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October 21, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.; Room TWD-204
Washington, D.C. 20554

Accepted / Filed

OCT 21 2019

Federal Communications Commission
Office of the SecretaryAttn: James D. Bradshaw
Senior Deputy Chief
Audio Division, Media BureauRe: W236CZ (Columbus, OH)
North American Broadcasting Company, Inc.
Facility ID No. 142835
File No. BLFT-20170608AAP**RESPONSE OF DELMAR COMMUNICATIONS, INC. TO
OCTOBER 11, 2019 LETTER SUBMITTED BY NORTH
AMERICAN BROADCASTING COMPANY, INC.**

Dear Ms. Dortch:

On behalf of Delmar Communications, Inc. ("Delmar"), Licensee of Radio Station WVXG-FM at Mount Gilead, Ohio, we herewith submit in triplicate a response to the letter submitted on October 11, 2019 in this proceeding by North American Broadcasting Company, Inc. ("North American"). North American claims that Delmar's submission on September 25, 2019 was inadequate. North American is wrong.

This interference complaint proceeding is more than two (2) years old. Delmar filed its original Petition to Deny on September 7, 2017. The broadcast stations at issue were identified long ago. Delmar's most recent submissions were largely updates of previous listener complaints. The listeners know what station they have been complaining about and their updated listener complaints were emailed to a manager of WVXG @ wvxgradio.com. There is no doubt interference to the

reception of Radio Station WVXG is at issue here.

North American claims that the Delmar interference complaints are not properly signed. Each complaint was electronically submitted to Delmar, and Delmar's staff verified the authenticity and accuracy of each complaint. Such a procedure is exactly what the FCC authorized when the new FM translator interference policy was adopted earlier this year.

North American's claim that the interference complaints of Kathy Mullins, Robert Keehl and Chris Johnston are at the same location is a disingenuous argument as each of these people listen to WVXG while driving in their car, and each of them experience interference in the same general area. There is nothing wrong or redundant. In fact, each of these people serve as verification for the interference received by the other two people. There is no doubt about the interference problem in that area.

In support of this response, Delmar submits two attached letter-statements:

1. The statement from Gary Rivers of Xtrmene Marketing regarding the process undertaken to collect the interference complaints and verify the accuracy of such information.
2. The statement from Delmar's President (Brent Casagrande) regarding the overall process of collecting the interference complaints and verifying the accuracy of such information.

In light of the foregoing, Delmar submits that it has complied with the FCC's new policies and has adequately demonstrated to the FCC that W236CZ causes objectionable interference to the operations of WVXG-FM in violation of the FCC's new FM translator interference policy. W236CZ should be ordered off-air immediately.

Should any questions arise concerning this submission please call or email the undersigned counsel for Delmar.

Sincerely,



Cary S. Tepper
Counsel to Delmar Communications, Inc..

Attachments

cc: James Bradshaw (FCC – via email)
Marissa Repp, Esq. (via email & U.S. mail)



10/11/2019

To Whom it May Concern,

My name is Gary Rivers.

I am President of Xtreme Marketing LLC

I provide contract web design, hosting and update services for WVXG Radio's website,
<https://wvxgradio.com/>.

Several months ago, I was directed to provide an online form that would capture information from individuals who may be having difficulty hearing the radio station on its assigned frequency of 95.1 FM.

Listeners were instructed to fill out the online complaint form.

The submissions were sent to two email addresses (Mine at grivers99@outlook.com and to Fred Shaffer, the WVXG Program Director. We compared emails to ensure that each complaint was received and able to be verified.

There were three required form fields on the complaint form, which assured the radio station had the ability to contact the complainant: 1. Name 2. Email Address 3. Phone number.

Each Email submission was authenticated by WVXG by contacting the individuals via the submitted contact form.

Sincerely,

Gary Rivers

Gary Rivers
Xtreme Marketing LLC

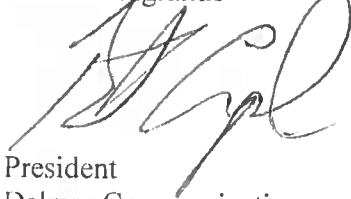
Delmar Communications
4001 Curve Road
Delaware, Ohio 43015
Phone; 614-832-9156

October 17, 2019

When the new guidelines for interference complaints were sent to us by the FCC in early September of 2019, we commissioned our WVXG web consultant to place a questioner on the WVXG web site. Listeners experiencing interference to their reception of WVXG were instructed to fill out the complaint form online and submit it through the station's web site. The completed forms were sent via email to both Gary Stackhouse and Fred Shaffer. Our staff then contacted the individuals through the contact information provided on the complaint form for authentication. The complaints were then forwarded to FCC counsel for submission.

I might note that many of the complaints were repeats of earlier complaints that were provided to North American Broadcasting. In fact, their engineer; Bill Bowan; made site visits to their addresses seeking a resolution to the problem. Our engineer At the time Mark Hiner conducted on off testing with North Americans translator as well as WVXGs transmitter to conclude that the interference was actually being caused by North Americans translator. Lower transmitter powers were tried by North Americans engineer all the way to ten watts with the interference continuing. North American must have a short memory since many of these complaints were already verified by investigations from their engineer Bill Bowan 18 months ago.

Brent Casagrande



President
Delmar Communications
614-832-9156