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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In re)
)
Edgewater Broadcasting, Inc.)
Licensee of FM Translator)
W256CL)
Park Forest, IL)

File No. BPFT-20171229ABE

ACCEPTED/FILED

FEB - 8 2018

To: Office of the Secretary
Attn.: Chief, Media Bureau

Federal Communications Commission
Office of the Secretary

OPPOSITION TO INFORMAL OBJECTION

Edgewater Broadcasting, Inc. (“EBI”), by its attorneys, submits its Opposition to the January 19, 2018 Informal Objection (“Objection”) filed by Sound of Hope Radio NFP (“SOH”).

SOH objects to the pending EBI modification application, BPFT-20171229ABE. SOH contends that EBI has engaged in a pattern of successive modification applications with the ultimate goal of providing service in the heart of Chicago. In a footnote, SOH states its real reason for its Objection. Specifically, it states, “In addition, SOH’s ability to relocate its facilities is directly impacted by the instant application.” *See* SOH Objection at footnote 1. *See also* Objection at pages 3 and 4. It is interesting to note that SOH states the following on the last page of the Objection:

“The public interest will be well served by denial of the EBI modification, enabling SOH to submit a modification to move closer to the Chinese community of Chicago.”

It is clear that SOH is seeking to achieve exactly what it is objecting to relative to the EBI application. EBI is not aware that a valid basis for an objection is that a grant would have an

impact on a licensee's future plans. Clearly, such an argument is predicated on total speculation. If this were the standard utilized, any competitor would be able to object and thwart modification applications to garner a competitive advantage. This, of course, could not be countered by the Commission. Furthermore, SOH does not even attempt to explain how the instant modification would impact it.

SOH argues that EBI has been guilty of "serial hopping." In support, it attaches to its submission a printout from the Commission's CDBS database.¹ That printout presents a series of applications commencing in 2013. However, as will be demonstrated, this application listing is disingenuous to say the least.

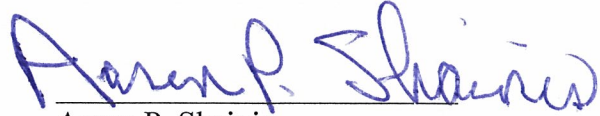
The application bearing File No. BMPFT-20150209AFF was the original facility which was built. A license to cover was filed and granted. *See* BLFT-20160127AFF. A modification application was filed in 2017 which was granted by the Commission. *See* BMPFT-20170414AAB. A license to cover was filed and granted. *See* BLFT-20170717ACV. Finally, a modification was filed and granted. *See* BPFT-20170718ACW. That modification was built and a license to cover was filed and granted. *See* BLFT-20170825ABG.

It is clear that since the original facility was licensed in January of 2016, there have been two modifications. Each of these modifications were built and overlapped the prior licensed facility. Thus, it is submitted that the modifications were all implemented consistent with the Commission's rules and policies. The current modification, which was filed in December of 2017, was filed four (4) months after the current license application was filed.

¹ *See* Exhibit B to SOH's submission.

It is submitted that SOH's Informal Objection should be summarily denied and EBI's modification should be granted.

Respectfully submitted,



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February 8, 2018

CERTIFICATE OF SERVICE

I, Malinda Markland, hereby certify that I have sent, this 8th day of February, 2018, copies of the foregoing OPPOSITION TO INFORMAL OBJECTION to the following:

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