

**Section 74.1204 - Statement of Compliance
AM Revitalization Auction 99 FM Translator
Long-Form Application Filing Window
NEW FM Translator Station Facility ID. 201249
Tech Box Proposal FCC File No. BNPFT-20170727AFQ
December, 2017**

The instant “Long Form Application for FM Translator in Auction Window 99” is filed in response to the FCC’s Public Notice, DA 17-1068, Released November 1, 2017, for a new FM translator station to rebroadcast Class C AM station: WOHI, East Liverpool, OH (Facility ID 13710). The Public Notice announced a window, opening from December 1, 2017, to December 21, 2017, for the filing of FM translator new station construction permit applications for singleton “Tech Box” proposals such as the Tech Box proposal referenced above. As a “singleton” proposal, the instant application is exempt from the Commission’s auction procedures.

This long-form application specifies the identical technical facility as previously submitted in the Tech Box proposal. Accordingly, the instant proposal may be considered a “minor change”. Further, the instant long-form application does not create a new conflict to any pending Auction 99 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 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 WLYI(FM), Burgettstown, PA (Channel 278B) and WOGI(FM), Moon Township, PA (Channel 282B) 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 the stations listed above which results in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, WOGI(FM) is predicted to produce an F(50,50) signal strength of 81 dBu while WLYI(FM) is predicted to produce an F(50,50) signal strength of only 73 dBu. Therefore, WLYI(FM) provides for a worst-case interference analysis.

In the vicinity of the third-adjacent channel station, the translator's relevant interfering contour is the 113 dBu contour relative to WLYI(FM). According to free space calculations, the translator's predicted interfering contour will extend at most 25 meters from the proposed transmit antenna (See attached Table). As demonstrated on Exhibit 2, the predicted interference area will not reach any buildings or people within a 25 meter horizontal distance from the proposed antenna location (See Exhibit 2). Therefore, the instant proposal will cause no interference to any population served by either WLYI(FM) or WOGI(FM).

In light of the above, 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".

Parma

Key to Stations on Map

- FX.APP.280
- WWIZ.280A.FAC.ID.23437
- NEW.FX.APP.PITTSBURGH.PA.280D.FAC.ID.200045
- W280EW.280D.FAC.ID.140908

Section 74.1204 CoChannel Contour Overlap Study

Exhibit 1

December, 2017

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)

FX.APP.280

East Liverpool, OH
Latitude: 40-37-47 N
Longitude: 080-36-08 W
ERP: 0.18 kW
Channel: 280
Frequency: 103.9 MHz
AMSL Height: 418.0 m
Horiz. Pattern: Directional

Scale 1:975,000



WOHI.AM.FX

East Liverpool, OH (Facility ID 201249)

ERP 180.00 WATTS

Maximum ERP 0.18 kW
 Interfering contour value -----> 113 dBu
 RCAGL (m)-----> 40 meters
 Antenna Type -----> 11

Antenna Type 11 = Nicom, BKG77, 3-bay, 0.85 wave spaced

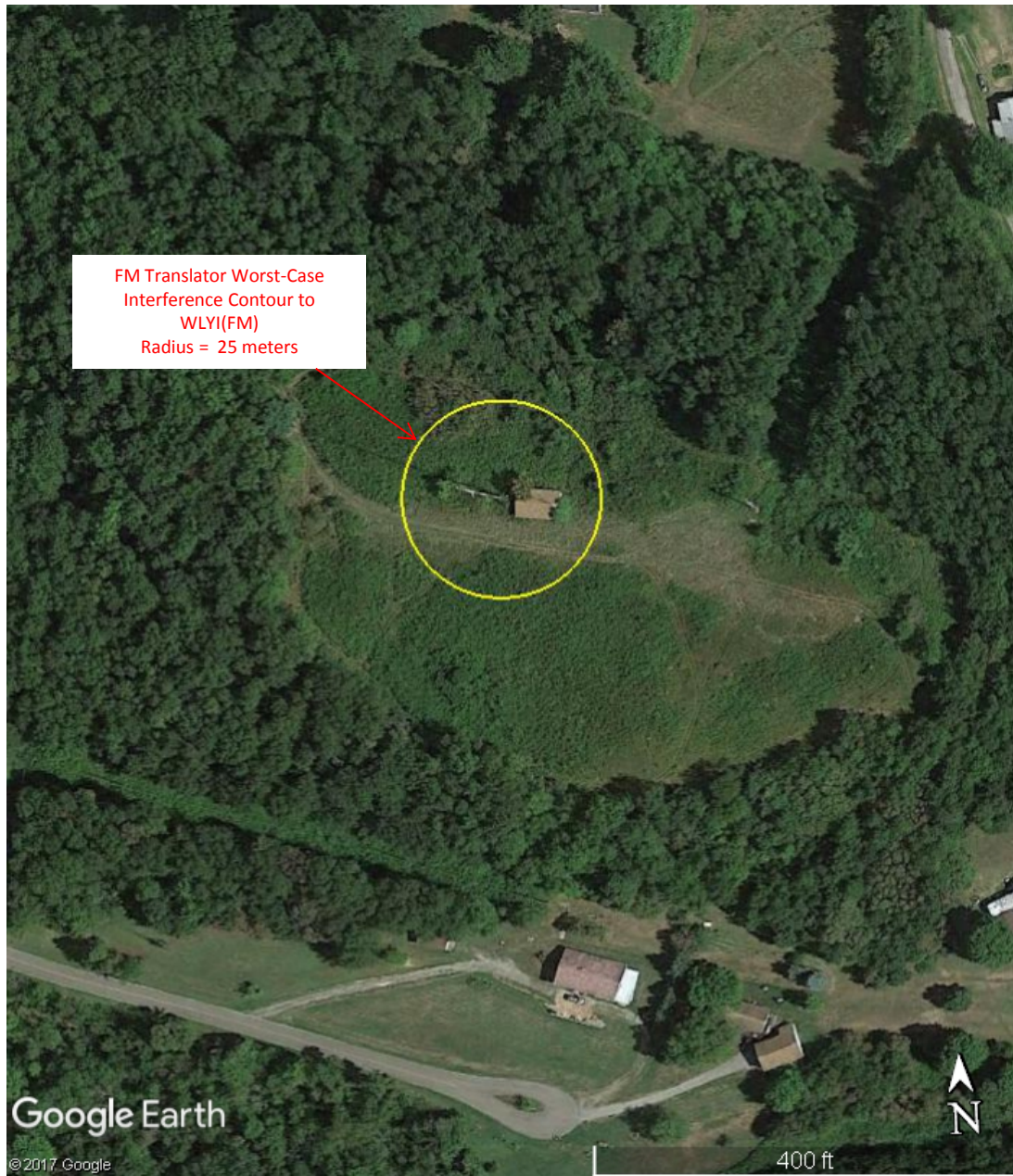
Angle Below Horizontal (degrees)	Vertical Pattern (REL. FIELD)	WOHI.AM.FX ERP (kW)	WOHI.AM.FX ERP (dBk)	WOHI.AM.FX Free-Space Distance to interfering contour (meters)	Slant Distance (meters) *	Height of interfering contour above ground (feet)**	Proposed Interference within 30 ' of ground level?	Horizontal Distance (meters) ***	Horizontal Distance (feet) ***
0	1.000	0.1800	-7.447	210.2	N/A	131.2			689.6
5	0.913	0.1500	-8.238	191.9	354.5	76.4	No	191.2	627.2
10	0.678	0.0827	-10.823	142.5	177.9	50.0	No	140.4	460.5
15	0.357	0.0229	-16.394	75.0	119.4	67.5	No	72.5	237.8
20	0.049	0.0004	-33.643	10.3	90.3	119.7	No	9.7	31.8
25	0.171	0.0053	-22.787	35.9	73.1	81.4	No	32.6	106.9
30	0.270	0.0131	-18.820	56.8	61.8	38.1	No	49.2	161.3
35	0.250	0.0113	-19.488	52.6	53.9	32.3	No	43.0	141.2
40	0.148	0.0039	-24.042	31.1	48.1	65.6	No	23.8	78.2
45	0.015	0.0000	-43.925	3.2	43.7	123.9	No	2.2	7.3
50	0.107	0.0021	-26.860	22.5	40.3	74.7	No	14.5	47.4
55	0.194	0.0068	-21.691	40.8	37.7	21.6	Yes	23.4	76.7
60	0.238	0.0102	-19.916	50.0	35.7	-10.9	Yes	25.0	82.1
65	0.244	0.0107	-19.699	51.3	34.1	-21.3	Yes	21.7	71.1
70	0.220	0.0087	-20.599	46.2	32.9	-11.3	Yes	15.8	51.9
75	0.185	0.0062	-22.104	38.9	32.0	8.0	Yes	10.1	33.0
80	0.145	0.0038	-24.220	30.5	31.4	32.8	No	5.3	17.4
85	0.119	0.0025	-25.936	25.0	31.0	49.5	No	2.2	7.2
90	0.114	0.0023	-26.309	24.0	30.9	52.6	No	0.0	0.0

* Slant distance from antenna center of radiation to location 30 feet (9.1 meters) above ground level at angle below horizontal.

** A negative number indicates that the interfering contour is predicted to reach ground level. If a negative number is present, the interfering contour reaches ground level at the "Horizontal Distance" described below.

*** Horizontal distance from tower base to interfering contour at the indicated height above ground level. If a negative height above ground level is indicated, this horizontal distance is the distance from the tower base to the interfering contour. This horizontal distance is only relevant if the proposed interference is predicted to occur within 30 feet of ground level.

WLYI(FM), Burgettstown, PA
Channel 278B, 19.5 kW ERP, 247 m HAAT
FCC File No. BLH-20040823AAU



Worst-Case Channel 280
Interfering Contour to WLYI
NEW FX, East Liverpool, OH (Facility ID 201249)
ERP: 180 watts (DA) , 418 m RCAMSL
December, 2017