

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Application of)
)
FAITH PLEASES GOD CHURCH CORP.) File No. BNPFT-20000128AAP
) Facility ID No. 122346
For a New FM Translator Station)
to Operate on Channel 210 at)
Mission Viejo, California)

To: Audio Services Division
Media Bureau

INFORMAL OBJECTION

Santa Monica Community College District ("SMCCD"), licensee of noncommercial educational Station KCRW(FM), Santa Monica, California, acting pursuant to Section 73.3587 of the Commission's rules, 47 C.F.R. §73.3587, hereby submits this informal objection to the above-captioned application filed January 28, 2000 ("Application"), by Faith Pleases God Church Corp. ("Church Corp."). The Application is inconsistent with Commission rules and should be either dismissed or denied. In support of that conclusion, the following is stated:

1. Church Corp. proposes to operate a new co-channel FM translator station at Mission Viejo, California, with an effective radiated power of 100 watts at an antenna height of 64 meters above ground. Church Corp. proposes to locate its transmitter for the new Mission Viejo FM translator station on a tower owned by Cox Communications, Inc., which is located at 28000 Marguerite Parkway in Mission Viejo.¹

¹ See File No. BNPFT-20000128AAP, p. 4; Antenna Structure Registration No. 1018349 (copy appended hereto as Appendix A).

2. Station KCRW operates on Channel 210 with an effective radiated power of 6.8 kilowatts at an antenna height of 298 meters above average terrain. See File No. BLED-19940824KA. Church Corp.'s proposed transmitter site for the new FM translator station is located approximately 57 miles southeast of the licensed site of Station KCRW which is atop Hollywood Hills.

3. Section 74.1235(b) of the Commission's rules provides that an application for a new FM translator station will not be accepted for filing if it proposes an effective radiated power which exceeds the maximum ERP value determined in accordance with that provision. 47 C.F.R. §74.1235(b). As demonstrated in the attached engineering statement of John J. Davis (appended hereto as Appendix B), Church Corp.'s Application violates the maximum ERP value determined in accordance with Section 74.1235(b)(1) of the rules because the proposed new FM translator station at Mission Viejo is permitted to operate with no more than 19 watts ERP in the main lobe. See Appendix B at 1-2. Thus, Church Corp.'s Application should not have been accepted for filing and should be dismissed because it proposes to operate with a power level which greatly exceeds that permitted by Section 74.1235(b)(1) of the rules.

4. Even assuming, *arguendo*, that Church Corp. were to amend its application to specify no more than 19 watts ERP in the main lobe, the Application would still have to be dismissed because it does not comply with Section 74.1204(f) of the Commission's rules, which provides as follows:

An application for an FM translator station will not be accepted for filing even though the proposed operation would not involve overlap of field strength contours with any other station . . . if the predicted 1 mV/m field strength contour of the FM translator station will overlap a populated area already receiving a regularly used off-the-air signal of any authorized co-channel . . . station, . . . and grant of the authorization will result in interference to the reception of such signal.

47 C.F.R. §74.1204(f).

5. Figure 1 to Appendix B hereto contains a map depicting the 60 dBu contour of the proposed new FM translator station if it were to operate with 19 watts ERP. As demonstrated therein, the predicted service contour of Church Corp.'s proposed new FM translator station – even if it were to operate with only the maximum permitted power level of 19 watts ERP – would cover a substantial portion of the Mission Viejo area. Station KCRW has 67 subscriber-listeners who reside within the proposed translator station's 60 dBu contour.² Appendix B at 4-5. These listeners would receive harmful interference from the proposed co-channel FM translator station in Mission Viejo. Thus, even if the translator Application were amended to specify a permissible power level, it fails to comply with Section 74.1204(f) of the rules because it would cause interference to KCRW's off-air signal in the Mission Viejo area where KCRW has a significant number of subscriber-listeners. Therefore, for this additional reason, the application should be dismissed.

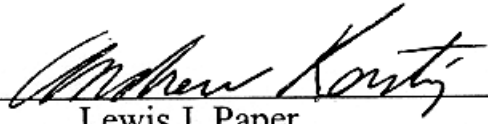
WHEREFORE, in light of the foregoing, SMCCD respectfully requests that the Application filed by Church Corp. for a new FM translator station to operate on Channel 210 at Mission Viejo, California be dismissed or denied.

² Although their residence addresses have not been plotted on the map contained in Appendix B, the attached engineering exhibit also demonstrates that KCRW has 101 subscriber-listeners who reside within the 60 dBu contour of the proposed new FM translator station if it were to operate with 100 watts ERP. Appendix B at 6-8.

Respectfully submitted,

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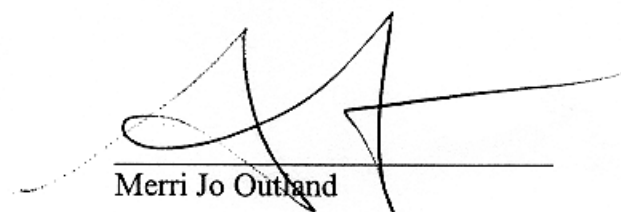
CERTIFICATE OF SERVICE

I, Merri Jo Outland, hereby certify that I have this 17th day of June, 2002, caused a copy of the foregoing Informal Objection to be served by First Class mail, postage prepaid, upon the following persons:

Peter H. Doyle, Chief*
Audio Services Division
Media Bureau
Federal Communications Commission
Room 2-A267
The Portals II
445 Twelfth Street, S.W.
Washington, DC 20554

James Bradshaw*
Audio Services Division
Media Bureau
Federal Communications Commission
Room 2-A262
The Portals II
445 Twelfth Street, S.W.
Washington, DC 20554

Mr. Clark Ortiz
Faith Pleases God Church Corp.
4501 West Expressway 83
Harlingen, TX 78552



Merri Jo Outland

* Hand Delivered

FCC Antenna Structure Registration



Antenna Structure Registration

[FCC](#) > [WTB](#) > [ASR](#) > [Registration 1018349](#)

[FCC Site Map](#)

ASR Registration Search

Registration 1018349

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[Reference Copy](#)

Registration Detail

Reg Number	1018349	Status	Constructed
File Number	A0021996	Constructed	03/25/1996
FAA Study	97-AWP-0689-OE	EMI	No
FAA Issue Date	03/25/1997	NEPA	No

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Communications Purposes

Location (in NAD83 Coordinates - [Convert to NAD27](#))

Lat/Long 33-33-10.0 N 117-39-42.0 W 28000 MARGUERITE PARKWAY

City, State MISSION VIEJO , CA

Center of
AM Array

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
120.4	82.8

Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
203.2	77.1

Painting and Lighting Specifications

FAA Chapters 3, 4, 5, 13

Paint and Light in Accordance with FAA Circular Number [70/7460-1J](#)

Owner & Contact Information

FRN

Licensee ID

Owner

COX COMMUNICATIONS INC
1400 LAKE HEARN DRIVE
ATLANTA , GA 30319

P: (404)843-5523
E:

Contact

P:
E:

Last Action Status

Status	Constructed	Received	04/09/1997
Purpose	New	Entered	04/09/1997
Mode	Interactive		

Related Applications

04/09/1997 A0021996 - New (NE)

Comments

Comments

None

Automated Letters

None

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Registration Search

By Registration Number

SUBMIT

Engineering Statement of John J. Davis

ENGINEERING EXHIBIT

INFORMAL OBJECTION
TO THE APPLICATION OF
FAITH PLEASES GOD CHURCH CORP.
FOR A MINOR AMENDMENT TO THE PENDING APPLICATION
FOR NEW FM TRANSLATOR STATION
MISSION VIEJO, CALIFORNIA
CHANNEL 210, 89.9 MHz

FCC FILE NO. BNPFT-20000128AAP

PREPARED FOR:

SANTA MONICA COMMUNITY COLLEGE DISTRICT
1900 PICO BOULEVARD
SANTA MONICA, CALIFORNIA 91405

JUNE 11, 2002

PREPARED BY:

JOHN J. DAVIS
CONSULTING ENGINEER
POST OFFICE BOX 128
SIERRA MADRE, CALIFORNIA 91025-0128
(626) 355-6909
FAX: (626) 355-4890
E-mail: JohnJDavisAssoc@cs.com

1.0 INTRODUCTION:

This Engineering Exhibit was prepared for SANTA MONICA COMMUNITY COLLEGE DISTRICT ("SMCCD"), licensee of Non-Commercial Educational FM (NCE-FM) Station KCRW in Santa Monica, California, to support its informal objections to the application of the Faith Pleases God Church Corp. ("Faith") for a new FM translator station to serve Mission Viejo, California [FCC File No. BNPFT-20000128AAP].

It will be shown that the amended application will cause interference to the signal of KCRW, which operates on a co-channel, Channel 210B (89.9 MHz), which is regularly received within the proposed translator's 60 dBu contour.

2.0 AMENDED COVERAGE:

Faith's amended application proposes to increase the height of the transmitting antenna by 29 meters, from 155 meters AMSL to 184 meters AMSL, and to change the antenna from a non-directional to a directional antenna. Faith concedes that there will be interference caused to KCRW, for it gives the elimination of interference as the reason for changing to a directional antenna. Unfortunately, the directional antenna does nothing to eliminate interference to KCRW as the coverage contour for the directional antenna is not substantially different from the original non-directional antenna. Because of its proposed co-channel operation with KCRW, there is nothing that can be done which will eliminate the interference likely to be caused to the subscribers to KCRW that reside within the 60 dBu contour of the proposed translator.

The amended application (as does the original application) violates the provisions of Section 74.1235(b)(1) in that the effective radiated power (ERP) exceeds that maximum

permitted for the radial height above the average terrain (HAAT) for those radials between 195 and 265 degrees. The maximum ERP permitted, as a function of radial direction, is shown below:

<u>RADIAL</u> (Degrees)	<u>HAAT</u> (Meters)	<u>APPL ERP</u> (Watts)	<u>MAX. ERP</u> (Watts)	
195	149.6	15.6	10	
200	132.5	23.6	13	
205	119.6	33.3	13	
210	124.2	46.1	13	
215	124.4	61.0	13	
220	128.1	73.6	13	
225	118.0	87.4	13	
230	110.1	93.6	19	
235	110.5	100.0	19	Main Lobe
240	127.3	93.6	13	
245	121.6	87.4	13	
250	116.7	73.6	13	
255	111.7	61.0	19	
260	126.4	46.1	13	
265	112.9	33.3	19	

3.0 SECTION 74.1204(f) CONSIDERATIONS:

Section 74.1204(f) of the Commission's Rules states:

“An application for an FM translator station will not be accepted for filing even though the proposed operation would not involve overlap of field strength contours with any other station, as set forth in paragraph (a) of this section, if the predicted 1 mV/m field strength contour of the FM translator station will overlap a populated area already receiving a regularly used, off-the-air signal of any authorized co-channel, first, second or third adjacent channel broadcast station, including Class D (secondary) noncommercial educational FM stations and grant of the authorization will result in interference to the reception of such signals.”

The original application and the proposed amendment would violate these provisions:

- The amended application's 1 mV/m (60 dBu) contour encloses a populated area.
- The amended application's 60 dBu contour encloses an area where significant, documented listenership to KCRW exists.

Based upon the above, the amended application violates the provisions of Section 74.1204(f).

4.0 LISTENERSHIP WITHIN INTERFERENCE AREA:

The proposed translator's 60 dBu contour was plotted on a series of pages from the Zip Code Directory for Orange County, California, of The Thomas Guide®, a publication of Thomas Brothers Maps, Inc. Using the current KCRW subscriber database, for those zip codes located within the amended translator's 60 dBu contour, each KCRW subscriber was located on the zip code/contour map, and if their address fell within the contour, it was so marked on the map. Because the Faith application violates the provisions of Section 74.1235(b)(1), both the 100 watt ERP (application) and the 19 watt ERP (maximum permitted in the main lobe at 235 degrees) were tabulated. The results are shown below. The subscriber is described by block number and that block is identified on the Zip Code/Contour map (Figure 1¹):

¹ Since the 100 watt ERP cannot be permitted, SMCCD chose to plot only the KCRW subscriber's locations on the zip code/contour map for the 19 watt ERP only.

4.1 19 WATT ERP CONTOUR:

<u>ZIP CODE</u>	<u>SUBSCRIBER'S</u>		<u>MAP ID#</u>
	<u>ID#</u>	<u>ADDRESS</u>	
92675	206605	30100 Silver Spur Road	20
92677	022051	28800 Aloma Avenue	21
	039869	23600 Dane Court	27
	041842	24200 Cherry Hills Place	1
	065299	29300 Port Royal Way	2
	092212	23500 Calverton Circle	24
	105113	100 Caribbean Court	25
	109719	24600 Royale Ridge	31
	114382	30200 Benecia Avenue	23
	119640	24300 Toponas Court	3
	126058	28200 Rancho de Linda	33
	130446	25400 Del Cobre	28
	133388	32300 Ridgeway Avenue	4
	141307	30100 Town Center Drive	34
	144911	100 Precipice	5
	153071	25600 Del Norte	29
	160383	29162 Abotsinch Street	22
	171434	24300 Toponas Court	3
	171729	28600 Rancho Grande	32
	175662	29200 Pompano Way	6
	180569	10 Copley Place	26
	180586	24800 Nueva Vista Drive	7
	205667	10 Joyeuse	30
	206839	29600 Via Cebolla	35
	212613	295500 Pointe Royal	8
	216344	28100 Moulton Parkway	43
	221184	24800 Laguna Vista	44
	221654	100 Taylor Place	53
224346	28400 La Falda	45	
226107	100 Sentry Hill	54	
226171	100 Serenity Lane	9	
227721	24700 Via Lagunaria	56	
228238	100 Sorbonne	55	
234708	28200 Via Fierro	57	
240416	25100 Via Catalina	58	
240607	29700 White Otter Lane	59	
244846	100 Siros	60	

<u>ZIP CODE</u>	<u>SUBSCRIBER'S</u>		<u>MAP ID#</u>
	<u>ID#</u>	<u>ADDRESS</u>	
92677	249311	28100 Rubicon Court	61
	254543	100 Sorbonne	55
	261615	28400 Las Cabos	46
	268787	100 Amarante	38
	269309	100 Argos	39
	274286	24500 Kings Road	51
	275325	25000 Monte Verde Drive	49
	277175	23700 Hillhurst Drive	50
	277710	23200 Cheswald	40
	277815	25100 Via Terracina	58
	280180	10 Circle Hill	41
	280365	28300 Lakewood Drive	47
	280428	29100 Kensington Drive	48
	281610	30900 Cypress Place	42
	283380	100 Oakcliff Drive	52
	283939	28200 Rancho Azul	37
	284571	24500 El Sorrento	36
92691	179381	26900 Jasper	15
	181668	27500 Hillcrest	17
	241774	26700 Morena Drive	18
	267001	26900 Stonehaven	19
	268166	26900 La Alameda	16
	270374	26900 Stonehaven	19
92692	137420	27200 Principe	10
	152931	26900 Colmenar	11
	164217	28800 Escalona Drive	13
	267667	27500 Jasmine Avenue	14
	273039	26900 Begonia Place	12
	137420	27200 Principe	10
152931	26900 Colmenar	11	

Total subscriber households: 67

4.2 100 WATT ERP CONTOUR:

<u>ZIP CODE</u>	<u>SUBSCRIBER'S</u>	
	<u>ID#</u>	<u>ADDRESS</u>
92629	105207	30 Los Cabos
	106974	60 Saint Michael
	130327	24000 Camino Del Avion
	136477	24200 Philemon Drive
	149804	33800 Robles Drive
	175136	24300 Barbados Drive
	217905	34000 Aurelio Drive
	227032	34100 Granada Drive
92651	143495	2800 Chillon Way
	153016	28800 Shady Lane
	177490	31600 Jewel Avenue
	207577	22300 3 rd Avenue
	225298	31500 Eagle Rock Way
92653	200416	26000 Los Cerros Drive
	222617	25500 Alisal Avenue
92656	172300	26300 Yolanda Street
	214734	100 Lyon Ridge
92675	120054	30300 Golf Club Dr
	127962	27900 Golden Ridge Lane
	133767	26300 Paseo Del Mar
	206605	30100 Silver Spur Road
	206661	31000 Via Sonora
	219307	31200 Calle Villa Clara
	224981	31100 Calle Entradero
92677	022051	28800 Aloma Avenue
	039869	23600 Dane Court
	041842	24200 Cherry Hills Place
	048582	30 Hancock Street
	056645	10 High Bluff
	065299	29300 Port Royal Way
	092073	100 Glastonbury Place
	105113	100 Caribbean Court
	109719	24600 Royale Ridge

<u>ZIP CODE</u>	<u>SUBSCRIBER'S</u>	
	<u>ID#</u>	<u>ADDRESS</u>
92677	114382	30200 Benecia Avenue
	119640	24300 Toponas Court
	126058	28200 Rancho de Linda
	130134	22900 Belmonte Road
	130446	25400 Del Cobre
	133388	32300 Ridgeway Avenue
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	144911	100 Precipice
	153071	25600 Del Norte
	160383	29162 Abotsinch Street
	171434	24300 Toponas Court
	171729	28600 Rancho Grande
	175662	29200 Pompano Way
	177412	32100 Virginia Way
	180569	10 Copley Place
	180586	24800 Nueva Vista Drive
	205667	10 Joyeuse
	206839	29600 Via Cebolla
	212613	295500 Pointe Royal
	216344	28100 Moulton Parkway
	221184	24800 Laguna Vista
	221654	100 Taylor Place
	224346	28400 La Falda
	225558	31900 9 th Avenue
	226107	100 Sentry Hill
	226171	100 Serenity Lane
	227721	24700 Via Lagunaria
	228238	100 Sorbonne
	234708	28200 Via Fierro
	240416	25100 Via Catalina
	240607	29700 White Otter Lane
	244846	100 Siros
	249311	28100 Rubicon Court
	254543	100 Sorbonne
261615	28400 Las Cabos	
268787	100 Amarante	
269309	100 Argos	
274286	24500 Kings Road	
275325	25000 Monte Verde Drive	

<u>ZIP CODE</u>	<u>SUBSCRIBER'S</u>	
	<u>ID#</u>	<u>ADDRESS</u>
92677	277175	23700 Hillhurst Drive
	277710	23200 Cheswald
	277815	25100 Via Terracina
	280180	10 Circle Hill
	280365	28300 Lakewood Drive
	280428	29100 Kensington Drive
	281610	30900 Cypress Place
	283380	100 Oakcliff Drive
	283939	28200 Rancho Azul
	284571	24500 El Sorrento
92691	083030	26900 Marbella
	108725	25000 Spadra Lane
	175292	26600 Saddleback Drive
	179381	26900 Jasper
	181668	27500 Hillcrest
	241774	26700 Morena Drive
	267001	26900 Stonehaven
	268166	26900 La Alameda
	270374	26900 Stonehaven
92692	137420	27200 Principe
	152931	26900 Colmenar
	153142	26100 San Marino Court
	164217	28800 Escalona Drive
	225356	24900 Via Florecer
	267667	27500 Jasmine Avenue
	273039	26900 Begonia Place
	137420	27200 Principe
	152931	26900 Colmenar

Total subscriber households: 101

5.0 SUMMARY:

SMCCD has shown that interference to the regularly received off-the-air reception of the KCRW signal will be subject to damaging interference from the proposed Faith translator within the proposed translator's 60 dBu contour, violating the provisions of Section 74.1204(f). SMCCD has also shown that it has 67 subscribers who regularly listen to KCRW and reside within the proposed translator's 60 dBu contour (19 watt ERP). The Commission does not have the resources to effectively deal with actual after-grant interference complaints. In such cases, the Commission has relied upon the parties involved to resolve the interference. This has proven in most cases to be ineffective. The parties have different agendas. There is nothing that Faith will be able to do to eliminate the interference because of the co-channel nature of the proposed operation. Based upon the above, SMCCD respectfully requests that the application of Faith for a construction permit be denied.

INFORMAL OBJECTIONS TO THE APPLICATION FOR MODIFICATION OF
CONSTRUCTION PERMIT, BNPFT-20000128AAP, FOR A NEW FM TRANSLATOR
STATION TO SERVE, MISSION VIEJO, CALIFORNIA
FILED BY FAITH PLEASES GOD CHURCH CORP.

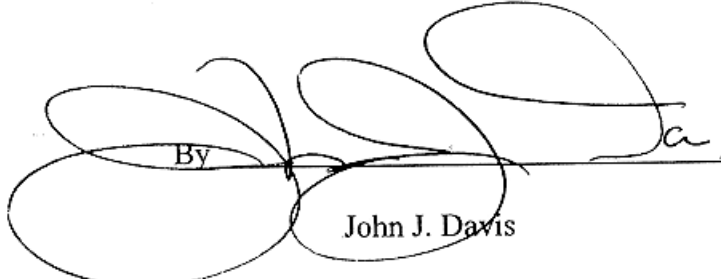
PREPARED FOR
SANTA MONICA COMMUNITY COLLEGE DISTRICT
1900 PICO BOULEVARD
SANTA MONICA, CALIFORNIA

6.0

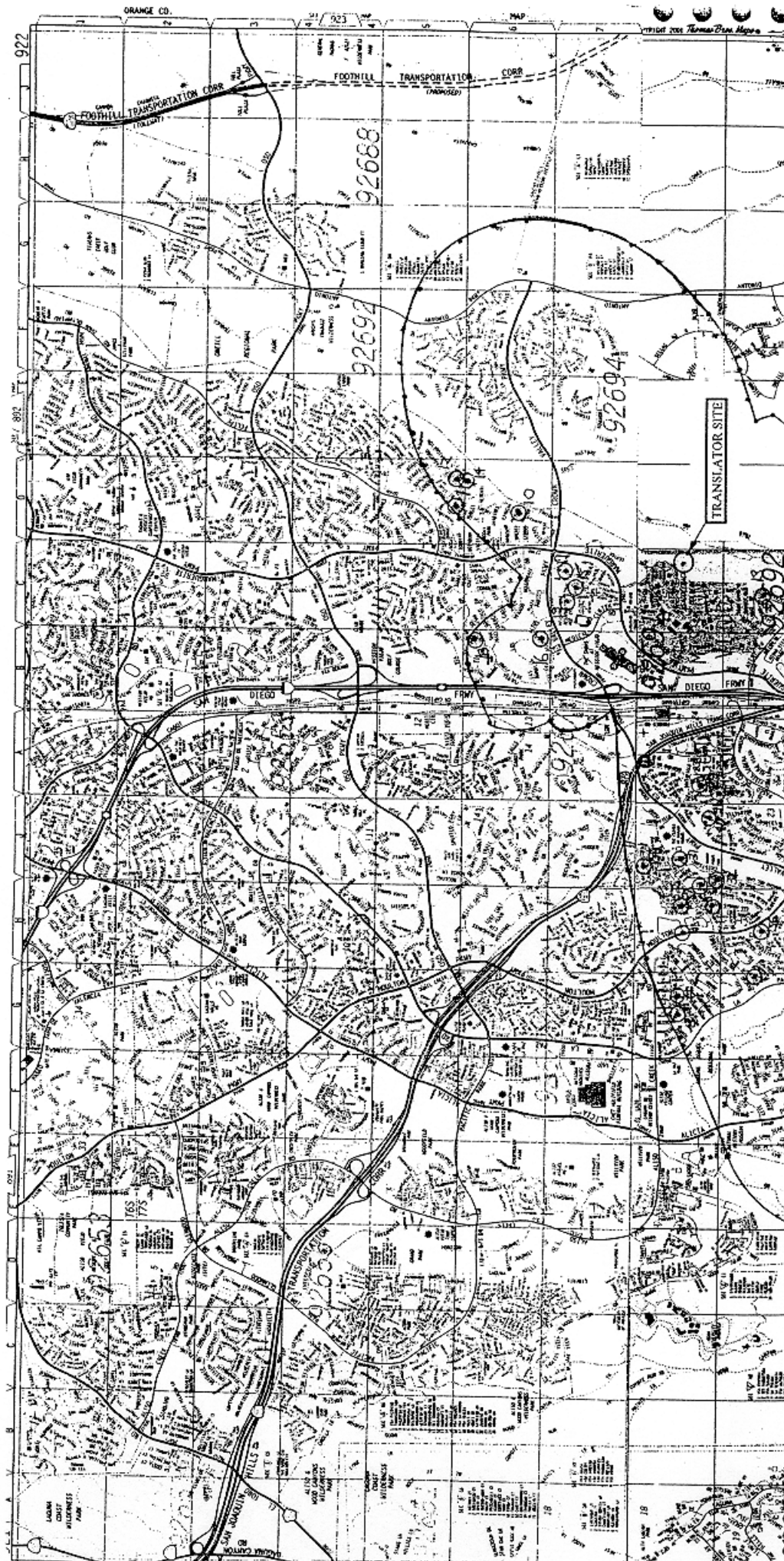
AFFIDAVIT

STATE OF CALIFORNIA)
) ss:
COUNTY OF LOS ANGELES)

JOHN J. DAVIS, does hereby swear that he is a consulting electronics engineer with offices in Sierra Madre, California; that he is a Registered Professional Engineer in the State of California; that his qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission; that the foregoing engineering statement was prepared by him or under his direction; and that the statements contained therein are true of his own knowledge and belief, and as to those statements prepared under his direction, he verily believes them to be true and correct.

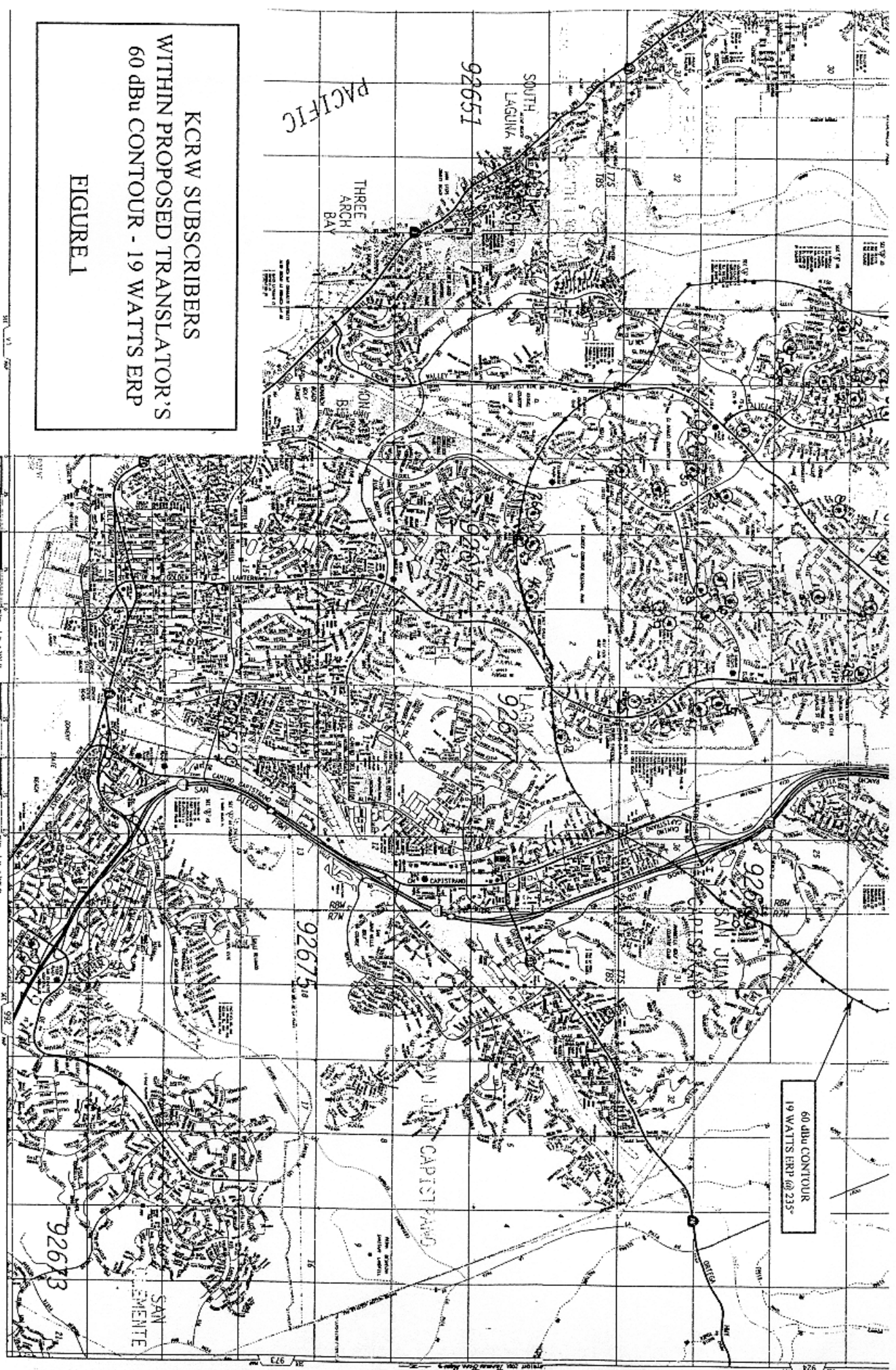
By 
John J. Davis

June 11, 2002



KCRW SUBSCRIBERS
WITHIN PROPOSED TRANSLATOR'S
60 dbu CONTOUR - 19 WATTS ERP

FIGURE 1



60 dbu CONTOUR
19 WATTS ERP @ 235°

92651 92652 92653 92654 92655 92656 92657 92658 92659 92660 92661 92662 92663 92664 92665 92666 92667 92668 92669 92670 92671 92672 92673 92674 92675 92676 92677 92678 92679 92680 92681 92682 92683 92684 92685 92686 92687 92688 92689 92690 92691 92692 92693 92694 92695 92696 92697 92698 92699 92700