



**Federal Communications Commission
Washington, D.C. 20554**

February 15, 2019

In Reply Refer to: 1800B3-KV

Bloomberg Radio Newburyport, LLC
c/o David A. O'Connor, Esq.
Wilkinson Barker Knauer, LLP
1880 M Street, NW
Suite 800N
Washington, DC 20036

Blount Communications, Inc. of NH
c/o Joseph C. Chautin, III, Esq.
Hardy, Carey, Chautin & Balkin, LLP
1080 West Causeway Approach
Mandeville, LA 70471

In re: W221EE, Newburyport, MA
File No. BLFT-20181009BPF
Facility ID No. 201495

Petition to Deny – Response Required

Counsel:

We have before us: 1) the referenced application filed on October 9, 2018, by Bloomberg Radio Newburyport, LLC (Bloomberg) for FM Translator Station W221EE, Newburyport, Massachusetts for a license to cover (License Application) a construction permit (Permit)¹ to operate on Channel 221; and 2) a "Petition to Deny" (Petition) the License Application filed on October 12, 2018, by Blount Communications, Inc. of NH (Blount) licensee of WDER-FM, Peterborough, New Hampshire. As detailed below, we will treat the Petition as an Informal Objection and require Bloomberg to respond to it.²

Background. On March 14, 2018, Bloomberg filed an application to construct a new FM

¹ See File No. BNPFT-20180314ABL.

² Also before us are the following: 1) an "Opposition to Petition to Deny" (Opposition) filed on October 25, 2018, by Bloomberg; 2) a "Supplement to Petition to Deny" (Supplement) filed on October 25, 2018, by Blount; 3) a "Reply" (Reply) filed October 29, 2018, by Blount; 4) a second "Reply" (Corrected Reply) (including a missing attachment) filed October 29, 2018, by Blount; and 5) an unopposed "Motion for Leave to File Surreply" filed on November 9, 2018, by Bloomberg and 6) a "Surreply" (Surreply), filed on November 9, 2018, by Bloomberg.

Translator Station on Channel 221 Newburyport, Massachusetts. On March 15, 2018, the Media Bureau (Bureau) accepted the permit application for filing;³ Blount did not oppose the application. On April 11, 2018, the Bureau granted the application and issued the Permit.⁴ On October 9, 2018, Bloomberg filed the License Application covering the Permit.

On October 12, 2018, Blount filed the Petition, arguing that the License Application should be denied because the Station's operations are causing actual interference to WDER-FM. Blount reports that on October 11, 2018, it began to receive listener complaints of interference. In support, Blount attaches signed declarations from seven WDER-FM listeners, dated October 11 -12, 2018, each listing their names and contact addresses, and reporting interference in their homes and/or while driving.⁵

On October 25, 2018, Bloomberg responded that the Petition is procedurally defective because: 1) petitions to deny license applications are not allowed under the Commission's rules; 2) it failed to demonstrate that Blount is a party-in-interest; and 3) it is unsupported by an affidavit from an individual with personal knowledge of the facts alleged therein.

Alternatively, Bloomberg argues that the Petition should be considered an informal objection which would afford Bloomberg "the time needed to study and, if necessary resolve any alleged interference issues"⁶ It notes that its informal efforts to work together were rebuffed by Blount and that it has hired an engineer to determine the source of the listeners alleged inference. Bloomberg speculates that the interference may be caused by pirate operators or by the possible testing of Blount's recent permit for a new FM Translator in Derry.⁷

Regarding the listener complainants, Bloomberg states that it is in "the process of engaging with the WDER listeners listed in the Petition . . ." but these efforts have been delayed by the listener complainants' failure to include email addresses or telephone numbers and to provide sufficient "location information to allow replication of the driving route on which certain interference allegedly occurred."⁸ It claims that similar circumstances the Bureau found "that in the absence of more specific information, such complainants are not deemed bona fide complaints"⁹ Bloomberg reports sending letters to three listeners, Burbank, Kossuth and Taylor, who "provided at least one location with sufficient information to begin assessing the alleged interference"¹⁰ and pledged to "work to the extent possible with these the FX complainants . . . to resolve any interference issues . . ."¹¹

On October 25, 2018, Blount filed a Supplement attaching signed declarations from 105 WDER-FM listeners, dated October 12 - 24, 2018, each listing their names and contact addresses, and reporting

³ See "Broadcast Applications Accepted for Filing" Report No. 29193 (dated Mar. 15, 2018).

⁴ See "Broadcast Actions," Report No. 49215 (dated Apr. 16, 2018).

⁵ See Declarations 1-7, Petition. Collectively, these listeners will be referred to as the "Original Complainants" and are listed individually in the Appendix.

⁶ Opposition at 3.

⁷ Bloomberg notes that Blount "has obtained a construction permit for a new FM translator facility in Derry, New Hampshire ('W221EM') which authorizes co-channel operations on 92.1 with WDER and the Station. Bloomberg is unaware of whether Blount has commenced tests or other tests of W221EM on 92.1 mhz which may be causing interference to WDER's co-channel operations." *Id.* at 6.

⁸ *Id.*

⁹ *Id.* (citing "Letter from James D. Bradshaw, Deputy Chief, Audio Division, Media Bureau to Arohi Media, LLC, regarding W252DK, Durham, NC" (dated Feb. 24, 2017) (*Arohi*)).

¹⁰ *Id.* at note 9.

¹¹ *Id.* at 4.

interference in their homes and/or work, and driving.¹² All but one of the declarations were from new listener complainants.¹³

In its October 29, 2018, Reply, Blount reiterated that the Station must cease operations because it is causing actual interference to WDER-FM. Regarding the procedural arguments against the Petition, Blount declares “[w]hether considered a petition to deny, an informal objection or an interference complaint, the facts are clear. . . . reception of WDER-FM’s regularly used signal is directly and severely impaired by the Translator’s operation.”¹⁴ Blount reports that while it was unaware of the Permit until granted, it warned Bloomberg, in an April 27, 2018, letter, that if constructed the Station would cause harmful interference, but “Bloomberg chose to construct the Translator and never contacted Blount until after it commenced translator operations.”¹⁵ Therefore, it asserts, “Bloomberg had more than 5 months to hire an engineering consultant before going on the air and causing actual interference”¹⁶ Blount opines that “though signed declarations are continuing to arrive, Blount has already provided the Commission with 112 declarations from *bona fide* listeners averring that WDER-FM’s signal is being impaired by . . . the Translator.”¹⁷ Regarding the allegations that the listener declarations lacked sufficient information, Blount asserts that the listeners provided all information required by the Commission; Blount notes “[a]ll of the declarations include the declarant’s home address and at least 45 specifically state that they . . . receive interference at their homes.”¹⁸

On November 9, 2018, Bloomberg responded that the Supplement and Reply are procedurally deficient because: 1) such filings do not lie against License Applications; and 2) they lack a declaration signed under penalty of perjury and fail to allege standing. Substantively, Bloomberg asserts that Blount’s *April 2018 Letter* is irrelevant because it predates the License Application. Moreover, Bloomberg notes that it “took into consideration the concerns expressed by Blount in its letter . . . in preparing and filing the engineering aspects of the construction permit application. That application was placed on public notice . . . and Blount did not object to it.”¹⁹ Bloomberg further declares that “many” complainants are not *bona fide* because they “have provided [only] general references to interference experienced in large geographic areas such as towns and cities, or in . . . driving on certain roads and highways” Bloomberg reports that it “will continue its good faith efforts to address the other interference complaints submitted by Blount to determine whether any of them contain sufficient specificity with which to access the interference, and to reach out to any such complainants to determine whether any remediation is appropriate.”²⁰ With respect to the three Original Complainants it contacted (Burbank, Kossuth and Taylor), it reports receiving a reply from Taylor who “indicated that she is not willing to work with Bloomberg to identify and resolve any interference she is receiving.”²¹

Discussion. The Petition. As an initial matter, neither the Communications Act of 1934, as amended (the Act), nor the Commission’s Rules (Rules) provides for the filing of a petition to deny a

¹² See Declarations, 1-105, Supplement. Collectively, except for Huber, these listeners will be referred to as the “Supplemental Complainants” and are listed individually in the Appendix.

¹³ Huber filed declarations in the Petition and in the Supplement. See Petition at 7; and Supplement at 56.

¹⁴ Corrected Reply at 2.

¹⁵ *Id.* at 1, and “Letter to Mr. Tom Gold, Bloomberg Radio Newburyport, LLC from Mark A. Balkin, Esq.” (dated Apr. 27, 2018), Attachment, *Id.* (*April 2018 Letter*).

¹⁶ *Id.* at 3.

¹⁷ *Id.* at 2. .

¹⁸ *Id.* at 3.

¹⁹ *Id.*

²⁰ *Id.* at 5.

²¹ *Id.* at 4. (citing Exh. A, “Response of Joanna Taylor” (dated Oct. 24, 2018), *Id.*).

license application.²² Therefore, we will treat the Petition as an informal objection under Section 73.3587 of the Rules.²³ Informal objections, like petitions to deny, must allege properly supported facts that, if true, would establish a substantial and material question of fact that grant of the application would be inconsistent with the public interest.²⁴

Blount alleges that Translator Station W221EE's operations are causing actual interference to WDER-FM listeners. The Rules regarding FM translators restrict FM translator stations to operate strictly on a secondary basis and limit their service. Section 74.1203(a)(3)²⁵ of the Rules states that an FM translator station will not be permitted to continue to operate if it causes any actual radio signal interference to the direct reception by the public of the off-the-air signals of any authorized broadcast station.²⁶

Actual interference is based on a complaint from one or more listeners indicating that the signal they regularly receive is being impaired by the signal radiated by the FM translator station. In particular, "the staff has routinely required a listener complainant to include the listener's name, address, location(s) at which FM translator interference occurs, and a statement that the complainant is, in fact, a listener of the affected station."²⁷

Bloomberg argues, citing *Arohi*, that an unspecified number of the listener complaints are not *bona fide* because they lack "specificity regarding interference location" ²⁸ In *Arohi*, the permittee experienced difficulty, due to a myriad of reasons, contacting certain listener complaints to address their complaints.²⁹ The Bureau stated that "in these instances [the listeners] . . . may amend the declarations to provide more specific information so *Arohi* is able to contact the complainant to investigate and respond to the interference complaint. Without specific information, we will be unable to deem such complaints as bona fide complaints."³⁰

Here, Bloomberg does not allege that it is unable to contact listener complainants. Indeed, all listeners have provided sufficient information, including names and postal addresses, for Bloomberg to contact them to investigate their complaints. Bloomberg also appears to misunderstand the investigation process. With respect to the Original Complainants, it declares "each . . . includes insufficient location information to allow replication of the driving route on which certain of the interference allegedly occurred."³¹ Replication of the listener's route in Bloomberg's vehicle, however, is not addressing the

²² See 47 U.S.C. § 309(c); 47 C.F.R. §§ 73.3580(a)(3), 73.3584(a). See also, e.g., *Clear Channel Broadcasting Licenses, Inc.*, Letter, 21 FCC Rcd 8677 note 1 (MB 2006).

²³ *Id.* § 73.3587.

²⁴ See, e.g., *WWOR-TV, Inc.*, Memorandum Opinion and Order, 6 FCC Rcd 193, 197 n.10 (1990).

²⁵ 47 CFR § 74.1203(a)(3).

²⁶ An FM translator station creating actual radio signal interference to any authorized broadcast station is obligated to eliminate the interference, regardless of the location where the impaired signal reception occurs.

²⁷ *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Notice of Proposed Rulemaking, FCC 18-60, at para. 7 (2018) (citing *Creation of an LPFM Service*, Fifth Order on Reconsideration and Sixth Report and Order, 27 FCC Rcd 15402, 15431-31 para. 83 (2012)).

²⁸ Surreply at 3.

²⁹ In particular, *Arohi* stated, "in many instances either the location is not specific enough; the complainant was not available at the location listed on the complaint; or the information provided was incomplete or not readable, making it impossible to contact the complainant. *Arohi* at 1. (footnotes omitted).

³⁰ *Id.* at 1. (emphasis added).

³¹ Opposition at 3.

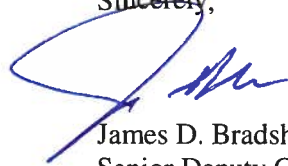
listener's complaint. Rather the issue is the interference that the listeners experience in *their* vehicle along said route(s).

Bloomberg, therefore, is required to address all listener complaints (Original Complainants and Supplemental Complaints) except for listener Taylor who declined to cooperate in the investigation.³² It is necessary for Bloomberg to submit a detailed report (Interference Response) on each listener complaint, even if an individual listener has previously filed a complaint in a different interference proceeding that it has addressed. For each of the actionable listener complaints, the Interference Response must 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 the Station for each device allegedly receiving the interference and whether such interference persists. Each of the listener complaints must be addressed individually.

Conclusion. Based on the above, IT IS ORDERED, that the Petition to Deny filed by Blount Communications, Inc. of NH Inc on October 12, 2018, will be treated herein as an Informal Objection.

IT IS FURTHER ORDERED that within thirty days of this letter, Bloomberg must take appropriate actions required by the provisions of 47 CFR § 74.1203 to resolve all referenced complaints to fulfill its obligations and submit its Interference Response.³³ Further action on the Complaint will be withheld for a period of thirty days from the date of this letter to provide Bloomberg an opportunity to respond. Failure to correct all complaints within this time may require Station W221EE to suspend operation pursuant to Section 74.1203 of the Rules.³⁴

Sincerely,



James D. Bradshaw
Senior Deputy Chief
Audio Division
Media Bureau

³² See *supra* note 21. See, also *e.g.*, *Jay Ayer and Dan J. Alpert*, Letter Order, 23 FCC Rcd 1879, 1883 (MB 2008) (requiring complainants to cooperate fully with the station's efforts to resolve interference and cautioning that the failure to do so could lead to a finding that the station has fulfilled its interference remediation obligations).

³³ Bloomberg should also send a courtesy via email to Kim Varner at kim.varner@fcc.gov and James Bradshaw at james.bradshaw@fcc.gov. Additionally, the obligation to resolve interference complaints is ongoing. Specifically, should any complaints be filed in the future, Licensee must resolve or address those complaints within 30 days of receipt.

³⁴ 47 CFR § 74.1203.

APPENDIX

Original Complainants

- Allan Burbank (Burbank) experienced interference in his home (Nashua, NH) and driving “to work – Nashua, Merrimack, Hoolseff, Concord”;
- Christine Kossuth (Kossuth) experienced interference in her home (Nashua, NH) and driving “to/from my home . . .[and] Lawrence, MA”;
- Lisa Huber (Huber) experienced interference driving “from home to work, which is in Tewksbury, MA”;
- Joanna Taylor (Taylor) experienced interference in her home (Derry, NH) and driving in “Nashua, Derry, Plaistow, Milford & Atkinson”;
- Alan Ringuette (Ringuette) experienced interference driving “Route 2, Route 3 and 93”;
- Rebecca Inselman (Inselman) experienced interference driving in “Nashua, Londonderry, and Manchester”;
- Chris Arnolds (Arnolds) experienced interference driving “to and from Amherst, NH to River Rd., Andover, MA.”

Supplemental Complainants

- Gregory Afarian experienced interference in his” home ([North Andover, MA] , work and car”;
- Genevieve Al-Egaily experienced interference in her home (E. Hampstead, NH) and driving “to & from work Hampstead to Concord, NH”;
- Jeannie M. Amber experienced interference driving “from home to work on the Route 95 corridor . . . from home along Route 3 to the Route 95 entrance . . .”;
- Eileen Anderson experienced interference in her home (Litchfield, MA) and driving “to and from work in Manchester, NH”;
- Babette Antegnoli experienced interference in her home (Lowell, MA) and driving “to work and other travel – all around Middlesex County”;
- Peter Antegnoli experienced interference driving “Lowell, MA to Salem, NH while traveling to and from home to 167 S. Broadway Salem, NH”;
- Michael J. Arbore experienced interference driving “Derry, Londonderry, Hudson & Nashua, NH, around home (Londonderry, NH) and to/from work in Nashua, NH”;
- Gloria Armstrong experienced interference driving “Salem Wyndham Rt. 28 . . .”;
- Paula L. Baker experienced interference in her home (Derry, NH) and driving “to and from Dracht, MA [and . . . from Methuen, MA to Salem and Derry, NH”;
- Diane M. Barletta experienced interference driving from home [Gordon, MA] to church (17 Main St., Pepperell, MA) and to my son’s home (13 Intervale St. Nashua, NH”;
- Helene Baum experienced interference in her “home [Merrimack, MA] and car”;
- Deborah Beaubien experienced interference in driving “Pepperell, Townsend, Littleton, Acton, Waltham, (all MA), Hollis, Nashua, Manchester (all NH);
- Randolph K. Beltz experienced interference driving “to work . . . 56 miles from Peterborough, NH to Bedford, MA. [on] . . . 31S/RT 101/ RT 101A/RT 3”;
- Randy Bestwick experienced interference driving “from Chester, NH to almost Lowell, Mass on Rt 93 where I lose the signal”;
- Randy Brashears experienced interference “driving around town [Nashua, NH]”;
- Joanne Brennan experienced interference in her “home [Fitchburg, MA] and commuting in my car” ;
- Peter Brousseau experienced interference in his “work van around Southern New Hampshire (Merrimack)”;
- Rosalie Brown experienced interference driving around “Dunstable & /Nashua . . .”;

- Todd W. Buck experienced interference “driving from Derry, NH to work – Andover, MA”;
- Paul Capozzi experienced interference driving “to and from work”;
- Michelle Carter experienced interference in her home (Nashua, NH) at work at (18 Tanguay Ave. Nashua, NH) and driving “around [unspecified locations in] NH and MA”;
- Richard Cascio experienced interference in his home (Nashua, NH) and driving “to and from Nashua, NH”;
- Scott Childs experienced interference in his home (Brookline, NH) and unspecified driving locations;
- John Colangelo experienced interference in his home (Bedford, NH), at work (Nashua, NH) and driving “between locations”;
- Paul Conway experienced interference in his home (Francestown, NH) and driving around “Francestown, NH, Manchester, NH, New Boston, NH, Derry, NH, [and] Londonderry, NH. . .”;
- Deborah J. Cote experienced interference in her home (Nashua, NH) and driving “to and from work also when traveling around shopping”;
- Steven Count experienced interference experienced interference in his home (Nashua, NH) and driving around driving “to work (Nashua to Manchester, NH”;
- Mark Croteau experienced interference in his home (Groton, NH) and driving “to work – Rt 3 thru Lowell, Chelmsford, Billerica”;
- Kerry Crouse experienced interference driving “to and from work (The MITRE Corporation, 202 Burlington Rd., Bedford, MA 01730) and travel to and from my church (International Family Church, 99 Concord Street North Reading, Massachusetts 01864)”;
- Elizabeth Cryan experienced interference driving “between Pelham/Derry & Bedford, NH”;
- Isaac Cryan experienced interference in his home (Pepperell, MA) and driving “for work within [a] 20 mile radius of home”;
- Robert Davidson experienced interference in his home (Ayer, MA) and driving “to Littleton, MA and from Lowell, MA”;
- Deborah A. Dolbec experienced interference in her home (Nashua, NH) and at “36 Allds St. Nashua, NH”;
- Steven Dolbec experienced interference in his home (Nashua, NH) and at work (9 Akisa Way, Londonderry, NH”;
- Sue Domas experienced interference driving “wherever and whenever I drive (in my car)”;
- John Duffett experienced interference driving “in my car in Westerford, Chelmsford and Southern, NH”;
- Marilyn DuPont experienced interference in her home (Hollis, NH) and driving “to Nashua, NH”;
- Paul Ericson experienced interference in driving “from Lunenburg, MA 01462 to my work in Westford, MA 01886”;
- David Farrell experienced interference driving around “Lunenburg, MA Townsend, MA, Pepperell, MA, Nashua, NH as I travel from home to work”;
- Ross S. Farrow experienced interference driving “ from home (Peterborough, NH) and work in /Bedford, MA”;
- Michael Finn experienced interference driving around “Nashua – work – 95 Canal St. Nashua, NH”;
- Nancy Fortes experienced interference in her home (Lowell, MA) and driving “around Lowell, MA running errands”;
- Glenn Forward experienced interference driving around “Ayer, Groton, Dunstable, Tyngsboro, Mass. and Nashua, NH [and] my drive to and from work”;
- Cheryl V. Garnes experienced interference driving “throughout Massachusetts. Home- Lowell, Work- Andover, Church-Cambridge”;
- John P. Glennon experienced interference in his home (Manchester, NH) ;
- Adolfo A. Gomez experienced interference driving “from Manchester to Beverly, MA”;

- David B. Grant, Jr. experienced interference driving around “Nashua . . . to work [St. Joseph Hospital 172 Kinsley St. Nashua, NH] and errands. . . .”;
- Erika Grant experienced interference driving “to work . . . through towns of Berlin, Hudson, Marlboro, MA”;
- Ricardo Hamlett, Jr. experienced interference driving “to and from work and almost everywhere”;
- Cheryl Hammar experienced interference driving around “Littleton, Concord, Westford, Chelmsford, Lowell, Burlington (or heading that way) . . .”;
- Dianne Heath experienced interference driving “to and from work , Nashua to Merrimack (never had issues before) and traveling towards Derry”;
- Scott E. Henriques experienced interference driving “in southern New Hampshire and Northeastern, Massachusetts”;
- Huber [one of the Original Complainants] experienced interference driving “to Tewksbury from Lancaster and the reverse”;
- Ginger Hughes experienced interference in her home (Peterborough, NH) and driving “through Nashua, Londonderry, Derry”;
- Joanne Johansen experienced interference driving “in Marlborough, MA to my work location Lowell, MA”;
- Donna Kectic experienced interference in her home (Hudson, NH) and driving “to church at Spit Brook Road in Nashua”;
- Janice Kendall experienced interference in her home (Townsend, MA) and driving “to work;” Ayer/Groton/Littleton/Acton/Concord/Lexington, MA”;
- Rob Keplin experienced interference driving “to work which is along 119 and 225 to Westford, MA”;
- Andrew Kuusisto experienced interference driving “from Greenville, NH to Billerica, MA”;
- Susan Lanen experienced interference driving “to and from Hudson, Berlin, Sudbury, Concord, Carlisle, Bedford, Westford, and Littleton”;
- Michelle Laveane experienced interference driving “Nashua, NH & Merrimack, NH to and from work”;
- Kenneth Locke experienced interference driving “to from Exit 4 [Rt 93] in New Hampshire all the way into Boston”;
- John Lord experienced interference in his home (Nashua, NH) and driving “to work in E. Billerica, MA”;
- Robert E. Lozeau experienced interference in his home (Nashua, NH) and driving “around Nashua, NH, and to work from Nashua to Concord, NH”;
- Catherine Manca experienced interference driving “from Baldwinville, MA to North Grafton, MA”;
- Lyn Marcello experienced interference in her home (Methuen, MA) and “as I drive”;
- Kathi Marino experienced interference in her home (Nashua, NH) and driving to “work (124 State Rd, 101A, Amherst, NH, and . . . from[her home] to 310 Daniel Webster, Pleasant Lane Mall/Costco”;
- Mark Markarian experienced interference driving around “Nashua, Hudson, Pelham, NH, Deacut, Lowell, Chelmsford, MA (work)”;
- Liza Martone experienced interference driving “from Nashua to Salem, NH, Nashua to Chelmsford, MA”;
- Daniel McCarthy experienced interference driving “to and from Lowell, Wilmington and Tewksbury”;
- Maureen McInerney experienced interference in her home (Lowell, MA) and driving “to and from work and on business trips”;
- Blair L. McKee experienced interference in his home (Littleton, MA), work (Rex Lumber Co., 840 Main St. Acton, MA) and driving “to work & around the area”;

- Diana McKee experienced interference in her home (Littleton, MA) and driving “to and from work (1 Peralnal St. Maynard, MA) [and] other commute times around town”;
- William A. Merola experienced interference in his home (Wilmington, MA) and driving around “Wilmington . . . Billerica, Tewksbury . . .”;
- Glenn T. Miller experienced interference driving “from Groton, MA to Cambridge, MA”;
- Joseph Msaddi experienced interference in his home (Pelham, NH) and driving “to work (in Devens, MA);”
- Sheila A. Mullins experienced interference driving “Rt 495 from Tewksbury to Westminster . . . [and] Salisbury, MA”;
- Stephen Mungai (Mungai) experienced interference driving around “Lowell, Billerica, Tewksbury, Andover, Lawrence and Chelmsford”;
- Chris Oliverio experienced interference driving around “Derry, Salem, Windham, Londonderry, Hudson, Nashua on my way to work at 65 Spit Brook Road, Nashua, NH03062. . .”
- Kevin C. Parsons experienced interference driving “to and from 220 Daniel Webster Highway, Merrimack, NH”;
- Jean Paul experienced interference in her home (Nashua, NH) and driving “to Andover, MA”;
- David Peever experienced interference driving “on highway #3 between Nashua and Lowell. . .”;
- Carla Smith Picariello experienced interference in her home (Littleton, MA) and driving “to & from work (76 Bedford St., Lexington)”;
- Bob Piper experienced interference in his home (Goppstown, NH) and driving from “home (Goppstown)/Manchester/Nashua [and] Portsmouth/ South & South Eastern, NH”;
- William Putnam experienced interference in his home (Plaistow, NH);
- Thomas Quattrociocchi experienced interference driving “to and from my church at 1195 Varnum Ave. in Lowell, MA . . . [and] around Lowell, and . . . down Route 93 into Boston”;
- Monica Racz experienced interference in her home (Clinton, MA) and car;
- David Rardin experienced interference driving “495 at Rt 93 to Rt 3 NH border . . . [and] Newbury to Nashua, NH”;
- Kevin Raymond experienced interference in his home (Haverhill, MA) and driving to and from “Hav[erhill] [to] No. Andover, Mass. My work . . .”;
- Charles Rose experienced interference in his home (Nashua, NH) and driving “from Nashua to/from Westford, MA”;
- David Ross experienced interference driving “up & down RT. 3 everyday”;
- Daniel Roussau experienced interference in his home (Peterborough, NH) and driving “in NH/MA . . . on Route 3 South . . . around Lowell/Burlington . . .”;
- Bruce Ruotsola experienced interference driving “to/from work New Ipswich, NH to Nashua, NH (via Townsend, MA & Hollis, NH”;
- Stephen Scardigno experienced interference in his home (Nashua, NH) and driving “to church . . . [and] Senior Ctr”;
- Mary Ann Schunemann experienced interference in her home (Hollis, NH) and driving “from my home to the Nashua/Hollis/Merrimack/Pepperell, MA areas”;
- Paula Skinner experienced interference in her home Nashua, NH), and driving “all over Nashua”;
- Michael H. Thibaudeau experienced interference driving “from my home in Jaffrey, Nh to my work at 60 Fitchburg Rd Ayer, MA 01432”;
- Steve Thomson experienced interference driving “to work from Athol, MA to Leominster, MA and beyond”;
- Pradeep Tilak experienced interference driving “from home [Shrewbury, MA] to work (Natick, MA”;
- Linda Wheeler experienced interference in her home (Berlin, MA) and car”;
- George Whitecraft, Jr. experienced interference in his home (Townsend, MA) and driving around “various areas . . . near my home, Townsend, MA, Lunenburg, MA, Fitchburg, MA”;

- Kristin Wilcoxson experienced interference in her home (Concord, MA) and driving “around my home [to] Harvard, Acton, Concord, Lexington & Littleton, Massachusetts”;
- Jeffrey A. Winslow experienced interference driving “in Jensens Trailer Park, Nashua”; and
- Steve Wolfe experienced interference driving “from Temple NH to North Reading, MA.”