

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In re Application of:)
)
CLEAR COMMUNICATIONS, INC.) FCC File No. BNPFT- 20180502ABQ
) FCC Facility ID No. 202064
)
)

Application for a New FM Translator on FM
Channel 293, 106.5 MHz, at Vineland, NJ

To: Office of the Secretary
Attn: The Chief, Audio Division, Media Bureau

SUPPLEMENT TO PETITION TO DENY

Press Communications, LLC (“Petitioner”), the licensee of WTHJ(FM), Bass River Township, New Jersey, pursuant to *Amendment of Part 74 of the Commission’s Rules Regarding FM Translator Interference, Report and Order*, FCC 19-440, released May 9, 2019 (the “FM Translator Interference Report and Order”), and the letter from James D. Bradshaw, Senior Deputy Chief, Audio Division, Media Bureau, dated September 9, 2019 to John F. Garziglia, Esq. (the “FCC Letter”), hereby submits this Supplement (this “Supplement”) to its May 23, 2018 Petition to Deny (the “Petition to Deny”).¹ This Supplement provides information specifically requested by the Commission in the FCC Letter regarding the new FM translator filed by Clear Communications, Inc. (the “Applicant”) on FM Channel 293, 106.5 MHz, at Vineland, New Jersey (FCC File No. BNPFT- 20180502ABQ / FCC Facility ID No. 202064) (the “Translator Application” or the “Application”). In response to the FCC Letter, the following is submitted:

¹ This Supplement is timely filed within the 30-day time period specified in the FCC Letter.

1. The FCC Letter stated that, under the revised interference standards adopted in the FM Translator Interference Report and Order, additional information supporting the May 23, 2018 Petition to Deny is required. Petitioner is hereby submitting such additional information.

2. Attached to this Supplement is the Engineering Statement of T Z Sawyer Technical Consultants (the “Engineering Statement”). That Engineering Statement depicts the WTHJ(FM) 60 dBμ protected contour and calculates that there are 174,813 persons encompassed within that 60 dBμ protected contour (2010 U.S. Census). Thus, in accord with Table 1 to Section 74.1203 of the Commission’s rules, the Minimum Number of Listener Complaints is six.

3. Attached to the Engineering Statement are 16 signed and dated Listener Complaints, each giving the Listener’s full name, address and phone number, a clear concise and accurate description of the location where interference is alleged, a statement that the Listener listens over-the-air to WTHJ(FM) at least twice a month, and a statement that the Listener has no legal, financial, employment, or familial affiliation or relationship with WTHJ(FM).

4. Accompanying each Listener Complaint are maps prepared by T Z Sawyer Technical Consultants plotting the specific locations of the alleged Listeners’ interference in relation to the WTHJ(FM) 45 dBμ contour, and a showing that at each specific stated location, the ratio of undesired-to-desired signal strength will exceed -20 dBμ for the co-adjacent channel relationship between WTHJ(FM) and the FM Translator.²

5. Also attached is a Declaration of Richard T. Morena, the Chief Financial Officer and Member of Press Communications, LLC, the licensee of WTHJ(FM). Mr. Morena states that he has management responsibility for the overall compliance of WTHJ(FM) operations with

² While the Listener Complaints reference an option for each listener to mark on an accompanying map the specific listening locations rather using words to describe such locations, none of the listeners took advantage of that option. Rather, the respective maps attached to each Listener Complaint showing the listening locations were prepared by T Z Sawyer Technical Consultants as described in the Engineering Statement.


legal and regulatory requirements, and that WTHJ(FM) is operating within its licensed parameters.

6. Finally, attached to this Supplement is a September 18, 2019 letter to the Applicant, directed through its counsel of record, Melodie Virtue, Esq., in which WTHJ(FM) uses commercially reasonable efforts to inform the FM translator applicant of the claimed interference and attempts a private resolution of such interference. As shown in the resulting email exchanges, it appears to be that the only resolution possible is one where the Translator Application is amended to specify a non-adjacent channel and is granted a construction permit for that non-adjacent channel.

7. Petitioner has fully complied with the FCC Letter's request for additional information to support the Petition to Deny. The Translator Application is unacceptable for filing pursuant to Section 74.1204(f) of the Commission's rules. The Application should either be dismissed as inadvertently accepted for filing, or denied.

Respectfully submitted,

PRESS COMMUNICATIONS, LLC

By  _____
John F. Garziglia
Its Attorney

Womble Bond Dickinson (US) LLP
1200 19th Street, N.W., Suite 500
Washington, DC 20036
(202) 857-4455

October 9, 2019

Engineering Statement of T Z Sawyer Technical Consultants

T Z SAWYER TECHNICAL CONSULTANTS

2130 HUTCHISON GROVE COURT
FALLS CHURCH, VIRGINIA 22043-5553
TEL. (703) 848-2130

ENGINEERING STATEMENT REGARDING PREDICTED INTERFERENCE TO FULL SERVICE STATION WTHJ (FM) CHANNEL 293A (106.5 MHZ) BAY RIVER TOWNSHIP, NJ

**FROM PROPOSED SECONDARY SERVICE
FM TRANSLATOR BNPFT-20180502ABQ
CHANNEL 293D (106.5 MHZ)
VINELAND, NJ**

OCTOBER 2019

Engineering Statement Narrative

This engineering statement and its associated exhibits, figures and tables have been prepared on behalf of PRESS COMMUNICATIONS, LLC, (PRESS) license of full-service FM Broadcast Station WTHJ, Bass River Township, New Jersey, FCC facility ID: 49984, in support of an objection to the application of CLEAR COMMUNICATIONS, INC., for a secondary service FM Translator at Vineland, New Jersey, FCC facility ID: 202064, FCC application file number: BNPFT-20180502ABQ.

CLEAR COMMUNICATIONS, INC., proposes in its application for a NEW FM Translator to construct and operate on Channel 293D, 106.5 MHZ with a power of 0.25 kW. The proposed facility is co-channel with the existing operation of WTHJ and will cause harmful and destructive radio frequency interference to the regularly received signal of WTHJ within the extended service area of WTHJ (i.e., the 45 dBu contour), as shown in Figure 1.

In support of its regular reception service and in particular to the area located beyond the predicted 60 dBu f(50,50) service contour of WTHJ, but within its 45 dBu extended service contour, PRESS submits SIXTEEN (16) LISTENER OBJECTIONS from persons whom regular listen to WTHJ at home, at work, or while traveling between those locations within the 45 dBu contour. All are located within the WTHJ's 45 dBu contour, as shown on the individual location maps associated with each objection.

In support of the submitted objections, the following map exhibits/figures and tables have been prepared by this office.

FIGURE 1 - Determination of Interference Area:

Figure 1 is a map showing the area of predicted interference from the proposed translator that has been created using a method previously established by the Commission in 47 CFR 73.525 to determine interference areas

between TV Channel 6 (analog) facilities and reserve band NCE FM Stations. Its use here to define the predicted interference area from the FM translator proposal is appropriate in a contour to contour interference study.

The distances to all contours of concern are calculated using the antenna height above average terrain and the effective radiated power in the pertinent directions and the F(50,10) or F(50,50) field strength curves as appropriate from each facility.

The predicted interference area is then defined as the area within the protected station's 45-dBu field strength contour that is bounded by the locus of intersections of a series of field strength contours and the applicable interference contours.

For co-channel stations, the dB ratio is 20 dB; thus, the 45-dBu f(50,50) desired service contour is matched with the 25 dBu f(50,10) undesired interference contour and so forth.

The area of interference, as shown in Figure 1, is substantial at 1,898.7 square kilometers and has a population of 306,025 persons within the area (based on the 2010 US Census).

Minimum Number of Listener Objections Required:

Figure 1 also shows the predicted 60 dBu service contour from WTHJ. The 60 dBu contour contains a population of 174,813 persons. Thus, establishing the minimum number of objections to the proposed translator required as SIX.

Method used to determine field strength values:

Tables 1 and 2 are the supporting data record tables; the location information was taken directly from the listener objection forms. The home addresses or office/work locations were then converted to geographical coordinates using the functions available in Google Maps.¹ All coordinates in the tables are in NAD83 datum.

Once the location's coordinates are known, use the various programs available on the Commission's website, to determine the distance and bearing to the point (the listener location) from each facility.² The height of the antenna above average terrain for the pertinent bearing can be found using the Commission's "Antenna Height Above Average Terrain (HAAT) Calculator."³ The ERP (power) of the facility (along with any directional pattern) can be found using the Commission's Mass Media engineering databases. And finally, once all of the

¹ Search for an address or the place you want to locate on Google Maps. Click on the exact location you'd like coordinates for, then Right-click on the pin and select "What's here?" A box will open on the map with the location's latitude and longitude (in decimal degrees using the NAD83 datum).

² Distance and Azimuths Between Two Sets of Coordinates, <https://www.fcc.gov/media/radio/distance-and-azimuths>

³ Antenna Height Above Average Terrain (HAAT) Calculator, <http://www.fcc.gov/meida/radio/hatt-calculator>

elements above are known, the predicted signal level can be calculated using the Commission's "FM and TV Propagation Curves."⁴

The predicted signal levels from the proposal have been calculated for all locations supported by listener declarations. The proposed translator DOES NOT meet the desired to undesired signal protection ratio of 20 dB for co-channel facilities with respect to WTHJ's signal as required by the Commission's rules at these locations.⁵

The listener objections and individual maps showing that each location is within the 45 dBu contour of WTHJ follow the tables. An index is provided to each person's objection/declaration and the individual location map.

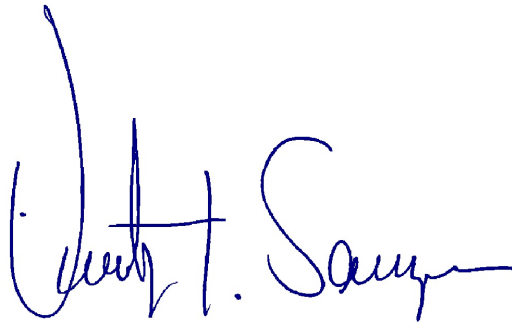
I, Timothy Z. Sawyer, have prepared the technical materials presented in this engineering statement or cause them to be prepared under my supervision and review. The statements presented herein are true and correct to the best of my knowledge and belief.

Respectfully submitted,

October 7, 2019

Timothy Z. Sawyer, Consulting Engineer

T Z Sawyer Technical Consultants
2130 Hutchison Grove Court, Suite 100
Falls Church, VA 22043
Telephone: (703) 848-2130 direct line
e Mail to: tzsawyer@tzsawyer.com



⁴ FM and TV Propagation Curves, <https://www.fcc.gov/media/radio/fm-and-tv-propagation-curves>

⁵ The protection - interference signal ratio between co-channel facilities is 20 dB, the desired station (WTHJ) signal must be 20 dB or greater than the undesired signal (FM Translator) or conversely, the undesired signal must be -20 dB or greater below the desired signal.

**FIGURE 1 - MAP OF PREDICTED INTERFERENCE AREA
WITHIN 45 DBU CONTOUR OF WTHJ BASS RIVER NJ**

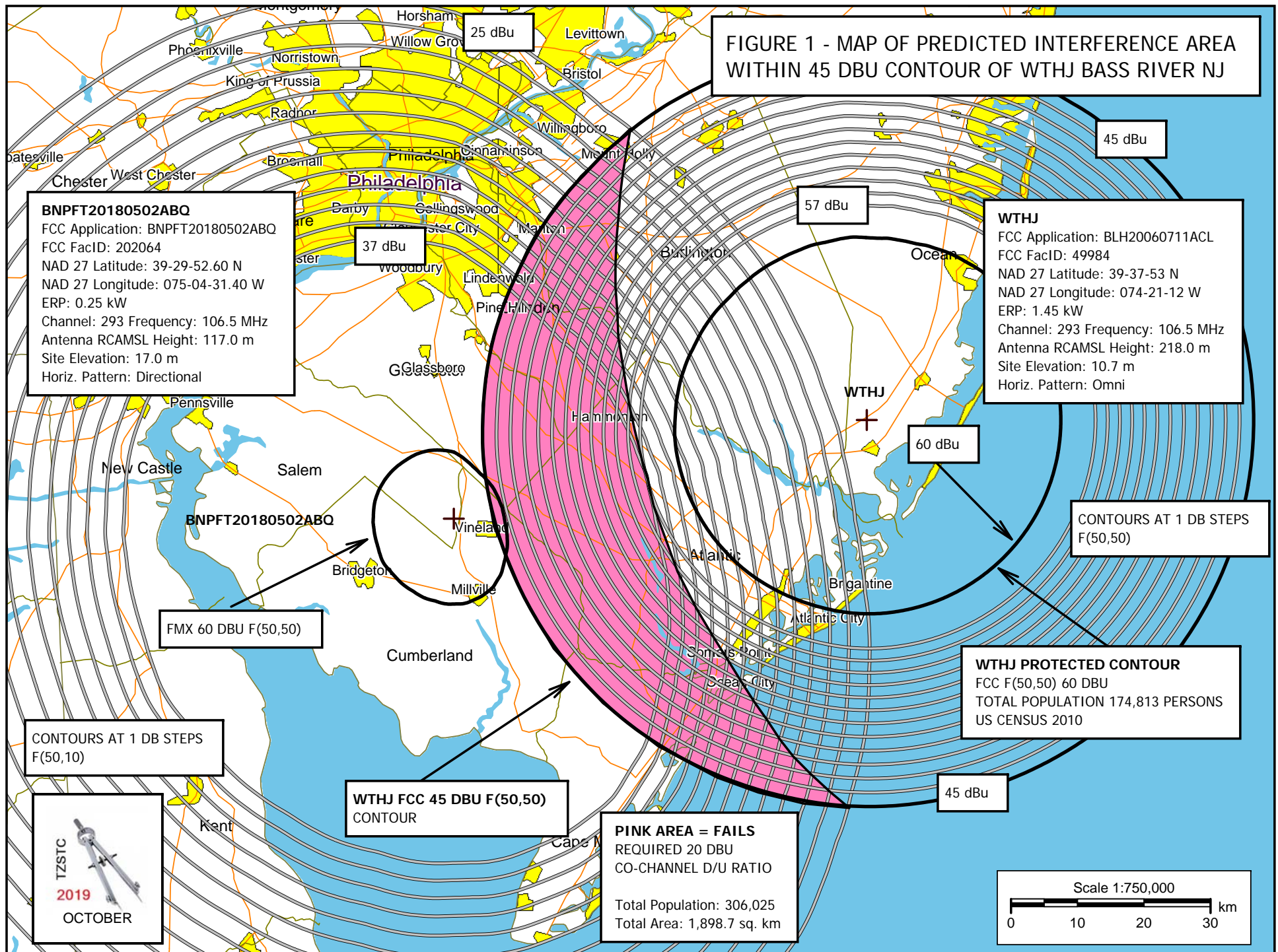


TABLE I - LOCATION DATA

LISTENER NUMBER	NAME		CONTACT PHONE	LOCATION	HOME OR WORK ADDRESS AS APPLICABLE						
	FIRST	LAST			NUMBER	STREET	CITY	ST	ZIP	GEOLOCATION NAD 83 *	
										LAT	LON
1	ARIANA	DIVENTURA	609-922-7439	HOME	12	ARCADIAN DRIVE	SICKLERVILLE	NJ	08081	39.699127	-74.901524
2	BILL	SLATER	617-285-8148	WORK	200	NJ-73 UNIT 41 (QUICK FIX SMARTPHONE & TABLE REPAIR)	WEST BERLIN	NJ	08091	39.806752	-74.936186
3	BRANDON	GLIKAS	609-501-0199	WORK	116	WALKER AVENUE SUITE 3A (GNC BERLIN CIRCLE SHOPPING CTN)	WEST BERLIN	NJ	08091	39.806708	-74.936253
4	BRIANNA	KNOX	856-267-3687	HOME	515A	WHITE HORSE PIKE	ATCO	NJ	08004	39.761244	-74.886713
5	CEREN	PALMAY	609-969-1721	WORK	501	NJ -73 & BRICK ROAD (PNC BANK)	MARLTON	NJ	08053	39.880283	-74.924007
6	CHRIS	COURTER	856-753-6246	WORK	200	N NJ ROUTE 73 (MODELL'S)	WEST BERLIN	NJ	08091	39.805466	-74.933683
7	JACOB	BEAL	240-522-5886	HOME	77	HADDON AVENUE	WEST BERLIN	NJ	08091	39.803836	-74.938850
8	LARRY	JOSLYN	609-625-1332	WORK	565	NJ RT 50 (FRANKIE'S PIZZA II)	MAYS LANDING	NJ	08330	39.457075	-74.725252
9	MARGARET	CLAYPOOL	856-767-6490	HOME	43	COLGATE COURT	ATCO	NJ	08004	39.769152	-74.902944
10	MARIAN	PIZA	848-391-5417	WORK	225	NJ-73 (PLANET FITNESS)	WEST BERLIN	NJ	08091	39.806936	-74.930316
11	RACHEL	CHOPEL	856-448-5990	WORK	200	N NJ-73 UNIT 4 (STAPLES - BERLIN CIRCLE SHOPPING CENTER)	WEST BERLIN	NJ	08091	39.805282	-74.935168
12	SHARON	LAPOLLO	856-534-7543	WORK	200	N NJ-73 UNIT 35 (ALLSTATE INSURANCE)	WEST BERLIN	NJ	08091	39.806682	-74.935723
13	TRACIE	MCGAIR	609-969-0941	HOME	93	EAVES MILL ROAD	MEDFORD	NJ	08055	39.906800	-74.830600
14	WARREN	DAVY	856-768-4638	HOME	338	MINCK AVENUE	WEST BERLIN	NJ	08091	39.807884	-74.937706
15	WILBUR	STEWART	856-701-2951	HOME	179	STOCKTON LANE	MARLTON	NJ	08053	39.869279	-74.918023
16	WILL	SCHWANDA	609-206-0339	HOME	928	PINEWOOD LANE	ATCO	NJ	08004	39.770944	-74.833670

* Geolocation (geographical location) coding courtesy of Google Maps

LISTENER NUMBER	NAME		CONTACT PHONE	LOCATION	PERTINENT NARRATIVE (EXCERPTS) FROM LISTENER OBJECTIONS
	FIRST	LAST			
1	ARIANA	DIVENTURA	609-922-7439	HOME	HOME & WHILE WORKING
2	BILL	SLATER	617-285-8148	WORK	AT WORK AT QUICK FIX IN BERLIN, NJ @ BERLIN CIRCLE PLAZA ON RT 73
3	BRANDON	GLIKAS	609-501-0199	WORK	LOVE HAVING THUNDER ON AT GNC IN BERLIN CIRCLE PLAZA WHILE WORKING
4	BRIANNA	KNOX	856-267-3687	HOME	DRIVING TO & FROM WORK FROM HOME
5	CEREN	PALMAY	609-969-1721	WORK	COMING TO WORK AT PNC BANK ...73N MARLTON
6	CHRIS	COURTER	856-753-6246	WORK	I HAVE THUNDER PLAYING AT WORK MODELL'S SPORTING GOODS IN MARLTON W/BERLIN
7	JACOB	BEAL	240-522-5886	HOME	I LISTEN TO THUNDER 106 IN THE MORNING GETTING READY FOR WORK AT MY HOME
8	LARRY	JOSLYN	609-625-1332	WORK	I LISTEN TO THUNDER AT WORK
9	MARGARET	CLAYPOOL	856-767-6490	HOME	I LISTEN TO THUNDER 106 AT MY HOME ADDRESS
10	MARIAN	PIZA	848-391-5417	WORK	DRIVING TO WORK AT PLANET FITNESS
11	RACHEL	CHOPEL	856-448-5990	WORK	I WORK AT STAPLES IN WEST BERLIN 200 RT 73 NORTH...DURING MY BREAKS
12	SHARON	LAPOLLO	856-534-7543	WORK	I KEEP THUNDER 106 PLAYING AT MY DESK 200 N RT 73 - ALLSTATE WEST BERLIN
13	TRACIE	MCGAIR	609-969-0941	HOME	I LOVE THUNDER 106 COUNTRY & ALWAYS LISTEN AT HOME IN MEDFORD
14	WARREN	DAVY	856-768-4638	HOME	AT HOME & ROUTE 73
15	WILBUR	STEWART	856-701-2951	HOME	AT HOME MORNING & NIGHT!
16	WILL	SCHWANDA	609-206-0339	HOME	I LISTEN TO THUNDER WHILE I WORK FROM HOME IN ATCO

TABLE II - LOCATION DATA WITH COMPUTED SIGNAL LEVELS

LISTENER NUMBER	NAME		DATA FROM TABLE I		INSIDE WTHJ 45 DBU ?	SIGNAL FROM WTHJ F(50,50)					SIGNAL FROM TRANSLATOR F(50,10)					D/U *	FAILS BY DB
	FIRST	LAST	GEOLOCATION NAD 83			NAD 83 SITE: 39.631508 LAT -74.352922 LON					NAD 83 SITE: 39.498061 LAT -75.075011 LON						
			LAT	LON		AZ	HAAT	PWR	DIST	DBU	AZ	HAAT	PWR	DIST	DBU		
1	ARIANA	DIVENTURA	39.699127	-74.901524	YES	279.27	210.1	1.45	47.67	49.69	33.56	88.4	0.047	26.84	39.91	9.77	10.23
2	BILL	SLATER	39.806752	-74.936186	YES	291.52	205.0	1.45	53.66	46.60	19.05	95.0	0.057	36.29	36.49	10.11	9.89
3	BRANDON	GLIKAS	39.806708	-74.936253	YES	291.52	205.0	1.45	53.67	46.60	19.05	95.0	0.057	36.28	36.49	10.10	9.90
4	BRIANNA	KNOX	39.761244	-74.886713	YES	287.70	207.9	1.45	48.00	49.44	28.80	88.6	0.050	33.39	36.61	12.83	7.17
5	CEREN	PALMAY	39.880283	-74.924007	YES	299.72	304.0	1.45	56.20	48.87	16.86	96.0	0.061	44.37	33.49	15.38	4.62
6	CHRIS	COURTER	39.805466	-74.933683	YES	291.46	305.8	1.45	53.41	50.23	19.45	95.0	0.057	36.22	36.52	13.71	6.29
7	JACOB	BEAL	39.803836	-74.938850	YES	291.11	305.8	1.45	53.76	50.07	18.88	95.0	0.057	35.90	36.66	13.41	6.59
8	LARRY	JOSLYN	39.457075	-74.725252	YES	238.84	215.9	1.45	37.41	55.25	98.52	93.7	0.044	30.44	38.02	17.23	2.77
9	MARGARET	CLAYPOOL	39.769152	-74.902944	YES	288.19	207.9	1.45	49.59	48.68	26.00	90.5	0.052	33.53	36.91	11.77	8.23
10	MARIAN	PIZA	39.806936	-74.930316	YES	291.74	205.0	1.45	53.20	46.82	19.79	94.1	0.056	36.47	36.25	10.58	9.43
11	RACHEL	CHOPEL	39.805282	-74.935168	YES	291.39	205.8	1.45	53.52	46.70	19.27	95.0	0.057	36.16	36.55	10.15	9.85
12	SHARON	LAPOLLO	39.806682	-74.935723	YES	291.53	205.0	1.45	53.62	46.62	19.12	95.0	0.057	36.29	36.49	10.13	9.87
13	TRACIE	MCGAIR	39.906800	-74.830600	YES	307.01	201.2	1.45	51.08	47.69	24.63	90.8	0.052	49.99	30.26	17.43	2.57
14	WARREN	DAVY	39.807884	-74.937706	YES	291.60	204.0	1.45	53.83	46.48	18.80	95.0	0.057	36.36	36.46	10.02	9.98
15	WILBUR	STEWART	39.869279	-74.918023	YES	298.87	204.1	1.45	55.16	45.84	17.98	95.6	0.059	43.36	33.71	12.13	7.87
16	WILL	SCHWANDA	39.770944	-74.833670	YES	290.81	205.8	1.45	44.04	51.33	34.18	88.4	0.047	36.70	34.84	16.50	3.50

* WTHJ MUST BE +20 DB OR HIGHER IN SIGNAL LEVEL OVER
THE PROPOSED TRANSLATOR SIGNAL LEVEL

NOTES:	
	ALL LATITUDE AND LONGITUDE VALUES IN NAD 83 DATUM
	DISTANCES ARE CALCULATED PER SECTION 47 CFR 73.208 (FM RULES)
AZ	AZIMUTH BEARING FROM FACILITY TO LISTENER REFERENCE POINT
HAAT	HEIGHT ABOVE AVERAGE TERRAIN AT AZIMUTH OF CONCERN (NEAREST METER & DEGREE)
PWR	RADIATED POWER IN KILOWATTS - INCLUDES DIRECTIONAL PATTERN VALUES IF APPLICABLE
DIST	DISTANCE IN KILOMETERS (DISTANCE BETWEEN FACILITY AND LISTENER REFERENCE POINT)
DBU	COMPUTED DBU VALUE (F50,50) FOR DESIRED STATION, F(50,10) FOR UNDESIRED FACILITY
D/U	VALUE MUST BE EQUAL OR GREATER THAN 20 FOR CO-CHANNEL FACILITIES

LISTENER OBJECTIONS 1 TO 16

OBJECTIONS AND LOCATIONS PLOTTED ON ASSOCIATED MAPS
(ALL WITHIN WTHJ 45 DBU F(50,50) CONTOUR)

INDEX OF OBJECTIONS

PAGES	NAME
2-3	ARIANA DIVENTURA
4-5	BILL SLATER
6-7	BRANDON GLIKAS
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14-15	JACOB BEAL
16-17	LARRY JOSLYN
18-19	MARGARET CLAYPOOL
20-21	MARIAN PIZA
22-23	RACHEL CHOPEL
24-25	SHARON LAPOLLO
26-27	TRACIE MCGAIR
28-29	WARREN DAVY
30-31	WILBUR STEWART
32-33	WILL SCHWANDA



LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is Ariana DiVentura.

My address is 2 Arcadian Dr Sikeville, NJ 08091

I can be reached at this phone number 609-922-7439.

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM: home

While working a CNC in Berlin, shopping centre I keep Thunder on always!
(209 Rt 73 N, West Berlin, NJ 08091)

Signed: Ariana DiVentura

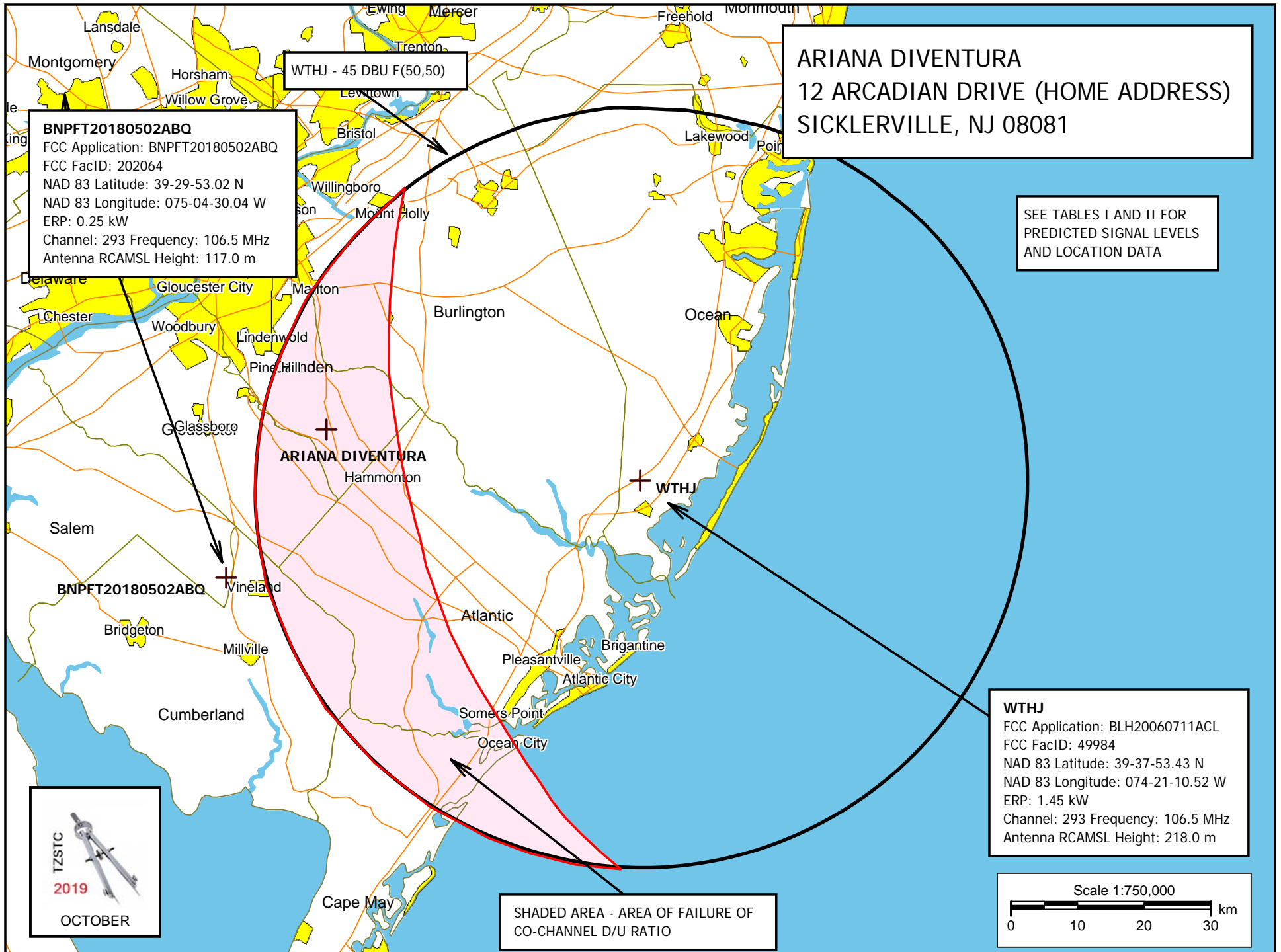
Print Name: Ariana DiVentura

Date: 10/1/19

Email Address: diventuraad3853@gmail.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

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LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
**08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350**

My full name is Bill Slater

My address is 1041 Chew Rd, Watertown, NJ 08089

I can be reached at this phone number 617 285 8148

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I make sure Thunder 106 is always
during my break at work at Quick Fit
in Berlin NJ @ Berlin Circle Plaza on Rt 73

Signed: [Signature]

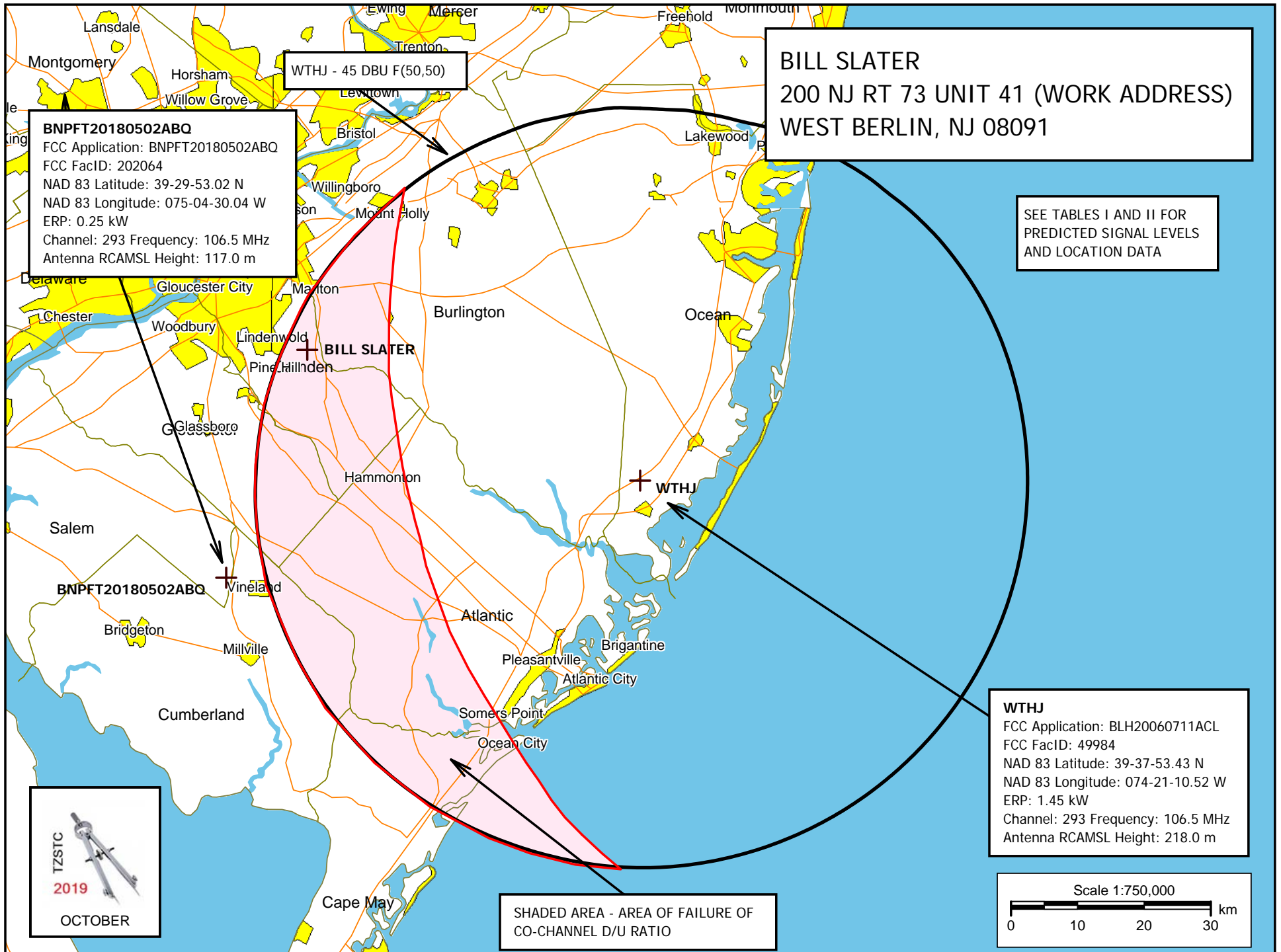
Print Name: Bill Slater

Date: 10/1/19

Email Address: ffcs77@yahoo.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

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LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is Brandon Glikas

My address is 219 Spring Garden Rd, Hammonton, NJ 08037

I can be reached at this phone number 609 501 8199

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

Love having Thunder on at GNC
on Berlin Circle Plaza while working!
- 200 ft 73 N, West Berlin

Signed: Brandon Glikas

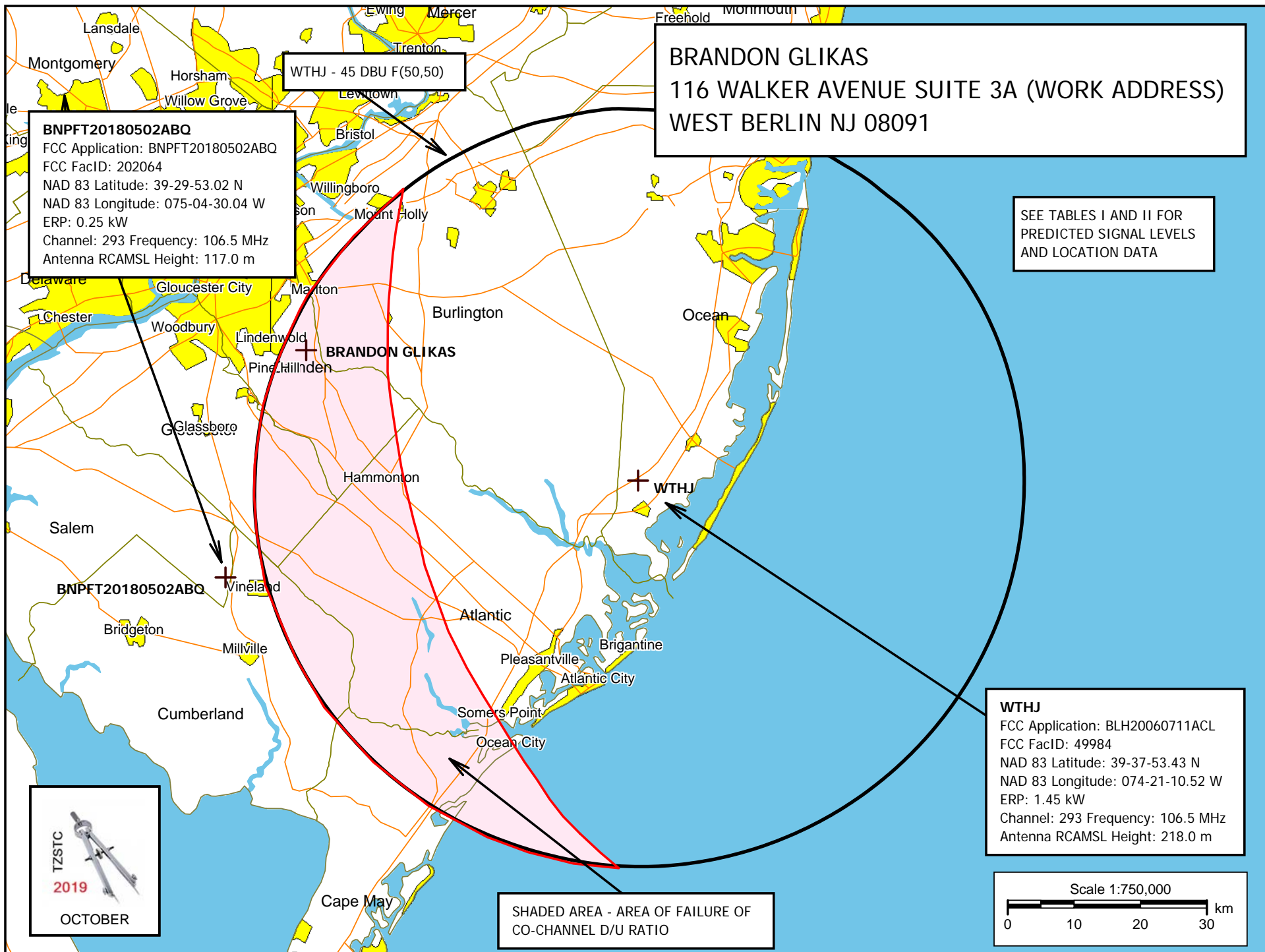
Print Name: Brandon Glikas

Date: 10-1-19

Email Address: brandon.glikas01@students.camdenoc.edu

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

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LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is Brianna Knox

My address is 515 A White Horse Pike, Atco, NJ 08004

I can be reached at this phone number 856 267 3687

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

Driving to & from work from home
Rt 73 in Berlin & Rt 42
Thunder is always playing in my car

Signed: Brianna Knox

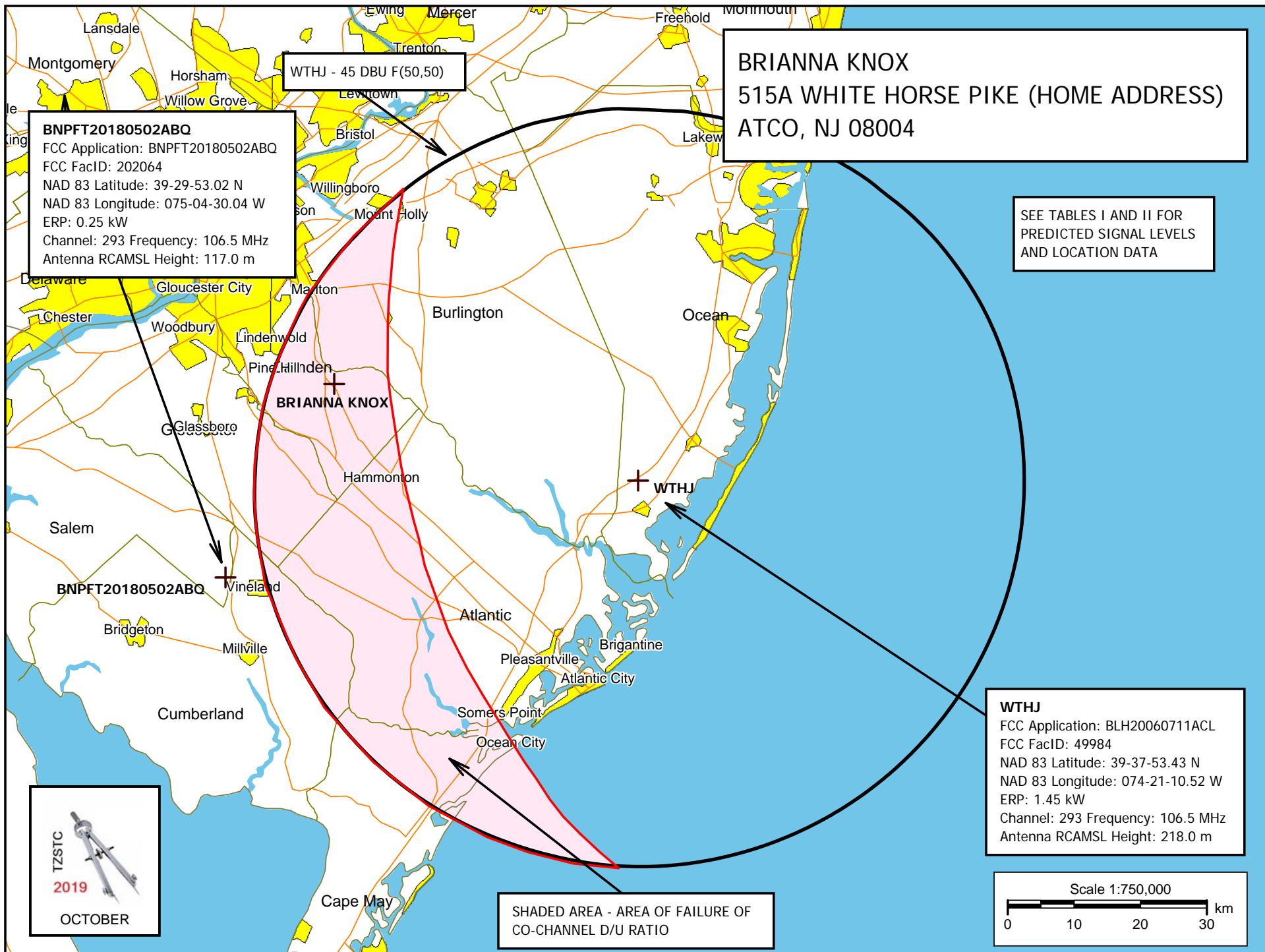
Print Name: Brianna Knox

Date: 10-01-19

Email Address: Bri.Knox00@gmail.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA -- RICH@RMORENA.COM

59





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is Ceren Palmay

My address is 103 Hazel Wood Lane Marlton, NJ

I can be reached at this phone number 609 969 1721

08053

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I have Thunder 106 on Driving from Marlton on
it 73 coming to work at PNC Bank
off Sat-73 W in Marlton.

Signed: Ceren

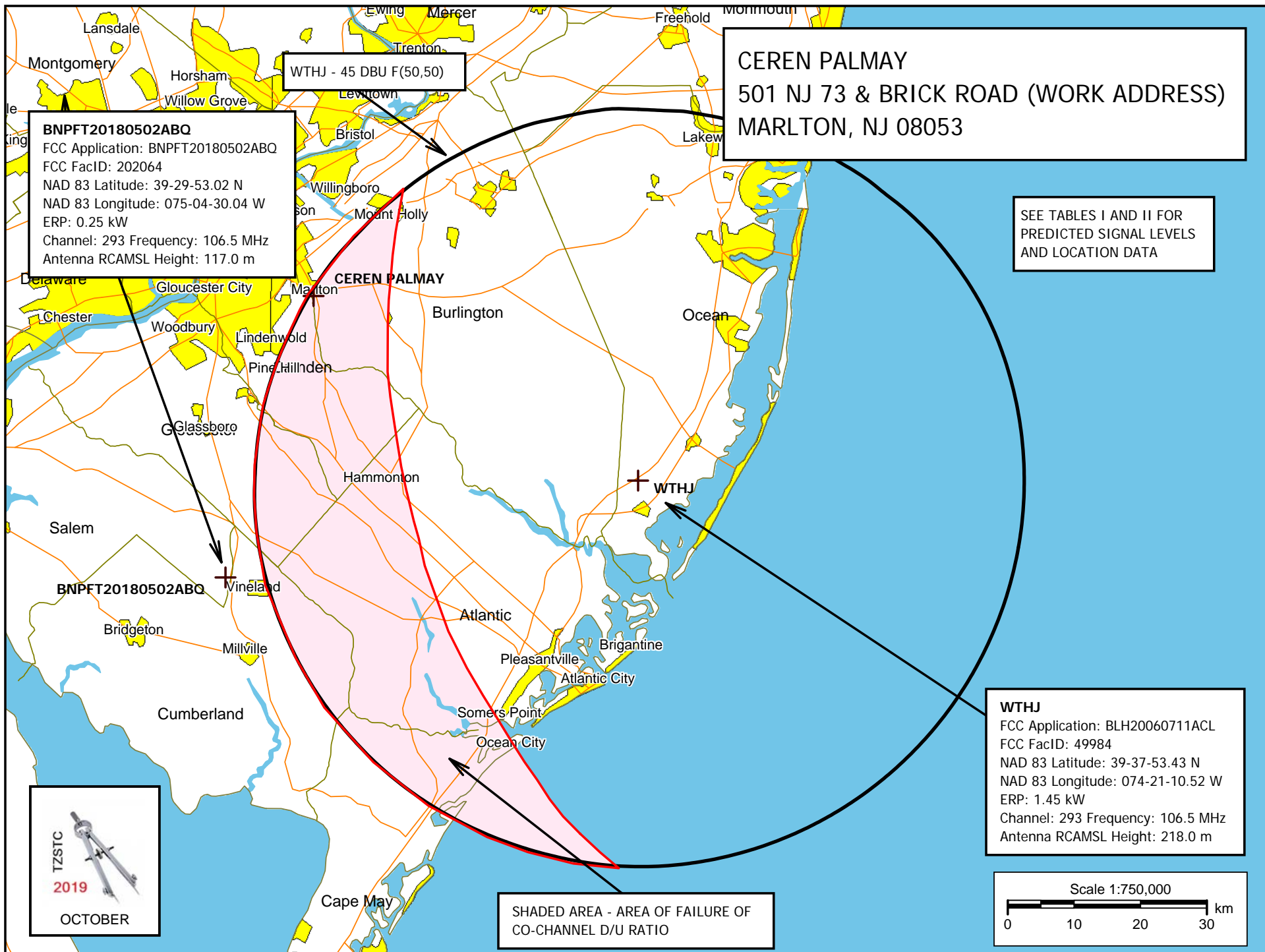
Print Name: Ceren Palmay

Date: 10-1-19

Email Address: Cerenpalmay@gmail.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

63





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
**08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350**

My full name is Chris Center.

My address is 304 N Wissahickon Ave, Westcar, NJ

I can be reached at this phone number 856 753 6246 08406

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I have Thunder playing at work
Modell's Sporting Goods in Marlton / W Berlin
a driving home on Rt 73 S.

Signed: Chris Center

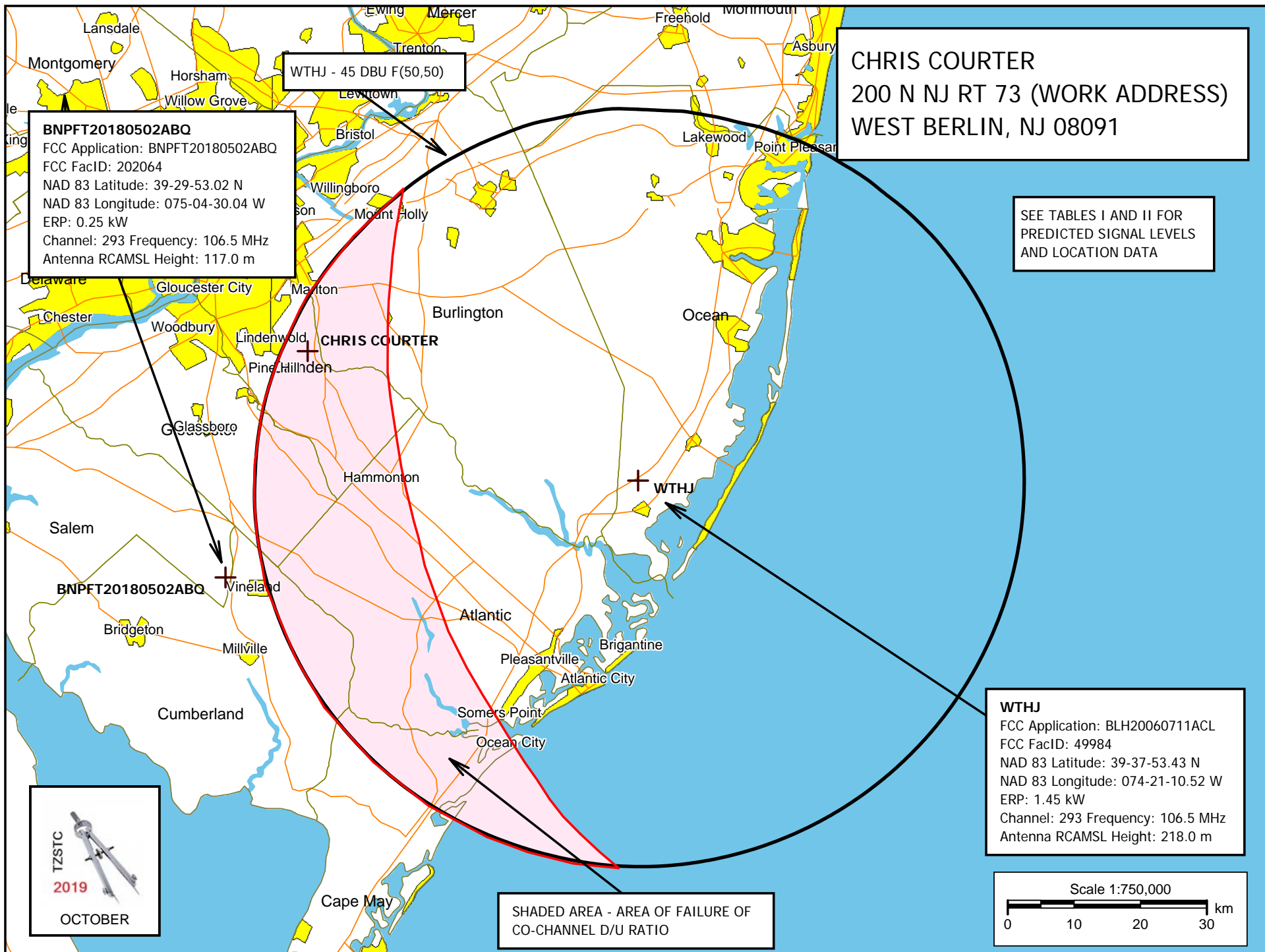
Print Name: Chris Center

Date: 10/1/19

Email Address: amblsca@gmail.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

53





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
**08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350**

My full name is Jacob Beal.

My address is 77 Haddon Ave, West Berlin, 08091

I can be reached at this phone number 240 522 5886.

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I listen to thunder 106 in the morning getting ready for work at my home in West Berlin & driving on rte 73

Signed: [Signature]

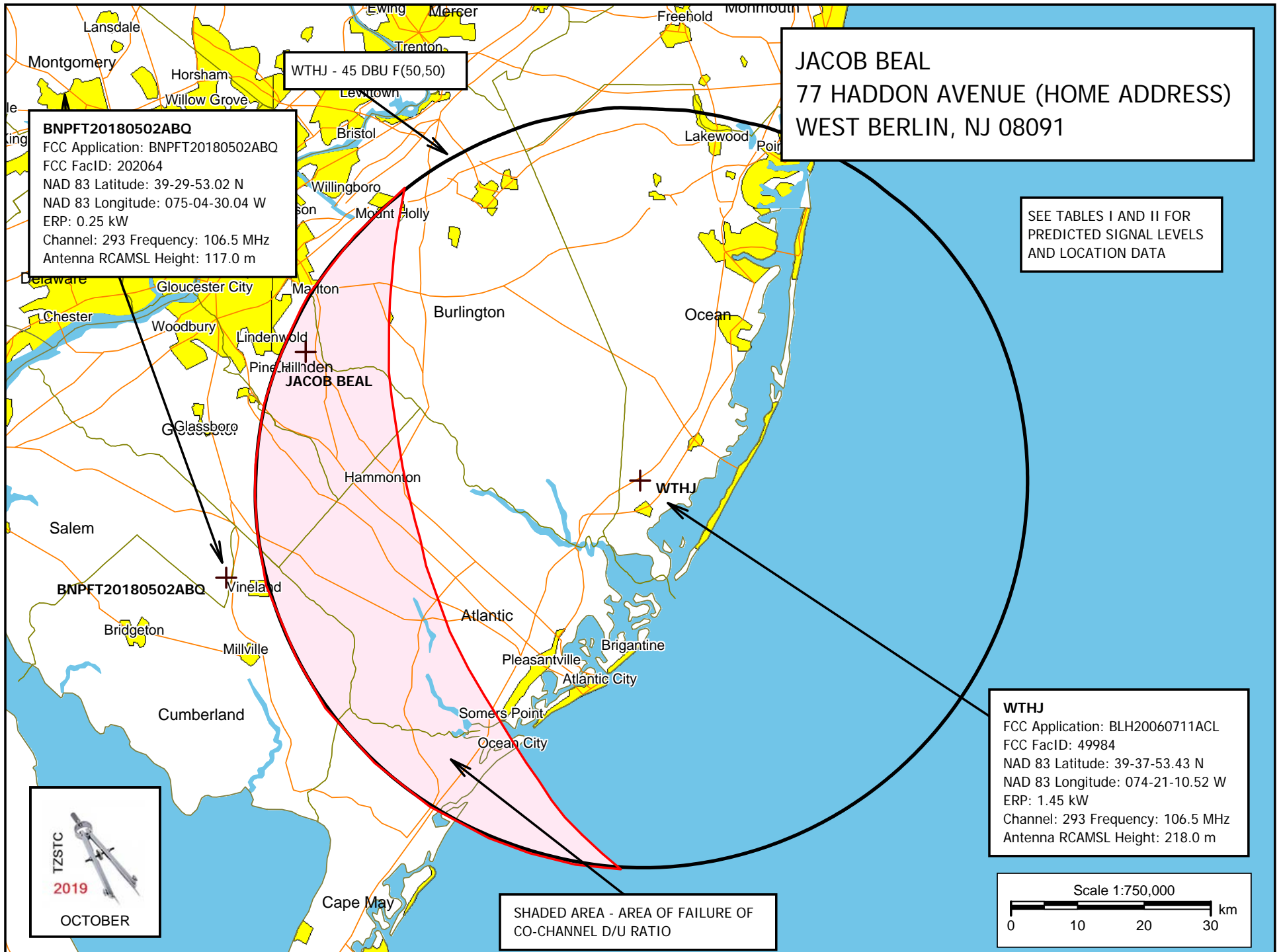
Print Name: Jacob Beal

Date: 10/1/19

Email Address: _____

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

49





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:

08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310

08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is LARRY TOSKY

My address is 46 RT 50 MYSTANDUNK NJ 08802

I can be reached at this phone number 609-625-1322

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I LISTEN TO THUNDER AT WORK

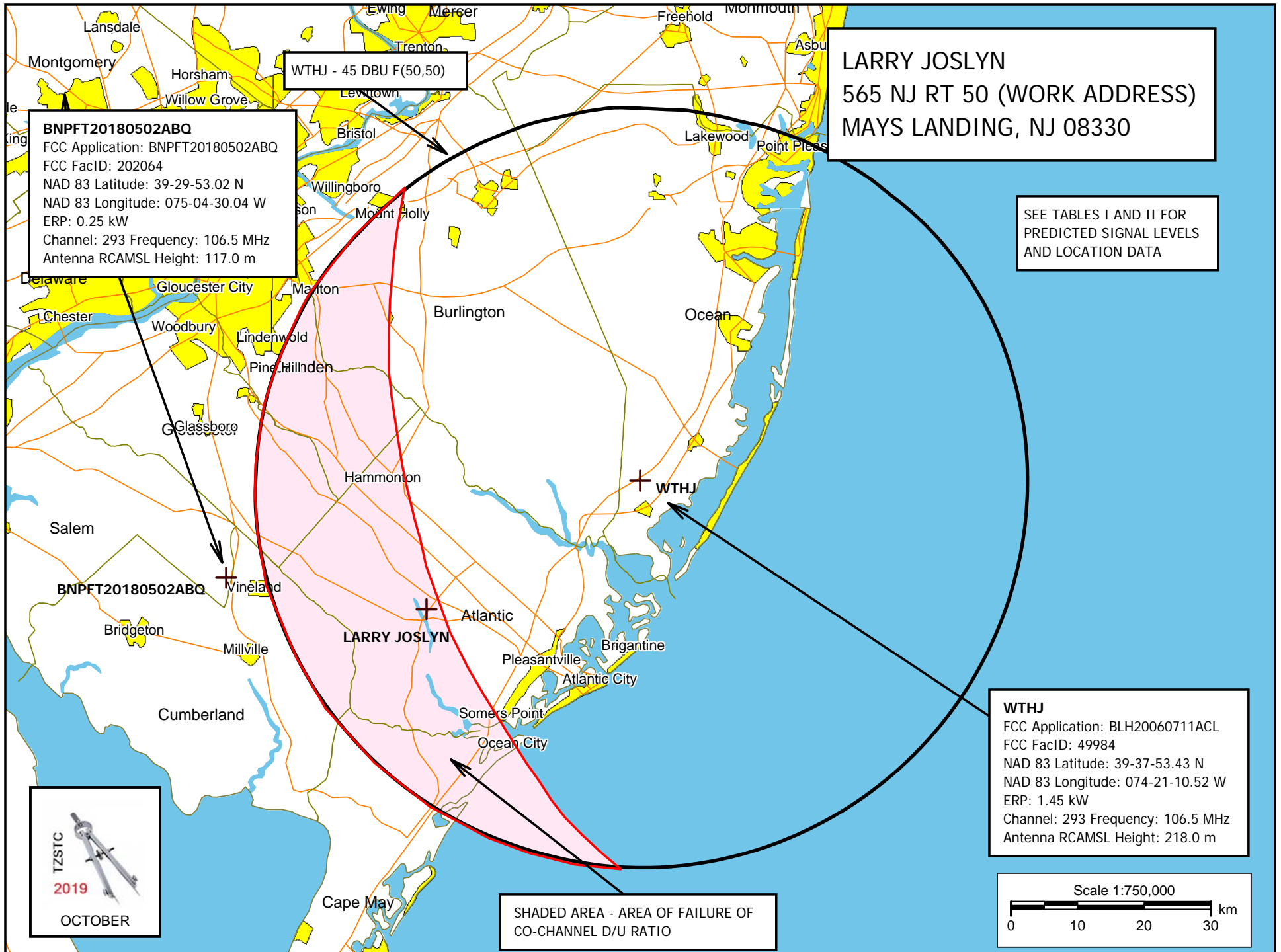
Signed: [Signature]

Print Name: Larry Tosky

Date: 9-10-09

Email Address: _____

PLEASE EMAIL THIS FORM BACK TO RICH MORENA – RICH@RMORENA.COM





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is **Margaret Claypool**.

My address is **43 Colgate Court Atco NJ 08004**

I can be reached at this phone number **856-767-6490**.

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I listen to Thunder 106 at my home address

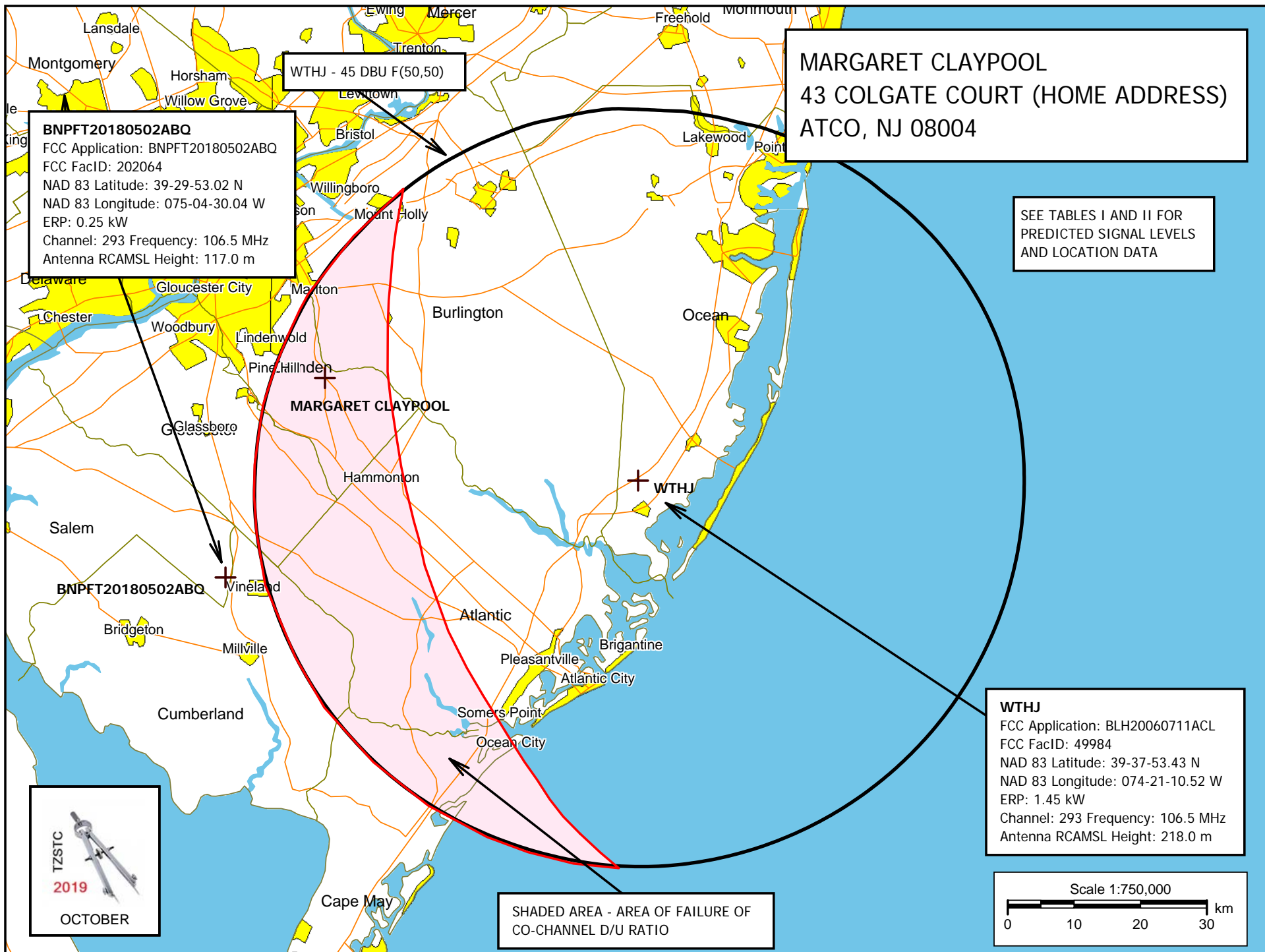
Signed: **Margaret Claypool** _____

Print Name: Margaret Claypool _____

Date: 9-26-19 _____

Email Address: **margaret.claypool@aol.com**

PLEASE EMAIL THIS FORM BACK TO RICH MORENA – RICH@RMORENA.COM





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is MARIA PERIN.

My address is 2409 ACORN DRIVE, NJ 08094

I can be reached at this phone number 848 391 5417.

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

My Dad & I love Thunder & listen
on Rt 73 driving to work at
Pioneer Fitness in West Berlin 225 North 73

Signed: [Signature]

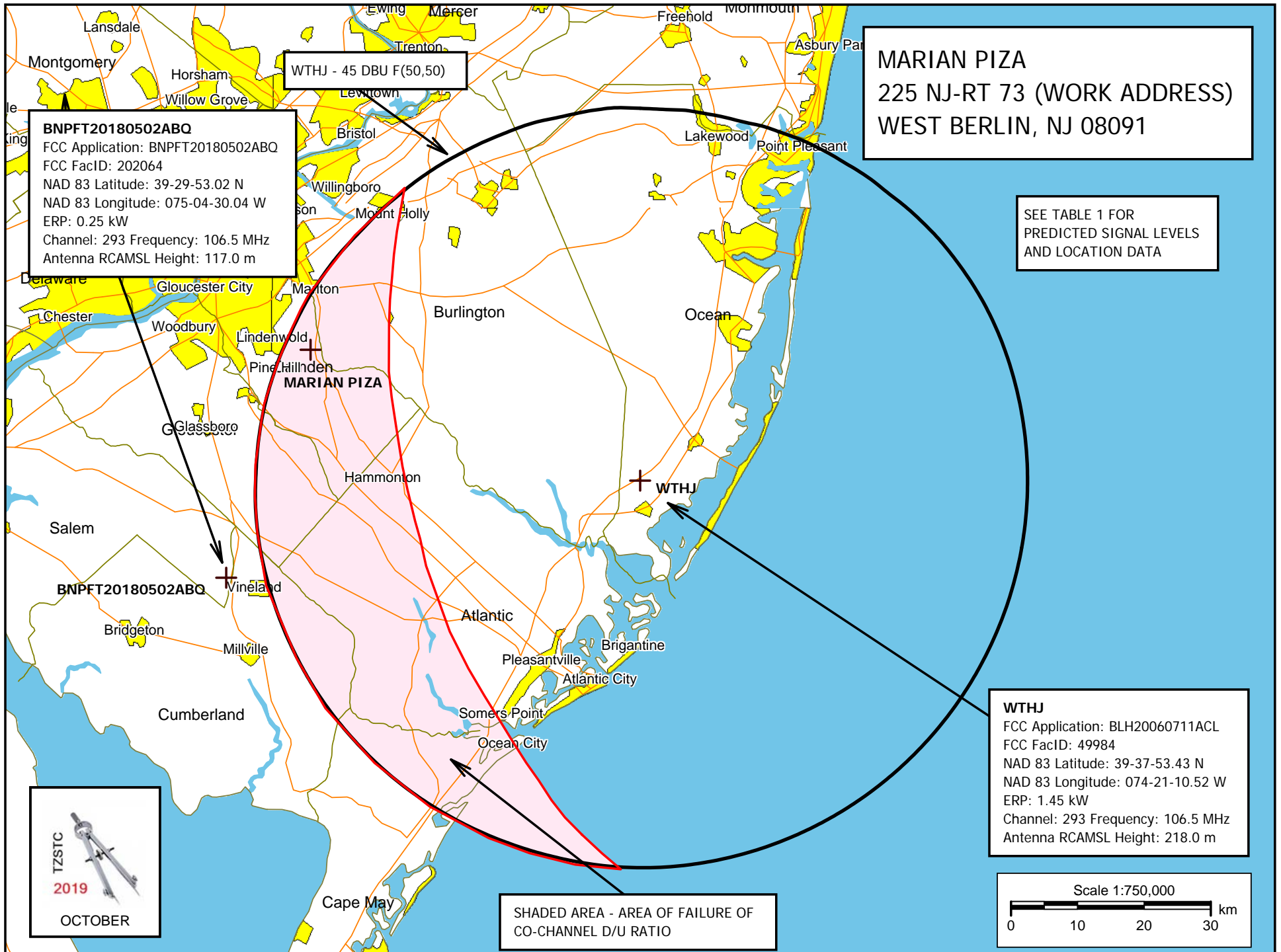
Print Name: MARIA BERNIERI-NICSEN

Date: 10/01/19

Email Address: mbn13@yahoo.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

48





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
**08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350**

My full name is Rachel Chapel

My address is 371 Rigne Ave, NJ 08091
West Berlin

I can be reached at this phone number 856 448 5940

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I work at Staples in West Berlin -
200 Rt 73 North & I am always having Thunder
106 on during my breaks

Signed: Rachel Chapel

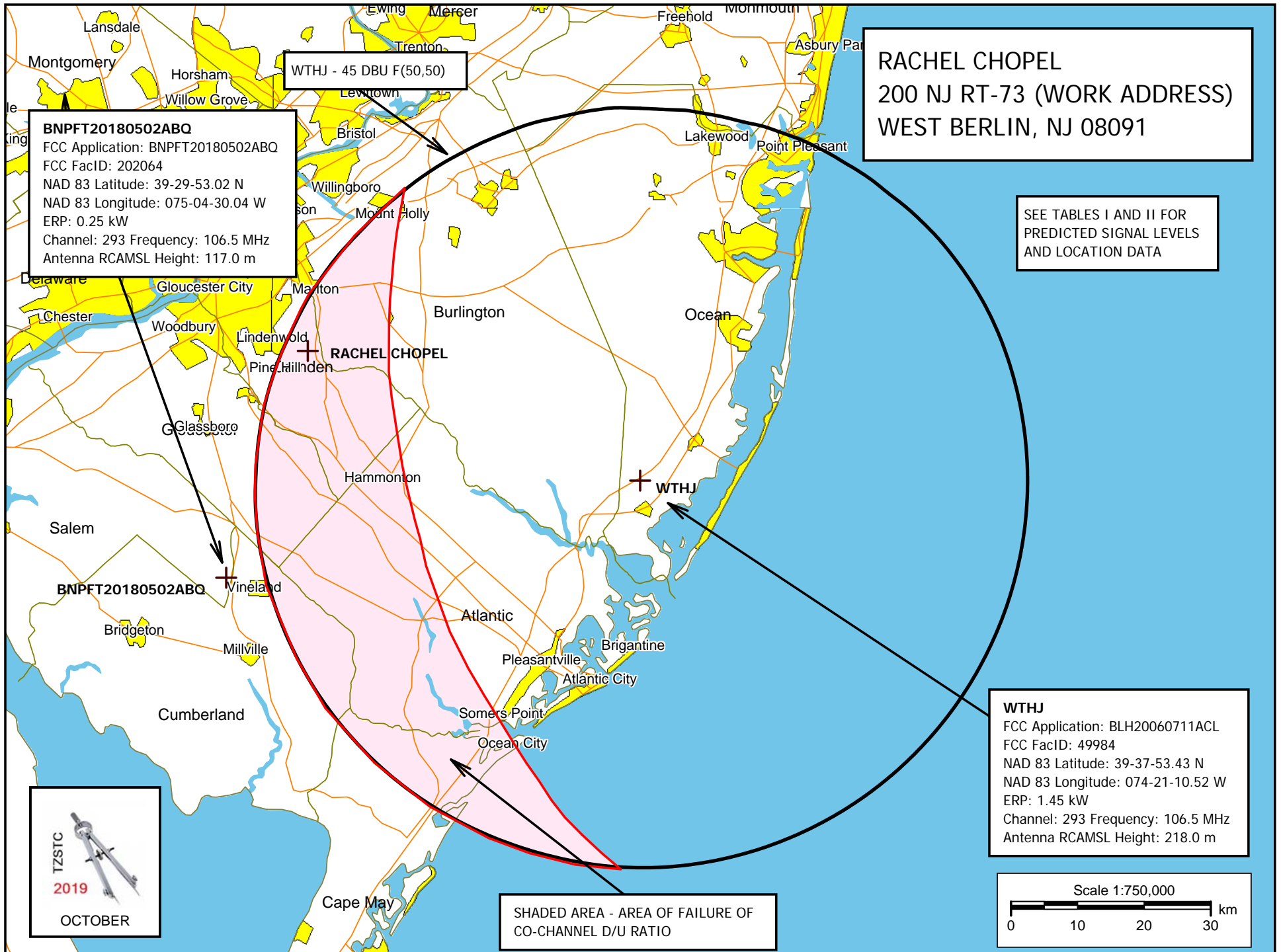
Print Name: Rachel Chapel

Date: 10/1/19

Email Address: rmchapel@gmail.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

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LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is Sharon LaPollo.

My address is 102 Trent Rd, Turnersville, NJ 08069

I can be reached at this phone number 856 534 7543.

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I keep Thunder 106 playing at my Desk
208 N Rt 73 - Allstate - West Berlin, NJ

Signed: Sharon LaPollo

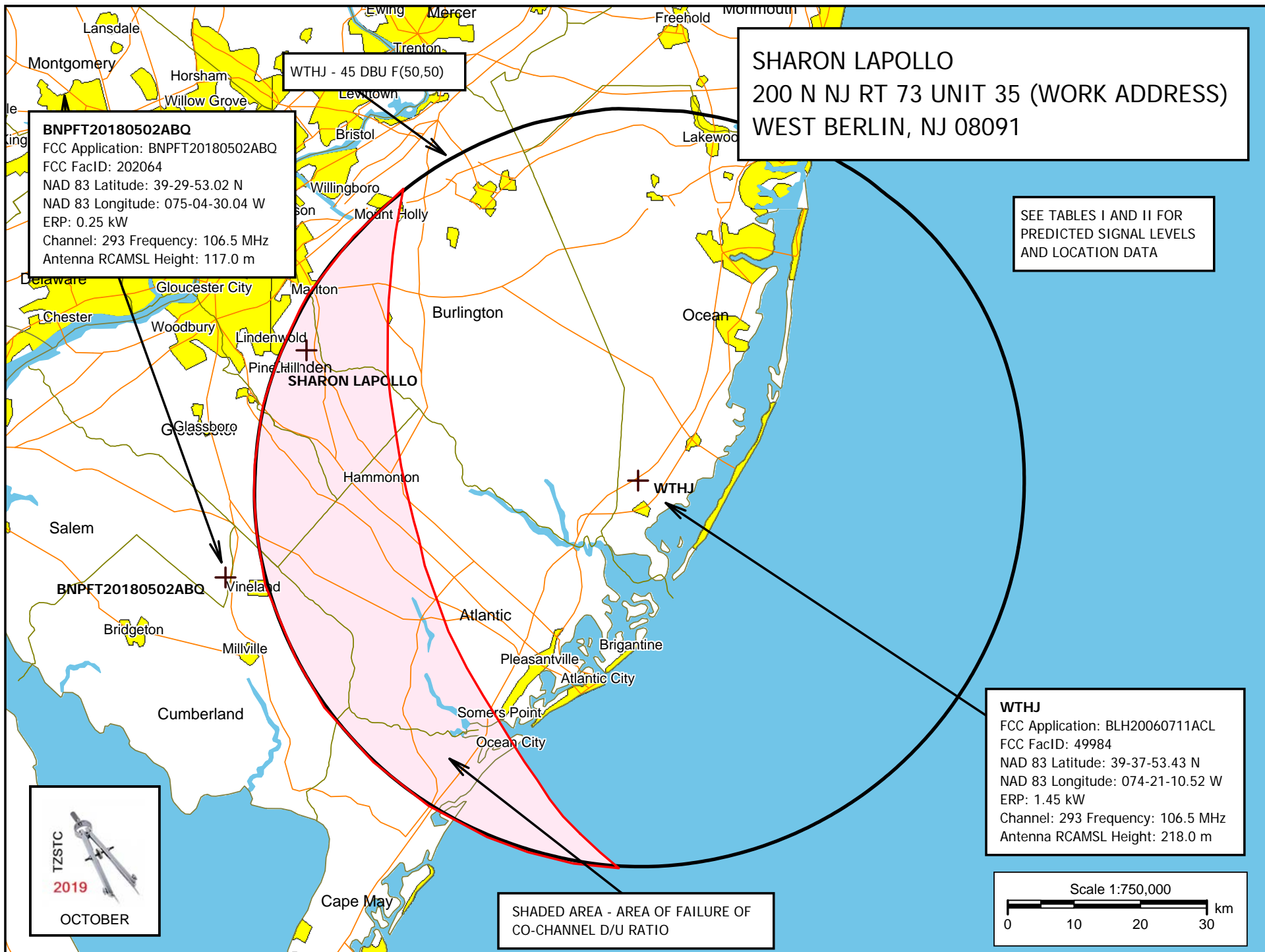
Print Name: Sharon LaPollo

Date: 10-1-19

Email Address: shar597999@gmail.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

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LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
**08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350**

My full name is Tracie M'Gar.

My address is 93 Eaves Mill Rd Medford, NJ 08053

I can be reached at this phone number 609 969 0941.

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I love Thunder 106 country always
listen at home in Medford

Signed: Tracie

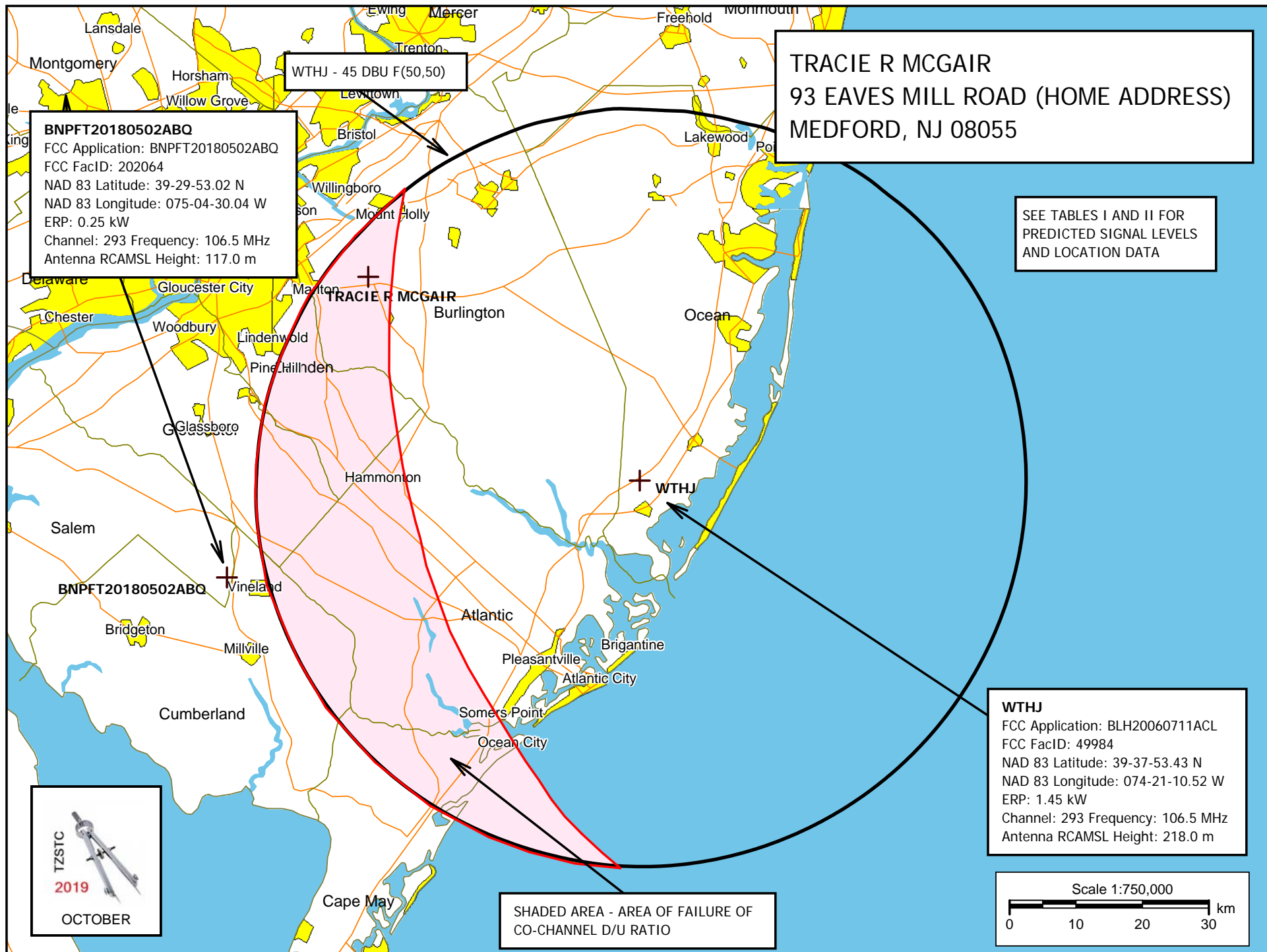
Print Name: Tracie R. M'Gar

Date: 10/01/19

Email Address: traciemcgair@gmail.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

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LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is Warren Davy
My address is 338 Minck Ave West Berlin, NJ 08091
I can be reached at this phone number 856-768-4638

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

at home, Route 93, local to shops like Target
Warren's Software

Signed: Warren Davy

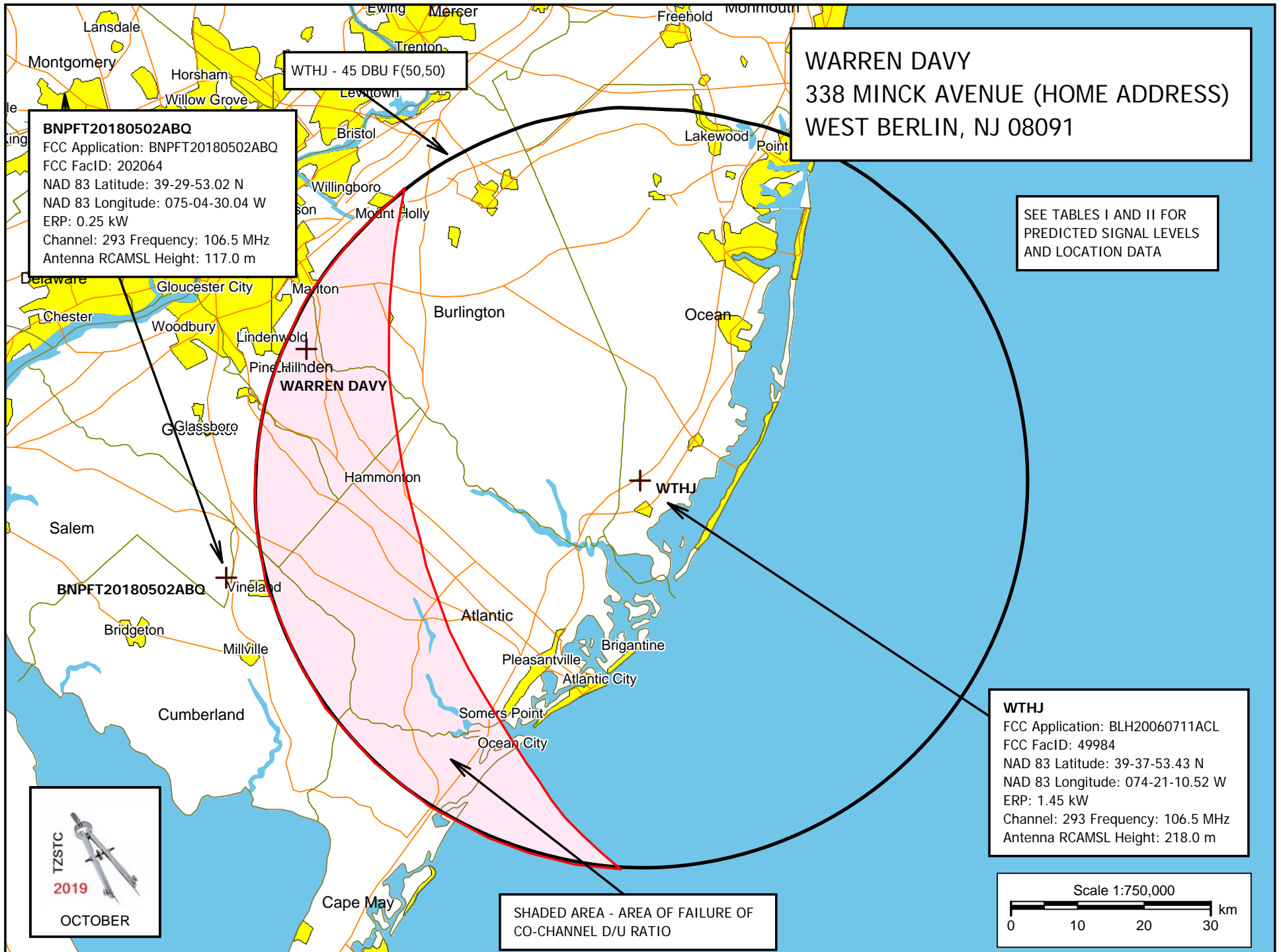
Print Name: Warren Davy

Date: 10/11/19

Email Address: dave-datubeo@yaho.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

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LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:
**08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310
08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350**

My full name is Wilbur Stewart

My address is 179 Stockton Lane, Malten, NJ 08053

I can be reached at this phone number 856 401 2951

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

Thunder is on my radio in the car on
RT 73 in Malten & at my home
morning & night!

Signed: [Signature]

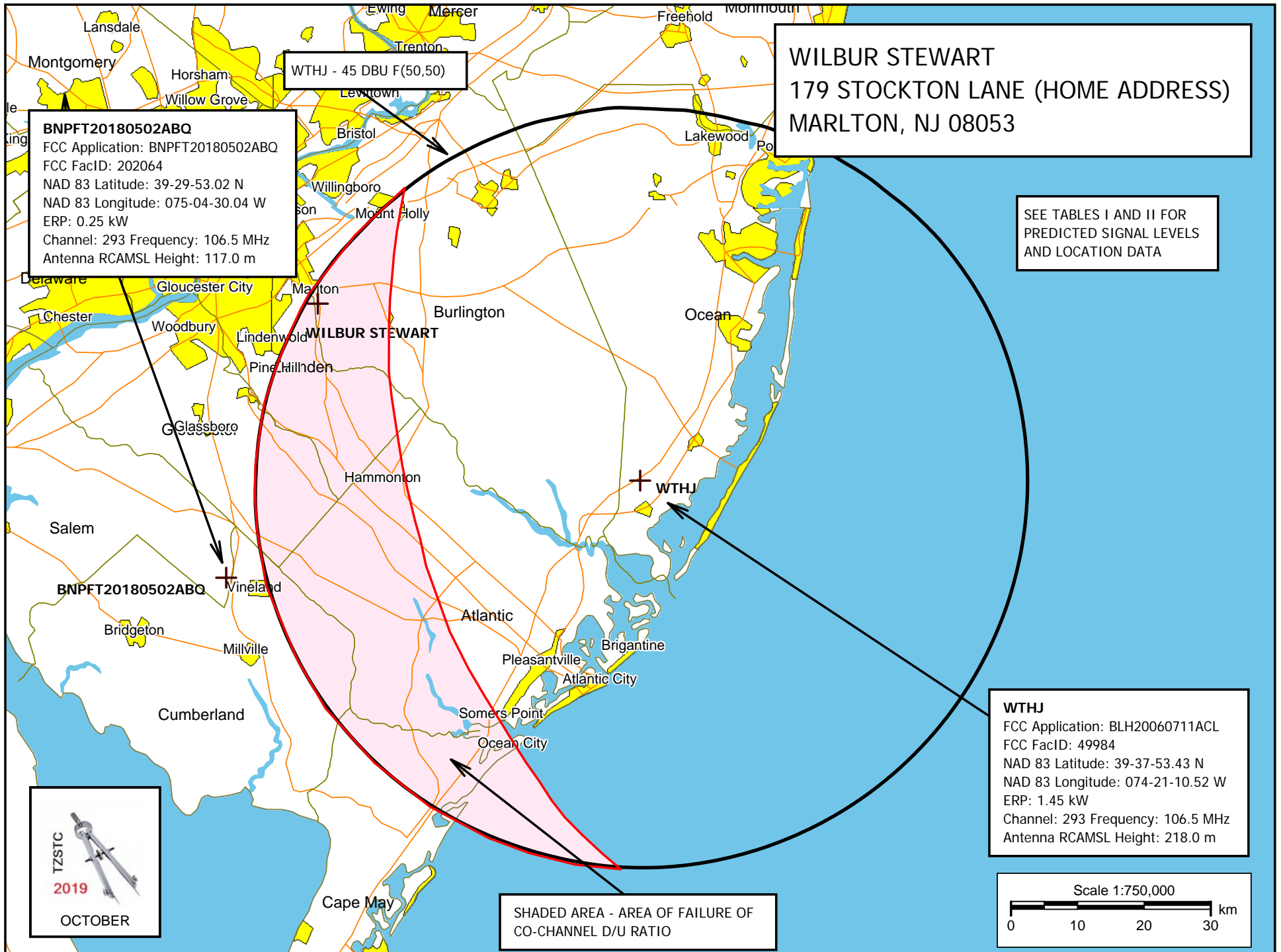
Print Name: Wilbur Stewart

Date: 10-1-19

Email Address: RavenSSpur@msn.com

PLEASE EMAIL THIS FORM BACK TO RICH MORENA - RICH@RMORENA.COM

04





LISTENER COMPLAINT

You must live, travel through or work in any of the following Zip Codes:

08004, 08009, 08053, 08055, 08081, 08091, 08094, 08095, 08310

08317, 08319, 08326, 08330, 08340, 08341, 08344, 08346, 08350

My full name is WILL SCHWANDA.

My address is 928 PINEWOOD LN ATEL, NJ 08004.

I can be reached at this phone number 609-206-0339.

I regularly listen to the over-the-air radio signal of WTHJ(FM), Bass River Township, New Jersey, also known as "Thunder 106", on 106.5 FM at least twice a month.

I am told by Thunder 106 that a new radio station is being considered by the Federal Communications Commission that might interfere with my listening to Thunder 106 on 106.5 FM in the area shown on the map on the next page.

I am therefore providing this complaint to inform the Federal Communications Commission that I do not want any new radio station to be allowed that might interfere with my present listening to Thunder 106 on 106.5 FM. I do not have any legal, employment, financial, or familial affiliation or relationship with Thunder 106.

I have marked on the map on the next page as to the locations at which I regularly listen to Thunder 106 on 106.5 FM or have noted below where I specifically and regularly listen to Thunder 106 on 106.5 FM:

I LISTEN TO THUNDER WHILE I WORK FROM HOME
IN ATEL AND ALL THROUGHOUT THE STATE

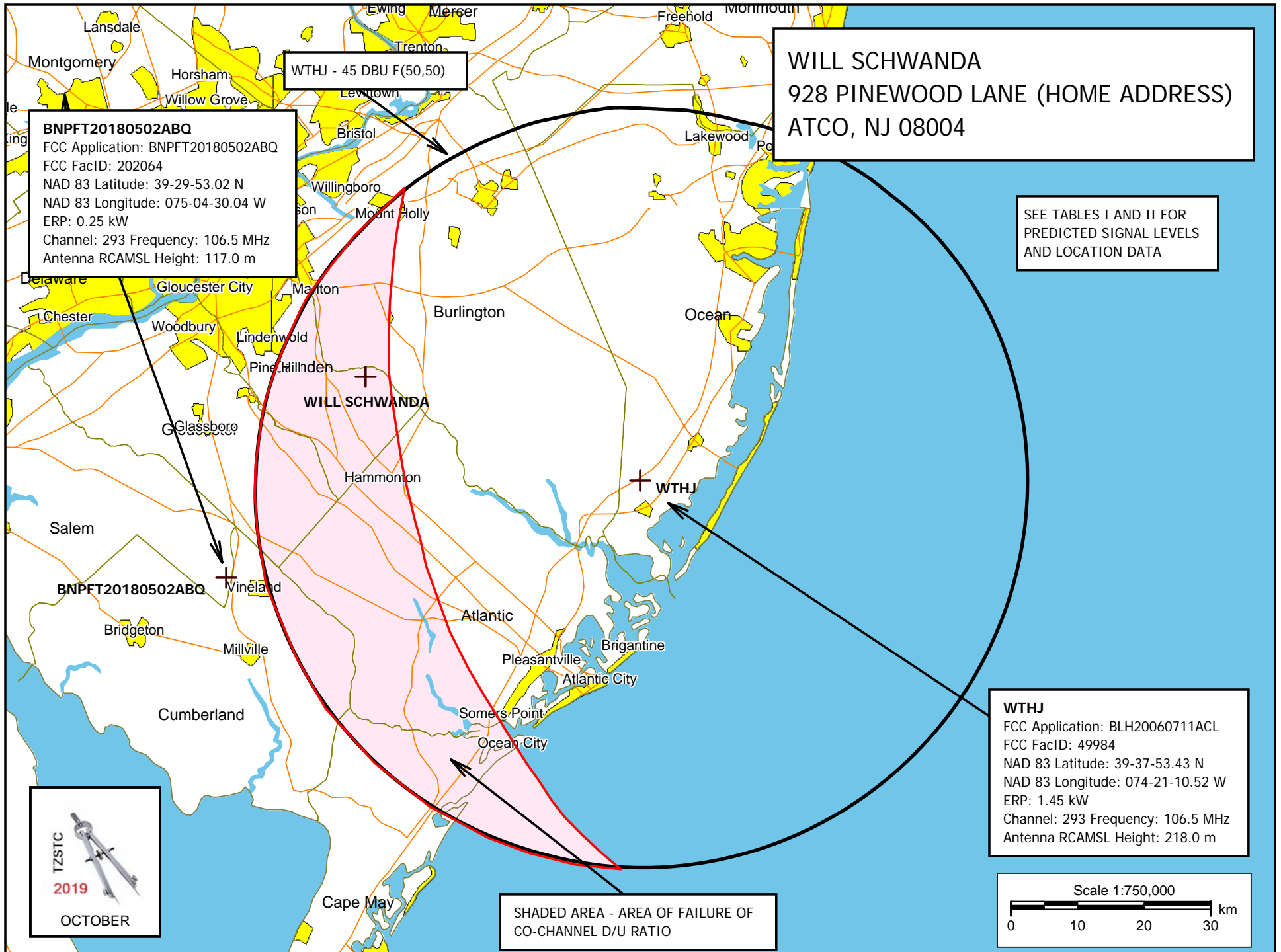
Signed: Will Schwanda

Print Name: WILL SCHWANDA

Date: 7/30/19

Email Address: WSCHWANDA825@GMAIL.COM

PLEASE EMAIL THIS FORM BACK TO RICH MORENA – RICH@RMORENA.COM



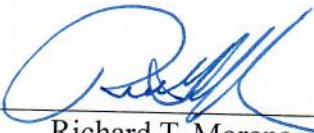
Declaration of Richard T. Morena

DECLARATION

I, Richard T. Morena, do hereby state to the best of my knowledge and belief:

1. I am the Chief Financial Officer and Member of Press Communications LLC, the licensee of WTHJ(FM), 106.5 MHz, Bass River Township, New Jersey.
2. I am submitting this Declaration to support the Supplement to Petition to Deny being filed by Press Communications LLC responding to the September 9, 2019 FCC Letter.
3. I have management responsibility for the overall compliance of WTHJ operations with legal and regulatory requirements. WTHJ is operating within its licensed parameters.

Executed this 8th day of October, 2019 under penalty of perjury.



Richard T. Morena

Letter to Applicant and Response



September 18, 2019

Melodie A. Virtue, Esq.
Garvey Schubert Barer
1000 Potomac Street, NW
Flour Mill Building, Suite 200
Washington, DC 20007
mvirtue@gsblaw.com

Womble Bond Dickinson (US) LLP

1200 Nineteenth Street, NW
Suite 500
Washington, DC 20036

t: 202.467.6900
f: 202.467.6910

John F. Garziglia
Direct Dial: 202-857-4455
Direct Fax: 202-261-0055
E-mail: John.Garziglia@wbd-us.com

Dear Ms. Virtue:

This letter is sent on behalf of Press Communications, LLC in accord with the new requirements imposed by the Federal Communications Commission in *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Report and Order, FCC 19-440, released May 9, 2019 (the "Report and Order"), and that certain letter from James D. Bradshaw, Senior Deputy Chief, Audio Division, Media Bureau, dated September 9, 2019 (the "Letter") regarding the new FM translator for Vineland, New Jersey proposed by Clear Communications, Inc. (FCC Facility ID No. 202064 / FCC File No. BNPFT-20180502ABQ).

The FCC, in both the Report and Order and in the Letter, requires that Press Communications, LLC inform a relevant FM translator applicant of claimed interference. To the extent that our previous May 23, 2018 Petition to Deny did not so inform Clear Communications, Inc. of such claimed interference, this letter hereby notifies Clear Communications, Inc. that its new FM translator facility is predicted, due to the massive overlap of the Press Communications, LLC WTHJ(FM), Bass River Township, New Jersey 45 dB μ (F50,50) contour and the proposed Clear Communications, Inc. 25 dB μ (F50,10) contour, to cause significant interference to numerous WTHJ(FM) radio listeners. Press Communications, LLC is prepared to show such interference with the required number of listener complaints and associated materials in response to the Letter.

Nonetheless, if a private resolution of this predicted interference is possible in advance of the Press Communications, LLC response to the Letter, we welcome such a proposal. Press Communications, LLC would be amenable to a resolution in which the WTHJ(FM) 45 dB μ contour is no longer overlapped by the proposed FM translator's interfering contour. Such a resolution might occur by a change in the translator's transmitter site location, a move to another channel, a significant reduction in power, a highly-directional antenna, or a dismissal of the application.

Please let me know immediately if such a resolution is possible. Such a resolution would conserve FCC resources as well as our own.

Best regards,

A handwritten signature in blue ink, appearing to read "John F. Garziglia".

John F. Garziglia

Garziglia, John

From: Garziglia, John
Sent: Friday, October 4, 2019 3:54 PM
To: Melodie Virtue
Subject: RE: Response to September 18, 2019 Letter re Press complaint

Dear Ms. Virtue:

We have evaluated the WTHJ 45 dBu (F50,50) contour as well as the proposed FM translator's 25 dBu (F50,10) contour. The calculated interference area within the WTHJ 45 dBu contour extends all the way from Mount Holly to just east of Vineland to Ocean City with a significant number of WTHJ listeners within that interference area. Also, as you will recall, there are a significant number of WTHJ listeners outside of the WTHJ 45 dBu contour but within the proposed 60 dBu of the translator.

WTHJ notes that, pursuant to Paragraph 44 of the FM Translator Report and Order, with a showing of 20 listeners outside of the WTHJ 45 dBu contour, a waiver request will be entertained by the FCC which would have the effect of encompassing your proposed FM translator with complainants making it highly unlikely that your client will receive a construction permit grant from the FCC with any facility no matter how minimal the parameters.

Therefore, the only resolution we can contemplate would be one where your client amends its application to a non-adjacent channel and is granted a construction permit for that channel. Please let me know if your client will be seeking to so amend its application.

John Garziglia

John F. Garziglia, Esq. – Communications Law

Womble Bond Dickinson (US) LLP / 1200 19th Street, NW / Washington, DC 20036

John.Garziglia@wbd-us.com / (202) 857-4455

LinkedIn: www.linkedin.com/in/johngarziglia / Bio: www.garziglia.com / Twitter: [@JohnGarziglia](https://twitter.com/JohnGarziglia)

2019 Broadcast Station Public File Checklists: www.garziglia.com/checklists

"The best way to hire a broadcast station lawyer is to ally with a tenacious, industry-knowledgeable counselor who has a passion for broadcasting" – JFG

John Garziglia

Partner

Womble Bond Dickinson (US) LLP

d: 202-857-4455

e: John.Garziglia@wbd-us.com

1200 Nineteenth Street, N.W.

Suite 500



womblebonddickinson.com



From: Melodie Virtue <MVIRTUE@gsblaw.com>
Sent: Friday, September 27, 2019 10:56 AM
To: Garziglia, John <John.Garziglia@wbd-us.com>
Subject: Response to September 18, 2019 Letter re Press complaint

EXTERNAL EMAIL: Open Attachments and Links With Caution.

Hi John.

Thank you for your letter of September 18, 2019 regarding the complaint of interference filed May 23, 2018 by Press Communications, LLC, WTHJ, Bass River Township, NJ, against Clear Communications, Inc.'s translator application for Vineland, NJ (BNPFT-20180502ABQ), and the FCC's invitation of September 9, 2019 to Press to supplement its complaint based on the FCC's new translator interference remediation rules.

After you have plotted the area inside the 45 dBu contour of WTHJ, and evaluated the area where the C/I ratio is less than 20 dB for your potential listener complaints, we invite you to come back to us with a proposed resolution that looks at the situation in a fair manner and let us consider it.

Melodie
202-298-2527

From: Etemadi, Dina [<mailto:Dina.Etemadi@wbd-us.com>]
Sent: Wednesday, September 18, 2019 9:28 AM
To: Melodie Virtue <MVIRTUE@gsblaw.com>
Cc: Garziglia, John <John.Garziglia@wbd-us.com>; Etemadi, Dina <Dina.Etemadi@wbd-us.com>
Subject: Sent on Behalf of John Garziglia: Letter to Melodie Virtue

Good morning Ms. Virtue,

Mr. Garziglia asked me to forward the attached letter to you.

Thank you,
Dina

Dina Etemadi
Legal Practice Assistant
Womble Bond Dickinson (US) LLP

d: 202-857-4423
m: 703-282-3822
e: Dina.Etemadi@wbd-us.com

1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036



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CERTIFICATE OF SERVICE

I, John F. Garziglia, do hereby certify that a true copy of the foregoing “Supplement to Opposition” was sent the 9th day of October, 2019 via USPS mail, postage prepaid, to the following:

Melodie A. Virtue, Esq.
Foster Garvey
1000 Potomac Street, N.W., Suite 200
Washington, DC 20007
(Counsel to Clear Communications, Inc.)



John F. Garziglia