

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

Applications of ) FCC File No.  
Combined Communications, Inc. ) 0000160476  
For Renewal of License of FM Station KTWS, ID 13579 )  
To: Secretary, Media Bureau, Audio Division

**REPLY TO OPPOSITION TO PETITION TO DENY**

1. Western Radio Services Co. (Western) and its President Richard L. Oberdorfer, hereby replies to opposition to petition to deny the above referenced renewal application for FM Station KTWS (Facility ID No. 13579) at Awbrey Butte in the City of Bend Oregon.
2. To clarify my 2nd paragraph in the Petition I would add that that some of the spurious emissions I have observed at Awbrey are in the 800 mhz band used for reception by both County 911 and Western. The USDA Forest Service property and tower at Awbrey is the primary radio dispatch point for the Deschutes National Forest. The Forest Service, like most Federal agencies, operates radios in the 150 to 174 mhz band.
3. The cartel members at Awbrey have all submitted near identical Oppositions claiming they are not aware of any pending interference claims and if they were to receive an interference complaint, they would work to promptly resolve any creditable interference concerns.
4. Attached as Exhibit A are copies of correspondence from and to attorneys representing

the cartel members in the interference arbitration matter. There is certainly, a pending interference complaint, a Court Order to comply with the interference arbitration provisions, and Combined Communication, Inc., being named as a defendant and being represented by legal counsel. I do not know under what conditions Mr. Chackel's declaration would not be considered false.

5. Combined's attorney submits additional false and misleading statements. Western properly submitted its Notice of Conflict. The cartel members took the position of "We do not have to ensure our broadcast stations do not interfere with nearby land mobile stations. We only have to comply with FCC rules." The parties to the litigation had already agreed in the Leases that it is the responsibility of Awbrey Towers, LLC to advance the arbitrator fees. It is the cartel members that have yet to cause the LLC to advance those fees and the reason for Western's request for sanctions.
6. If the Commission does not deny the renewal of the station license, the matter should be set for a hearing.

February 15, 2022  
Richard L. Oberdorfer  
PO Box 2450  
Carefree, AZ 85377

Respectfully Submitted

## **CERTIFICATE OF SERVICE**

I, Richard L. Oberdorfer hereby certify that the forgoing ‘Reply to Opposition to Petition to Deny’ is being served by E-Mail to the following:

Matthew H. McCormick  
[mccormick@fhhlaw.com](mailto:mccormick@fhhlaw.com)

Seth L. Williams  
[williams@fhhlaw..com](mailto:williams@fhhlaw..com)

## **AFFIDAVIT**

I, Richard L. Oberdorfer, state that I have reviewed the Reply to Opposition to Petition to Deny the Application for License Renewal of FM station KTWS and that I have personal knowledge of the facts stated in said Reply, and hereby swears and attests that the facts stated in said Reply are true and accurate.

February 15, 2022