

Maxson informal commentary inserted within document.

18th February, 2008

RE: WESTPOINT RADIO 94.3 FM

This letter is in response to the below email and subsequent meeting (held with myself, Mr. David Laliberte and Mr. David Archbold) on Monday, 11th February 2008.

I have copied the contents of the email for ease of reference below:

We have received the attached report from David Maxson about your transmission facilities in West Bay. As you can see, the report identifies a number of interference and blanketing issues. It was reviewed by the ICTA Board of Directors last week, and the Board was concerned about these interference and blanketing issues. However, instead of denying your application, the Board decided to postpone a decision on your application until a determination has been made on the move out policy, which will affect all FM broadcasters in Grand Cayman. This will give you a chance to modify your application to address the interference and blanketing concerns outlined in David Maxson's report.

Once you've had a chance to review the report, perhaps we should meet to talk about the next steps.

We have had the opportunity to review the report submitted by Mr. Maxson on behalf of the ICTA and would like to thank him for the report. We also appreciate the fact that the Board has not denied our application and have given us an opportunity to respond to the report.

I found the Goulds to be quite pleasant and hospitable during the test.
My thanks to them for their kindness.

We beg the indulgence of the Board as we put forward our concerns and ask that these concerns be taken into consideration as this venture is of great importance to us hence our persistence in seeking approval since our first application was made in 1996 at the Government Administration Building.

I must first say that I have over thirty years of experience working in broadcasting in Cayman. I started working with my uncle, Winston (Vincent) Sinclair for many years, assisting him in building probably the very first TV and radio here from a kit. During those days, I also had to

go on the boats to fix and repair all transmitters and receivers when they broke down. Then I went on to work in live broadcasting with Radio Cayman as their radio technician for over 20 years. I can say that I have the experience and knowledge and a very good understanding of how transmitters and receivers work.

With that said, we would like to address the point in your email where the report identifies a number of interference and blanketing issues. I would like to insert here that in previous meetings with the ICTA we were told that we would be a part of the blanketing problem (which was not substantiated) even before a test was carried out in West Bay.

Blanketing exists around a radio station, by definition.

I was very happy to have been at the location while Mr. Maxson was doing his thing. I watched him battle with the weak signals which is below broadcast quality, below the standards just breaking the squelch with a signal that cannot make it every place in the area especially where the testing was done.

The 2007 full survey report addresses the limitations of FM reception in West Bay and contrasts the car radio reception with the clock radio reception. Measurements of FM stations were taken at two locations in West Bay and reported.

At the same time he was battling with some very strong possible interference from C U C transmission lines which were in the immediate vicinity where he told us that he think he had found a couple of small foot prints. That's what he said to me in is own words as my wife and I were both present in his car.

On the contrary, it was Mr Gould who used the word "transformers" first while in the back seat of the test vehicle. It was I who said I had 30 years not only of FM experience but of critical listening to FM reception and interference problems and what the clock radio was doing was not in any stretch of the imagination caused by "transformers". Perhaps he misheard me from the front seat. I also described how the first downlobe of the vertical antenna pattern might touch down at about the radius where the most extreme conditions occurred (in both directions from the transmitter site).

I was waiting for him to say shut down the transmitter to confirm that our radio transmitter was the cause of the presented blanketing issue – he

never requested it to be shut down. So I must say that that report is not conclusive in its findings. One of the spots identified was by the little dock near the turtle farm and if you move out of that spot which is about three feet and full of interference from C U C transmission line there would be no foot print. The next spot is by the turtle farm where thousands of turtles live.

We drove up and down West Point Road several hundreds of yards, stopping at points to listen to the various stations on the clock radio and on the car radio. While the vehicle was in motion, the car radio was monitored. Even the car radio exhibited the significant blanketing problem described for the clock radio. The experience for the clock radio ran a longer radius from the Gould property than the car radio. The experience was symmetrical in either direction from the Gould property. The experience was across a wider portion of the FM band for the clock radio than the car radio. These characteristics demonstrate that the radio with the greater sensitivity, selectivity, and dynamic range – the JVC car radio – was more tolerant of the local signal overload. The phenomenon was simply the result of a too-strong signal causing the receivers to effectively mute.

What was very disappointing was the fact that no test was done in the highly populated areas of West Bay where the majority of the people live. This makes me question the validity of this test that was carried out.

With a presumably omnidirectional antenna, the blanketing effects will appear quite symmetrically around the tower site, including in the directions of other residences. The heavy blanketing effect on the clock radio was within about 200 yards of the transmitter site, and on the car radio within about 100 yards in an opportunistic manner where the desired station's signal would briefly dip below a certain level, inviting the overload to obstruct reception. Less pronounced interference effects occurred outside the radii.

I am not questioning the expertise or the professionalism in which Mr. Maxson carried out his duties, but it does make me wonder about the results of the test itself. The various low signal and blackout (foot prints) represented by the very colourful bar graphs and charts showed that our transmitter was causing blanketing in the West Bay area, when in fact during the time of the short blackout spot(s) the transmitter was not even powered up.

This is supposition on Mr Gould's part. There were locations where the blanketing overload created unmistakable interference from the test transmitter rather than the overload muting condition in which no source was identifiable. If the transmitter was off briefly, it was not of any duration that affected the overall results.

Mr. Maxson also stated that he did several surveys here in Cayman since Hurricane Ivan but I am not aware of any being done for West Point Radio 94.3 FM.

Clearly irrelevant. The issue is the desired-to-undesired ratio of the distant signals with respect to the new transmitter in West Bay. Closer to the new transmitter the issue is the blanketing level of the new transmitter as well. Previous analysis of analogous interference phenomena on the island informs the present discussion.

We have cited above several concerns that we have with the actual report on the blanketing and interference issues submitted by Mr. Maxson. And please understand that this is no bad reflection on Mr. Maxson himself – he was very descent and honourable in his dealing with us and has carried out his duties in the most professional manner and for this we are very grateful.

In closing:

We don't know if you can appreciate the frustrations we feel in experiencing all the set backs and lost applications and request to submit and re-submit information due to various reasons. But it has been a very long struggle from 1996 until now. We have submitted everything that we were asked to submit, paid the applications fees and were given an *approval in principle* and to date cannot understand why we are being held back. My wife and I have sacrificed our time and monetary resources to this project and many individuals along with us are anxiously waiting to hear some good word.

We have watched for many many years, other stations coming up and getting approval with frequencies right beside ours even while our application was still pending. Now we are being told that we are a part of the blanketing problem that other stations are causing in the George Town area and are being linked to the role out policy. This is the precise reason why we opted to position our tower/antennae in West Bay – six miles out of Town. A study was conducted (as requested by the ICTA) by an overseas consultant to show where our transmission would not pose

a problem and subsequently it did not at the time of the study nor do we perceive it to be a problem presently.

Have I seen this study?

I do not present myself as any expert, but I do know a little about radio transmissions and I feel very strongly that we have not been given a fair chance to operate our radio station 94.3 FM. We have had our ad in the telephone directory for several years now and obtained telephone numbers for the station with the first 3 digits of 943 since receiving the *approval in principle* and would like for our dream to become a reality.

Indeed, it is a policy decision as to whether and from whose radio stations to accept new areas where reception of island wide broadcasts is compromised by new facilities. It might be determined that the population affected is de minimus. Or it might be determined that a substantially lower power would be de minimus. However, the island wide coverage objective is challenged by this station at one extreme of the island, and further challenged if the power were reduced further. These two policy interests – island wide coverage and minimal new impact on radio reception – are balanced against the interests of providing diverse voices on the spectrum and enabling reasonably unfettered licensee economic decision making to foster the market.

We, Locksley and Carol Gould, are saying that this has taken too many years, too many setbacks and costing a lot of valuable time and finances and we therefore humbly beg that the Board allow us to move forward like the others so we can bring valuable programming and health messages to our Beloved Cayman Islands.

In Jesus name, we thank you and God bless you all!

Respectfully submitted,

Locksley and Carol Gould
WestPoint Radio 94.3 FM