- 18) Pat Hallisey

13 Marcel Drive
Mystic, CT 06355

The letters offering interference remediation were delivered to Pat Hallisey. No response was received from Pat Hallisey.

- 19) Mike Hancin
541 Eastern Point Road
Groton, CT 06340

The letters offering interference remediation were delivered to Mr. Hancin. No response was received from Mr. Hancin.

- 20) Richard Thomas Jr.
66 Ward Avenue
Groton, CT 06340

The letters offering interference remediation were delivered to Richard Thomas Jr.. No response was received from Richard Thomas Jr.

In view of the above, in the absence of a single response requesting interference remediation from the above individuals, Radio Sharon is absolved from further responsibility for their complaints pursuant to Section 74.1203(b) of the FCC's rules. Mr. Lacey did respond to the Radio Sharon letter offering interference remediation. However, he neither requested interference remediation nor provided the information requested in the FCC Letter to Radio Sharon.

Because no responses have been received, Radio Sharon at this time is unable to determine what impact has occurred since W235CN, voluntarily substantially reduced power. While some preliminary investigations by Radio Sharon have pointed to a significant reduction in the area which now may receive W235CN, Radio Sharon continues to look into the effect of

its severe reduction in station facility on perceptions of interference to WJJF. Radio Sharon intends to file a Supplemental Letter advising the FCC of its findings and conclusions no later than March 21, 2018.

It is readily apparent that this complaint proceeding is an effort by the owner of Red Wolf to advance interference complaints in order to put a competing broadcaster out of business, or force the licensee of the Radio Sharon translator to sell it to Red Wolf, rather than to protect actual listeners. Red Wolf, apparently, would not mind the "interference" as much if it owned W235CN.

It is a valid question to ask what purpose Red Wolf even serves in this proceeding. While it claims an interest in protecting the interest of purported station listeners, many of whom reside 40 to over 60 miles from its Class A Long Island FM station, how can it seriously fulfill that position when it has offered to purchase the very translator that it is currently attacking because it is licensed to its competitor? Red Wolf appears, basically, to have trolled for interference complaints, many of which, on their face, are difficult or impossible to believe, and used them as a strawman. Red Wolf has offered itself as "the listener's friend", but it really is no more than a wolf in sheep's clothing, functionally a "One-Eyed Jack".

Further, it is difficult to comprehend how Red Wolf could honestly contend that Station WJJF could be regularly received at distances approaching 40, 50 or even 60 miles or more away from the station's site. Interference remediation is not required in these cases.

The purported listeners, here, either failed to respond to an offer of interference remediation, did not desire interference remediation when it was offered or lived at incredible

~~Shainis & Peltzman, Chartered~~

Mr. James D. Bradshaw

March 9, 2018

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distances from the Class A station. As such, Radio Sharon should be absolved from further responsibility for these purported listener allegations of interference.

Respectfully submitted,

RADIO SHARON FOUNDATION

By: _____


Lee J. Peltzman
Its Attorney

Enclosures

cc (w/ encl): Scott Woodworth, Esq.

DECLARATION

I, Quilvio (Frankie) Perdomo, make the following Declaration under penalty of perjury.

I am a principal of Radio Sharon Foundation, licensee of FM translator Station W235CN, Providence, Rhode Island. We rebroadcast the signal of Station WSTL(AM), Providence, Rhode Island. At one time I worked at a station owned by John Fuller, who I believe is 100% owner of Red Wolf Broadcasting Corporation ("Red Wolf"). Red Wolf is licensee of Station WKKB, which serves Providence, Rhode Island and, as such, because it programs the same format as WSTL currently broadcasts and Station W235CN rebroadcasts, actively competes with those stations.

Mr. Fuller has made several attempts to acquire W235CN and Station WSTL, including an offer for our translator made in a phone call to me last year. He has also threatened in writing to sue me personally because of my association with Station W235CN. Therefore, his recent filing of an Informal Objection to the W235CN license application (BLFT-20171124AA) is not surprising to me. I know Mr. Fuller well enough to know that he will not rest until he has tried everything within his power to destroy my station. I only pray that the FCC is able to see through his actions.

While I believe that virtually all of the complaints alleging interference have virtually no basis in fact, Radio Sharon has substantially reduced power at W235CN to see if that will result in successfully resolving these interference complaints. I have travelled throughout the W235CN service area listening to the station and have noticed a significant decrease in the area where W235CN can be heard now. Radio Sharon intends to continue to look into the matter and will supplement its findings with an additional FCC filing shortly. We intend to resolve any real complaints of interference with the assistance of these individuals who have filed those complaints.

While Mr. Fuller and Red Wolf claim that they are disturbed by listener interference allegedly caused by the Radio Sharon Providence translator, in fact, as noted above, Mr. Fuller attempted to acquire the very same translator to rebroadcast Station WSTL. My group was not

and is not interested in selling Station W235CN to him. I believe that we are currently providing important public interest programming to the minority communities in and around Providence. We have received recognition from, among others, the Governor of the State of Rhode Island, The State of Rhode Island Secretary of State and the Mayor of Providence, while our station continues to provide a needed service to the Hispanic community.

The foregoing Declaration is true and correct to the best of my knowledge and belief.

Quilvio Perdomo

March 9, 2018



Certificate of Special Recognition

Be it known that I,

Gina M. Raimondo

Governor of the State of Rhode Island and Providence Plantations,
extend my congratulations to

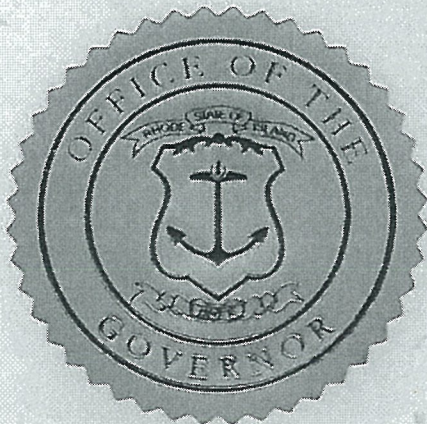
La Mega 94.9FM

On the occasion of celebrating the grand opening of your new station.

In appreciation of your commitment to bringing Latin music to Rhode Island,
I am pleased to issue this Certificate of Special Recognition.

You have my best wishes for your continued success.

*Given under my hand and the great seal of
the State of Rhode Island and Providence
Plantations, this 12th day of February, 2018*



Gina M. Raimondo
Governor



State of Rhode Island and Providence Plantations
Department of State

Nellie M. Gorbea
Secretary of State

WHEREAS; Mega 94.9 FM is a new and exciting Rhode Island business venture being launched on this day offering a variety of entertainment and programming options, in-depth coverage of local and national news and current events that are important to the Rhode Island Latino community; and,

WHEREAS; We have gathered to celebrate a joyous occasion giving staff, friends and listeners the opportunity to recognize your achievements; now therefore,

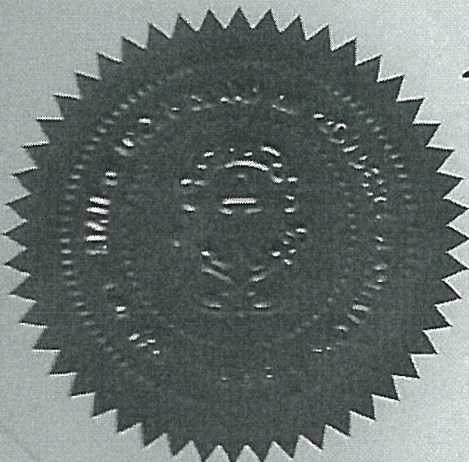
BE IT HEREBY KNOWN TO ALL; that I, Nellie M. Gorbea, Secretary of State of the State of Rhode Island and Providence Plantations do hereby acknowledge and congratulate the owners and operators of Mega 94.9 FM, wishing you much success and growth with this new venture and in all your future endeavors.

Mega 94.9 FM

Signed under the seal of the
State of Rhode Island and Providence Plantations
on this, the twelfth day of February, two thousand eighteen.



Nellie M. Gorbea
Secretary of State





Citation

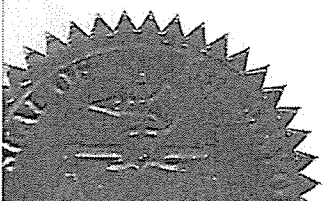
Presented to

La Mega 94.9 FM

*I, JORGE O. ELORZA, Mayor of the City of Providence,
do hereby confer upon you this citation
in recognition of the Grand Opening of your radio station,
a welcome addition to the growing Latino media outlets
that are entertaining, informing, and energizing Providence and the State of Rhode Island.
Your stellar programming, work and dedication are sure to win you many loyal fans.
I am joined by the residents of Providence in congratulating Quilbio Perdomo,
as well as the rest of the support team of La Mega 94.9 FM,
with best wishes for growth and success in the years ahead.*

*Given under the Seal of the Mayor of the City of Providence
This 12th day of February, 2018*

MAYOR OF PROVIDENCE





State of Rhode Island and Providence Plantations

CITATION

BE IT HEREBY KNOWN TO ALL THAT:

THE RHODE ISLAND HOUSE OF REPRESENTATIVES HEREBY OFFERS ITS SINCEREST CONGRATULATIONS TO:

The Mega 94.9 FM

IN RECOGNITION OF

***celebrating the Ribbon Cutting on February 12, 2018 of your new
Latino Radio Station "The Mega 94.9 FM"***

The entire membership extends its very best wishes on this memorable occasion and expresses the hope for continued good fortune.

Given this **12th** day of **February** 20 **18** at the State House in Providence, Rhode Island.

Proposed by: **Representative Grace Diaz**
Representative Scott A. Slater

NICHOLAS A. MATTIELLO, SPEAKER OF THE HOUSE

K. JOSEPH SHEKARCHI, MAJORITY LEADER

PATRICIA L. MORGAN, MINORITY LEADER

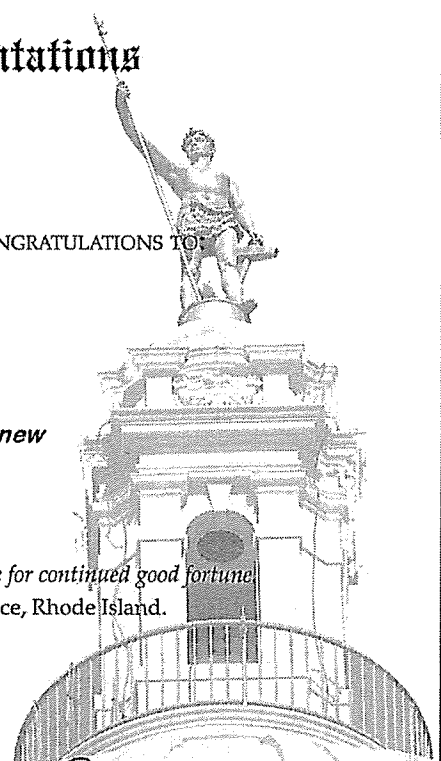


EXHIBIT 1

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February 22, 2018

VIA US PRIORITY MAIL

Mr. David Mossberg
94 Underwood Dr.
Warwick, RI 02888

Dear Mr. Mossberg:

I am writing you on behalf of Radio Sharon Foundation, licensee of Station W235CN, Providence, Rhode Island, which rebroadcasts the programming of Station WSTL(AM), Providence, Rhode Island. You may have already received a Questionnaire bearing my signature. I ask you to discard that document and instead review and respond to the attached Questions.

It is my understanding that you have notified Red Wolf Broadcasting Corporation, licensee of Station WJFF, Montauk, NY, operating on 94.9 MHz, that you are a listener of WJFF and that you have had problems receiving WJFF, at least in certain instances, or under certain circumstances. Red Wolf has submitted your complaint, including your name and address to the Federal Communications Commission in Washington, D.C., to become part of an official governmental record alleging that W235CN is interfering with your reception of WJFF.

You should be aware that interference to the reception of any station, including WJFF, may occur for several reasons unrelated to W235CN. Atmospheric conditions occasionally affect the reception of FM stations. Hills and other terrain often block FM signals. A listener's distance from an FM station largely determines whether a good, listenable signal will be received. In the case of a Class A station such as WJFF, the maximum distance that the Federal Communications Commission normally expects listeners will be able to receive satisfactory reception is in the area of 17½ miles from the transmitter site. Some listeners may even

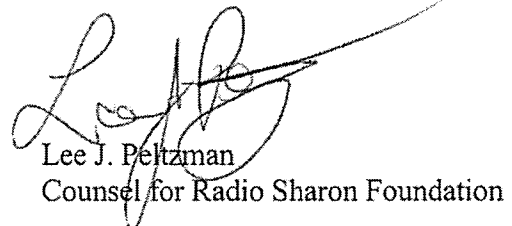
experience reception problems at distances closer than 17 miles from the WJFF transmitter site. In addition, interference to the reception of WJUF may result from stations other than W236CN.

If you are experiencing interference to your regularly received signal of WJFF and that is caused by W235CN, we will require further information. To correct any interference you may be receiving to your WJFF regular listening, the Federal Communications requests that we obtain information from you so that we can determine if any action is required on our part.

We request that you answer all of the questions below so that we may evaluate and determine a fix of any problem that is required. Please feel free to write your answers on the Attachment to this letter and either fax the Attachment back to me at (202) 293-0810, scan and email it back to me at my email address, lee@s-plaw.com, or mail it to me at the address for Shainis & Peltzman, Chartered, which appears above. This letter, with your signed response, will become part of the official governmental record of the Federal Communications Commission with respect to your interference complaint. Please provide your response to the inquiries which follow as soon as possible and, in no event, later than March 5th, 2018.

Your time answering these questions is very much appreciated and as we noted, it is required if we are to further investigate the interference issues. Since the Federal Communications Commission expects a response from Radio Sharon and W235CN shortly, if I do not hear from you by March 5th, Radio Sharon will assume you are no longer experiencing a problem, and notify the Federal Communications Commission of that fact and consider the matter closed.

Sincerely yours,



Lee J. Peltzman
Counsel for Radio Sharon Foundation

Attachment

LIST OF ATTACHED QUESTIONS REGARDING INTERFERENCE

Name:

Address:

Telephone Numbers

Home:

Mobile:

Email address (home or office):

Are you a regular listener of WJJF?

If you are, how often and on what days and times do you listen to WJJF?

How many hours per week do you estimate you listen to WJJF?

Approximately when did you start listening to WJJF?

Please describe in detail where you regularly listen to WJFF? (while driving in your car [list road or roads], driving from [list address] to [list address], at your home [list address], at your business [list address], etc.)

When did interference to your reception of WJFF first occur?

Where were you listening to WJFF when you first experienced the interference about which you complained to the FCC? (Please be as precise as possible, i.e., specific address or, if while driving, on what roads or streets, landmarks, etc.)

While listening to WJFF, do you have trouble just picking up the signal of WJFF or has the signal dropped out, or do you experience interference from another station to the WJFF signal or have you experienced both problems?

If there is interference from another station, can you identify which station is causing the interference and whether that station has identified itself by call sign or frequency?

Have you ever heard static or hissing, or experienced a signal drop out during your regular listening of WJFF without interference from another station? If so, please describe when that occurred.

If you have a problem with interference to WJFF, please state as precisely as possible at what location you are experiencing the interference.

What were the weather conditions when you experienced interference to WJFF?

What time or times of day do you listen to WJFF?

Have you experienced interference now or previously receiving any radio station, including WJFF? If so, when in the past have you previously experienced interference to your regular reception of WJFF or another radio station?

What kind of radio device (portable radio, car radio, home stereo unit, etc.) were you using when the interference to WJFF occurred?

Please identify the manufacturer, model and serial number for each radio device you were using when you received interference to WJFF.

What caused you to contact WJFF regarding interference to WJFF (WJFF website announcements, conversation with another person [if so please provide the name of that other person], conversation with WJFF owner or personnel [if so, please provide the name of that person], other)?

Who wrote your complaint? Were you presented with an already typed form, which you used to file your complaint? Was the form almost completed (but without your personal information) when you received it? When were you given the form to review and sign?

Did anyone assist you in completing your complaint? If so, who assisted you?

Did you complete the form complaint or did another person complete the form for you before you signed it?

Who dated the complaint?

Who, if not you, stated where you were when the interference you experienced to WJFF occurred?

Did you discuss your interference complaint with anyone before you signed it? If so, with whom did you discuss your complaint?

Did anyone attempt to persuade you with or recommend that you accept certain language in your complaint before you submitted it (to make your complaint clearer or stronger, to include certain better language, for any other reason)? Please explain your answer.

Do you now, or have you in the past, had any connection with WJJF or any of its affiliated stations such as WKKB, WBMB, WMRQ-FM, or WSKP, or with the owner of those stations, John Fuller, or with either an employee, advertiser or vendor, or person having any other connection, such as with a family member, relative, or friend, including social media of such people? If yes, please explain the connection that you have with that person or persons.

Do you have now, or have you in the past had any connection with any other radio station or media, either as or with an employee, advertiser, or vendor, or any other connection such as with a family member, relative or friend, including social media, of an individual involved in radio or media? If yes, please state the connection with that person or persons.

If you receive interference while driving to your workplace and/or receive interference at your employment location, please provide your employment location and the route you follow to drive to work.

Employment Location:

Name of Business:

Contact Information:

Please describe the interference to WJFF. Were you able to hear WJFF at all? What other stations were you able to hear?

Are you aware that W235CN is voluntarily reducing its broadcast power? Have you recently experienced any reduction in the interference received as the W235CN power has been reduced?

Would you meet with a representative of W235CN to address possible technical solutions to the problem described in your complaint?

If so, please state when, prior to March 3 that one of our engineers can speak with and visit with you so that you can recreate the interference conditions on your radio(s) on which you receive interference.

Have you expressly authorized Red Wolf Broadcasting and WJJF to use your interference complaint in a legal filing before the Federal Communications Commission?

Were you promised anything of value in return for submitting and signing your interference complaint?

Please state with whom, outside of your immediate family, you have communicated with regarding any WJJF interference concern you may have, and what you stated in those communications.

Please be aware that the FCC assumes that all persons making statements to the FCC shall not provide factual information that is incorrect or omit material information that is necessary to prevent any material factual statements that are made from being incorrect or misleading.

I hereby declare to the best of my knowledge, the complete truthfulness and accuracy of my above responses.

(Signature)

(Printed Name)

(Date)

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2018 ⓘ **by**
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EXHIBIT 2

Distance between:

WJUR 41 1 56. N Latitude, 71 58 32. W Longitude (Point 1)
As decimals: 41.0322222 Latitude, -71.9755556 Longitude

and

Glenn Sulmasy 41 55 11. N Latitude, 71 32 14. W Longitude (Point 2)
As decimals: 41.9197222 Latitude, -71.5372222 Longitude

Distance = 105.148 km (65.336 miles)

via the method in Sections 73.208 and 73.611(d)

This method is only suitable for distances up to 475 km (295 miles).

Azimuth, Point 1 to Point 2: 20.16 ° True

Azimuth, Point 2 to Point 1: 200.45° True

[Return to Data Input](#)

[Print Results](#)

To find the terminal coordinates given a bearing and a distance
use the [Terminal Coordinates](#) function.

EXHIBIT 3

Distance between:

WJF

41 1 56. N Latitude, 71 58 32. W Longitude (Point 1)

As decimals: 41.0322222 Latitude, -71.9755556 Longitude

and

Lima Family

41 52 18. N Latitude, 71 25 4. W Longitude (Point 2)

As decimals: 41.8716667 Latitude, -71.4177778 Longitude

Distance = 104.231 km (64.766 miles)

via the method in Sections 73.208 and 73.611(d)

This method is only suitable for distances up to 475 km (295 miles).

Azimuth, Point 1 to Point 2: 26.29 ° True

Azimuth, Point 2 to Point 1: 206.66° True

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To find the terminal coordinates given a bearing and a distance
use the [Terminal Coordinates](#) function.

EXHIBIT 4

Distance between:

WJFF

41 1 56. N Latitude, 71 58 32. W Longitude (Point 1)

As decimals: 41.0322222 Latitude, -71.9755556 Longitude

and

Thomas Carroll

41 52 53. N Latitude, 71 27 19. W Longitude (Point 2)

As decimals: 41.8813889 Latitude, -71.4552778 Longitude

Distance = 103.846 km (64.527 miles)

via the method in Sections 73.208 and 73.611(d)

This method is only suitable for distances up to 475 km (295 miles).

Azimuth, Point 1 to Point 2: 24.49 ° True

Azimuth, Point 2 to Point 1: 204.84° True

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To find the terminal coordinates given a bearing and a distance
use the [Terminal Coordinates](#) function.

EXHIBIT 5

Distance between:

VJJP

41 1 56. N Latitude, 71 58 32. W Longitude (Point 1)

As decimals: 41.0322222 Latitude, -71.9755556 Longitude

and

M, Kayla
Labbe

41 49 14. N Latitude, 71 32 49. W Longitude (Point 2)

As decimals: 41.8205556 Latitude, -71.5469444 Longitude

Distance = 94.600 km (58.782 miles)

via the method in Sections 73.208 and 73.611(d)

This method is only suitable for distances up to 475 km (295 miles).

Azimuth, Point 1 to Point 2: 22.04 ° True

Azimuth, Point 2 to Point 1: 202.32° True

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To find the terminal coordinates given a bearing and a distance
use the [Terminal Coordinates](#) function.

EXHIBIT 6

Distance between:

WJR

41 1 56. N Latitude, 71 58 32. W Longitude (Point 1)

As decimals: 41.0322222 Latitude, -71.9755556 Longitude

and

David
Hassberg

41 45 34. N Latitude, 71 24 51. W Longitude (Point 2)

As decimals: 41.7594444 Latitude, -71.4141667 Longitude

Distance = 93.420 km (58.049 miles)

via the method in Sections 73.208 and 73.611(d)

This method is only suitable for distances up to 475 km (295 miles).

Azimuth, Point 1 to Point 2: 29.89 ° True

Azimuth, Point 2 to Point 1: 210.26° True

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To find the terminal coordinates given a bearing and a distance
use the [Terminal Coordinates](#) function.

EXHIBIT 7

Distance between:

WJJP

41 1 56. N Latitude, 71 58 32. W Longitude (Point 1)

As decimals: 41.0322222 Latitude, -71.9755556 Longitude

and

John Botello, Jr.

41 41 40. N Latitude, 71 30 49. W Longitude (Point 2)

As decimals: 41.6944444 Latitude, -71.5136111 Longitude

Distance = 83.084 km (51.626 miles)

via the method in Sections 73.208 and 73.611(d)

This method is only suitable for distances up to 475 km (295 miles).

Azimuth, Point 1 to Point 2: 27.48 ° True

Azimuth, Point 2 to Point 1: 207.79° True

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[Print Results](#)

To find the terminal coordinates given a bearing and a distance
use the [Terminal Coordinates](#) function.

EXHIBIT 8

Distance between:

41 1 56. N Latitude, 71 58 32. W Longitude (Point 1)

As decimals: 41.0322222 Latitude, -71.9755556 Longitude

and

41 43 44. N Latitude, 71 44 50. W Longitude (Point 2)

As decimals: 41.7288889 Latitude, -71.7472222 Longitude

Distance = 79.694 km (49.520 miles)

via the method in Sections 73.208 and 73.611(d)

This method is only suitable for distances up to 475 km (295 miles).

Azimuth, Point 1 to Point 2: 13.74 ° True

Azimuth, Point 2 to Point 1: 193.89° True

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[Print Results](#)

To find the terminal coordinates given a bearing and a distance
use the [Terminal Coordinates](#) function.

EXHIBIT 9

QUESTIONNAIRE FOR INTERFERENCE COMPLAINANT

1. Name: Bonan Lacey
2. Address: 67 Stanton Ln, Mystic, CT. 06355
3. Telephone Number: Home: please contact using mailing address
Mobile: same as above
4. E-mail Address: Same as above
Preferred: _____
(Home or Office) _____
5. Do you have an Employment, Business, Professional, Contractor, or Familial Relationship with Red Wolf Broadcasting Corp., WJFJ, or any other radio station owned directly or indirectly by Red Wolf Communications, Inc.? no
- if so, please Indicate relationship: _____
6. Are you a regular listener of WJFJ? yes
- if so, how many hours per week do you estimate you listen to that station? 10 hrs.
7. Approximately when did you start listening to WJFJ? 3 years ago
8. Where do you typically listen to WJFJ? (your car, someone else's car (your home), your office, etc.) car, home
9. Where were you listening to WJFJ when you experienced the interference about which you complained to the FCC? (Please be as precise as possible, i.e., In what town or city, on what roads or streets, landmarks [like The Safeway or the Museum, etc.]) Jamestown Bridge, Pell Bridge, Rte 138 Jamestown Intersection of Rte 138 & Rt. 1 in South Kingston near Hannah Also Rte. 102 Exeter & 95-102 intersection Robinson Rock & Tower
10. How long did the interference last? noticed interference problems since Nov 2017
interference has been consistently present
11. Has the Interference occurred on other occasions? yes If so, when? see answer to #10

12. What were the weather conditions when you experienced the interference?

All weather conditions

13. What time(s) of day do you listen to WJJF? Primarily 3 PM & after

14. What kind of receiving equipment were you using when the interference occurred?

car radio

15. Do you know the model and serial number of the equipment? If so, please provide:

no

16. Would you meet with a representative of W235CN to address possible technical solutions to the problem described in your complaint?

no

17. How did you come to submit your complaint to the FCC?

contacted 94.9 WJJF inquiring about reception problems

Who provided you with the complaint form?

John Fuller

Did anyone assist you in completing the form?

yes

If so, who?

John Fuller

Did you complete the form or did a third party complete the form before you signed it?

I completed the form

Who dated the form?

I dated it

Who, if not you, stated where you were when the Interference you experienced was present?

no one

Did you discuss your responses on the form with anyone. before you. signed it? If so, whom?

no

Were you instructed or did anyone try to persuade you to modify your responses before you signed and dated the complaint form?

no

18. You said get interference while you are driving to your work and listen interference in your employment location, to determinate your route please provide your employment location and supervisor phone number;

Employment Location: Middletown, RI

Supervisor Phone number: N/A

19. Please describe the Interference. Were you able to hear WJJF at all? What other stations could you hear if any? sounds like two strong signals on the same frequency w/ Sharon Signal dominating. no other stations

20. On February 10, 2018, W235CN voluntarily reduced power as authorized by the FCC. Since that reduction date, have you experience any interference as the W235CN power was reduced by 33% at locations you have noted in your complaint? yes

20. Are you aware that your declaration has been submitted to the FCC under penalty of perjury?


yes

Did you authorize Red Wolf Broadcasting to use your declaration in a legal proceeding before the Federal Communications Commission?

yes

Were you promised anything of value in return for your execution of the complaint and your grant of permission to WJJF to use the complaint in a filing at the FCC? no

I hereby declare that the above responses are true to the best of my knowledge

Signed 

Printed Name Rohan Lacey