

# CASE REPORT - EB-06-LA-113

Run Date: 9/1/2009

Start 3/23/2006 Susp. Status: CLOSED HQ SolDate: Agent

COMPLAINANT		SUBJECT	
Name:	[REDACTED]	Name:	[REDACTED]
Company:	[REDACTED]	Company:	[REDACTED]
Address:	[REDACTED]	Address:	[REDACTED]
City:	[REDACTED] ST: [REDACTED]	City:	[REDACTED] ST: [REDACTED]
Geo:	Zip: [REDACTED]	Geo:	Zip: [REDACTED]
Phone:	Aux: [REDACTED]	Phone:	Aux: [REDACTED]
Email:	[REDACTED]	Email:	[REDACTED]
P_Address:	[REDACTED]	P_Address:	[REDACTED]
Notes:	[REDACTED]	Notes:	[REDACTED]

CGeo:	Safety	Non-Safety	:SGeo	None	:Special
Freq: 88.1000	Complt	NO	88.1000	:Freq	:Local
Call:	IX	NO	:Call		:Master
Method: Archived	Confide	NO	- 0:FRN		:ASR
Entity: Archived	Cong.	NO	Archived	:Entity	:Lat.
To: Archived	InfoTrs	NO	Archived	:From	:Long
			:Utility		:XCityS

Part 15 device interference to FM broadcast

### WORK EVENTS

EventDate	Agent	Event Type	WeUtility
3/23/2006	[REDACTED]	OPEN	
Prob. Resolution:			
3/24/2006	[REDACTED]	ON SCENE	
Prob. Resolution: Agent [REDACTED] & [REDACTED] Dfcd subject to SIRRUS receiver with intergal FM rebroadcaster. Rebroadcaster was set to 88.1 MHZ, apparently at factory and subject did not reset frequency to unused channel before activating. Subject's SIRRUS receiver/FM transmitter was in a bedroom directly underneath complainants stereo system in multi-unit dwelling. Signal was very weak..so weak that it could not be heard more that ten feet from source. Beyond that distance, subjects transmitter was drowned out by licensed FM staaion.. Agents advised subject to find an unused frequency and reprogram his transmitter to that frequency.			
3/27/2006	[REDACTED]	CLOSED	Archived
Prob. Resolution: CASE CLOSED			

**CASE REPORT - EB-06-LA-113**  
**RULE VIOLATIONS**

Run Date: 9/1/2009

**CASE REPORT EB-06-LA-113**

7.1 HRS Spent on 30N24

Utility Field:

Safety  Confidential  Congressional  Unlicensed Source:

Suspense Date  
Status **CLOSED**

Start Date 3/23/200 Office LA HQ# Local# Logged by

COMPLAINANT				SUBJECT			
Name				Name			
Company				Company			
Address				Address			
City				City			
Pri Phone		Fax		Pri Phone		Fax	
Alt Phone				Alt Phone			
Call Sign		Freq 88.1000 MHz		Call Sign		Freq 88.1000 MHz	
Xmtr City		State		Twr#		Lat Long	
Activity Enforcement - Investigations				ActCode 30N24		Rule Part 73B	
Project FM Pirate				Action Plan Involved Unlicensed FM BC			

**GENERAL CASE DESCRIPTION**

- Information Transfer  Investigation  HFDF Bearing  Unlicensed  
 Comm Prob Resolution  Inspection  Inquiry/Complaint  Safety

C-Alt Contact

C-Alt Call or ID

S-Contacts

Tower Owner

Other Site Info:

Problem Description: Part 15 device interference to FM broadcast

**RULE VIOLATIONS**

**WORK EVENTS**

Event Date	Agent	Event Type	IN	OUT	Travel Cost	Problem Resolution
3/23/2006		OPEN				
3/24/2006		ON SCENE	1.0	6.0		Agent & Dfed subject to Sirrus receiver with intergal FM rebroadcaster. Rebroadcaster was set to 88.1 MHZ, apparently at factory and subject did not reset frequency to unused channel before activating. Subject's Sirrus receiver/FM transmitter was in a bedroom directly underneath complainants stereo system in multi-unit dwelling. Signal was very weak..so weak that it could not be heard more that ten feet from source. Beyond that distance, subjects transmitter was drowned out by licensed FM staaion.. Agents advised subject to find an unused frequency and reprogram his transmitter to that frequency.
3/27/2006		CLOSED	0.1			CASE CLOSED

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, March 24, 2006 7:24 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Part 15 Interference to 88.1 MHz

First, thank you for the prompt field investigation on Part 15 interference to KKJZ, a licensed 88.1 MHz broadcast station. Without your data, we would have had no idea what was happening in that unusual case.

Because many Part 15 "intentional radiators" (e.g. the mini-transmitters associated with Sirius, XM and iPod devices) are apparently pre-programmed for 88.1 MHz, Part 15 interference is now a genuine concern for all full power 88.1 stations across the U.S. - and some Channel 6 TV stations may feel the heat as well.

Until recently, Mike Starling, Chief Technology Officer and Executive Director of National Public Radio Labs, was promoting the use of 87.9 MHz as the default frequency for Part 15 intentional radiators, because 87.9 is little used in the U.S. Earlier this week, our office pointed out to him that Rule 15.209(a) precludes the use of that frequency, and Mike immediately agreed to drop his promotion of 87.9 (he was apparently unaware of the legal prohibition), so that is good news.

Based on the 15.209(a) finding and a confirming letter from Rashmi Doshi, PhD, Chief, FCC Laboratories (who cited different Part 15 rule sections but came to the same conclusion), I plan to ask the FCC's Enforcement Bureau to ask Sirius to delete 87.7, 87.9 and any other non-compliant frequencies from their user-accessible menus, because those frequencies are prohibited by 15.209(a). Right now, I am trying to determine how many of these devices have "below 88" frequencies built in (the popular Sirius Sportster has both 87.7 and 87.9 for example). Possibly XM and the folks who make mini-FM transmitters for iPods use frequencies below 88 MHz - that remains to be seen.

I also suggested to Mike Starling that the manufacturers of mini-FM transmitters could dramatically reduce the impact on 88.1 MHz if they would randomly program their default frequencies across the entire 88.1 to 107.9 MHz band. It is likely that the number of Part 15 transmitters will soar in the years ahead, so something needs to be done soon to stem the interference tide without violating 15.209(a) and shifting the interference burden to TV Channel 6 (or any new users of that spectrum after the 2009 DTV transition occurs).

FYI, I am investigating the allegation that power adjustment potentiometers are built into some Part 15 intentional radiator transmitters. According to the claims on my desk, these pots, once adjusted by end users, can easily increase the output power levels well into the non-compliant range. I am told that the [www.xmfan.com](http://www.xmfan.com) website contains numerous suggestions for defeating Part 15 limitations, and I plan to investigate that site further. See, for example, <http://www.xmfan.com/viewtopic.php?t=3257&postdays=0&postorder=asc&start=0> for information on the power pot, and how to use it. Seems to me that manufacturers who include such pots are aiding and abetting would-be law breakers and are violating the spirit and intent of Part 15 rules.

If there are others in the Commission who you believe should receive a copy of this letter, please feel

3/27/2006

free to copy them. If and when I have additional data worth passing along to the Commission, to whom should I direct my e-correspondence?

Thank you,

[REDACTED] Consulting Radio Engineer  
Communications General Corporation  
Fallbrook, California

At 02:30 PM 3/24/2006 -0500, [REDACTED] wrote:

Subject was DFed this morning. Was legal part 15 transmitter built into Sirmus receiver. Device was being operated from bedroom of adjacent apartment directly below complainants stereo. Distance was less than 10 feet.

<http://www.highspeedsat.com/replay-starmate.htm>

Because signal was cochannel with KKJZ, signal could not be heard from street in front of residence. When interviewed, subject agreed to consult instruction manual and reprogram Sirmus device to transmit on a different frequency. Apparently these devices come from the factory, preprogrammed for 88.1 MHz.

-----Original Message-----

From: [REDACTED] [mailto:[REDACTED]]  
Sent: Thursday, March 23, 2006 5:44 PM  
To: [REDACTED] <[REDACTED]@att.net>  
Cc: [REDACTED]  
Subject: RE: A fixed Sirius complaint

Hello,

Unfortunately (or fortunately depending on how you look at it) I just got a call from the listener that it cleared up within the last hour. It may still be helpful to give him a call and discuss the details of that is of any assistance in the long run on these kinds of problems. It may pop up again.

Thanks for the response.

Regards,

[REDACTED]  
KKJZ

3/27/2006

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From: [REDACTED]  
Sent: Thursday, March 23, 2006 2:38 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: A fixed Sirius complaint

We're on it...Stand by for update..

-----Original Message-----

From: [REDACTED]  
Sent: Thursday, March 23, 2006 3:36 PM  
To: [REDACTED]  
Cc: A [REDACTED]  
Subject: RE: A fixed Sirius complaint  
Yes,

The complainant did provide his name and number:

[REDACTED]  
[REDACTED]  
[REDACTED]

He is motivated to assist.

[REDACTED]  
KKJZ

---

From: [REDACTED]  
Sent: Thursday, March 23, 2006 12:13 PM  
To: [REDACTED]  
Cc: A [REDACTED]  
Subject: Fwd: A fixed Sirius complaint

[REDACTED]  
I have advised [REDACTED] at the FCC/L.A. office about the importance of this case by leaving voice mail, and a copy of this e-mail is being sent to him now. [REDACTED] is apparently in the office today, so perhaps he will be able to look at this case soon, and the FCC would certainly be the best party to be involved.  
It will be very interesting to find out if a so-called Part 15 device from Sirius is the culprit.

If you have a name and/or telephone number on the complainant, or any other helpful information, please e-mail it directly to [REDACTED], with a copy to [REDACTED] and me.

Best regards, [REDACTED]

X-IronPort-AV: i="4.03,123,1141632000";  
d="scan'208,217"; a="33844839:sNHT30099848"

Reply-To: <[REDACTED]>

From: "[REDACTED]"

To: "[REDACTED]"

Subject: A fixed Sirius complaint

Date: Thu, 23 Mar 2006 10:46:01 -0800

Organization: Pacific Public Radio

X-Mailer: Microsoft Office Outlook 11

Thread-Index: AcZOqggdVOieqUGRRjy+R+ih8+PAQg==

X-UCF-Filter-Settings: 3 [REDACTED] redirected to 12\_MED\_TAG

X-Spam-Score: 1.7 (\*)

HTML\_MESSAGE,J\_CHICKENPOX\_23,NO\_DNS\_FOR\_FROM

X-Scanned-By: IEEE UCE Filtering Service (uce . ieee . org) on 140.98.193.231

-Just got a call from a KKJZ listener in Manhattan Beach. He is receiving interference at a fixed location from what appears to be from Sirius (Stern).

For the last two days he has been unable to receive KKJZ at 88.1 where he normally would have. The interference seems to have been continuously on at all hours of the day.

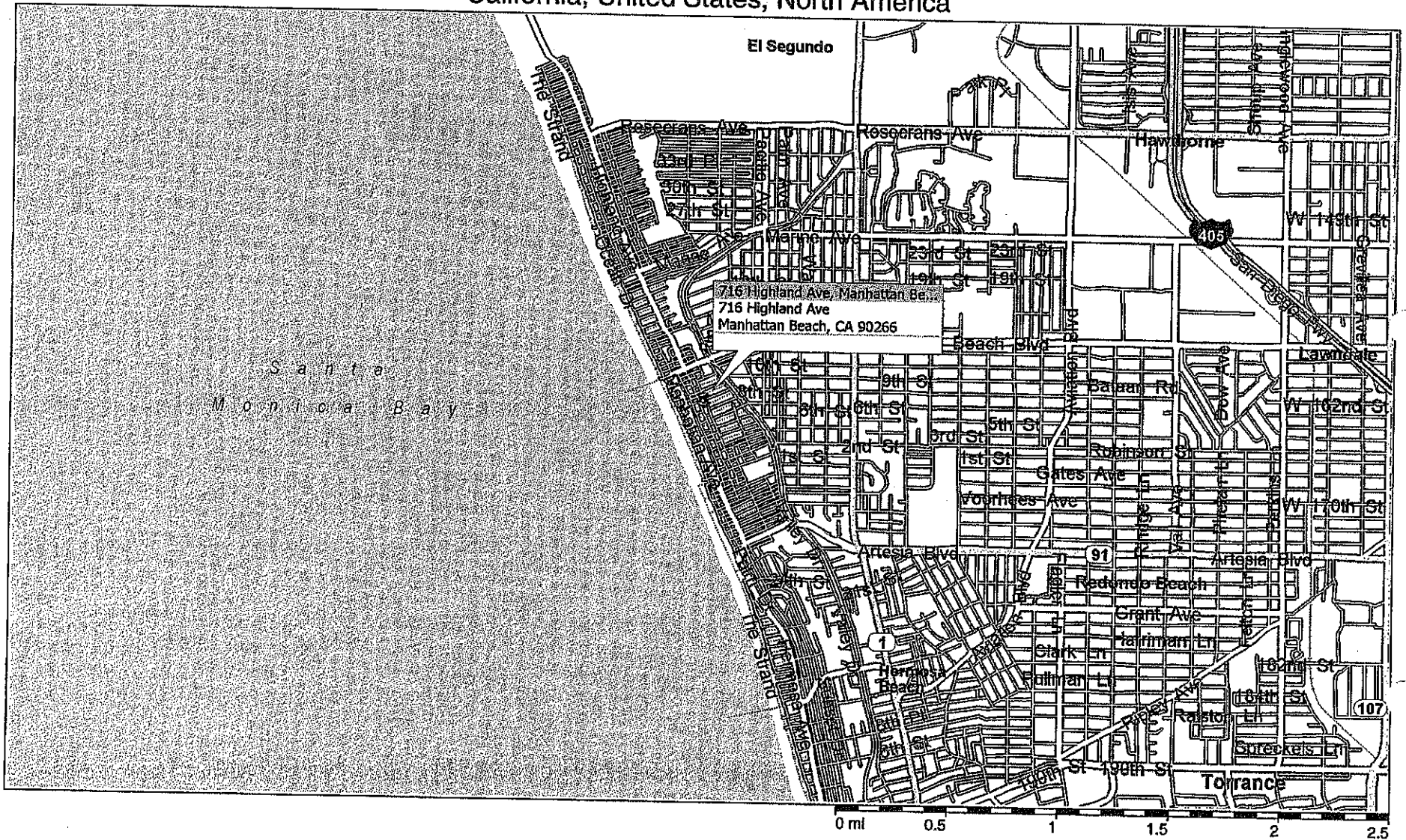
[REDACTED]

Do you think the Commission would be interested in this? Can you think of anyone in town that may be good at DFing?

[REDACTED]

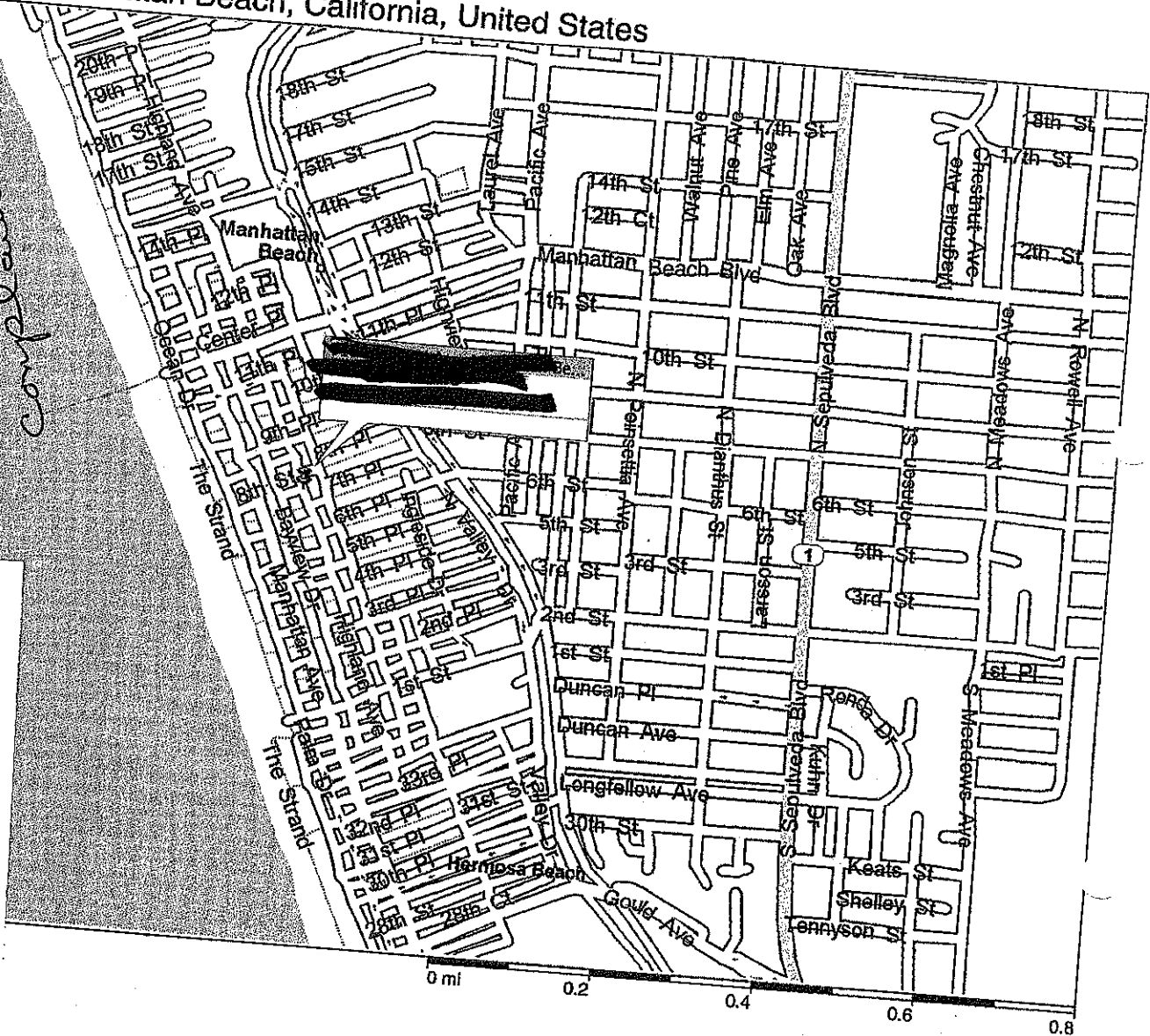
Dir. of Engineering  
Pacific Public Radio  
KKJZ-FM, Long Beach  
KUOR-FM, Redlands

# California, United States, North America





# Manhattan Beach, California, United States



*Subje [unclear] company*

Santa Monica Bay



GE Healthcare

West Region Manager  
Global Diagnostic Ultrasound

www.geultrasound.com

718 Highland Avenue  
Manhattan Beach, CA 90266 U.S.A.  
General Electric Company

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(Statistics Canada and/or Geomatics Canada), all rights reserved.

**CASE REPORT EB-06-LA-113**

0 HRS Spent on 30N24

Utility Field:

Safety  Confidential  Congressional  Unlicensed Source:

Suspense Date  
Status OPEN

Start Date 3/23/200 Office LA HQ# Local# Logged by

Name <b>COMPLAINANT</b>		SUBJECT	
Company			
Address			
Cit			
Pri Phone	Fax	Pri Phone	Fax
Alt Phone		Alt Phone	
Call Sign	Freq	Call Sign	Freq 88.1000 MHz
Xmtr City	State	Twr#	Lat Long
Activity Enforcement - Investigations		ActCode 30N24	Rule Part 73B
Project FM Pirate		Action Plan Involved Unlicensed FM BC	

**GENERAL CASE DESCRIPTION**

- Information Transfer  Investigation  HFDF Bearing  Unlicensed  
 Comm Prob Resolution  Inspection  Inquiry/Complaint  Safety

C-Alt Contact

C-Alt Call or ID

S-Contacts

Tower Owner

Other Site Info:

Problem Pirate

Description:

**RULE VIOLATIONS**

**WORK EVENTS**

Event Date	Agent	Event Type	IN	OUT	Travel Cost	Problem Resolution
3/23/2006		OPEN				
Totals Hours / Travel -			0.0	0.0	\$0.00	

3/23 06 1430 [redacted] spoke to

[redacted]

last 2 1/2 Days - not on now -  
will check bank in AM 3/24

( [redacted] [redacted] )  
\_\_\_\_\_

**CASE REPORT EB-06-LA-113**

Totals Hours / Travel - 1.1 6.0 \$0.00