

**Section 74.1204 - Statement of Compliance**  
**AM Revitalization Auction 100 FM Translator**  
**Long-Form Application Filing Window**  
**NEW FM Translator Station Facility ID. 203252**  
**Tech Box Proposal FCC File No. BNPFT-20180131AEH**  
**October, 2018**

The instant “Long Form Application for FM Translator in Auction Window 100” is filed in response to the FCC’s Public Notice, DA 18-986, Released October 2, 2018, for a new FM translator station to rebroadcast Class B AM station: WBZW, Apopka, FL (Facility ID 1185). The Public Notice announced a window, open from October 4, 2018, to November 5, 2018, for the filing of FM translator new station construction permit applications for “Tech Box” proposals identified as not mutually exclusive with any other Tech Box proposals from the Auction 100 filing window.

This long-form application proposes substantially the same technical facility as specified in the Tech Box proposal and is a minor change relative to the technical facility in the current Tech Box proposal. Further, the instant long-form application does not create a new conflict to any pending Auction 100 Tech Box proposal, or to any prior-filed Form 349 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 is a map which demonstrates that the 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) 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 stations WJRR(FM), Cocoa Beach, FL (Channel 266C) and WRUM(FM), Orlando, FL (Channel 262C) 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 both stations listed above resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. At the translator's proposed transmitter site, both stations are predicted to produce an F(50,50) signal strength of 81 dBu. Consequently, in the vicinity of the proposed translator, the translator's relevant interfering contour is the 121 dBu contour relative to both WJRR(FM) and WRUM(FM). According to free space calculations, the translator's predicted interfering contour will extend only 97.9 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 130 meters above ground level, the predicted interference area will neither reach ground level nor reach any people. Therefore, the instant proposal will cause no interference to any population served by either WJRR(FM) or WRUM(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".

# Section 74.1204 CoChannel Contour Overlap Study

Exhibit 1

October, 2018

## FX.APP.264D.FAC.ID.203252

Apopka, FL  
Latitude: 28-36-22 N  
Longitude: 081-27-25 W  
ERP: 0.25 kW  
Channel: 264  
Frequency: 100.7 MHz  
AMSL Height: 163.0 m  
Horiz. Pattern: Directional

## Section 74.1204 Contours

### Proposed FX Interfering Contour (DASHED):

40 dBu F(50,10) to Class A & FX & LPFM  
40 dBu F(50,10) to Class C, C0, C1, C2, C3  
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, C, Cx, 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)

## Key to Stations on Map

Note: Both the protected and interfering contours are shown relative to other Auction 100 Short Form proposals to demonstrate that the instant proposal will neither cause nor receive overlap from another Auction 100 Short Form proposal.

- FX.APP.264D.FAC.ID.203252
- WMTX.264C.FAC.ID.23078
- WUOH-LP.264L1.FAC.ID.196508
- W264DP.CP.264D.FAC.ID.201673
- AUCTION 100 SHORT FORM APP.264D.FAC.ID.202624

Scale 1:975,000

0 10 20 30 km

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