

This report establishes that BNPFT20030311AAO meets all requirements for a Fill-In Translator for WIBG(AM), that it meets LPFM non-preclusion requirements and that it resolves the mutual exclusivity with BNPFT20030317KKD, Ocean City, NJ through technical revisions.

## **Fill In Translator**

BNPFT20030311AAO will be used as a fill in translator for WIBG(AM).

Exhibit 1 Figure 1 is a map showing the proposed BNPFT20030311AAO 60 dbu F(50,50) contour and the 2.0 mV/m contour of the primary station, WIBG(AM) illustrating that the translator service contour is encompassed by the AM contour. Additionally, a 25 mile radius circle from the WIBG(AM) transmitter is shown, which also encompasses the proposed FM translator service contour. This amendment therefore meets the requirement of § 74.1232(d) and (e) as a fill-in translator.

## **Minor change amendment**

This amendment is a minor change, as there is no change to the channel or antenna location, and only a power increase and height change on the same tower. As such, the proposed service contour encloses the originally requested service area. This meets the requirement for a minor amendment under § 74.1233 (a)(2).

## **LPFM Non-Preclusion**

The instant application is for Channel 267. The potential channels that BNPFT20030311AAO could effect are channels 264 through 270, and channels 213 and 214. The only channels among these in the Atlantic City – Cape May spectrum available market that have gridpoints are channels 267 and channel 270.

Exhibit 1 figure 2 is a map showing the proposed site and the closest gridpoint for each of these channels. For both channel 267 and channel 270 the closest gridpoint to the proposed site is #422 at N 39-24-51 W 074-23-24. The greatest distance from the proposed tower site to 60 dbu contour is 11.91 km, less than 13.3 km, so according to §73.807(c)(1) table, the greatest preclusion distance can be 32 km.

The distance between the proposed site and Atlantic City market point #422 is 32.49 km. Therefore there can be no preclusion of an LPFM station at any of the gridpoints in the Atlantic City – Cape May market.

The proposed site is just outside the Atlantic City grid, although site analysis for LPFM preclusion is required only for the top 50 markets, there are several LPFM allocations



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**Engineering Report**

**Exhibit 1**

**BNPFT20030311AAO, Palermo**

**Fill In Translator, Non-Preclusion, and Resolving Technical Conflicts**

**July 2013**

available at the proposed site.

According to the LPFM Finder tool, without second adjacent waiver, there are two LPFM channels available at the proposed site, Channel 282 and Channel 300. These are not precluded by the instant proposal.

With second adjacent waivers, the proposed channel, 267, is not available for a LPFM at the proposed site. Five additional channels, 230, 238, 276, 277 and 299 are available for LPFM stations at the site if you include second adjacent channels.

The closest adjacent market to the proposed site is Philadelphia. The site is 56.2 km from the nearest point in the Philadelphia grid.

As a result, the instant proposal will not preclude any LPFM allocations.

### **Resolution of Technical Conflicts**

An informal resolution of technical conflicts has been made between the applicant and the applicant for BNPFT20030317KKD wherein that translator application is amended to colocate BNPFT20030317KKD to the tower proposed herein. Colocation of the two translators to the same tower will assure that at no point on the ground will the signals of either translator exceed the other by 40 db, thereby assuring that no mutual interference will occur between the stations.

The agreement includes no financial consideration between the applicants for BNPFT20030317KKD and BNPFT20030311AAO, only the resolution of technical conflicts. Neither amendment causes a new conflict with FM Translator, LPFM or FM stations, and is in compliance with the requirements for this settlement window.