

2018 FEB 20 PM 12: 49

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In re Application of )

EMMANUEL COMMUNICATIONS, INC. )

For Construction Permit for a New FM Translator )  
Station, W256DN, to Operate on Channel 256 )  
At Worcester, Massachusetts )

BNPFT-20171220AAW  
Facility ID No. 200924

**ACCEPTED/FILED**

**FEB 19 2018**

Directed to: Office of the Secretary  
Attention: Chief, Audio Division, Media Bureau

Federal Communications Commission  
Office of the Secretary

**PETITION TO DENY**

Plymouth Rock Broadcasting Co., Inc. ("Plymouth Rock"), licensee of WPLM-FM, Plymouth, Massachusetts, by its attorneys, hereby submits its Petition to Deny the above-captioned application of Emmanuel Communications, Inc. ("Emmanuel") for construction permit for a new FM translator, assigned the call letters W256DN, at Worcester, Massachusetts, due to predicted interference to the reception of WPLM-FM by regular listeners. With respect thereto, the following is submitted:

Emmanuel has submitted an application for a new FM translator to provide fill-in service for WNEB(AM), Worcester, Massachusetts. This translator is proposed for operation on Channel 256, which is the same channel on which WPLM-FM is licensed to operate. Plymouth Rock had determined that it has regular listeners in the Worcester area, as well as other nearby areas, that are predicted to receive interference as a result of the proposed translator's operation. Accordingly, pursuant to Section 74.1201(f) of the Commission's rules, the above-captioned W256DN application should not have been accepted for filing and may not be granted.

Section 74.1201(f) provides that even in cases where no prohibited overlap of signal contours is predicted, an FM translator application will not be accepted for filing if the proposed station would interfere with reception of a co-channel station's "regularly used, off-the-air signal." As set forth in the attached Technical Statement (*see* Exhibit 1), W256DN would do just that. Attached to the Technical Statement are the declarations of 17 different listeners who are predicted to receive interference from the proposed operation of W256DN.

These declarations arose out of Plymouth Rock's ongoing efforts to understand where its regular listeners are located. After Plymouth Rock learned that a number of its regular listeners are located in the area likely to receive interference from W256DN, it asked some of them to sign declarations to confirm their status as regular listeners of WPLM-FM. Those declarations further indicate that none of the declarants is employed by WPLM-FM, Plymouth Rock, or any affiliated entity. Additionally, to the best knowledge of Plymouth Rock, none of the declarants is a close relative of any WPLM-FM or Plymouth Rock employee. Accordingly, all of the declarants qualify as *bona fide*, regular, over-the-air listeners of WPLM-FM. As set forth in the Technical Statement, each of the 17 declarants is expected to receive interference with his or her reception of WPLM-FM. On this basis alone, the above-captioned W256DN application must be dismissed or denied.

Another significant issue that must also be considered before granting the W256DN application is that WPLM-FM is a Massachusetts Primary entry point for EAS alerts. As such, WPLM-FM is a source of EAS State messages. See 47 C.F.R. §11.18(c). As a result, WPLM-FM is relied upon as an upstream initiator of alerts, far more than a mere local, downstream participant would be. Frequently, at the edges of Operational Areas, monitoring stations are unable to monitor their required EAS monitored stations because of reception issues. They

therefore will monitor adjacent Operational Area Primaries such as WPLM-FM to complete their reception of alerts and tests in accordance with FCC and FEMA regulations. Worcester is just adjacent to the Primary EAS operational area that WPLM-FM serves under the Massachusetts state EAS plan. It is therefore critical that reception of WPLM-FM EAS alerts in the Worcester and surrounding area not be compromised by the operation of a co-channel translator.

In sum, Plymouth Rock has demonstrated that acceptance and grant of the above-captioned W256DN application would be contrary to Section 74.1204(f) of the Commission's Rules in that the proposed facilities would cause interference to reception of WPLM-FM. In addition, authorization of W256DN would disrupt WPLM-FM's role as a primary provider of state EAS alerts.

WHEREFORE, the premises considered, Plymouth Rock respectfully requests that Emmanuel's above-captioned application be dismissed or denied.

Respectfully submitted,

PLYMOUTH ROCK BROADCASTING CO., INC.

By:

A handwritten signature in blue ink, reading "Anne Goodwin Crump", is written over a horizontal line.

Susan A. Marshall  
Anne Goodwin Crump

Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.  
1300 N. 17<sup>th</sup> Street – Eleventh Floor  
Arlington, Virginia 22209  
(703) 812-0400

February 16, 2018

Exhibit 1



TECHNICAL EXHIBIT  
FM TRANSLATOR STATION W256DN  
FCC FILE NO. BNPFT-20171220AAW  
FCC FACILITY ID 200924

This technical exhibit was prepared on behalf of Plymouth Rock Broadcasting Co., Inc., licensee of FM station WPLM-FM on channel 256B (99.1 MHz) at Plymouth, Massachusetts, in regard to the construction permit for FM translator station W256DN on channel 256 (99.1 MHz) at Worcester, Massachusetts. Specifically, the purpose of this Technical Exhibit is to provide convincing evidence under Section 74.1204(f) that activation of the W256DN CP operation will result in interference to regular home and mobile listeners of WPLM-FM.

W256DN CP Interference to Regular Listeners of WPLM-FM

Pursuant to Section 74.1204(f) of the FCC Rules, an FM translator station application will not be accepted for filing if its authorization will result in interference to the reception of a "regularly used, off-the-air signal." Our calculations indicate that regular listeners of WPLM-FM in both home and mobile situations will be subject to interference, both inside and outside of the W256DN CP 1 mV/m (60 dBu) contour.

Attached hereto are declarations from 17 listeners of WPLM-FM that will be subject to predicted interference from the W256DN CP.

Based on the listener declarations, a determination of the geographic coordinates of the listener's home or selected mobile listening locale was made. The respective distances and azimuths to the given listener locations were determined from both the WPLM-FM desired facility and the undesired translator facility. Using these data, the respective desired and undesired signals were calculated and a determination of interference was made. See attached tabulation.

A map showing the listener locations is attached hereto for reference.



Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
3135 Southgate Circle  
Sarasota, FL 34239

February 14, 2015

DECLARATION

I, Paul C. Thayer, Jr., hereby declare and state as follows:

(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work and/or in my car while traveling to and from Southborough, MA to Northborough, MA and surrounding towns while doing errands ✓

(Add Locations/Addresses)

I live at: 56 Framingham Rd. Southborough, MA 01772

(Add Full Street Address)

I have lived there since 1994

(Add Date)

I am employed by (retired since 2013), and I have worked there since

(Add Name If Applicable)

My office where I work is located at

(Add Date)

(Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Paul C Thayer Jr  
(Sign Name)

02/08/2018  
(Date)

ID No. 1 - Home  
42-18-41.8 N.L.  
71-31-07.5 W.L.  
(NAD83)

## DECLARATION

I, David Lalone, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Shrewsbury to all locations in Central MA, Eastern  
MA and RI. (Add Locations/Addresses)

I live at: 22 Kenilworth Rd, Shrewsbury MA ✓  
(Add Full Street Address)

I have lived there since 1976.  
(Add Date)

I am self-employed and I have worked there since  
(Add Name If Applicable)  
Oct 2014. My office where I work is located at 22 Kenilworth Rd, Shrewsbury, MA. Prior  
employment in Marlboro, Natick and Northboro MA for over 30 years.  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

David Lalone  
(Sign Name)

2/11/18  
(Date)

ID No. 2 - Home  
42-17-11.0 N.L.  
71-42-50.3 W.L.  
(NAD83)

2/9/2018

Pending new station - l Mitchell3ri@gmail.com - Gmail

1. Pending new station - l Mitchell3ri@gmail.com - Gmail

Open with Google Docs



# DECLARATION

I, Leeds Mitchell III, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from MA RI including Worcester.  
(Add Locations/Addresses)

I live at: 14 Griswold Ave Bristol, RI 02809  
(Add Full Street Address)

I have lived there since 2/07.  
(Add Date)

I am employed by Component Technologies, and I have worked there since  
(Add Name If Applicable)  
1995. My office where I work is located at 14 Griswold Ave Bristol, RI.  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

[Signature]  
(Sign Name)  
2/9/18

ID No. 3 - Worcester Main Post Office  
42-15-48.0 N.L.  
71-48-04.7 W.L.  
(NAD83)

DECLARATION

I, David Plamondon, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Douglas MA - Worcester MA ✓  
(Add Locations/Addresses)

I live at: 96 Penny St Douglas MA 01516  
(Add Full Street Address)

I have lived there since 2007 Sep 1 (approx.)  
(Add Date)

I am employed by UMASS Medical, and I have worked there since  
(Add Name If Applicable)  
FEB 2006. My office where I work is located at 333 South St NEWBURY MA  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

[Signature]  
(Sign Name)

6 FEB 18  
(Date)

ID No. 4 - Home  
42-02-07.4 N.L.  
71-41-11.9 W.L.  
(NAD83)

DECLARATION

I, PAUL LAMALVA, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from WORCESTER. ✓  
(Add Locations/Addresses)

I live at: WORCESTER  
(Add Full Street Address)

I have lived there since 2011.  
(Add Date)

I am employed by NOT WPLM, and I have worked there since  
(Add Name If Applicable)  
2005. My office where I work is located at WORCESTER.  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

[Signature]  
(Sign Name)

2/6/18  
(Date)

ID No. 5 - Worcester Main Post Office  
42-15-48.0 N.L.  
71-48-04.7 W.L.  
(NAD83)

DECLARATION

I, Laurie Irwin, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Franklin, MA and surrounding towns, including  
many towns in Worcester County (Milford, Hopedale, Grafton, Westborough)

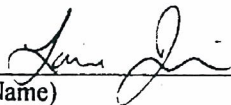
(Add Locations/Addresses)

I live at: 30 Marvin Ave, Franklin, MA 02038  
(Add Full Street Address)

I have lived there since October, 1999  
(Add Date)

I am employed by Wordsmith Pros, Inc, and I have worked there since  
(Add Name If Applicable)  
March 2015. My office where I work is located in my home at 30 Marvin Ave, Franklin, MA  
02038.

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

  
(Sign Name)

February, 7, 2018  
(Date)

ID No. 6 - Milford Main Post Office  
42-08-19.4 N.L.  
71-31-19.9 W.L.  
(NAD83)



DECLARATION

I, Paul Wright, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Shrewsbury and Worcester, MA area ✓  
(Add Locations/Addresses)

I live at: 38 NORTH ST., SHREWSBURY, MA 01545  
(Add Full Street Address)

I have lived there since February 1999  
(Add Date)

I am employed by RETIRED and I have worked there since  
(Add Name If Applicable)  
JULY 2000. My office where I work is located at N/A  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Paul Wright  
(Sign Name)

FEBRUARY 7, 2018  
(Date)

ID No. 7 - Home  
42-18-33.5 N.L.  
71-42-12.9 W.L.  
(NAD83)

DECLARATION

I, Meg Wright, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Shrewsbury and Worcester area  
(Add Locations/Addresses) ✓

I live at: 38 NORTH ST., SHREWSBURY, MA 01545  
(Add Full Street Address)

I have lived there since October 1994.  
(Add Date)

I am employed by SELCO/Town of Shrewsbury and I have worked there since  
(Add Name If Applicable)  
2008. My office where I work is located at 100 Maple Ave., Shrewsbury,  
MA 01545  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Meg Wright  
(Sign Name)

February 8, 2018  
(Date)

ID No. 8 - Home  
42-18-33.5 N.L.  
71-42-12.9 W.L.  
(NAD83)

DECLARATION

I, Jonathan Wright, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Worcester MA, Lawrence MA  
(Add Locations/Addresses)

I live at: 38 North St., Shrewsbury, MA 01545  
(Add Full Street Address)

I have lived there since October 1994.  
(Add Date)

I am employed by Comm. of MASS., and I have worked there since  
(Add Name If Applicable)  
May 2017. My office where I work is located at 37 Shattuck St. Lawrence, MA  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Jonathan B. Wright  
(Sign Name)  
2-8-18  
(Date)

ID No. 9 - Home  
42-18-33.5 N.L.  
71-42-12.9 W.L.  
(NAD83)

DECLARATION

I, Denise Nelson, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Hopedale MA. ✓  
(Add Locations/Addresses)

I live at: 9 Dennett St. Hopedale MA 01747  
(Add Full Street Address)

I have lived there since 4/2016.  
(Add Date)

I am employed by Belles Business Bureau, and I have worked there since  
(Add Name If Applicable)  
5/2014. My office where I work is located at 280 Donald Lynch Blvd Ste 102  
(Add Date) (Add Address)  
Marlborough MA 01752

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Denise Nelson  
(Sign Name)  
2/8/18  
(Date)

ID No. 10 - Home  
42-08-15.6 N.L.  
71-32-38.3 W.L.  
(NAD83)

DECLARATION

I, David P Markt, hereby declare and state as follows:

(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from in car and at work Warwick

RI (Add Locations/Addresses)

I live at: 220 providence road South Grafton, ✓  
MA (Add Full Street Address)

I have lived there since over 20 years  
(Add Date)

I am employed by Coastal INTL trucks, and I have  
worked there since May 2016

(Add Name If Applicable)

My office where I work is located at Warwick,

RI (Add Date)

(Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

(Sign Name)

2/8/2018  
(Date)

ID No. 11 - Home  
42-11-02.5 N.L.  
71-41-18.3 W.L.  
(NAD83)

DECLARATION

I, Jeffrey Deiana, hereby declare and state as follows:

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work and/or in my car while traveling to and from furniture delivery locations throughout the Worcester area.

I live at 305 Linwood Avenue Whitinsville, MA 01588 ✓

I have lived there since 1996.

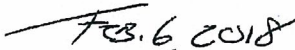
I am employed by Deiana's Furniture Refinishing and Repair and I have worked there since

1998. My office where I work is located at 35 Elmdale Road Uxbridge, MA 01569.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



(Sign Name)



(Date)

ID No. 12 - Home  
42-06-23.0 N.L.  
71-39-17.8 W.L.  
(NAD83)



## DECLARATION

I, Diane E. Cadman, hereby declare and state as follows:

(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or ~~work~~  
and/or in my car while traveling to and from Bellingham, MA \_\_\_\_\_  
\_\_\_\_\_. (Add  
Locations/Addresses)

I live at: 16 Hixon Street, Bellingham, MA 02019

(Add Full Street Address)

I have lived there since 1994  
(Add Date)

I am employed by N/A, and I have worked there since  
(Add Name If Applicable)

\_\_\_\_\_. My office where I work is located at \_\_\_\_\_  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Diane Cadman  
(Sign Name)

(Date) 2/10/18

ID No. 13 - Home  
42-06-49.5 N.L.  
71-28-47.1 W.L.  
(NAD83)



DECLARATION

I, GAYLE M. THOMPSON, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from WORK/HOME/ANYWHERE.  
(Add Locations/Addresses)

I live at: 2 Walcott Valley Dr Hopkinton, MA 01748  
(Add Full Street Address)

I have lived there since July 2011.  
(Add Date)

I am employed by Painters Pride Inc, and I have worked there since  
(Add Name If Applicable)  
Jan 2000. My office where I work is located at 801 Waverly St Framingham MA  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Gayle M. Thompson  
(Sign Name)

2/7/18  
(Date)

ID No. 14 - Home  
42-13-53.4 N.L.  
71-31-12.4 W.L.  
(NAD83)

DECLARATION

I, TONI CULBERT, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and ~~at~~ work  
and ~~in~~ in my car while traveling to and from EVERYWHERE I DRIVE  
(Add Locations/Addresses)

I live at: 8-1 OAK RIDGE DR., MAYNARD MA 01754  
(Add Full Street Address)

I have lived there since 1999  
(Add Date)

I am employed by NASUMI CORP, and I have worked there since  
(Add Name If Applicable)  
JULY 2016. My office where I work is located at 8-1 OAK RIDGE DR., MAYNARD MA  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Toni Culbert  
(Sign Name)

2-7-18  
(Date)

ID No. 15 - Home  
42-25-37.0 N.L.  
71-26-17.7 W.L.  
(NAD83)

## DECLARATION

I, Walter W. Kriemeyer, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from Promenade Street, Providence, RI  
(Add Locations/Addresses) 454 Quaker Hwy, Uxbridge, MA  
Pleasant Valley Crossing, Sutton, MA

I live at: 10 Knollridge Drive, North Smithfield, RI 02896  
(Add Full Street Address)

I have lived there since January, 2010.  
(Add Date)

I am employed by Cameron + Mitheiman LLP and I have worked there since  
(Add Name If Applicable) 7-28-14. My office where I work is located at 301 Promenade St., Providence, RI 02908  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Walter W. Kriemeyer  
(Sign Name)

2-7-18  
(Date)

ID No. 16 - Uxbridge address  
42-02-27.1 N.L.  
71-37-12.8 W.L.  
(NAD83)

DECLARATION

I, Candace Hulyk, hereby declare and state as follows:  
(Print Full Name)

I regularly listen to FM Station WPLM 99.1 MHz while at home and/or work  
and/or in my car while traveling to and from MILFORD MA 01757.  
(Add Locations/Addresses)

I live at: 96 HIGHLAND ST  
(Add Full Street Address)

I have lived there since 11/1996.  
(Add Date)

I am employed by N/A, and I have worked there since  
(Add Name If Applicable)  
N/A My office where I work is located at N/A.  
(Add Date) (Add Address)

I declare under penalty of perjury that the foregoing is true and correct to the best of  
my knowledge and belief.

Candace Hulyk  
(Sign Name)

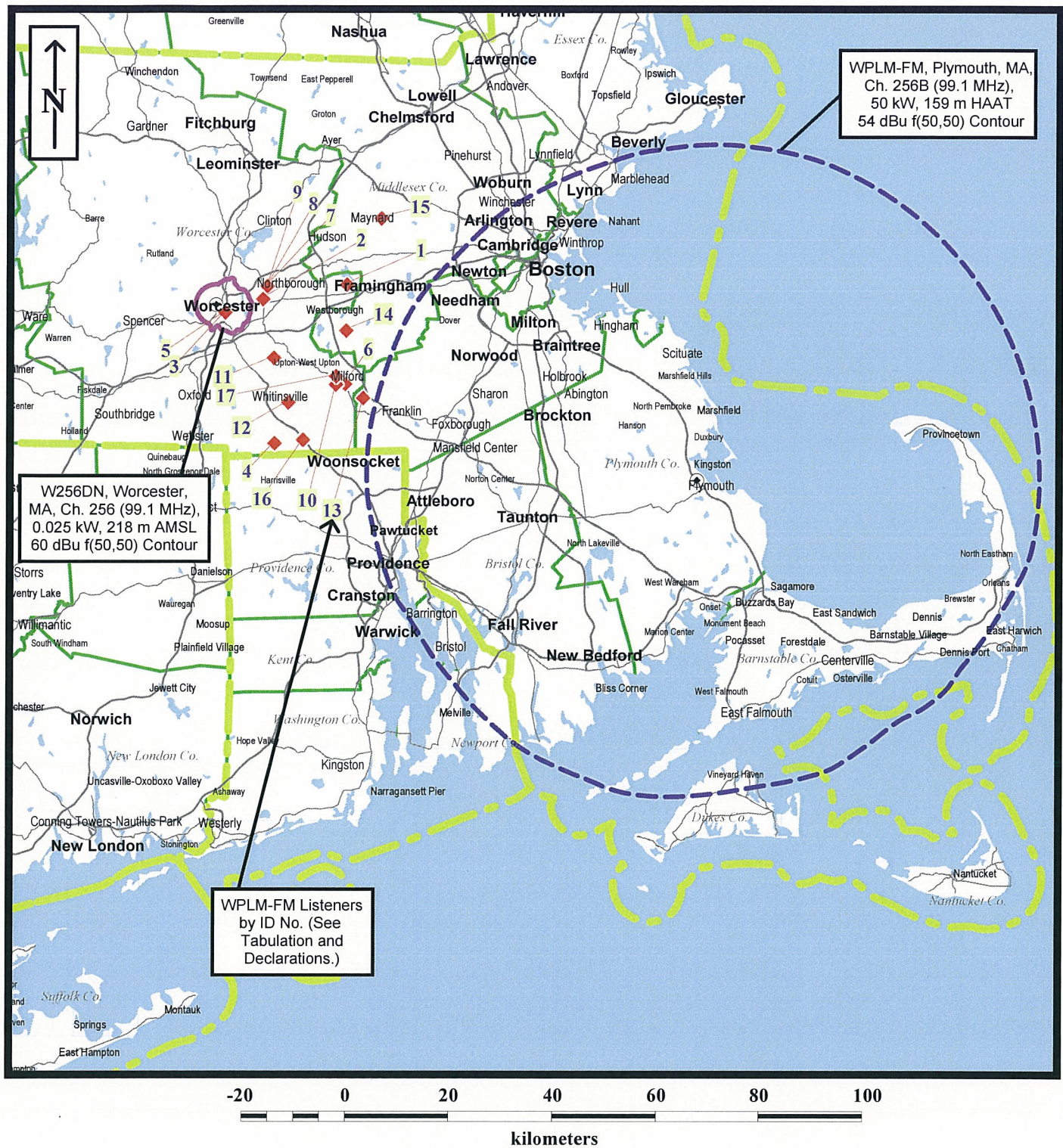
Jul 12, 2018  
(Date)

ID No. 17 - Home  
42-07-07.1 N.L.  
71-32-36.2 W.L.  
(NAD83)

WPLM-FM LISTENER PREDICTED INTERFERENCE ANALYSIS

ID (See Map)	Listener Name	LatD	LatM	LatS	LonD	LonM	LonS	Distance & Azimuth From WPLM-FM (km/deg True)		Distance & Azimuth From Translator (km/deg True)		WPLM-FM Desired (D) f(50,50) Signal (dBu)	Translator Undesired (U) f(50,10) Signal (dBu)	U/D Ratio (more than -20 dB fails Requirement)	Interference Result based on -20 dB U/D
1	Paul C. Thayer, Jr.	42	18	41.8	71	31	7.5	77.7	299.8	25.4	80.2	48.3	37.2	-11.1	Fail
2	David Lalone	42	17	11.0	71	42	50.3	91.0	293.3	9.1	80.6	42.5	54.3	11.8	Fail
3	Leeds Mitchell III	42	15	48.0	71	48	4.7	96.8	290.3	2.1	121.9	40.0	79.3	39.3	Fail
4	David Plamondon	42	2	7.4	71	41	11.9	82.0	275.6	28.7	157.0	46.3	32.5	-13.8	Fail
5	Paul LaMalva	42	15	48.0	71	48	4.7	96.8	290.3	2.1	121.9	40.0	79.3	39.3	Fail
6	Laurie Irwin	42	8	19.4	71	31	19.9	70.6	286.0	29.0	121.0	51.1	35.3	-15.8	Fail
7	Paul Wright	42	18	33.5	71	42	12.9	91.2	295.0	10.6	67.6	42.4	51.1	8.7	Fail
8	Meg Wright	42	18	33.5	71	42	12.9	91.2	295.0	10.6	67.6	42.4	51.1	8.7	Fail
9	Jonathan Wright	42	18	33.5	71	42	12.9	91.2	295.0	10.6	67.6	42.4	51.1	8.7	Fail
10	Denise Nelson	42	8	15.6	71	32	38.3	72.3	285.5	27.5	123.2	50.3	35.9	-14.4	Fail
11	David P Markt	42	11	2.5	71	41	18.3	85.2	286.8	14.9	131.8	44.9	46.3	1.4	Fail
12	Jeffrey Deiana	42	6	23.0	71	39	17.8	80.5	281.4	23.1	143.3	47.0	38.4	-8.6	Fail
13	Diane E. Cadman	42	6	49.5	71	28	47.1	66.5	284.5	33.4	122.0	52.8	32.9	-19.9	Fail
14	Gayle M. Thompson	42	13	53.4	71	31	12.4	73.9	293.8	25.4	100.4	49.7	37.8	-11.9	Fail
15	Toni Culbert	42	25	37.0	71	26	17.7	79.5	310.3	36.0	61.4	47.3	30.3	-17.0	Fail
16	Walter W. Krite Meyer	42	2	27.1	71	37	12.8	76.6	276.4	30.7	147.1	48.6	33.8	-14.8	Fail
17	Candace Hulyk	42	9	7.1	71	32	36.2	72.7	286.7	26.7	120.3	50.2	36.8	-13.4	Fail





## WPLM-FM LISTENER LOCATIONS MAP

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

Exhibit 2



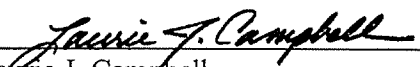
### DECLARATION

I, Laurie J. Campbell, hereby declare and state as follows:

I am the President and sole stockholder of Plymouth Rock Broadcasting Co., Inc. I have read the foregoing Petition to Deny with regard to the application for construction permit for FM translator W256DN. The facts contained therein are true and correct to the best of my knowledge and belief.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 16<sup>th</sup> day of February, 2018.

  
Laurie J. Campbell

**CERTIFICATE OF SERVICE**

I, Deborah N. Lunt, an Assistant with the office of Fletcher, Heald & Hildreth PLC, hereby certify that a true and correct copy of the foregoing "Petition to Deny" was sent on this 16<sup>th</sup> day of February, 2018, via First-Class United States mail, postage pre-paid, to the following:

Stuart W. Nolan, Jr., Esquire  
Legal Works Apostolate, PLLC  
4 Family Life Lane  
Front Royal, Virginia 22630  
*Counsel for Emmanuel Communications, Inc.*



Deborah N. Lunt