

**Exhibit 13-F Narrative**  
Section 74.1233(a)(1) Common Overlap  
Request for Mattoon Waiver

Cornerstone Community Radio, Inc. ("Cornerstone"), licensee of FM translator W248CA, Channel 248D, Facility ID No. 156011, Bradenton, Florida hereby respectfully requests the Commission waive section 73.1233(a)(1), requiring overlap between the present and proposed FCC F(50,50) 60 dBμ contours of the translator for grant of a minor change application.

In accordance with the previously established requirements for the grant of a "Mattoon Waiver"<sup>1</sup>, the Commission has previously waived Section 74.1223(a)(1) where an applicant has demonstrated that it does not have a history of filing "serial" minor modification applications, the proposed facility is mutually exclusive to its licensed facility and the translator will rebroadcast an AM station as an AM fill-in translator. Cornerstone has no history of filing "serial" minor modification applications.

The W248CA facility has not been "hopped" and is operating from its original licensed transmitter site. The proposed W248CA would rebroadcast AM station WWBA, 820 kHz, Facility ID No. 51971, licensed to Largo, FL, as an AM fill-in translator. The proposed W248CA facility is mutually exclusive to the W248CA licensed facility. The attached map demonstrates that the proposed W248CA FCC F(50,10) 40 dBμ interfering contour does overlap with the licensed W248CA FCC F(50,50) 60 dBμ contour. Both facilities specify operation on the same frequency, Channel 248D (97.5 MHz). The two facilities are mutually exclusive. Therefore it is believed this proposed modification is eligible for a waiver of Section 74.1233(a)(1) of the Commission's rules.

<sup>1</sup> *John Garziglia, Esq.*, 26 FCC Rcd 12685 (2011) ("Garziglia")

**W248CA**

Bradenton, FL  
BMPFT20151208ADC  
Latitude: 27-32-41 N  
Longitude: 082-34-28 W  
ERP: 0.02 kW  
HAAT: 0.0 m  
Channel: 248  
Frequency: 97.5 MHz  
AMSL Height: 13.0 m  
Elevation: 3.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**W248CA Appl.**

St. Petersburg, FL  
Latitude: 27-50-51.80 N  
Longitude: 082-45-48.90 W  
ERP: 0.25 kW  
HAAT: 166 m  
Channel: 248  
Frequency: 97.5 MHz  
AMSL Height: 169.0 m  
Elevation: 3.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**Exhibit 13-F Section 74.1233(a) Common Overlap**  
Request for "Mattoon Waiver"

The W248CA licensed and proposed facilities are mutually exclusive.

FCC F(50,51)  
40 dBu contour

FCC F(50,50)  
60 dBu contour

Pinellas Hillsborough  
+ W248CA Appl.

W248CA

**HORIZON**  
BROADCAST SOLUTIONS

Scale 1:1,100,000  
0 10 20 30 km

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