

MINOR MODIFICATION APPLICATION
WTBR-FM, Pittsfield MA FIN 57249
July 2019

SUMMARY

In this application, station WTBR-FM proposes to relocate to a new transmitter site, reducing power and antenna height from its currently licensed facility, which is no longer available for use. (WTBR-FM has been operating under STA, BSTA-20181204AAC, since December 2018.)

WTBR-FM proposes to use 350 watts, non-directional, -82 meters HAAT, using the same location specified in its current STA operation. HAAT calculation was made with the FCC HAAT calculator, using FCC terrain data and 360 radials.

Figure 1 shows that the instant proposal covers nearly all of the city of license, Pittsfield, more than meeting the 50% requirement for 60 dBu coverage.

INTERFERENCE

WTBR-FM's proposal complies with all interference requirements. **Figure 2** shows that the proposal meets all contour protection requirements with the exception of 100 dBu overlap to third-adjacent WAMC-FM, Albany NY.

The overlap to WAMC-FM is grandfathered under the station's current license, BLED-19850415KT. **Figure 3** demonstrates that the total area of 100 dBu overlap with WAMC-FM does not increase; there is also no increase in distance to the contour representing a +40 dB ratio to WAMC-FM's F(50,50) predicted signal at both the licensed and proposed sites.

The proposal thus complies with 47 CFR 73.509(d), since it does not increase the total area of overlap with WAMC-FM or with any other station; does not move the overlap area significantly closer to WAMC-FM; and does not create any area of overlap with any station where overlap does not currently exist.

CHANNEL 6 INTERFERENCE

The only channel 6 television facility requiring consideration is WRGB, Schenectady NY. Applicant received a waiver from WRGB, **Figure 4**, for any interference considerations. Applicant's final engineering reflects the same site, but a lower power and smaller coverage area than was initially proposed to and agreed to by WRGB; WRGB's consent would clearly apply to a smaller coverage area and less interference from WTBR than originally proposed.

CANADIAN BORDER

The proposed WTBR-FM site is 277 km from the closest point on the Canadian border. The proposed 34 dBu contour of WTBR-FM will not reach any point on Canadian soil. The nearest Canadian allocation of any concern is channel 209B at Sherbrooke QC, 344 km distant. Required spacing under 73.207(b)(2) is 206 km.

RFR COMPLIANCE

The proposed WTBR-FM site is an existing tower on the rooftop of an office building. The proposed two-bay, half-wave-spaced antenna will be pole-mounted atop the existing tower, with radiation center 20 meters above ground. The rooftop is approximately 7 meters above ground.

Based on the FCC's Worksheet #1, using the guidelines in OET Bulletin 65 and assuming a worst-case scenario of spherical free-space radiation, the instant proposal would produce no more than 23.387% of maximum permissible uncontrolled exposure at the rooftop level of the proposed transmitter site. There are no other broadcast facilities located at this site. Access to the rooftop will be limited to authorized personnel only, and WTBR-FM will reduce power or shut down as needed when work is being conducted on the tower.

Figure 1
Proposed WTBR-FM Coverage Contour

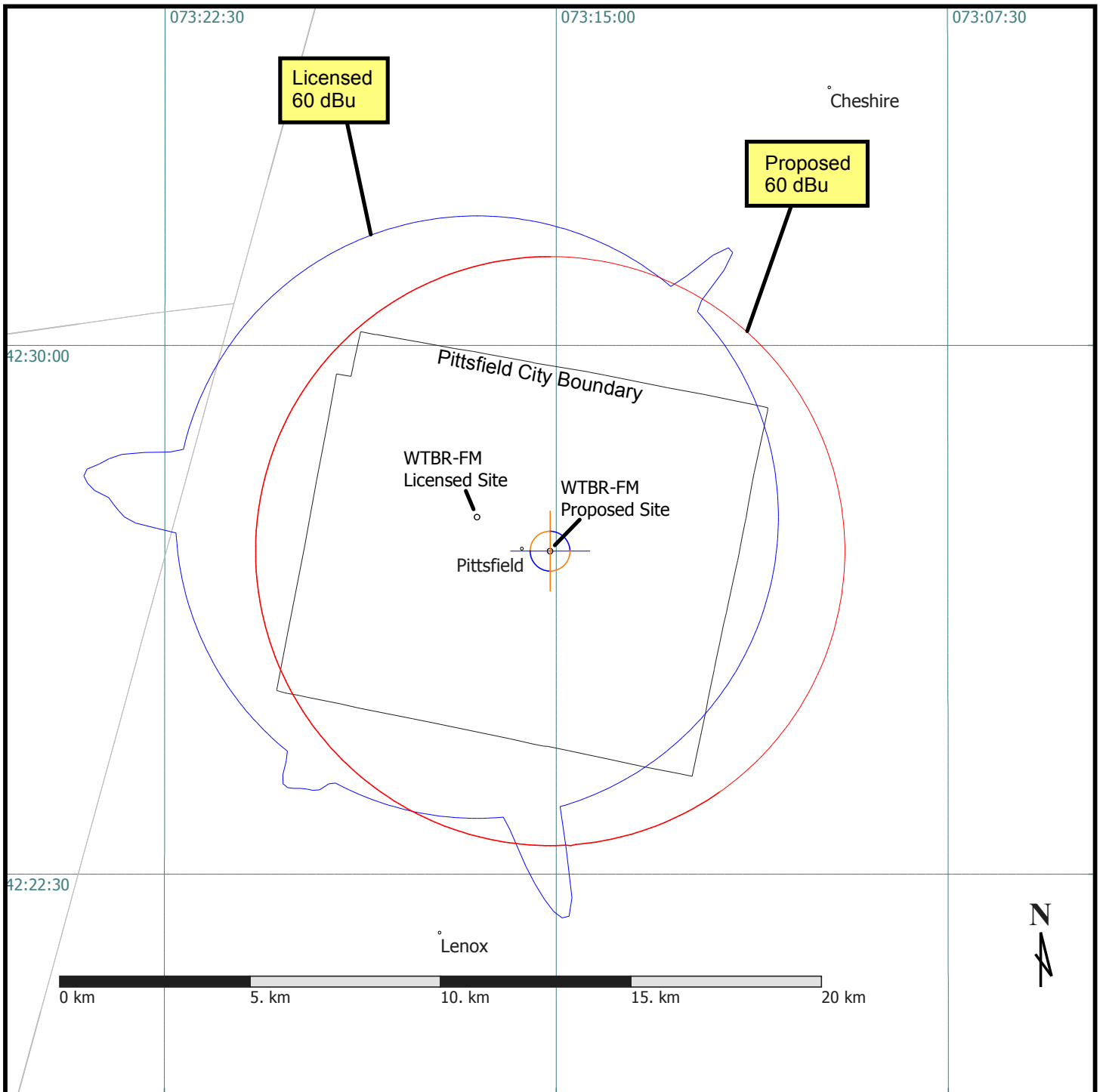


Figure 2
Interference Contours

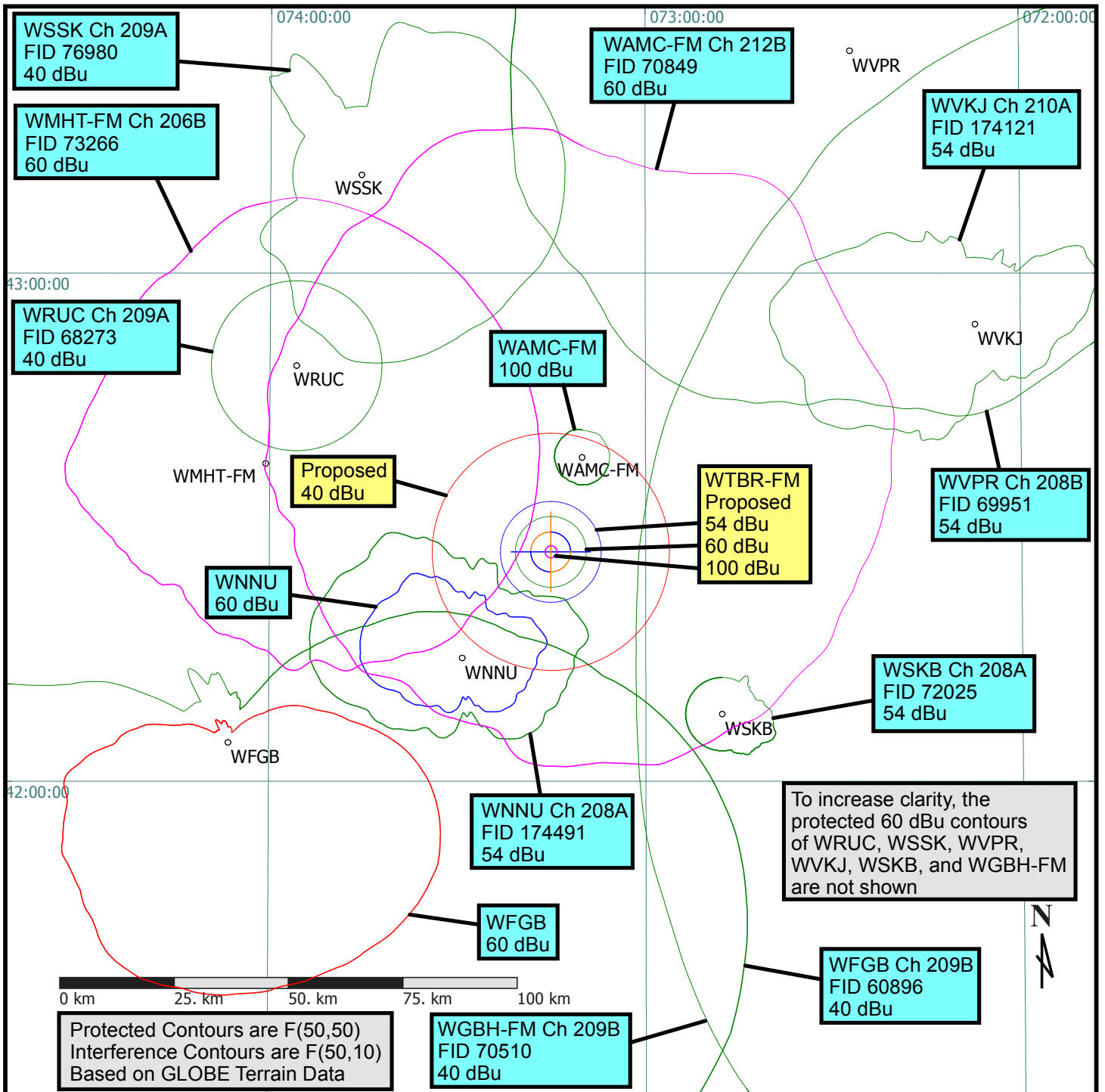
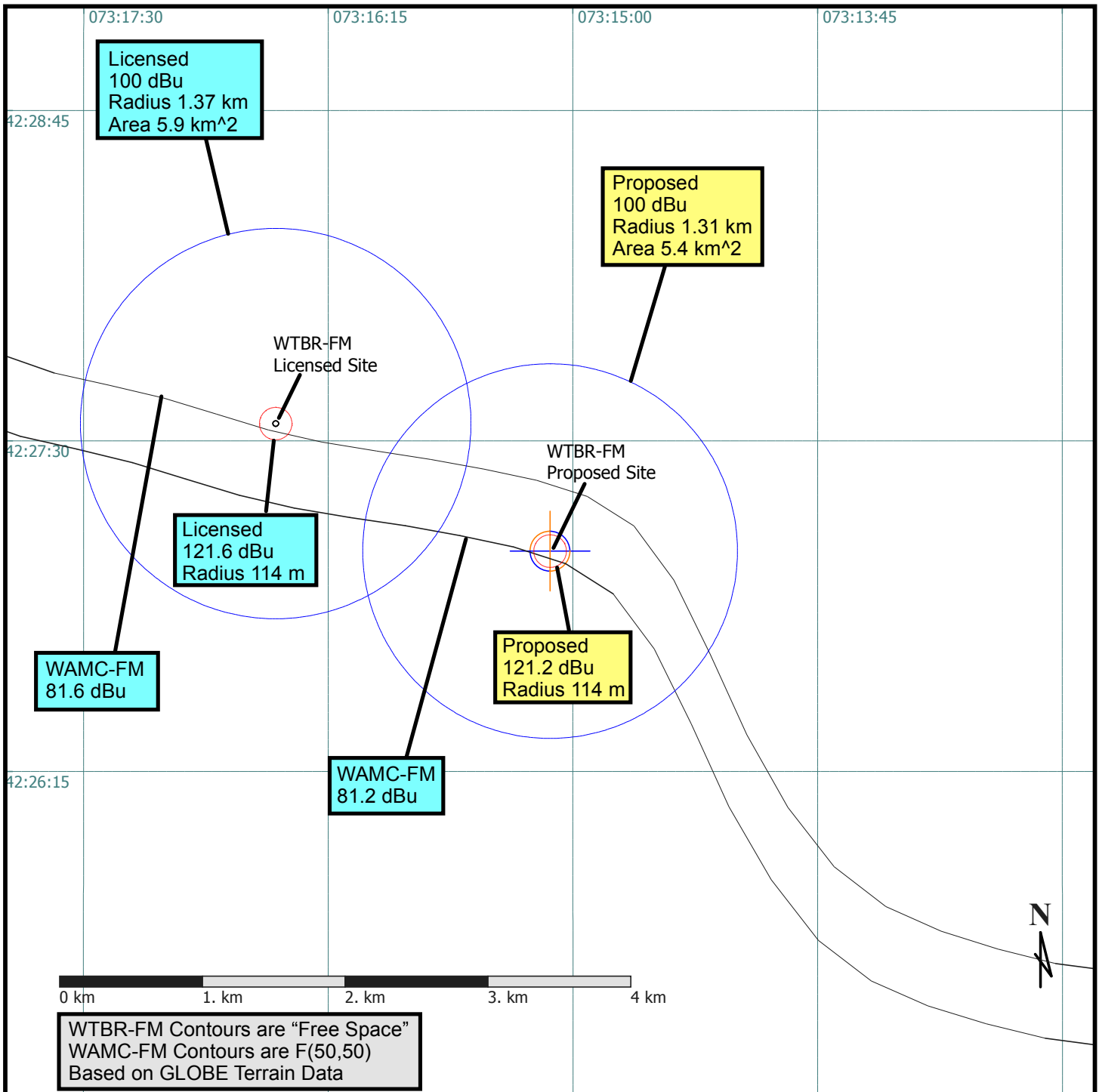


Figure 3
WAMC-FM Contour Overlap Analysis



Interference Acceptance Statement

The purpose of this Statement is to inform the Federal Communications Commission ("FCC") that WRGB Licensee, LLC, licensee of WRGB(TV), Schenectady, NY (Fac. Id. No. 73942), hereby agrees to FCC approval of the facilities set forth in the FCC Form 340 minor modification application filed by Pittsfield Public School Committee for WTBR-FM, Pittsfield, MA (Fac. Id. No. 52749), which includes the following parameters:

Antenna Location Coordinates: (NAD 27)	
Latitude: Degrees 42 Minutes 27 Seconds 05	• North
Longitude: Degrees 73 Minutes 15 Seconds 07	• West
Other Proposed Parameters	
Overall Tower Height Above Ground Level:	19 meters
Height of Radiation Center Above Mean Sea Level:	334 meters(H) 334 meters(V)
Height of Radiation Center Above Ground Level:	20.4 meters(H) 20.4 meters(V)
Height of Radiation Center Above Average Terrain:	-79 meters(H) -79 meters(V)
Effective Radiated Power:	0.66 kW(H) 0.66 kW(V)

WRGB Licensee, LLC limits its consent to the parameters set forth above. No consideration is being paid or promised by either party in connection with this Interference Acceptance Statement.

WRGB LICENSEE, LLC

By: Harvey Arnold

Name: Harvey Arnold

Title: V.P. - Engineering

Date: June 3, 2019