

Exhibit 18.1

Tabulation of Proposed NCE-FM Allocation

REFERENCE 27 26 07.0 N. 80 21 41.0 W.		Black Media Works, Inc. CH# 216C1 - 91.1 MHz, Pwr= 100 kW DA, HAAT= 125.3 M, COR= 128 M Average Protected F(50-50)= 55.01 km Standard Directional							DI SPLAY DATES DATA 03-04-14 SEARCH 03-05-14		
CH CITY	CALL	TYPE STATE	ANT AZI ---	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*	
216C1 Fort Pierce	WJFP	CP DCX FL	0.0 0.0	0.00 BPED20101130APN	27 26 07.0 80 21 41.0	100.000 125	136.7 128	49.6 Black Media Works, Inc.	-186.4*	-186.4*	
216A Fort Pierce	WJFP	LIC_CN FL	5.9 185.9	1.86 BLED19940725KA	27 27 07.0 80 21 34.0	6.000 48	76.5 51	20.6 Black Media Works, Inc.	-126.9*	-162.1*	
219A Stuart	WWFR	LIC DCX FL	186.2 6.2	35.19 BMLED20131118ALW	27 07 14.0 80 23 59.0	2.650 152	1.9 157	23.8 Family Stations, Inc.	-21.9*<	4.8	
216C1 Lakeland	WKES	LIC_CN FL	293.8 113.0	180.08 BLED19970416KD	28 04 46.0 82 02 27.0	100.000 128	149.7 164	54.1 The Moody Bible Institute	0.7	38.5	
213C1 Cypress Quarters	WREH	LIC DE_ FL	260.6 80.3	59.02 BLED20041116ACR	27 20 51.0 80 57 04.0	100.000 76	5.1 85	45.8 Reach Communications, Inc.	18.3	9.7	
269A Vero Beach amended 980901	WCZR«	LIC NCN FL	344.2 164.1	34.57 BLH19980715KB	27 44 07.0 80 27 27.0	4.200 120	17.1 123	5.2 Aloha Station Trust, Lic	22.0R	12.6M	
217C1 Miami	WLRN-FM	LIC DCX FL	174.2 354.2	162.68 BLED20030411ABJ	25 58 46.0 80 11 46.0	47.000 285	90.4 287	61.8 The School Board Of Miami -	16.9	16.1	
214C1 West Palm Beach	WPBI	LIC DCX FL	171.0 351.1	95.25 BMLED20030509AAR	26 35 20.0 80 12 44.0	38.000 340	5.6 345	54.8 Classical South Florida In	34.3	33.9	
218A Clewiston	WPSF	LIC_VX FL	207.2 27.0	92.93 BLED20080804ABW	26 41 27.0 80 47 18.0	0.700 118	1.6 119	18.6 American Educational Broad	36.5	67.9	
218A Clewiston	WPSF	CP_CX FL	213.6 33.3	96.70 BMPED20140116AAD	26 42 34.8 80 54 00.0	1.200 161	2.0 165	24.6 American Educational Broad	40.8	65.8	
215C1 Naples	WSOR	LIC_C_ FL	228.0 47.4	180.79 BLED20050510ACN	26 20 29.0 81 42 38.0	36.000 275	88.8 279	60.6 The Moody Bible Institute	43.5	46.3	
218C3 Cocoa	WMI E-FM	LIC DEN FL	339.8 159.6	109.11 BLED19840921CT	28 21 21.0 80 44 47.0	20.000 30	2.7 52	26.3 National Christian Network	65.1	78.5	
219A Sebring	WJFH	LIC DCX FL	267.2 86.6	111.66 BLED20131121AVS	27 22 52.0 81 29 28.0	2.000 137	2.3 166	26.0 Radio Training Network, In	76.1	82.4	
214C1 Orlando	WMFE-FM	LIC_CN FL	331.2 150.8	148.31 BLED19800723AE	28 36 08.0 81 05 37.0	100.000 223	8.6 233	65.4 Communi ty Communi cations,	101.6	79.0	
216C3 Palm Coast	WHYZ	LIC DEX FL	340.9 160.6	235.56 BLED20100823ACQ	29 26 08.0 81 09 21.0	9.200 53	74.8 56	20.3 Central Flori da Educati ona	119.0	99.3	

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
Contour distances are on direct line to and from reference station. Reference zone= - Zone 2, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.
« = Station meets FCC minimum distance spacing for its class.
< = Contour Overlap
Reference station has protected zone issue:

Green Text denotes the WJFP(FM) - Fort Pierce, FL facility to be modified by this Form 340 proposal. This facility need not be protected.

Yellow Highlighted Text denotes §73.509 Contour Protection Studies toward select stations as included in **Exhibit(s) 18.2**.

Red Highlighted Text denotes a waiver for received third adjacent channel received contour overlap with WWFR(FM) - Stuart, FL as requested in **Exhibit 18.4**.

Exhibit 18.2

Contour Protection Studies Toward WKES(FM) - Lakeland, FL

Black Media Works, Inc.

FMCommander Single Allocation Study - 03-05-2014 - NGDC 30 SEC
WJFP.P's Overlaps (In= 0.74 km, Out= 38.52 km)

WJFP.P CH 216 C1 DA
Lat= 27 26 07.0, Lng= 80 21 41.0
100.0 kW 125.3 M HAAT, 128 M COR
Prot.= 60 dBu, Intef.= 40 dBu

WKES CH 216 C1 BLED19970416KD
Lat= 28 04 46.0, Lng= 82 02 27.0
100.0 kW 128 M HAAT, 164 M COR
Prot.= 60 dBu, Intef.= 40 dBu

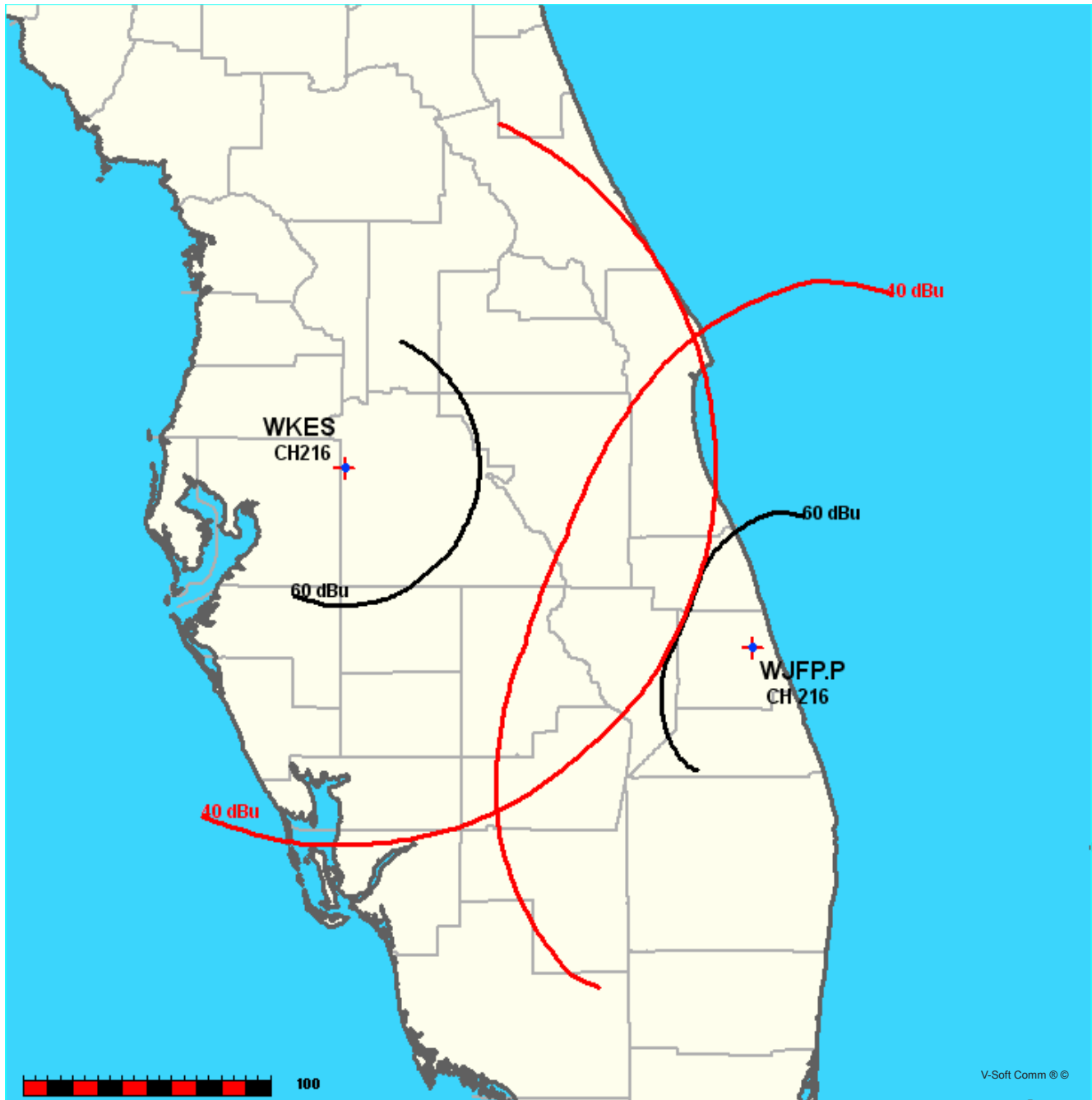


Exhibit 18.2

Contour Protection Studies Toward WKES(FM) - Lakeland, FL

03-05-2014

Terrain Data: NGDC 30 SEC

FMOver Analysis

WJFP.P

WKES BLED19970416KD

Channel = 216C1
Max ERP = 100 kW
RCAMSL = 128 M
N. Lat. 27 26 07.0
W. Lng. 80 21 41.0
Protected
60 dBu

Channel = 216C1
Max ERP = 100 kW
RCAMSL = 164 M
N. Lat. 28 04 46.0
W. Lng. 82 02 27.0
Interfering
40 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
251.0	017.0817	0122.0	039.2	123.0	100.0000	0121.4	153.7	39.41	
252.0	016.3701	0122.0	038.8	122.8	100.0000	0121.2	153.3	39.46	
253.0	015.6737	0122.0	038.5	122.5	100.0000	0121.1	153.0	39.50	
254.0	014.9924	0122.0	038.1	122.2	100.0000	0120.9	152.8	39.54	
255.0	014.3262	0122.0	037.8	122.0	100.0000	0120.8	152.5	39.58	
256.0	013.6752	0122.0	037.4	121.7	100.0000	0120.6	152.3	39.61	
257.0	013.0393	0122.0	037.0	121.4	100.0000	0120.4	152.1	39.64	
258.0	012.4186	0122.0	036.6	121.2	100.0000	0120.2	151.9	39.66	
259.0	011.8130	0122.0	036.2	120.9	100.0000	0120.0	151.7	39.68	
260.0	011.2225	0122.0	035.8	120.6	100.0000	0119.8	151.6	39.70	
261.0	010.7650	0122.0	035.5	120.3	100.0000	0119.7	151.5	39.72	
262.0	010.3169	0122.0	035.2	120.1	100.0000	0119.5	151.3	39.73	
263.0	009.8784	0122.0	034.8	119.8	100.0000	0119.3	151.2	39.75	
264.0	009.4495	0122.0	034.5	119.6	100.0000	0119.2	151.1	39.76	
265.0	009.0300	0122.0	034.1	119.3	100.0000	0119.0	151.1	39.76	
266.0	008.6201	0122.0	033.8	119.0	100.0000	0118.9	151.1	39.76	
267.0	008.2197	0122.0	033.4	118.8	100.0000	0118.8	151.1	39.76	
268.0	007.8288	0122.0	033.0	118.5	100.0000	0118.7	151.1	39.75	
269.0	007.4474	0122.0	032.6	118.2	100.0000	0118.6	151.1	39.74	
270.0	007.0756	0122.0	032.2	118.0	100.0000	0118.5	151.2	39.73	
271.0	006.9222	0122.0	032.0	117.8	100.0000	0118.5	151.1	39.75	
272.0	006.7704	0122.0	031.8	117.5	100.0000	0118.5	151.0	39.76	
273.0	006.6203	0122.0	031.7	117.3	100.0000	0118.5	150.9	39.78	
274.0	006.4719	0122.0	031.5	117.1	100.0000	0118.5	150.8	39.79	
275.0	006.3252	0122.0	031.3	116.9	100.0000	0118.5	150.8	39.80	
276.0	006.1802	0122.0	031.2	116.7	100.0000	0118.6	150.7	39.81	
277.0	006.0368	0122.0	031.0	116.5	100.0000	0118.6	150.7	39.81	
278.0	005.8952	0122.0	030.8	116.2	100.0000	0118.6	150.7	39.82	
279.0	005.7552	0122.0	030.6	116.0	100.0000	0118.7	150.7	39.82	
280.0	005.6169	0122.0	030.5	115.8	100.0000	0118.7	150.7	39.82	
281.0	005.5554	0122.0	030.4	115.6	100.0000	0118.8	150.6	39.83	
282.0	005.4943	0122.0	030.3	115.4	100.0000	0118.8	150.5	39.84	
283.0	005.4336	0122.0	030.2	115.2	100.0000	0118.9	150.5	39.85	
284.0	005.3731	0122.0	030.2	115.0	100.0000	0118.9	150.5	39.86	

Exhibit 18.2

Contour Protection Studies Toward WKES(FM) - Lakeland, FL

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
285.0	005.3130	0122.0	030.1	114.8	100.0000	0119.0	150.4	39.87
286.0	005.2533	0122.0	030.0	114.6	100.0000	0119.0	150.4	39.87
287.0	005.1938	0122.0	029.9	114.4	100.0000	0119.0	150.4	39.87
288.0	005.1348	0122.0	029.8	114.2	100.0000	0119.1	150.4	39.87
289.0	005.0760	0122.0	029.8	114.0	100.0000	0119.1	150.4	39.87
290.0	005.0176	0122.0	029.7	113.8	100.0000	0119.1	150.5	39.86
291.0	005.0176	0122.0	029.7	113.6	100.0000	0119.2	150.4	39.87
292.0	005.0176	0122.0	029.7	113.4	100.0000	0119.2	150.4	39.87
293.0	005.0176	0122.0	029.7	113.2	100.0000	0119.2	150.4	39.88
294.0	005.0176	0122.0	029.7	113.0	100.0000	0119.2	150.4	39.88
295.0	005.0176	0122.0	029.7	112.8	100.0000	0119.2	150.4	39.88
296.0	005.0176	0122.0	029.7	112.6	100.0000	0119.2	150.4	39.87
297.0	005.0176	0122.0	029.7	112.4	100.0000	0119.2	150.5	39.87
298.0	005.0176	0122.0	029.7	112.2	100.0000	0119.2	150.5	39.86
299.0	005.0176	0122.0	029.7	112.0	100.0000	0119.2	150.5	39.85
300.0	005.0176	0122.0	029.7	111.8	100.0000	0119.2	150.6	39.84
301.0	005.1393	0122.0	029.8	111.6	100.0000	0119.1	150.5	39.86
302.0	005.2624	0122.0	030.0	111.4	100.0000	0119.1	150.4	39.87
303.0	005.3870	0122.0	030.2	111.2	100.0000	0119.1	150.4	39.88
304.0	005.5131	0122.0	030.3	111.0	100.0000	0119.0	150.3	39.89
305.0	005.6406	0122.0	030.5	110.8	100.0000	0119.0	150.3	39.89
306.0	005.7696	0122.0	030.7	110.6	100.0000	0119.0	150.3	39.90
307.0	005.9000	0122.0	030.8	110.4	100.0000	0119.0	150.2	39.90
308.0	006.0319	0122.0	031.0	110.1	100.0000	0118.9	150.2	39.90
309.0	006.1653	0122.0	031.1	109.9	100.0000	0118.9	150.3	39.89
310.0	006.3001	0122.0	031.3	109.7	100.0000	0118.9	150.3	39.89
311.0	006.5434	0122.0	031.6	109.5	100.0000	0118.9	150.2	39.90
312.0	006.7912	0122.0	031.9	109.2	100.0000	0118.9	150.1	39.91
313.0	007.0437	0122.0	032.2	109.0	100.0000	0118.9	150.1	39.92
314.0	007.3008	0122.0	032.4	108.8	100.0000	0119.0	150.1	39.93
315.0	007.5625	0122.0	032.7	108.5	100.0000	0119.0	150.0	39.93
316.0	007.8288	0122.0	033.0	108.3	100.0000	0119.1	150.1	39.93
317.0	008.0997	0122.0	033.3	108.0	100.0000	0119.2	150.1	39.93
318.0	008.3752	0122.0	033.5	107.8	100.0000	0119.3	150.1	39.93
319.0	008.6554	0122.0	033.8	107.5	100.0000	0119.4	150.2	39.92
320.0	008.9401	0122.0	034.0	107.3	100.0000	0119.5	150.3	39.90
321.0	009.4065	0122.0	034.4	107.0	100.0000	0119.6	150.3	39.91
322.0	009.8847	0122.0	034.8	106.8	100.0000	0119.7	150.3	39.91
323.0	010.3748	0122.0	035.2	106.5	100.0000	0119.9	150.3	39.91
324.0	010.8768	0122.0	035.6	106.2	100.0000	0120.0	150.4	39.90
325.0	011.3906	0122.0	036.0	105.9	100.0000	0120.1	150.5	39.89
326.0	011.9163	0122.0	036.3	105.7	100.0000	0120.2	150.6	39.88
327.0	012.4538	0122.0	036.7	105.4	100.0000	0120.3	150.7	39.85
328.0	013.0032	0122.0	037.0	105.1	100.0000	0120.4	150.9	39.83
329.0	013.5645	0122.0	037.3	104.9	100.0000	0120.5	151.1	39.80
330.0	014.1376	0122.0	037.7	104.6	100.0000	0120.6	151.3	39.77

Exhibit 18.2

Contour Protection Studies Toward WKES(FM) - Lakeland, FL

03-05-2014

Terrain Data: NGDC 30 SEC

FMOver Analysis

WKES BLED19970416KD

WJFP.P

Channel = 216C1

Max ERP = 100 kW

RCAMSL = 164 M

N. Lat. 28 04 46.0

W. Lng. 82 02 27.0

Protected

60 dBu

Channel = 216C1

Max ERP = 100 kW

RCAMSL = 128 M

N. Lat. 27 26 07.0

W. Lng. 80 21 41.0

Interfering

40 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
068.0	100.0000	0120.9	054.4	309.0	006.1681	0122.0	146.8	28.46	
069.0	100.0000	0120.9	054.4	308.8	006.1430	0122.0	146.0	28.58	
070.0	100.0000	0121.0	054.4	308.6	006.1174	0122.0	145.2	28.71	
071.0	100.0000	0121.1	054.4	308.4	006.0909	0122.0	144.4	28.84	
072.0	100.0000	0121.2	054.4	308.2	006.0635	0122.0	143.6	28.96	
073.0	100.0000	0121.3	054.4	308.0	006.0349	0122.0	142.8	29.09	
074.0	100.0000	0121.3	054.4	307.8	006.0048	0122.0	142.0	29.21	
075.0	100.0000	0121.2	054.4	307.6	005.9732	0122.0	141.3	29.33	
076.0	100.0000	0121.0	054.4	307.3	005.9403	0122.0	140.5	29.44	
077.0	100.0000	0120.8	054.4	307.0	005.9061	0122.0	139.8	29.55	
078.0	100.0000	0120.5	054.3	306.8	005.8704	0122.0	139.2	29.66	
079.0	100.0000	0120.2	054.3	306.5	005.8340	0122.0	138.5	29.76	
080.0	100.0000	0120.0	054.2	306.2	005.7973	0122.0	137.8	29.87	
081.0	100.0000	0119.9	054.2	305.9	005.7604	0122.0	137.2	29.97	
082.0	100.0000	0119.8	054.2	305.6	005.7228	0122.0	136.5	30.06	
083.0	100.0000	0119.7	054.2	305.3	005.6844	0122.0	135.9	30.16	
084.0	100.0000	0119.6	054.2	305.0	005.6453	0122.0	135.3	30.25	
085.0	100.0000	0119.6	054.2	304.7	005.6055	0122.0	134.7	30.34	
086.0	100.0000	0119.7	054.2	304.4	005.5657	0122.0	134.1	30.42	
087.0	100.0000	0119.9	054.2	304.1	005.5254	0122.0	133.5	30.51	
088.0	100.0000	0120.0	054.2	303.8	005.4841	0122.0	132.9	30.59	
089.0	100.0000	0120.2	054.3	303.4	005.4422	0122.0	132.4	30.66	
090.0	100.0000	0120.4	054.3	303.1	005.3997	0122.0	131.8	30.73	
091.0	100.0000	0120.6	054.3	302.8	005.3564	0122.0	131.3	30.80	
092.0	100.0000	0120.7	054.4	302.4	005.3124	0122.0	130.8	30.86	
093.0	100.0000	0120.8	054.4	302.0	005.2673	0122.0	130.4	30.91	
094.0	100.0000	0120.8	054.4	301.7	005.2216	0122.0	129.9	30.96	
095.0	100.0000	0120.8	054.4	301.3	005.1752	0122.0	129.5	31.00	
096.0	100.0000	0120.8	054.4	300.9	005.1284	0122.0	129.1	31.04	
097.0	100.0000	0120.8	054.4	300.5	005.0812	0122.0	128.7	31.07	
098.0	100.0000	0120.8	054.4	300.1	005.0336	0122.0	128.4	31.09	
099.0	100.0000	0120.8	054.4	299.7	005.0176	0122.0	128.0	31.14	
100.0	100.0000	0121.0	054.4	299.3	005.0176	0122.0	127.7	31.20	

MUNN-REESE, INC.

Broadcast Engineering Consultants
COLDWATER, MI 49036

Exhibit 18.2

Contour Protection Studies Toward WKES(FM) - Lakeland, FL

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
101.0	100.0000	0121.1	054.4	298.9	005.0176	0122.0	127.4	31.26
102.0	100.0000	0121.2	054.4	298.5	005.0176	0122.0	127.1	31.31
103.0	100.0000	0121.1	054.4	298.1	005.0176	0122.0	126.9	31.36
104.0	100.0000	0120.8	054.4	297.7	005.0176	0122.0	126.7	31.39
105.0	100.0000	0120.5	054.3	297.3	005.0176	0122.0	126.5	31.42
106.0	100.0000	0120.1	054.3	296.8	005.0176	0122.0	126.4	31.44
107.0	100.0000	0119.6	054.2	296.4	005.0176	0122.0	126.3	31.45
108.0	100.0000	0119.2	054.1	296.0	005.0176	0122.0	126.3	31.47
109.0	100.0000	0118.9	054.1	295.6	005.0176	0122.0	126.2	31.48
110.0	100.0000	0118.9	054.1	295.1	005.0176	0122.0	126.1	31.49
111.0	100.0000	0119.0	054.1	294.7	005.0176	0122.0	126.0	31.51
112.0	100.0000	0119.2	054.1	294.3	005.0176	0122.0	126.0	31.52
113.0	100.0000	0119.2	054.1	293.8	005.0176	0122.0	126.0	31.52
114.0	100.0000	0119.1	054.1	293.4	005.0176	0122.0	126.0	31.52
115.0	100.0000	0118.9	054.1	293.0	005.0176	0122.0	126.0	31.51
116.0	100.0000	0118.7	054.0	292.6	005.0176	0122.0	126.1	31.49
117.0	100.0000	0118.5	054.0	292.1	005.0176	0122.0	126.2	31.47
118.0	100.0000	0118.5	054.0	291.7	005.0176	0122.0	126.3	31.45
119.0	100.0000	0118.9	054.1	291.3	005.0176	0122.0	126.4	31.44
120.0	100.0000	0119.4	054.2	290.8	005.0176	0122.0	126.5	31.42
121.0	100.0000	0120.1	054.3	290.4	005.0176	0122.0	126.6	31.41
122.0	100.0000	0120.8	054.4	290.0	005.0181	0122.0	126.7	31.39
123.0	100.0000	0121.3	054.4	289.6	005.0429	0122.0	126.8	31.39
124.0	100.0000	0121.9	054.5	289.1	005.0677	0122.0	127.0	31.38
125.0	100.0000	0122.3	054.6	288.7	005.0923	0122.0	127.2	31.36
126.0	100.0000	0122.5	054.6	288.3	005.1165	0122.0	127.5	31.33
127.0	100.0000	0122.4	054.6	287.9	005.1403	0122.0	127.8	31.29
128.0	100.0000	0122.2	054.6	287.5	005.1635	0122.0	128.2	31.24
129.0	100.0000	0121.8	054.5	287.1	005.1862	0122.0	128.6	31.19
130.0	100.0000	0121.4	054.5	286.7	005.2087	0122.0	129.0	31.13
131.0	100.0000	0121.2	054.4	286.4	005.2310	0122.0	129.4	31.06
132.0	100.0000	0121.0	054.4	286.0	005.2531	0122.0	129.9	31.00
133.0	100.0000	0120.8	054.4	285.6	005.2749	0122.0	130.3	30.93
134.0	100.0000	0120.4	054.3	285.3	005.2960	0122.0	130.8	30.85
135.0	100.0000	0119.7	054.2	285.0	005.3160	0122.0	131.4	30.75
136.0	100.0000	0118.7	054.0	284.6	005.3350	0122.0	132.0	30.65
137.0	100.0000	0117.7	053.9	284.3	005.3535	0122.0	132.7	30.54
138.0	100.0000	0117.2	053.8	284.0	005.3725	0122.0	133.2	30.44
139.0	100.0000	0117.1	053.8	283.7	005.3923	0122.0	133.8	30.35
140.0	100.0000	0117.4	053.8	283.4	005.4123	0122.0	134.3	30.26
141.0	100.0000	0117.8	053.9	283.0	005.4323	0122.0	134.9	30.17
142.0	100.0000	0118.2	054.0	282.7	005.4521	0122.0	135.4	30.08
143.0	100.0000	0118.7	054.0	282.4	005.4716	0122.0	136.0	29.98
144.0	100.0000	0119.1	054.1	282.1	005.4906	0122.0	136.6	29.88
145.0	100.0000	0119.5	054.2	281.8	005.5092	0122.0	137.2	29.78
146.0	100.0000	0120.1	054.3	281.5	005.5278	0122.0	137.8	29.67
147.0	100.0000	0121.0	054.4	281.1	005.5470	0122.0	138.4	29.57

Exhibit 18.3

Directional Antenna Pattern Study

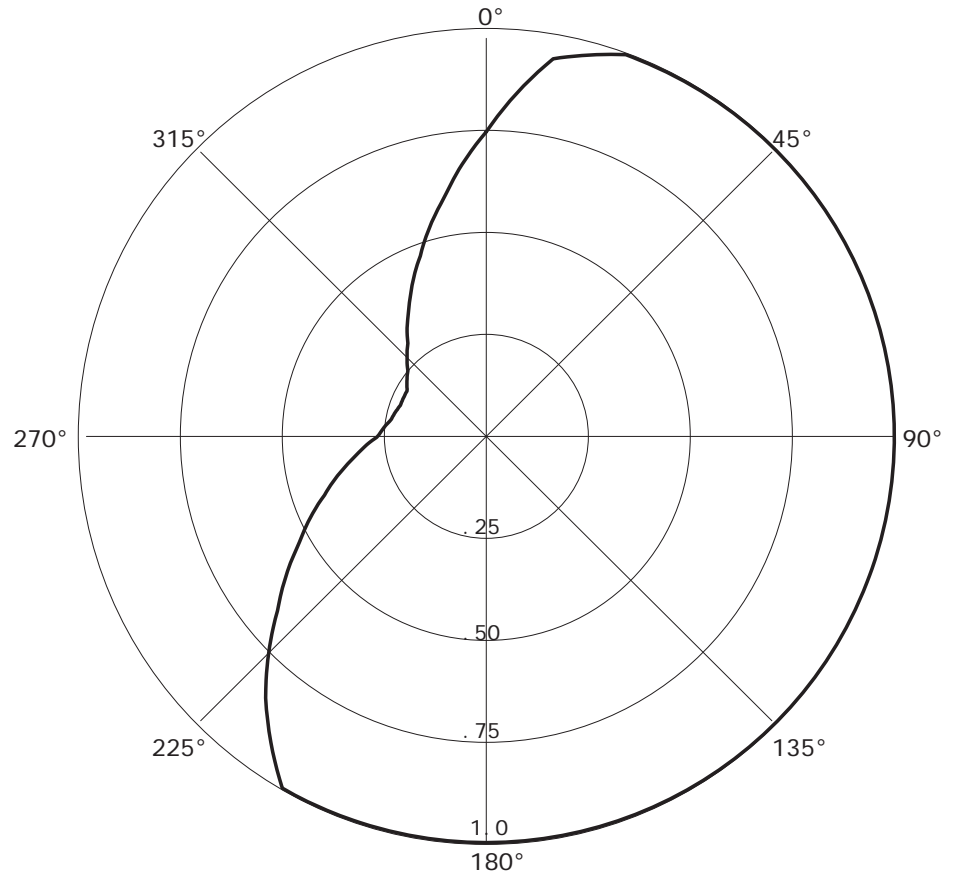
WJFP. P

03-05-2014

RMS(V) = .821

Graph is Relative Field

Azi	Field	dBk	kW
000	0.750	17.501	56.250
010	0.944	19.499	89.114
020	1.000	20.000	100.000
030	1.000	20.000	100.000
040	1.000	20.000	100.000
050	1.000	20.000	100.000
060	1.000	20.000	100.000
070	1.000	20.000	100.000
080	1.000	20.000	100.000
090	1.000	20.000	100.000
100	1.000	20.000	100.000
110	1.000	20.000	100.000
120	1.000	20.000	100.000
130	1.000	20.000	100.000
140	1.000	20.000	100.000
150	1.000	20.000	100.000
160	1.000	20.000	100.000
170	1.000	20.000	100.000
180	1.000	20.000	100.000
190	1.000	20.000	100.000
200	1.000	20.000	100.000
210	1.000	20.000	100.000
220	0.841	18.496	70.728
230	0.668	16.496	44.622
240	0.531	14.502	28.196
250	0.422	12.506	17.808
260	0.335	10.501	11.223
270	0.266	08.498	7.076
280	0.237	07.495	5.617
290	0.224	07.005	5.018
300	0.224	07.005	5.018
310	0.251	07.993	6.300
320	0.299	09.513	8.940
330	0.376	11.504	14.138
340	0.473	13.497	22.373
350	0.596	15.505	35.522



The antenna proposed in this application will be mounted in accordance with specific instructions provided by the antenna manufacturer. The antenna will be tested by the manufacturer using the type of mounting which will be employed in the field.

The directional antenna will be mounted on the tower which is of uniform cross section. No other antennas of any type are or will be mounted on the same tower level as the directional antenna.

No antenna is or will be mounted within any vertical or horizontal distance specified by the antenna manufacturer as being necessary for proper operation of the directional antenna. The antenna will be assembled under the supervision of a qualified engineer, who will provide the required certification. This statement will certify that the antenna has been installed pursuant to the manufacturer's instructions. Also upon completion of antenna construction, a statement from a licensed surveyor will be submitted with the application for license certifying the antenna has been installed in the proper orientation.

The directional antenna pattern will be produced by means of parasitic elements, adjusted to produce the required pattern.

The antenna pattern will be measured by the manufacturer on the test range, and the measurement results will be supplied to the Commission at the time Form 302-FM is filed covering the construction.

Exhibit 18.4

Waiver Request of 47 C.F.R. §73.509

Regarding this WJFP(FM) - Fort Pierce, FL proposal, a waiver of §73.509 is requested for received 3rd adjacent channel contour overlap from WWFR(FM) - Stuart, FL, License Number BMLED 20131118ALW. This WJFP(FM) proposal will receive *de minimis* contour overlap from third adjacent channel station WWFR(FM) as noted here-in. The WJFP(FM) proposal will not cause interference to any other existing facility or pending application.

The area of received contour overlap has been calculated in terms of land area and in terms of U.S. Census 2010 population. The interference contour employed is the standard 100 dBμ F(50:10) interference contour as required in §73.509. A map showing the relevant interference contour in relation to the relevant U.S. Census 2010 population centroid datum has been provided at the end of this study. The existing and proposed WJFP(FM) service contours have been previously supplied in **Exhibit 16.4**.

Summary of Contour Relationship		
	Service Contour	
WJFP(FM).P – Fort Pierce, FL	Population	Land Area*
60 dBμ F(50:50) Service Contour	548,631	3,845.37 km ²
*Land Area adjusted for areas over water		
	Interference Contour	
WWFR(FM) – Stuart, FL	Population	Land Area
100 dBμ F(50:10) Interference Contour	none (0.00%)	18.33 km ² (0.48%)

A grant of this proposal and waiver request will allow WJFP(FM) to increase its overall coverage to 3,845.37 km² or an increase of 422% from the present licensed facilities (see **Exhibit 16.4**). Population will be increased to 548,631 or an increase of 219% from the present licensed facilities (see **Exhibit 16.4**). In addition, the actual received contour overlap from WWFR(FM) will comprise only 0.48% of the proposed WJFP(FM) 60 dBμ F(50:50) land area and 0.00% of proposed WJFP(FM) 60 dBμ F(50:50) population. These can only be defined as major increases in coverage and population served in comparison to the *de minimis* contour overlap predicted to occur.

This waiver request is essentially the same as requests made by the licensees of WCPE(FM) and WCCE(FM) in *Educational Information Corporation*, 6 FCC Rcd 2207 (1991). WCPE(FM) requested a waiver in its application to permit *de minimus* overlap "received," and WCCE(FM) requested a waiver in its application to permit *de minimus* overlap "caused." In recognition of the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, the Commission granted both waiver requests. The instant request fully satisfies the criteria established by the Commission for waiver of Section 73.509 of the Commission's rules as it pertains to overlap received¹.

¹ This waiver request differs from the second waiver request made by WCPE in *Educational Information Corporation*, 1997 FCC LEXIS 2636 (May 20, 1997). Unlike here, WCPE was seeking a waiver of overlap "caused" in the second case.

Exhibit 18.4

Waiver Request of 47 C.F.R. §73.509

Moreover, following the precedent established in the 1991 waiver case, the Commission waived §73.509 and granted a virtually identical Construction Permit application waiver for NCE-FM Station KLTU(FM) - Mammoth, AZ (File No. BPED-20051202ABA, dated 4/5/2006); and granted an identical waiver of §73.509 for WJFP(FM) – Fort Pierce, FL for Construction Permit application File No. BPED-20101130APN (dated 3/17/2011).

Alternate solutions were explored which might result in equal public benefit. After careful study, the applicant believes waivers of the received third adjacent channel contour overlaps remain the best alternative to serve the public interest. Studies were conducted and no minor change frequency exists which will allow for even a remotely equivalent operation. Alternate site searches were conducted by the applicant. Site locations near or around Fort Pierce Florida were considered, however existing towers equivalent in height to the Antenna Structure Registration Tower No. 1032455 would be subject to the same third adjacent channel waiver request. New tower construction was considered, however given the Commission's own emphasis of antenna co-location as noted in the recent Nationwide Programmatic Agreement and NHPA Section 106 issuances, it is believed co-location better serves the public as opposed to new tower construction. Given these factors and the required distances needed so as to not cause interference with the aforementioned third adjacent channel facility as well as the structural and aperture window needed to house the proposed antenna, existing Antenna Structure Registration No. 1032455 is ideal for the proposed WJFP(FM) operation.

The use of a directional antenna was also considered, and in fact employed as noted in this application. However, the directivity required to achieve the full protection would substantially degrade coverage along the southern Atlantic coastal areas as opposed to the zero population proposed to receive interference as a result of this waiver request. Upon review of the above mentioned KLTU, Mammoth, AZ Construction Permit and waiver request, it was noted a similar situation existed for the WJFP(FM) allocation which would address the anticipated reception problems and substantially better serve the public with *de minimus* received interference.

In conclusion, substantial increases in service and public benefit will be achieved with a grant of this proposal and waiver request. The overlap resulting will be inconsequential and well within the scope of the Commission's waiver policy. The benefit heavily outweighs the potential for interference as the relevant interference area constitutes less than 0.48% of the station's proposed land area and more importantly 0.00% of the station's proposed population. Accordingly, the applicant respectfully requests a waiver of §73.509 of the Commission's rules in this instance.

"+" Denotes U.S. Census 2010 PL Population Centroid Datum

Exhibit 18.4

Page 3 of 3

Waiver Request of 47.C.F.R. §73.509

Received Third Adjacent Channel Interference

NGDC 30 SEC Terrain Database
U.S. Census 2010 PL Database

WWFR.L - 100 dBµ F(50:10)

+
WWFR.L

WWFR.L
Stuart, FL
BMLED20131118ALW
Facility ID: 20785
Latitude: 27-07-14 N
Longitude: 080-23-59 W
ERP: 2.65 kW
Channel: 219A
Frequency: 91.7 MHz
AMSL Height: 157.0 m
Horiz. Pattern: Directional

10 dBµ F(50:10) Contour
Total Population: 0
Total Area: 18.33 sq.km

