

LAND MOBILE COMMUNICATIONS COUNCIL

August 28, 2020

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Federal Communications Commission
445 12th Street, S. W.
Washington, D.C. 20554

Re: Request for Relief from Interference from Digital Television Stations

Dear FCC Bureau Chiefs:

The Land Mobile Communications Council (“LMCC”), in accordance with Section 1.41 of the Federal Communications Commission (“FCC”) rules, urgently requests expedited FCC action to address multiple instances of harmful interference from newly authorized digital television (“DTV”) stations to long-standing Part 90 private land mobile radio (PLMR) systems. This interference has rendered affected PLMR facilities entirely unusable in certain markets, resulting in hundreds of thousands of dollars of lost revenue as customers of commercial systems are forced to search for alternative communication options and incurred expenses as licensees have sought remedial action by the broadcasters and/or acquired other spectrum to which their operations could be moved. The interference with what had been reliable communications endangers the safety of employees, disrupts operations at affected facilities, and poses a major threat to public safety in certain instances. The urgency of the problems demand FCC action to enforce those regulations and policies as promptly as possible and to avoid the creation of similar problems in the future.

The LMCC is a non-profit association of organizations representing virtually all users of land mobile radio systems.¹ It is bringing this issue to the attention of the FCC

¹ LMCC member organizations include the American Association of State Highway and Transportation Officials; American Automobile Association; American Petroleum Institute; Association of American Railroads; Association of Public-Safety Communications Officials-International; Aviation Spectrum Resources; Enterprise Wireless Alliance; Forest Industries Telecommunications; Forestry-Conservation

both because the problem is wide-spread among a number of licensee members of the LMCC organizations² and because requests for action from individual licensees, for the most part, have not resolved the interference in a timely fashion, or in some cases, at all.

Yet these situations require rapid resolution. The fact patterns are entirely consistent. PLMR licensees begin experiencing interference once a new DTV station repacked to a channel between 14-20 begins operating, or, in some cases, testing. This is not a competitive situation in which there might be a business motivation for a licensee to lodge an interference complaint against a newcomer. PLMR licensees have no reason to seek FCC assistance in resolving the problem other than the need to maintain their own operations. There should be a process in place that allows these matters to be fast-tracked given existing FCC rules and policies.

As detailed in Attachment A, there are two categories of interference situations, both of which involve DTV stations that have been moved to Channels 14-20. Some of the DTV stations are full-power while others are low-power and, thus, are subject to different rules regarding their interference-correction responsibilities.

- 1) Co-channel interference from DTV stations to PLMR systems operating on spectrum in the 470-512 MHz band (“T-Band”) that was allocated for PLMR use in certain major markets more than fifty years ago (“T-Band Interference”). Because these are co-channel facilities, filtering is not a solution.
- 2) Adjacent channel interference from DTV stations on Channel 14 (470-476 MHz) to PLMR licensees operating in the UHF band below 470 MHz (“Ch 14 Interference”). As discussed below, appropriate filtering has been successful in certain situations.

In New York and Chicago, there is both co-channel interference from the Channel 14 DTV station to Ch 14 T-Band licensees and adjacent channel interference to UHF MHz PLMR licensees.

T-Band Interference

Full-power DTV Stations: Rule Section 73.623² establishes minimum distance separations between full-power DTV stations and PLMR T-Band markets. A DTV transmitter must be 250 km/155 miles from the city center of a co-channel land mobile

Communications Association; Government Wireless Technology & Communications Association; International Association of Fire Chiefs; International Municipal Signal Association; MRFAC, Inc.; Telecommunications Industry Association; The Monitoring Association; Utilities Technology Council; and, Wireless Infrastructure Association.

² The licensees identified in Attachment A are representative of those experiencing interference in each of those situations. Many more PLMR systems are affected by the interfering DTV stations identified.

operation and 176 km/109 miles from an adjacent channel market. Those distances have proven inadequate for providing the intended interference protection in Dallas/Houston, Texas, and Los Angeles/San Francisco, California. In those markets, PLMR systems have been entirely desensed and rendered inoperable by DTV stations that meet (often by the narrowest of margins) the minimum distance separation.

These PLMR facilities have been in operation for decades and provide essential fleet dispatch communications for a broad range of business and governmental users, including hospitals, school buses, roadside assistance, highway maintenance, refining, petrochemical production, high voltage electrical repair, and firefighting.

The systems have not been immune from interference in the past, including seasonal ducting problems from more distant co-channel television stations. That type of intermittent interference is troublesome but temporary and is a reality of congested airwaves. This situation is different. Rather than having a problem on a few days during periods when the seasons change, this interference is so strong that it takes the PLMR systems off the air and is occurring for many hours several days a week or even multiple consecutive days. It is harmful interference as defined by FCC Rule Section 15.3:

[a]ny emission, radiation or induction that endangers the functioning of a radio navigation service or of other safety services or seriously degrades, obstructs or repeatedly interrupts a radio communications service.

The LMCC assumes that the DTV stations are operating in accordance with FCC rules – as are the PLMR stations. In such cases, the FCC has relied on its long-standing “newcomer” policy pursuant to which new licensees are responsible for resolving interference caused by their operations even if all parties are operating in accordance with the rules and the terms of their authorizations.³ In this instance, it is vital that the newcomer DTV stations assume this obligation because there are no anti-interference solutions available to the PLMR licensees. The interference has been measured regularly at -70 dBm at certain PLMR sites and at -86 dBm even at receive antennas on 20’ above ground level. The PLMR systems cannot be reconfigured to reject the overpowering transmissions from too proximate DTV stations, nor should they be required to attempt to do so in accordance with established FCC policy that has been relied upon in multiple decisions over many decades. The newcomer DTV stations must eliminate the interference they are causing and assume full financial responsibility for doing so.

³ See, e.g., *Midnight Sun Broadcasting Company*, 11 FCC 1119 (1947); *Western Slope Communications, Ltd.*, Mimeo No. 4431 (released May 31, 1983); *Broadcast Corporation of Georgia (WVEU-TV)* 96 FCC 2d 901 (1984); *WKLX, Inc.*, 6 FCC Rcd 225 (1991).

Low-Power DTV Stations: The FCC rules could not be more explicit with regard to the rights of these stations vis-à-vis land mobile systems. Rule Section 74.703(e) states the following:

Low power TV and TV translator stations are being authorized on a secondary basis to existing land mobile uses and must correct whatever interference they cause to land mobile stations or cease operations.

There should be no hesitation on the part of the FCC in directing low-power stations to fix the interference they cause promptly or take their transmitters off the air until they can do so.

Channel 14 Interference

Full-Power DTV Stations: The FCC rules also are clear about UHF PLMR protection rights when interference comes from Channel 14 stations. Following multiple instances of interference from Channel 14 stations to adjacent PLMR UHF operations and from Channel 69 TV stations to adjacent PLMR 800 MHz operations in the 1980s, the FCC adopted Rule Section 73.687(e), subsection (ii) that reads in pertinent part:

A TV permittee must take steps before construction to identify potential interference to normal land mobile operations that could be caused by TV emissions outside the authorized channel, land mobile receiver desensitization or intermodulation. It must install filters and take other precautions as necessary, and submit evidence that no interference is being caused before it will be permitted to transmit programming on the new facilities ...

A number of new permittees have been diligent both in identifying potentially affected PLMR systems and, more important, in implementing the necessary filtering to avoid causing interference.⁴ Their success makes clear that those facilities can co-exist when appropriate interference mitigation measures are taken by the DTV station. The FCC rules give the agency full authority to take prompt, decisive action when permittees fail to comply with this obligation and the LMCC urges it to do so.

⁴ For example, KDTS-LD in San Francisco prepared an extensive land mobile impact study as part of its modification application, and now that the station is in a testing phase, they are in constant contact with potentially impacted licensees.

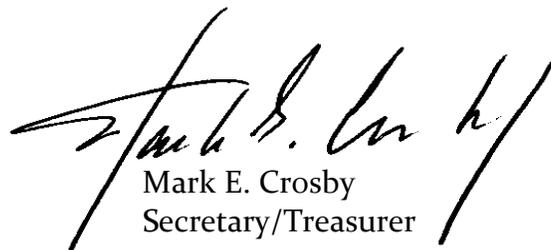
Low-Power DTV Stations: Low-power DTV stations are subject to Rule Section 74.703(e) cited above whether the interference is to co-channel T-Band PLMR systems or adjacent PLMR UHF systems.

The LMCC is not requesting the Commission to take action which is in any way novel. Rather, the LMCC is requesting that the Commission enforce existing Commission Rules without delay. Some of the instances of harmful interference reported in the Attachment have been known by the Commission for over a year without resolution. The number of PLMR systems affected and the extent of the interference requires the LMCC to request a meeting as soon as possible with appropriate FCC personnel. The purpose would be to develop remedial action plans for ongoing interference situations and to discuss how to prevent future occurrences.

Sincerely,



Klaus Bender
President



Mark E. Crosby
Secretary/Treasurer

Attachment

cc: David Furth, PSHSB
Roger Noel, WTB
Ira Keltz, OET
Jeremy Marcus, EB
Robert Weller, NAB

Summary

TV Interference into Land Mobile Systems

August 28, 2020

Dallas Market – T Band on Channel 16

Interfering TV Stations	KBTX-Channel 16: GRAY TELEVISION LICENSEE, LLC, Bryan, TX KHCE-Channel 16: SAN ANTONIO COMMUNITY EDUCATIONAL TV, INC. KSHV-Channel 16: WHITE KNIGHT BROADCASTING OF SHREVEPORT LICENSE CORPORATION, Shreveport, LA Note - Interference from KBTX masks the interference from KSHV
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Licensee	Self Communications Licensee name: Self Radio Inc
Impacted Call Signs	WQXM642, WIJ389, WPKM616, WQBY576, WPLR982, WIM566, KNS428, WPMC359, WNAS361, WPLR672, WPJR757, WIL556, WPKV404, WPKM623, WPKV412, WPKW417, WPKW426, WPLQ505, KX8389, WPJP712, WPKM290, WPMW912, WPLQ520, WPOV621, WPMW908, WPQD624, WPKK217, WPKM635, WPQE404
Resolution Efforts	<ul style="list-style-type: none"> • Efforts to secure alternative spectrum in the 450-470 MHz band have not produced sufficient capacity to replicate a 50-channel private carrier wireless system that serves over 4,000 customer wireless devices
Economic Impact	<ul style="list-style-type: none"> ▪ Licensee has invested approximately \$200,000 securing new frequencies including system retune upgrades, new combiners, multi-coupler, new antennas, and lines at multiple sites ▪ This investment does not include lost business revenues due to customers terminating contracts resulting from degraded service attributable to the TV interference

Licensee	Megahertz Technology Licensee name: Hopper Jr., James T
Impacted Call Signs	WIM446, WIM303, WIM329, WIM446, WQBY580, WRFY813, WPKC839, WQBY580, WQZV347, WQBG879, WQBY576, WRFX998, WPKY902, WPXP470, WPYC727, WRHV227, WQVX225, WIM304, WIM574, WNXQ371, WPKK703, WPSS977, WPTU767, WQCA906, WQMM550, WQTN553, WNSW656, WQDI610, WQUN782, WPKC848, WPMK989, WPPA916, WPVA505, WPVB757, WPXU766, WPYC714, WQBC525, WQBY627, WQBY653, WQUN585, WIM320, WQTN553, WIM556
Resolution Efforts	<ul style="list-style-type: none"> ▪ Efforts to secure exclusive use channels have resulted in no comparable spectrum capacity ▪ Numerous conversations have been convened with Texas-based and Washington, D.C. based FCC Enforcement Bureau representatives, which have included a review of interference measurements that TV Channels 15, 16, and 17 are all affecting operations ▪ It is believed that addressing the Channel 16 interference would return the situation to an acceptable spectrum environment
Economic Impact	<ul style="list-style-type: none"> ▪ Interference used to occur 2-3 times per year, now 2-3 times per week over many months, a situation well beyond ducting or other random atmospheric events ▪ Spent \$10,000 to date seeking alternative channels ▪ Business revenue losses due to customers terminating use of the private carrier system ▪ Finding RF alternatives take significant software changes to 1500 radios and multiple weeks to complete ▪ Customers use these radios for responding to auto breakdowns, school bus coordination, high voltage electrical repairs and hospital uses. ▪ Biggest threat to safety would be the air ambulance company, which operates all over the Dallas metroplex with mobile ambulances and helicopters using this RF spectrum.

Licensee	General Motors Licensee name: General Motors Research Corporation
Impacted Call Signs	WQUE874
Resolution Efforts	<ul style="list-style-type: none"> • Pursuing alternative Part 22 channels to lease • Current technology is supported through the use of exclusive use channels to operate effectively, otherwise all equipment must be upgraded at affected plant • Interference is affecting their operations even though the facilities are primarily indoors using low antenna heights
Economic Impact	<ul style="list-style-type: none"> ▪ Annual spectrum lease costs will be substantial ▪ Costs were incurred to identify the TV interference ▪ System transition costs will be substantial ▪ Costs associated with maintaining plant productivity

Houston Market – T Band on Channel 17

Interfering TV Stations	KNCT-Channel 17: GRAY TELEVISION LICENSEE, LLC (Belton, TX) KNVO-Channel 17: ENTRAVISION HOLDINGS, LLC (McAllen, TX) KCRP-LP-Channel 17 (Corpus Christi, TX)
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Licensee	Channel Industries Mutual Aid (CIMA, 101 individual members) Licensee name: CIMA Organization
Impacted Call Signs	WIH777, WIH776, WIH775, WQOK35, WIH854
Resolution Efforts	<ul style="list-style-type: none"> ▪ Currently researching potential for alternative channels ▪ FCC has advised licensee (1) that the problem is atmospheric and not the responsibility of the TV station, and (2) that the FCC would conduct further investigations. No further responses have been received by the FCC
Economic Impact	<ul style="list-style-type: none"> ▪ It is estimated that a new system necessary to remove the public safety and environmental risks will cost \$1 million for new equipment plus additional investments to purchase necessary spectrum capacity ▪ The impact is risk based. Among other emergency events, this system was used to mitigate the ITC fire on the Houston Ship Channel and reopen the Ship Channel. Losses can easily run into several millions of dollars a day when the Ship Channel is closed to CIMA members

Licensee	LyondellBassel Licensee name: Equistar Chemicals, LP
Impacted Call Signs	WPMM820
Resolution Efforts	<ul style="list-style-type: none"> ▪ The LaPorte petrochemical facility loses T-Band radio communications monthly, leaving employees without essential communications capabilities critical to protect employee and public safety. ▪ LyondellBassel Legal team is conducting a risk assessment to determine the scope of the problem and its effect on plant operations
Economic Impact	<ul style="list-style-type: none"> ▪ Has invested \$6,000 seeking alternative spectrum ▪ Currently securing bids for a new system to move part of the system to the 450 MHz band that is estimated to cost \$1.4M utilizing spectrum that is already available to them ▪ The impact is risk based, not only interrupting operations of the facility but interfering with site-based fire and emergency response personnel. ▪ This issue is impacting the entire Port of Houston area and puts 9% of US economy at risk if this interference continues

T Band Licensee	Shell Deer Park Licensee name: Shell Chemical Company
Resolution Efforts	<ul style="list-style-type: none"> ▪ FCC advises that both the TV station and the T-Band licensee are operating according to FCC rules, so there are no resolution approaches the FCC may conduct as the interference is “environmental” ▪ Licensee plans to coordinate with CIMA to turn off all radios and use TS Reader during next outage to find exact source of interference ▪ Currently reviewing the costs associated with securing alternative spectrum in order to secure more stable radio operations
Economic Impact	<ul style="list-style-type: none"> ▪ Shell has incurred significant costs to attempt to detect the source of interference, and the unpredictable radio system interference has resulted in various operational constraints, which have also had their own financial impacts

Los Angeles Market – T Band on Channels 15, 16

Interfering TV Stations	KHSC-LD-Channel 16: Cocola Broadcasting Companies, LLC KDTF-Channel 16: ENTRAVISION HOLDINGS, LLC Ko8MM-Channel 15 XHTJB-Channel 15: Tijuana, Mexico K12PO-Channel 15
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Licensee	County of Los Angeles, California Licensee name: Los Angeles, County of
Resolution Efforts	<ul style="list-style-type: none"> ▪ FCC determined interference into Land Mobile operations at Tejon Peak and TV station KHSC is required to resolve its portion of the interference ▪ FCC requested continued coordination and testing to find mutual solution to resolve interference to Tejon Peak from KHSC ▪ KDTF agreed to change antenna and pattern, not yet implemented ▪ Working with FCC International Bureau to resolve issues related to treaty for interfering Mexico TV station XHTJB. ▪ K12PO agreed to move to Channel 3
Economic Impact	<ul style="list-style-type: none"> ▪ Legal, engineering, installation costs for Land Mobile licensee to install new antennas to abate interference is currently over \$75,000 ▪ Mitigating interference from Tijuana is forcing a system redesign that has cost \$1 million

San Francisco Market – T-Band on Channels 16, 17

Interfering TV Station	KCVU-Channel 17: PARADISE (KCVU-TV) LICENSEE, INC., Paradise, CA
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Licensee	RFC Wireless, Inc. Licensee name: RFC Wireless, Inc.
Impacted Call Signs	WPTF232, WPTF213, WPPZ976, WQOL263, WIM692, WQQH714, WQLF324, WPPZ439, WPUB506, WPQK412
Resolution Efforts	<ul style="list-style-type: none"> ▪ Research has determined that KCVU is causing problems to operations on numerous peaks from its site on Cohasset Peak. ▪ T band operations on Mt. Diablo are experiencing the greatest amount of interference ▪ T band licensees have requested the Chief Engineer at the TV station turn off the transmitter so further tests can evaluate the interference
Economic Impact	<ul style="list-style-type: none"> ▪ Mission critical licensees on Mt. Diablo, Black Mountain, Mt. Presson, Monument Ridge, and Mt. Sutro are being fully taken off the air by these TV operations ▪ Customers are being given financial allowances to accommodate the loss of radio service ▪ Building a completely new system to avoid this interference will cost millions of dollars

Licensee	CRYSTAL SMR INC. Licensee name: CRYSTAL SMR INC.
Resolution Efforts	<ul style="list-style-type: none"> ▪ Research has determined that KCVU is causing problems to operations on numerous peaks from its site on Cohasset Peak ▪ T band operations on Mt. Diablo are experiencing the greatest amount of interference ▪ T band licensees have requested the Chief Engineer at the TV station turn off the transmitter so further tests can evaluate the interference
Economic Impact	<ul style="list-style-type: none"> ▪ Mission critical licensees on Mt. Diablo, Black Mountain, Mt. Presson, Monument Ridge, and Mt. Sutro are being fully taken off the air by these TV operations ▪ Building a completely new system to avoid this interference will cost millions of dollars

New York Market – T Band on Channels 14, 15, 16

Interfering TV Station	WYBN-LP-Channel 14 (Albany, NY)
Licensee	Goosetown Radio
Impacted Call Signs	WQFM363
Resolution Efforts	<ul style="list-style-type: none"> ▪ The FCC informed Goosetown that they were prepared to send a letter stating Goosetown is operating correctly and are protected from this TV station interference. Goosetown was informed ten months later that WYBN was directed by FCC to reduce power to stop interfering with Goosetown. The interference still has not been mitigated ▪ TV station is only 78.7 miles away, it is impacting entire Channel 14 T-band system ▪ The TV station went off the air in December and the interference ceased until operations commenced again ▪ Investigations show the signal from the Channel 14 station is in the 466-470 window overloading the preamp that feeds Goosetown's 454/459 Part 22 system at the WYBN transmitter site ▪ Goosetown invested \$5,500 to partially resolve the local issue due to WYBN's apparent unwillingness to assist
Economic Impact	<ul style="list-style-type: none"> ▪ \$5,500 on retuning a multi-coupler and adding filters to address adjacent channel interference. ▪ \$9,000 on tech time plus coordinating with the FCC ▪ \$5,000 in legal fees

Chicago Market – T Band on Channels 14, 15

Interfering TV Stations	WGBA-Channel 14: SCRIPPS BROADCASTING HOLDINGS LLC, Green Bay, WI WLAJ-Channel 14: WLAJ-TV LLC (Lansing, MI)
Licensee	ESP Wireless Technology Group, Inc. Licensee name: ESP Wireless Technology Group, Inc.
Resolution Efforts	<ul style="list-style-type: none"> ▪ Land Mobile operators at the Willis Tower are completely knocked off the air, including B/ILT operators and police communications ▪ More prevalent interference during hot and humid weather ▪ TV station is cordial but not cooperative with mitigating interference being caused by their operations
Economic Impact	<ul style="list-style-type: none"> ▪ Operator is being forced to offer credits to customers when system is not operating, this can cause thousands of dollars of impact

Miami Market – T Band on Channel 14

Interfering TV Station	WOPX-TV-Channel 14: ION MEDIA ORLANDO LICENSE, INC. (Orlando, FL)
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Licensee	Sun Talk, LLC, Highland Wireless Services, LLC Licensee name: Sun Talk, LLC, Highland Wireless Services, LLC
Impacted Call Signs	WPSZ313, WPTQ633, WPSF366, WPSI633, WPUX944, WII541, WQAP980, WPTP761, WPSS474
Resolution Efforts	<ul style="list-style-type: none"> ▪ TV station is causing interference to T band licensees in the region ▪ TV station installed a directional antenna to accommodate and minimize interference to Jacksonville TV station ▪ TV station has been contacted about interference, stated position is they are operating as authorized. ▪ TV station warned FCC of potential issues and hardships from repacking and are being cordial during phone calls concerning the interference
Economic Impact	<ul style="list-style-type: none"> ▪ Radio systems in Delray Beach (140 miles from TV station), Ft. Lauderdale, and North Miami, FL are not able to operate when this interference is present (up to 2-3 times per week). ▪ RX noise floor during interference rises up to -90 dBm, customers are complaining about troubles with radios during these interference events

San Francisco Market Adjacent Channel 14 Interference

Interfering TV Station	KMCE-LD-Channel 14: KMCE, INC. (Azteca) (Monterey, CA)
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Licensee	Silke Communications, Inc. Licensee name: Silke Communications, Inc.
Resolution Efforts	<ul style="list-style-type: none"> ▪ KMCE ceased operations to determine if filtering could solve problem
Economic Impact	<ul style="list-style-type: none"> ▪ Part 90 licensees at Fremont Peak have been unable to operate while KMCE was transmitting

Interfering TV License	KQTA-Channel 14: ONE MINISTRIES, INC.
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T Band Licensee	CRYSTAL SMR INC. Licensee name: CRYSTAL SMR INC.
Resolution Efforts	<ul style="list-style-type: none"> ▪ KQTA ceased operations to determine if filtering could solve problem
Economic Impact	<ul style="list-style-type: none"> ▪ Part 90 licensees at Upper Bear Mountain were unable to operate while KQTA was transmitting

Interfering TV Station	KQTA-LD-Channel 14: ONE MINISTRIES, INC. KDTS-LD-Channel 14: Word of God Fellowship, Inc. (SF, CA – Sutro Tower) KMMW-LD-Channel 14; NBC Telemundo License, LLC (Stockton, CA; Upper Bear) KSAO-LD-Channel 14; TV Cocola Broadcasting Companies, LLC (Azteca) (Sacramento, CA) KMCE-LD-Channel 14: KMCE, INC. (Azteca) (Monterey, CA)
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Licensee	Fisher Wireless Services, Inc. Licensee name: Fisher Wireless Services, Inc.
Resolution Efforts	<ul style="list-style-type: none"> ▪ KQTA ceased operations to determine if filtering could solve problem ▪ KDTS-LD announced its intention to begin testing from Sutro Tower on August 17th ▪ Fisher has notified the station that it has 16 sites within a 75-mile radius of Sutro and that the proposed testing schedule is inadequate to permit evaluation of the impact of the KDTS-LD transmitter ▪ Fisher asked the station to arrange a workable test schedule and the station’s engineer agreed to make the necessary changes to the receive system at Sutro ▪ Further testing to confirm the impact of these changes will be completed as needed ▪ KMMW is causing desense at certain sites, but since these sites are potentially affected by KSAO in Sacramento as well, both stations may need to be taken down and brought up separately to evaluate the interference levels from each ▪ KMMW has filed a complaint against KSAO saying its antenna pattern is overlapping into Stockton, so any changes in KSAO’s technical parameters will require retesting ▪ KSAO is waiting for a filter to arrive before additional testing can begin ▪ KMCE has not tested at Fremont, but if others have experienced interference there, it will also
Economic Impact	<ul style="list-style-type: none"> ▪ Extensive technician costs to date

Jacksonville Market Adjacent Channel 14 Interference

Interfering TV Station	WFOX-TV-Channel 14: COX TELEVISION JACKSONVILLE, LLC (Jacksonville, FL)
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Licensee	Mobile Communications America, Inc. Lone Peak Licensing, LLC
Resolution Efforts	<ul style="list-style-type: none"> ▪ TV station caused interference to multiple licensees in the region, totally disabling all land mobile facilities at a tower approximately one mile away ▪ TV station returned to its prior channel until it was able to take steps to address the issue; interference appears to be mitigated
Economic Impact	<ul style="list-style-type: none"> ▪ Cox has reimbursed the licensee for all labor costs involved in testing so only <i>de minimis</i> internal expenses