

Sterling Communications, Inc.

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This ENGINEERING STATEMENT is prepared for
Pine Tree Broadcasting, LLC
WRMO 84096 Milbridge, ME

Introduction:

This statement is being prepared on behalf of Pine Tree Broadcasting, LLC ("PTB") in response to the FCC's dismissal letter dated April 1, 2013. This application is being filed as a minor amendment to the technical specifications of application BPH-20121116AMF (the "Application"). The instant application removes the formerly requested waiver, and instead only requests an upgrade in wattage, while maintaining the same class and technical specifications of BPH-20121116AMF. The applicant will continue to use the same directional antenna pattern and orientation as authorized within the current WRMO license.

Background:

WRMO(FM) currently is licensed pursuant to §73.215 because the authorized facilities do not meet the minimum distance separation requirements of §73.207 of the Commission's Rules toward the licensed facilities of station WCTB(FM), Fairfield, Maine, and station WARX(FM), Lewiston, Maine. The Application (BPH-20121116AMF) did not propose a change in the licensed WRMO(FM) station class or transmitter site location, so the proposed WRMO(FM) facilities remain short-spaced to WCTB(FM) and WARX(FM) pursuant to §73.207. PTB acknowledged these short-spacings in the application and requested processing of the application pursuant to §73.215. §73.215 requires applicants to meet both the minimum distance separations and contour protection requirements specified therein. Within the Application, PTB stated the proposed WRMO(FM) facilities meet the minimum distance separation requirements of § 73.215 to both WCTB(FM) and

WARX(FM), but, using the standard contour prediction method in §73.313 of the Commission's Rules ("FCC prediction method"), created prohibited contour overlap with WCTB(FM) in violation of §73.215. Accordingly, it was ordered that the request for waiver of §73.215 filed by PTB was denied and application BPH-20121116AMF was dismissed.

Proposed Technical Parameters:

The new proposed operation of WRMO will remain at the existing transmitter site authorized in the WRMO license, but will increase the effective radiated power to 27.0 kilowatts while maintaining the same radiation center above ground level of 109 meters and height above average terrain of 204 meters on channel 229 (93.7 MHz), and finally, as mentioned previously, no change in the directional antenna pattern or orientation as authorized in the WRMO license.

Figure 1 of this exhibit provides the §73.207 distance separation to the surrounding FM stations. The proposed site does not meet the required §73.207 distance separation towards WCTB, channel 228, Fairfield, Maine or WARX, Channel 230, Lewiston, Maine. The required distance between the stations is set forth in Figure 1.

Figure 2 of this exhibit shows that the proposed WRMO facilities comply with §73.315 of the Commissions rules providing the 70 dBu contour over the entire principal community of Milbridge, ME.

In order to avoid interference to WTCB, the applicant is proposing to use §73.215 contour protection. Figure 3 of this exhibit demonstrates there will be no prohibited overlap between WTCB, WARX and the proposed facilities for WRMO pursuant to §73.215 contour protection methodology. The contours of WCTB are based on Maximum class C3 facilities. The contours of WARX are based on Maximum Class B facilities.

Conclusion:

PTB respectfully requests that the Commission reinstate the BPH-20121116AMF application, pursuant to the minor amendments made to the technical specifications. PTB proposes to operate pursuant to §73.215 with no change to the transmitter site authorized in PTB's license. This filing request is only an increase of the effective radiated power to 27.0 kilowatts with no change in height and no change in channel 229 (93.7 MHz) and no

change to the existing directional antenna pattern or orientation as previously authorized within the existing WRMO license. The proposed technical specifications meet all FCC rules and no waivers are being requested.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Danny Langston', is positioned above the printed name.

Danny Langston
Technical Consultant
April 26, 2013
DAL/aml

Figure 1
WRMO
Pine Tree Broadcasting, LLC
§73.207 Separations
Milbridge, Maine

Search of Channel 229 (93.7 MHz Class B) at 44-38-33.0 N, 68-10-18.0 W.

CALL	CITY	ST	CHN CL	DIST (km)	SEP (km)	BRNG	CLEARANCE
WCTB*	FAIRFIELD	ME	228 C3	121.07	145.00	276.0	-23.9
WARX*	LEWISTON	ME	230 B	157.53	169.00	250.0	-11.5
WRFR-LP	ROCKLAND	ME	227 LP100	95.46	67.00	232.0	28.5

*The proposed site does not meet the required §73.207 distance separation. The applicant is proposing to us the §73.215 contour protection.

Section 73.315 Compliance

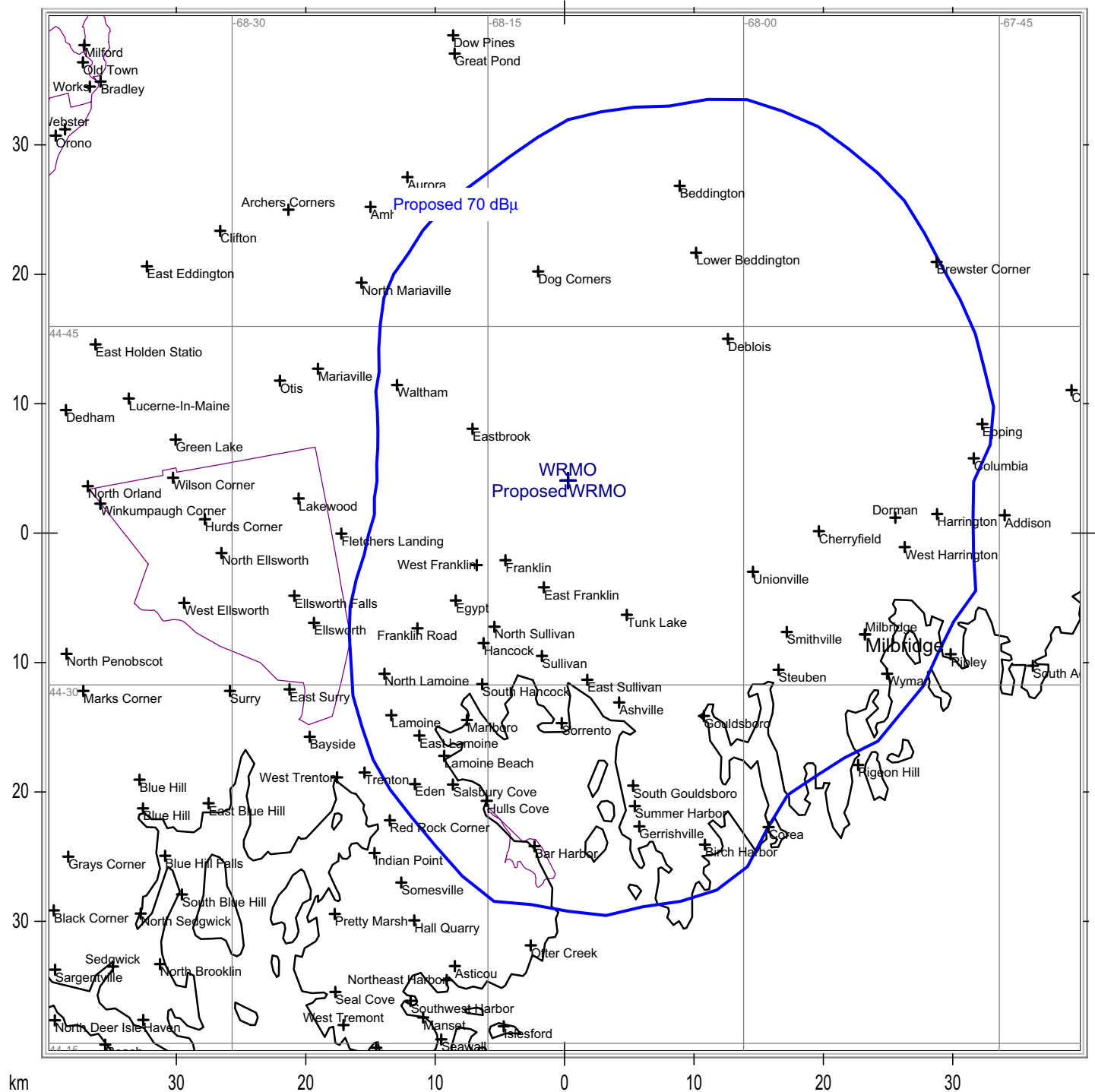


Figure 2
Pine Tree Broadcasting, LLC
Community Coverage
Milbridge, Maine

State Borders City Borders Lat/Lon Grid

Section 73.215 Compliance

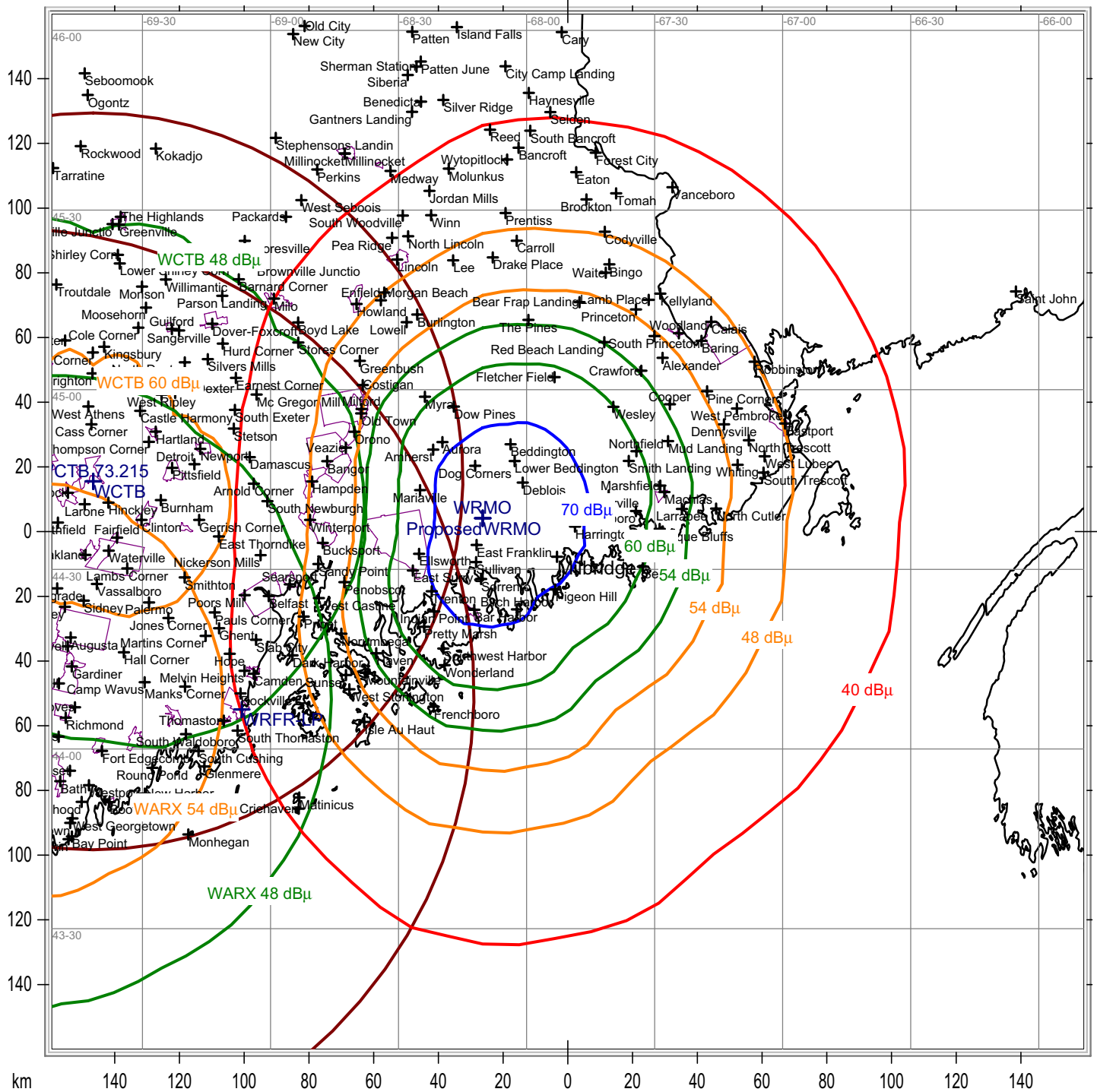


Figure 3
Pine Tree Broadcasting, LLC
§73.215 contour Protection
Milbridge, Maine

State Borders City Borders Lat/Lon Grid

CERTIFICATION

I, Danny Langston, hereby certify that I am a technical consultant with Sterling Communications, Inc., that I have prepared the foregoing Technical Statement and Exhibits on behalf of Pine Tree Broadcasting, LLC, and that the foregoing Statement and Exhibits are true and correct, to the best of my knowledge and information.

Signature: _____

Date: April 26, 2013