



Federal Communications Commission  
Washington, D.C. 20554

August 20, 2019

*In Reply Refer to:*  
1800B3-KV

Cypress Broadcasting Club  
c/o Richard Calvert  
16814 N. Swirling Cloud Court  
Cypress, TX 77433

In Re: K278CR, Houston, TX  
Centro Cristiano de Vida Eterna  
Facility ID No. 148295  
File No. BLFT-20171213ADO

**Interference Complaints**

Dear Mr. Calvert:

This letter refers to the pending "Petition for Reconsideration Interference Complaint" (Petition - Complaint) filed on March 1, 2018, by Cypress Broadcasting Club, licensee of LPFM Station KCYB-LP, Cypress, Texas (Cypress or Complaining Station); the March 2, 2018, "Supplement" (First Supplement); the May 4, 2018, untitled filing (Second Supplement); the May 29, 2018, "Request to Deny Extension" (Request); and the August 23, 2018, "K278CR Interference Demonstration" (Interference Demonstration)<sup>1</sup> alleging interference from FM Translator K278CR, Houston, Texas, licensed to Centro Cristiano de Vida Eterna (Centro).

Recently, the Commission adopted certain changes to the FCC's rules (Rules) relating to the translator interference complaint resolution process.<sup>2</sup> The Commission stated that, once effective, all pending complaints would be decided under the new Rules. The Commission further stated that parties involved in pending proceedings would be given an opportunity to submit supplemental material to address the changes.<sup>3</sup>

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<sup>1</sup> Collectively, the Petition-Complaint, the First and Second Supplements, the Request, and the Interference Demonstration will be referred to as the Complaints.

<sup>2</sup> See *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, Report and Order, FCC 19-40, 34 FCC Rcd \_\_\_\_ (2019) (*Translator Interference Order*).

<sup>3</sup> *Id.* at ¶ 49.

Our initial review of the Complaints under the revised interference standards reveals that additional information is required. Specifically, in order to continue processing the Complaints the items marked below must be submitted:<sup>4</sup>

1. Listener Complaints:

- Detailed information on the Complaining Station's protected contour and the population located therein;
- Minimum Number of Listener Complaints as determined by the population located within the Complaining Station's protected contour;<sup>5</sup>
- Signed and dated (within one year of Complaint and all other listener complaints) by Listener;
- Listener's full name, address and phone number;
- Clear, concise, and accurate description of the location where interference is alleged;<sup>6</sup>
- Statement that Listener listens over-the-air to the desired station at least twice a month;

<sup>4</sup> An item will be marked as missing the required information if it is missing from one or more listener complaints.

<sup>5</sup> See 47 CFR § 74.1203 Table 1.

Population within Protected Contour	Minimum Listener Complaints Required for Interference Claim
1-199,999	6
200,000-299,999	7
300,000-399,999	8
400,000-499,999	9
500,000-999,999	10
1,000,000-1,499,999	15
1,500,000-1,999,999	20
2,000,000 or more	25
LPFM stations with fewer than 5,000	3

<sup>6</sup> In the *Translator Interference Order*, the Commission noted that “[a]ppropriate descriptions include map coordinates, street addresses, street intersections, or other descriptions such as ‘along Route XX near mile marker XX’ or ‘between Exits 1 and 2 on Route XX.’ Unacceptable descriptions would include ‘on my way to work’ or ‘downtown,’ as they do not inform . . . [if] within its 45 dBu contour or . . . provide sufficient information to resolve the complaint.” *Id.* at note 65.

Statement that Listener has no legal, financial, employment, or familial affiliation or relationship with desired station.

2. Technical Interference Showing:

Map plotting the specific location of the alleged interference in relation to the Complaining Station's 45dBu contour;

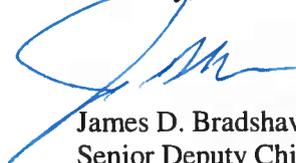
Statement that the Complaining Station is operating within its licensed parameters;

Statement that the Complaining Station licensee has used commercially reasonable efforts to inform the relevant translator licensee of the claimed interference and attempted private resolution;

Undesired/Desired data demonstrating that at each listener location the ratio of undesired to desired signal strength exceeds -20 dB for co-channel situations, -6 dB for first-adjacent channel situations or 40 dB for second- or third- adjacent channel situations, calculated using the Commission's standard contour prediction methodology.

Within thirty (30) days of this letter, Cypress must submit the above information and any other information not referenced above that might be required by the Rules.<sup>7</sup> Further action on the Complaints will be withheld for a period of 30 days from the date of this letter to provide Cypress an opportunity to respond. Failure to submit the required information will result in the dismissal of the Complaints.<sup>8</sup>

Sincerely,



James D. Bradshaw  
Senior Deputy Chief  
Audio Division  
Media Bureau

cc: Centro Cristiano de Vida Eterna (by email)

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<sup>7</sup> On June 13, 2019, the Bureau ordered K278CR off the air due to a separate interference complaint proceeding initiated by Educational Media Foundation; although Centro has appealed this decision, currently, K278CR is not operational. Therefore, any new information submitted by Cypress must specifically state that it concerns K278CR's operations on or before June 13, 2019.

<sup>8</sup> This action is without prejudice to any other issues raised in the Petition-Complaint as supplemented by Cypress.