

**Section 74.1204 - Statement of Compliance**  
**Amendment to AM Revitalization 250-Mile Window Application**  
**FCC File No. BMPFT-20170213ABO**  
**W260CY, Cleveland, OH, to Channel 273**  
**FM Translator Facility ID. 143930**  
**August, 2017**

The Applicant proposes herein to amend an application to modify the above-referenced, non-reserved band, FM translator authorization pursuant to the announced “*Second FM translator application modification window for AM stations to modify and/or relocate FM translator stations (Second Modification Window)*”.<sup>1</sup> As proposed in the original application, the FM translator will relocate, change frequency and rebroadcast Class B AM station WHK(AM), Cleveland, OH (Facility ID 72299). However, this technical amendment proposes a channel change to resolve a conflict with full-service station WNIR(FM), Kent, OH (Channel 261A) which caused the Media Bureau to rescind the translator’s construction permit on Channel 260D and dismiss the above-referenced application. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached are two maps which demonstrate that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) and first-adjacent channel (See Exhibit 2) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

The required protection to second-adjacent channel station WDOK(FM), Cleveland, OH (Channel 271B) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of WDOK(FM) resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, WDOK(FM) is predicted to produce an F(50,50) signal strength of 87 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator’s relevant interfering contour is the 127 dBu contour relative to WDOK(FM). According to free space calculations, the translator’s worst-case predicted 100 dBu contour will extend, at most, 6.7 meters from

---

<sup>1</sup> See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

the proposed antenna which will be mounted 8 meters above roof level of a tall building in downtown Cleveland. Because the proposed transmit antenna will be located 173 meters above ground level, the predicted interference area will neither reach ground level nor will the predicted 6.7 meter radius interference area extend to any nearby buildings. Therefore, the instant proposal will cause no interference to any population served by WDOK(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been “demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable”.

Amended  
Section 74.1204 CoChannel  
Contour Overlap Study

Exhibit 1 August, 2017

Key to Stations on Map

- W260CY.AMENDMENT.273D.FAC.ID.143930
- WZOO-FM.CH.273A.FAC.ID.7819
- W273BL.CH.273D.FAC.ID.141395

**W260CY.AMENDMENT.273D.FAC.ID.143930**  
Cleveland, OH  
Latitude: 41-30-19 N  
Longitude: 081-41-19 W  
ERP: 0.005 kW  
Channel: 273  
Frequency: 102.5 MHz  
AMSL Height: 369.0 m  
Horiz. Pattern: Omni

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):  
40 dBu F(50,10) to Class A & FX & LPFM  
37 dBu F(50,10) to Class B1 FM Station  
34 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
Class A & FX & LPFM = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

Amended  
Section 74.1204 First-Adjacent  
Channel Contour Overlap Study

Exhibit 2

August, 2017

Key to Stations on Map

- W260CY.AMENDMENT.CH.273D.FAC.ID.143930
- WCPZ.CH.274B.FAC.ID.19706

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):  
54 dBu F(50,10) to Class A & FX & LPFM  
51 dBu F(50,10) to Class B1 FM Station  
48 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
Class A & FX & LPFM = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

W260CY.AMENDMENT.CH.273D.FAC.ID.143930

Cleveland, OH  
Latitude: 41-30-19 N  
Longitude: 081-41-19 W  
ERP: 0.005 kW  
Channel: 273  
Frequency: 102.5 MHz  
AMSL Height: 369.0 m  
Horiz. Pattern: Omni

Scale 1:564,688

