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**News from the offices of Munn-Reese October 2018**

*Thumbs Feebleman, Editor & F.C.C. Theologian*

[Thumbs@Munn-Reese.com](mailto:Thumbs@Munn-Reese.com)

[www.Munn-Reese.com](http://www.Munn-Reese.com)

**\* —→ Dead Line!!! “C Band” Registration Ends October 17, 2018**

**In this The October 2018 Issue of the Munn-Reese News Letter!**

**LED Tower Lights + Night Vision + FAA is Set to Play Hide & Seek**

**How We Lost the Satellite C Band and What is Ahead**

**The FCC Is Having a Hard Time Finding Young Engineers**

**Your New FM Translator and Spectrum Measurements**

**The Best of The FCC Enforcement Actions**

**Satellite “C Band” Registration & Microwave Frequency Coordination**



**Munn-Reese can help you with all your Part 74 Frequency Coordination and Licensing needs. For straight answers about STL or RPU systems and licensing requirements contact Rick Grzebik via email at [Rick@Munn-Reese.com](mailto:Rick@Munn-Reese.com) or 517-278-7339 ext 108**

## **The FAA Has Published an Amendment to AC70/7460-1L**

AC70/7460-1L is the FAA book on lighting and marking obstructions in air space. The amendment is regarding LED Tower lights. We see with our eyes nice bright red led lights on towers. But, it has come to the attention of the FAA that pilots using night vision goggles for air rescue and air ambulance can't see the new LED tower lights. Looking through the night vision units the towers appear dark.

The amendment to AC70/7460-1L, Change: 2, August 17, 2018, states that after September 6, 2018, all new LED tower lights will have to include some kind of infrared generating system. Currently installed LED lighting systems will be grandfathered. But, it also explains, using the, "Readers Digest version", "These guidelines are not mandatory; they do not constitute a regulation (**what, not a Regulation?**); but will be studied on a case by case basis, as required." Read that to say, if your tower is in a flight path where night vision goggles usage makes your tower a hazard, you will comply.

Thumbs is very curious how the FAA with all the testing and training they require on power plant, airframe, repair personnel, and pilot training that this night vision problem would slip by the FAA the regulations.

It will be a safe bet that the price of LED light packages will be going up. It will also be a safe bet that the new LED lights with extra IR LED or heat generating devices will not be as energy efficient.

*Thumbs suggests that with all caution you make very sure all of your ASR information for each tower under your control is dead on!*

All that ASR data ends up in air GPS navigation – air obstruction navigation data bases. Pilots will rely on GPS data when the situation calls for dangerous minimums. An LED light, night vision minimums, and ASR coordinates out of limits, is an invitation to a very bad day. Don't be that station.

Thumbs suggests that you educate yourself by reading the three documents that may change your tower lighting standards. [FAA Engineering Brief 98](#) Technical specifications of night vision, aircraft speed, and towers. [FAA AC70/7460-1L change 2](#) This is the full tower lighting standard. 100 pages is overwhelming. Please, just read change # 2 at the front of the document.

### **How We Lost the Satellite C Band and What is Ahead**

Thumbs Feebleman is a voracious reader of FCC digest, Federal Register, and any Radio or Tower related magazine. It eats up a good part of Thumbs life, leaving just enough time for him to update his collection of colored bread bag ties.

Thumbs is very bewildered about how we lost the grip on the C Band satellite program delivery system. It just makes sense that something that works so well should be left alone. In a magazine related to non-broadcast topics, Thumbs stumbled across a title that kicked his curiosity. The title read, “C.B.R.S. is almost ready for the People.” The article read like Alphabet soup. That abbreviated title stands for “Citizens Broadband Radio Service”.

Thumbs plugged that tile in the FCC Home page search engine and boom! [Citizens Broadband Radio Service](#)

The [Report and Order and Second Further Notice of Proposed Rulemaking](#) adopted by the Commission on April 17, 2015 established a new Citizens Broadband Radio Service for shared wireless broadband use of the 3550-3700 MHz band (3.5 GHz Band). Rules governing the Citizens Broadband Radio Service are found in Part 96 of the Commission's rules.

In yesterday's FCC digest another voice waves the C Band satellite downlink flag! But, not in our favor!



**For immediate release**

**STATEMENT OF COMMISSIONER MICHAEL O'RIELLY  
ON FORMATION OF NEW SATELLITE C-BAND ALLIANCE (CBA)**

WASHINGTON, October 1, 2018. – “The 3.7 to 4.2 GHz band, or C-band downlink, is a key component to having a solid U.S. mid-band spectrum play for 5G services. This announcement appears to be a great step to quickly and orderly reallocate the spectrum to commercial wireless use. It also further establishes the private market option as the lead proposal to do so. I am impressed and pleased to learn the new alliance will be run by an experienced hand, Preston Padden, who knows how to get projects completed.”

**Media Contact:**

Brooke Ericson, (202) 418-2300

[Brooke.Ericson@fcc.gov](mailto:Brooke.Ericson@fcc.gov)

[DOC-354333A1.pdf](#)

Here is a link to the C-Band Alliance.

[\*Intelsat, SES, Eutelsat and Telesat Establish the C-Band Alliance \(CBA\), a Consortium to Facilitate Clearing of U.S. Mid-band Spectrum for 5G While Protecting U.S. Content Distribution and Data Networks\*](#)

Thumbs thinks there may be too many players on the field! But the more he digs in, he finds the U.S. is trying to beat China to the 5G worldwide system. Google; China 5G

## **The FCC Is Having a Hard Time Finding Young Engineers**

### **The FCC Launches New Honors Engineering Program**

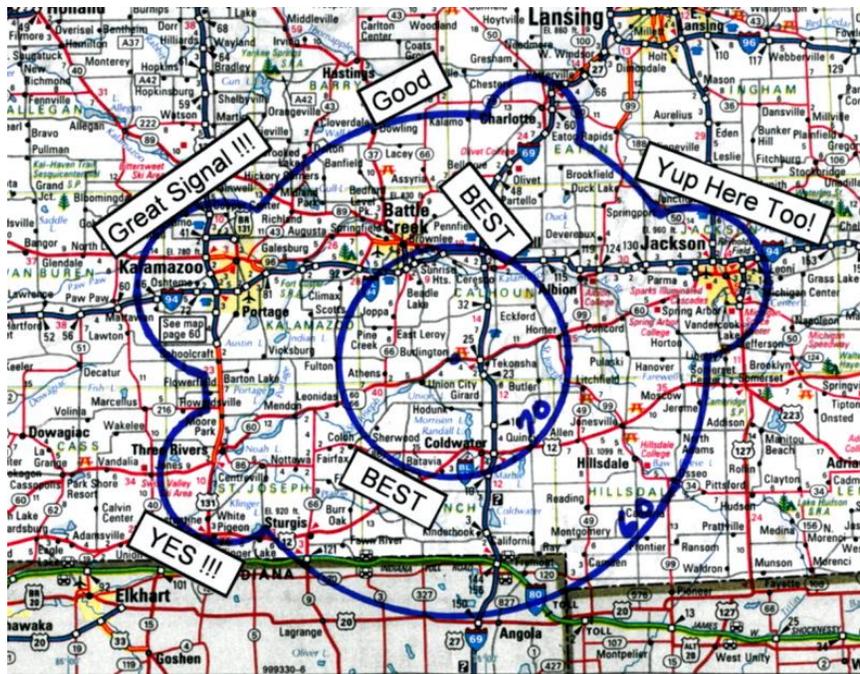
Here in the state of Michigan more than 50% of the broadcast engineering talent will hit retirement age in the next 5 years. That will create a void of talent that will hurt broadcast radio and TV. Well the FCC apparently has the same problem. The FCC's solution is an Honors program allowing the FCC to target engineering colleges in hopes of finding some young blood. The FCC wants these new engineers to explore new technology to push us in to the next century.



WASHINGTON, April 2, 2018—The Federal Communications Commission today announced the launch of a new Honors Engineer Program to recruit current students and recent engineering school graduates to the FCC and into the forefront of the technology and communications fields.

“The digital revolution is rapidly transforming virtually every aspect of American life,” said FCC Chairman Ajit Pai. “And it’s changing the FCC’s work, too. Many of the issues we confront today are technically complex. That makes it all the more important to bring the best engineering talent to the Commission. I’m thrilled to kick-start the Honors Engineering Program and excited to see the contributions from the next generation of technical experts.” [FCC Engineering Honors Program](#)

## *Need a coverage Map for your new Translator?*



Don't use the one that came from the Sales Manager's desk!!

Contact [Bruce@Munn-Reese.com](mailto:Bruce@Munn-Reese.com)

## **Your New FM Translator and Spectrum Measurements**

Got a new translator to build this year? Save yourself some headaches and go read the construction permit all the way to the end. I can't say it enough. Just about every month somebody calls in a panic because the new construction permit is conditioned with some special requirement. The FCC has conditions that require intermodulation and spectrum measurements. If you are very unlucky it's a partial proof on an AM directional array.

Remember that in the very beginning of FCC part 74 there is a paragraph that refers many requirements back to FCC part 73. Your new translator is licensed under part 74. But your new Translator is a part 73 device.

Therefore your translator must meet the part 73 rules unless stated otherwise in the part 74 rules. Clear as mud?

Remember that anytime you have an existing high power FM operation on tower and you add another broadcast system. Like, let's say adding a small low power solid state transmitter, like a translator. You will be required to install filters to keep the little guy from kicking out a spurious emission. Read the CP, then plan and be happy.

## The Munn-Reese Coverage Map

**RFR Studies**  
**AM Array Design**  
**AM Array Tune up**  
**AM Frequency Searches**  
**AM Method of Moments**  
**Coverage Maps**  
**Duopoly Studies**  
**FAA 7460 No Hazard**  
**FM Allocations Studies**  
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**Contact Bruce Bellamy [Bruce@Munn-Reese.com](mailto:Bruce@Munn-Reese.com) 517-278-7339 Ext. 101**

Munn-Reese, Inc.

**WSMR-AP**  
Sarasota, FL  
Proposed  
Latitude: 27-09-03 N  
Longitude: 80-27-51 W  
ERP: 50.00 kW  
HAA: 130.0 m  
Channel: 206  
Frequency: 89.1 MHz  
ANSL Height: 131.0 m  
Elevation: 3.0 m  
Horn Pattern: Omni  
Vert. Pattern: No  
Prop Model: Longley/Rice  
Climate: Cool temperate  
Conductivity: 0.0040  
Dielec Const: 15.0  
Refraction: 333.0  
Receiver Ht AG: 1.5 m  
Receiver Gain: 0 dB  
Time Variability: 50.0%  
Stk. Variability: 50.0%  
ITM Mode: Broadcast

**Note:**  
Signal Strengths less than 60 dBu are considered secondary and may be subject to interference.  
Predicted signal strengths are based on the use of a vertical receiving antenna 1.5 meters above ground level. This is believed to represent the real world parameters used by many listeners.

■ ~ 70.0 dBu  
■ 60.0 - 70.0  
■ 50.0 - 60.0  
■ 40.0 - 50.0  
■ 30.0 - 40.0

**Predicted Longley-Rice Coverage**  
WSMR (Appl) - Sarasota, FL

Scale: 1:1,000,000  
0 20 40 60 km

## The Best of the FCC Enforcement Actions

This enforcement action has Thumb's vote as the best enforcement action of the year 2018. Every so often the field inspector takes the time to give us enough details in the foot notes that the enforcement action turns in to a small novel. This action has a cute twist as the person of interest offers to sell the illegal device to the FCC field guy. Enjoy!

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Ravi's Import Warehouse, Inc.,  
Dallas, Texas

FileNo.:EB-FIELDSCR-17-00024142  
NAL/Acct No.: 201732500001  
FRN: 0026514281

**FORFEITURE ORDER**

**Adopted: April 25, 2018**

**Released: April 26, 2018**

By the Regional Director, Region Two:

***introduction***

1. We impose a penalty of \$22,000 against Ravi's Import Warehouse, Inc., (Ravi's) for operating a cellular phone jammer (jammer or signal jammer) in its commercial establishment in Dallas, Texas, in willful violation of Sections 301, 302a(b), and 333 of the Communications Act of 1934, as amended (Act),<sup>1</sup> and Sections 2.805(a) and 15.1(c) of the Commission's rules.<sup>2</sup> The Enforcement Bureau (Bureau) previously proposed a \$22,000 forfeiture against Ravi's for its use of a signal jammer.<sup>3</sup> In response to the *NAL*, Ravi's asserts that the Bureau incorrectly applied relevant portions of the Act and proposed a forfeiture that was inconsistent with precedent. After reviewing Ravi's response to the *NAL*, we disagree and find no reason to cancel, withdraw, or reduce the proposed penalty. We therefore assess the \$22,000 forfeiture the Bureau previously proposed.

***background***

2. On July 26, 2017, the Bureau issued the *NAL* proposing a \$22,000 forfeiture against Ravi's for its apparent willful violation of Sections 301, 302a(b), and 333 of the Act and Section 2.805(a) and 15.1(c) of the Commission's rules stemming from its operation of a signal jammer.<sup>4</sup> As discussed in the *NAL*, on April 10, 2017, an agent from the Bureau's Dallas Field Office (Dallas Office) responded to a complaint from an AT&T representative asserting that an AT&T base station was receiving interference from what appeared to be a signal jammer.<sup>5</sup> The AT&T representative advised the agent that the characteristics of the interference were typical of a signal jammer. While the agent was en route to the general location of the suspected signal jammer, the AT&T representative separately, and using his own equipment, determined that the jammer was likely located within Ravi's commercial establishment. When the agent arrived on the scene, the AT&T representative was already present and stated that shortly after Ravi's security personnel noticed the AT&T representative's presence, the jammer ceased operating. In the presence of the AT&T representative, the agent spoke with Anita Bhatia, who stated that she was the owner of Ravi's.<sup>6</sup> **Ms. Bhatia admitted to the agent that Ravi's used a signal jammer as a means of**

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<sup>1</sup> 47 U.S.C. §§ 301, 302a(b), 333.

<sup>2</sup> 47 CFR §§ 2.805(a), 15.1(c).

<sup>3</sup> *Ravi's Import Warehouse, Inc., Dallas Texas*, Notice of Apparent Liability for Forfeiture, 32 FCC Rcd 5606 (EB 2017) (*NAL*).

<sup>4</sup> The *NAL* includes a more complete discussion of the facts and history of this case and is incorporated in its entirety herein by this reference.

<sup>5</sup> See *NAL*, 32 FCC Rcd at 5607, para. 3.

<sup>6</sup> *NAL*, 32 FCC Rcd at 5607, para. 3.

preventing its employees from using mobile phones while at work.<sup>7</sup> The agent informed Ms. Bhatia of the public safety issues that could be caused by Ravi's use of a cell jammer. **Ms. Bhatia acknowledged that, in February 2017, the AT&T representative had warned her adult son against the operation of a signal jammer. Ms. Bhatia further stated that she disposed of the jammer shortly before the agent's arrival. Ms. Bhatia refused to voluntarily retrieve and surrender the device to the agent, and she also refused to identify the specific dumpster in which she disposed of the device.<sup>8</sup> Instead, Ms. Bhatia offered to sell the signal jammer to the agent.<sup>9</sup>** The agent declined the offer and issued a Notice of Unlicensed Radio Operation informing Ravi's that the operation of a signal jammer is illegal.<sup>10</sup> The following day, the agent contacted the AT&T representative, who confirmed that AT&T was no longer receiving interference from equipment operated at Ravi's commercial establishment.<sup>11</sup>

3. On August 21, 2017, Ravi's submitted a brief response to the *NAL*.<sup>12</sup> In the *NAL* Response, Ravi's affirms the core facts establishing that it violated Sections 301, 302a(b), and 333 of the Act and Sections 2.805(a) and 15.1(c) of the Commission's rules but argues that the Bureau misapplied relevant law and Commission precedents in proposing a \$22,000 monetary forfeiture against Ravi's. Specifically, Ravi's argues that, (i) while Ms. Bhatia used a jammer and discarded it in a dumpster, that the FCC agent did not ask her to retrieve it; and (ii) that the Bureau erred in applying Section 503(b)(2)(D) of the Act and otherwise misapplied the law in determining the proposed forfeiture amount. For the reasons set forth below, we find that Ravi's has not provided an adequate basis for reducing or canceling the forfeiture proposed in the *NAL*.

### **discussion**

4. The Bureau proposed a forfeiture in this case in accordance with Section 503(b) of the Act,<sup>13</sup> Section 1.80 of the Commission's rules,<sup>14</sup> and the Commission's *Forfeiture Policy Statement*.<sup>15</sup> When we assess forfeitures, Section 503(b)(2)(E) requires that we take into account the "nature, circumstances, extent, and gravity of the violation and, with respect to the violator, the degree of culpability, any history of prior offenses, ability to pay, and such other matters as justice may require."<sup>16</sup> We have fully considered Ravi's response to the *NAL*, which includes a variety of legal arguments, but we find none of them persuasive. The Bureau therefore affirms the \$22,000 forfeiture proposed in the *NAL*.

5. In the *NAL* Response, Ravi's admits to the core "operative facts" set forth in the *NAL*—that Ravi's operated a signal jammer on April 10, 2017, and that Ravi's previously received a warning from AT&T in February 2017.<sup>17</sup> As a result, Ravi's conceded the central facts to support a conclusion that Ravi's violated Sections 301 and 302a(b) of the Act and Sections 2.805(a) and 15.1(c) of the Commission's rules by operating a radiofrequency device without authority from the Commission and Section 333 of the Act by willfully causing interference to AT&T.<sup>18</sup> Thus, we affirm our apparent findings of liability.

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> Ravi's Import Warehouse, Inc., Response to Notice of Apparent Liability for Forfeiture (Aug. 21, 2017) (on file in EB-FIELDSCR-17-00024142) (*NAL* Response). The *NAL* Responses is two pages, *see id.*, and is accompanied by a one-page notarized affidavit of Anita Bhatia. *Id.*, Affidavit of Anita Bhatia (Bhatia Affidavit).

<sup>13</sup> 47 U.S.C. § 503(b).

<sup>14</sup> 47 C.F.R. § 1.80.

<sup>15</sup> *The Commission's Forfeiture Policy Statement and Amendment of Section 1.80 of the Rules to Incorporate the Forfeiture Guidelines*, Report and Order, 12 FCC Rcd 17087 (1997) (*Forfeiture Policy Statement*), *recons. denied*, Memorandum Opinion and Order, 15 FCC Rcd 303 (1999).

<sup>16</sup> 47 U.S.C. § 503(b)(2)(E).

<sup>17</sup> *NAL* Response at 1.

<sup>18</sup> 47 U.S.C. §§ 301, 302a(b), 333; 47 CFR §§ 2.805(a), 15.1(c). As noted in the *NAL*, because the same underlying facts here resulted in violations of both Section 301 (operation without an instrument of authorization) (\$10,000 base forfeiture) and Section 302a(b) (use of unauthorized or illegal equipment) (\$5,000 base forfeiture), we imposed only one of these two base forfeiture amounts. *NAL* at 32 FCC Rcd 5609, n. 22.

6. In the NAL Response, however, Ravi's disputes narrow portions of the NAL's description of the April 10, 2017,<sup>19</sup> conversation between Ms. Bhatia and the agent from the Dallas Office. Ravi's disputes whether the FCC Agent asked her to retrieve the signal jammer from the trash and she declined or whether she told the agent that the agent could retrieve it. Specifically, in the Bhatia Affidavit, Ms. Bhatia states that she "told [the FCC agent] that [she] had thrown the jammer in the dumpster and that they were welcome to retrieve it. They declined to do so."<sup>20</sup> Even if we were to accept the version of events recounted in the Bhatia Affidavit, the disputed portion of the conversation between Ms. Bhatia and the agent is irrelevant to our finding of liability, especially in light of Ravi's admissions in the NAL Response.<sup>21</sup> Rather, the only logical purpose of the Bhatia Affidavit would be to argue against the \$5,000 upward adjustment proposed in the NAL for egregious behavior. Although Ravi's does not make such an affirmative argument in the NAL Response, even if it had done so, we would not find it persuasive. While Ravi's disputes the characterization in the NAL that Ms. Bhatia refused to voluntarily surrender the jamming device to the agent,<sup>22</sup> the NAL Response does not deny the Bureau's assertion that Ms. Bhatia offered to sell the signal jammer to the agent.<sup>23</sup> Because the NAL based the \$5,000 upward adjustment on the egregiousness of Ms. Bhatia's attempt to sell the jamming device to the agent, we need not address the factual question raised in the NAL Response of who told whom that they could retrieve the jammer from the trash.<sup>24</sup>

7. The remainder of the NAL Response asserts that the Bureau misapplied applicable law in calculating the NAL's proposed forfeiture of \$22,000.<sup>25</sup> Ravi's asserts that the NAL's use of Section 503(b)(2)(D) of the Act "is misplaced."<sup>26</sup> To the contrary, this is the applicable statutory section to apply when the Commission proposes or assesses a forfeiture against an entity that is not a broadcast licensee or a common carrier.<sup>27</sup> And the monetary forfeiture proposed in the NAL is consistent with the Commission's precedents for enforcement actions involving signal jammers.<sup>28</sup> We therefore reject Ravi's argument for a reduction of the monetary forfeiture.

8. After considering the relevant statutory factors and the Commission's *Forfeiture Policy Statement*, we find that Ravi's is liable for a total forfeiture of \$22,000. As explained in the NAL, this amount represents the sum of (a) the \$10,000 base forfeiture for operating a radio without the Commission's authorization, in violation of Sections 301 and 302a(b) of the Act and Sections 2.805(a) and 15.1(c) of the Commission's rules, (b) the \$7,000 base forfeiture for causing harmful interference, in violation of Section 333 of the Act, and (c) an upward adjustment of \$5,000 to address the egregiousness of Ravi's attempt to generate revenue from the Commission's efforts to resolve an interference complaint (with potential public safety ramifications).

## Conclusion

9. Based on the record before us, and in light of the applicable statutory factors, we conclude that Ravi's willfully violated Sections 301, 302a(b) and 333 of the Act and Sections 2.805(a) and 15.1(c) of the Commission's rules by operating a signal jammer from its commercial establishment in Dallas, Texas. We decline to cancel or reduce the \$22,000 forfeiture proposed in the NAL.

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<sup>19</sup> NAL Response at 1.

<sup>20</sup> NAL Response, Affidavit of Anita Bhatia.

<sup>21</sup> NAL Response at 1.

<sup>22</sup> *Id.*

<sup>23</sup> Compare NAL, 32 FCC Rcd at 5607, para. 3, to NAL Response at 1.

<sup>24</sup> See NAL, 32 FCC Rcd at 5609, para. 8.

<sup>25</sup> NAL Response at 2.

<sup>26</sup> *Id.*

<sup>27</sup> See 47 U.S.C. 503(b)(2)(D).

<sup>28</sup> See, e.g., *R&N Manufacturing, Ltd.*, Notice of Apparent Liability for Forfeiture, 29 FCC Rcd 3332, para. 2 (2014), cancelled by Order, 31 FCC Rcd 1897 (EB 2016) (adopting a Consent Decree terminating and resolving the investigation); *The Supply Room, Inc.*, Notice of Apparent Liability for Forfeiture, 28 FCC Rcd 4981, 85-87, paras. 11-14 (2013), cancelled by Order, 31 FCC Rcd 2082 (EB 2016) (adopting a Consent Decree terminating and resolving the investigation). In addition, we note that Ravi's reliance on *U.S. v. Baxter*, 841 F. Supp. 2d 378 (D. Me. 2012), is misplaced. Unlike the present case, *Baxter* involved violations of the Commission's Part 97 rules for amateur radio licensees, not the operation of a signal jamming device.

## Ordering clauses

10. Accordingly, **IT IS ORDERED** that, pursuant to Section 503(b) of the Act,<sup>29</sup> and Section 1.80 of the Rules,<sup>30</sup> Ravi's Import Warehouse, Inc., **IS LIABLE FOR A MONETARY FORFEITURE** in the amount of Twenty-Two Thousand Dollars (\$22,000) for willfully violating Sections 301, 302a(b), and 333 of the Act,<sup>31</sup> and Sections 2.805(a) and 15.1(c) of the Commission's rules.<sup>32</sup>

11. Payment of the forfeiture shall be made in the manner provided for in Section 1.80 of the Rules within thirty (30) calendar days after the release of this Forfeiture Order.<sup>33</sup> If the forfeiture is not paid within the period specified, the case may be referred to the U.S. Department of Justice for enforcement of the forfeiture pursuant to Section 504(a) of the Act.<sup>34</sup>

12. Payment of the forfeiture must be made by check or similar instrument, wire transfer, or credit card, and must include the NAL/Account Number and FRN referenced above. Ravi's shall send electronic notification of payment to Matthew L. Gibson at [matthew.gibson@fcc.gov](mailto:matthew.gibson@fcc.gov), with a copy to [field@fcc.gov](mailto:field@fcc.gov), on the date said payment is made. Regardless of the form of payment, a completed FCC Form 159 (Remittance Advice) must be submitted.<sup>35</sup> When completing Form 159, enter the Account Number in block number 23A (call sign/other ID) and enter the letters "FORF" in block number 24A (payment type code). Below are additional instructions that should be followed based on the form of payment selected:

- Payment by check or money order must be made payable to the order of the Federal Communications Commission. Such payments (along with completed Form 159) must be mailed to the Federal Communications Commission, P.O. Box 979088, St. Louis, MO 63197-9000, or sent via overnight mail to U.S. Bank – Government Lockbox #979088, SL-MO-C2-GL, 1005 Convention Plaza, St. Louis, MO 63101.
- Payment by wire transfer must be made to ABA Number 021030004, receiving bank TREAS/NYC, and Account Number 27000001. To complete the wire transfer and ensure appropriate crediting of the wired funds, a completed Form 159 must be faxed to U.S. Bank at (314) 418-4232 on the same business day the wire transfer is initiated.
- Payment by credit card must be made by providing the required credit card information on FCC Form 159 and signing and dating the Form 159 to authorize the credit card payment. The completed Form 159 must then be mailed to Federal Communications Commission, P.O. Box 979088, St. Louis, MO 63197-9000, or sent via overnight mail to U.S. Bank – Government Lockbox #979088, SL-MO-C2-GL, 1005 Convention Plaza, St. Louis, MO 63101.

13. Any request for making full payment over time under an installment plan should be sent to: Chief Financial Officer – Financial Operations, Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Room 1-A625, Washington, DC 20554.<sup>36</sup> Questions regarding payment procedures should be directed to the Financial Operations Group Help Desk by telephone, 1-877-480-3201, or by e-mail, [ARINQUIRES@fcc.gov](mailto:ARINQUIRES@fcc.gov).

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<sup>29</sup> 47 U.S.C. § 503(b).

<sup>30</sup> 47 CFR § 1.80.

<sup>31</sup> 47 U.S.C. § 301, 302a(b), 333.

<sup>32</sup> 47 CFR §§ 2.805(a), 15.1(c).

<sup>33</sup> *Id.*

<sup>34</sup> 47 U.S.C. § 504(a).

<sup>35</sup> An FCC Form 159 and detailed instructions for completing the form may be obtained at <http://www.fcc.gov/Forms/Form159/159.pdf>.

14. **IT IS FURTHER ORDERED** that a copy of this Forfeiture Order shall be sent by first class mail and certified mail, return receipt requested to Ravi's Import Warehouse, Inc., Attn: Anita Bhatia, 11029 Harry Hines Boulevard, Dallas, Texas 75229, with a copy to Allen Landerman, Esq., Allen Landerman, P.C., 16801 Addison Road, Suite 125, Addison, Texas 75001.

FEDERAL COMMUNICATIONS COMMISSION  
Ronald Ramage  
Regional Director  
Region Two  
Enforcement Bureau  
[DA-18-417A1.pdf](#)

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