

Technical Report Supporting a Minor Change in Licensed Facility Construction Permit Application

Pursuant to 47 C.F.R. Section 74:

for

*W292EM.L - Lafayette, IN
(Facility ID: 140803)*

*Non-Adjacent Channel Change per
47 C.F.R. Section 74.1233(a)(1)*

as a

*Non-Commercial,
Regular (non-fill-in) Translator
for WHLP(FM) - Hanna, IN*

February, 2020

Table of Contents

Table of Contents

Explanation of Technical Report

Exhibit 1 - Service Contour Study: Present vs Proposed Operations

Exhibit 2 - Service Contour Study: Proposed vs Primary Operations

Exhibit 3 - Copy of Existing Antenna Structure Registration

Exhibit 4 - Vertical Plan of Antenna System

Exhibit 5 - HAAT Calculation & Miscellaneous Coordinate Information

Exhibit 6 - Tabulation of Proposed Allocation

Exhibit 7(a-c) - Contour Protection Studies Toward Select Allocation Concern(s)

Exhibit 8 - Manufacturer's Directional Antenna Documentation

Supplemental Appendix(s):

RF Appendix 1 - Radio Frequency Radiation Compliance Showing

Explanation of Technical Report

1

EXPLANATION OF PROPOSAL: This LMS filing and accompanying technical report supports a Minor Change in Licensed Facility Construction Permit Application for FM Translator W292EM.L - Lafayette, IN (Facility ID: 140803). This filing requests a 47 C.F.R. Section 74.1233(a)(1) non-adjacent channel change from CH292D (106.3 MHz) to CH232D (94.3 MHz) based upon a showing of reduced interference. Operation on the new frequency of CH232D (94.3 MHz) with a power of 0.250 kW ERP circular polarization (H&V) is requested. The FM Translator will operate from an antenna COR of 226.0 meters AMSL at the same site location. This LMS Filing will specify rebroadcast of non-commercial, Class B1, FM Primary Station WHLP(FM) - Hanna, IN (Facility ID: 91345) via the off-air reception of FM Translator W265CP - Buffalo, IN (Facility ID: 140809). The Translator will remain licensed to the community of Lafayette, IN.

FACILITY COMPLIANCE SHOWINGS: A map of the proposed 60 dB μ service contour in relation to the present 60 dB μ service contour has been included in *Exhibit 1*. The minor change proposed service area will overlap a portion of the presently licensed service area as noted in the exhibit. The proposed 60 dB μ contour of the Translator lies wholly outside of the NCE-FM Primary Station 60 dB μ contour. The Primary Station service contour relationship has been plotted in *Exhibit 2*.

The proposed facility will be located on the tower bearing Antenna Structure Registration Number 1222470. In support of this filing, a copy of the existing ASRN has been included in *Exhibit 3*. A depiction of the tower and antenna configuration has been included in *Exhibit 4*. Further notification to the FAA or ASR governing authorities is not required as this proposal will not increase the overall tower height.

The applicant would like to note use of the NED 03 second terrain database for all allocation, contour and HAAT showings contained herein. A copy of the proposed HAAT calculation has been included in *Exhibit 5*.

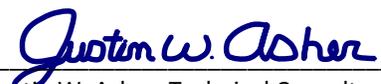
ALLOCATION COMPLIANCE SHOWINGS: The proposed Translator remains in compliance with 47 C.F.R. Section 74.1204 toward all allocation protection concerns. A general allocation study for this proposal is found in *Exhibit 6*. There are three (3) facilities, existing or proposed, close enough to merit further study. Therefore, a supplemental contour protection study has been provided toward each facility as included in *Exhibit(s) 7(a-c)*. It is believed sufficient clearance exists precluding the need for additional contour protection showings. Additional manufacturer's directional antenna documentation has been included in *Exhibit 8*.

Regarding protection of international concerns, the facility is, and will remain, more than 320 km from the common border between the United States and Canada or Mexico. As a result, no further international protection showings are believed required.

ENVIRONMENTAL COMPLIANCE SHOWINGS: The proposed facility complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments as set forth under §1.1310 and/or §1.1307(b)(3) of the Commission's rules and the guidelines for RF radiation protection guidelines as set forth in OET Bulletin No. 65 (Edition 97-01), and the accompanying Supplement A, (Edition 97-01). Compliance has been demonstrated in the attached **RF Appendix 1** of this filing. The facility is, or will be, properly marked with signs. Entry is, or will be, restricted by means of fencing, locked doors or gates. In addition, coordination with other users of the site will be secured to reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

Regarding compliance with the NEPA, Nationwide Programmatic Agreement and NHPA Section 106 for tower co-location, compliance with the Agreement is not required where no new tower construction is being proposed and the tower is not being substantially altered. Specifically, compliance is not necessary where only an antenna is being replaced, and existing feed-line reused, on an existing structure. However, should the Commission determine compliance is necessary, upon notification to the applicant, the applicant will file FCC Form 621.

CERTIFICATION OF TECHNICAL CONSULTANT: *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty years of experience as a broadcast technical consultant before the Federal Communications Commission ("the FCC"); and am familiar with the Code of Federal Regulations Title 47 ("the Rules") as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*



Justin W. Asher, Technical Consultant
February 20, 2020

NED 03 SEC Terrain Database
US Census 2010 PL Database
NAD 1983 Coordinate Datum

Exhibit 1

Service Contour Study: Present vs Proposed Operations

Proposed 60 dBμ F(50:50) Contour

Licensed 60 dBμ F(50:50) Contour

CH232D.P
Lafayette, IN
Proposed Operation
Facility ID: 140803
Latitude: 40-25-05.60 N
Longitude: 086-53-08 W
ERP: 0.25 kW
Channel: 232D (94.3 MHz)
AMSL Height: 226.0 m
Pattern: Directional

60 dBμ F(50:50) Contour
Total Population: 124,237
Total Area: 162.6 sq. km

W292EM.L
Lafayette, IN
BLFT20161220ABK
Facility ID: 140803
Latitude: 40-25-05.10 N
Longitude: 086-53-08 W
ERP: 0.003 kW
Channel: 292D (106.3 MHz)
AMSL Height: 223.0 m
Pattern: Omni

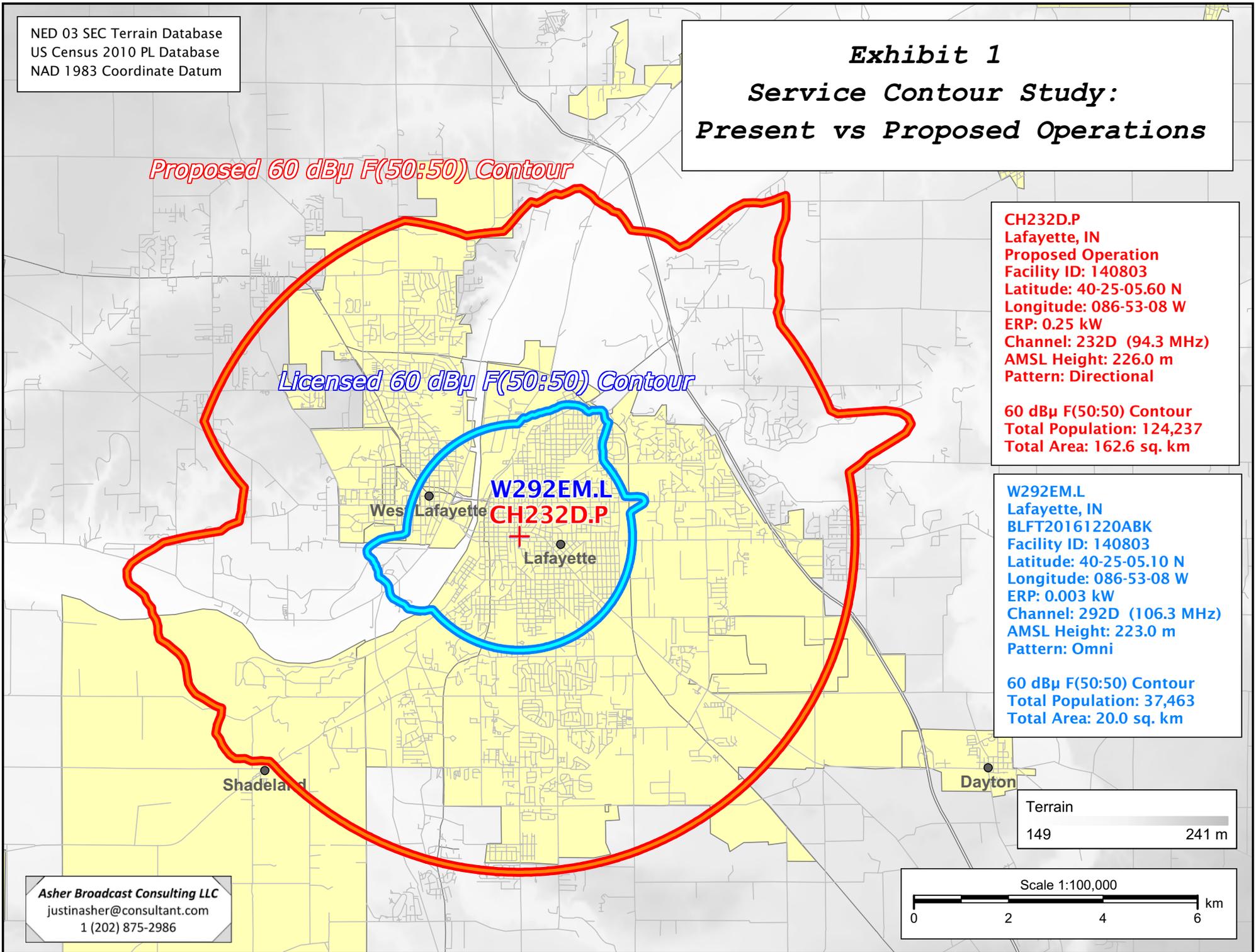
60 dBμ F(50:50) Contour
Total Population: 37,463
Total Area: 20.0 sq. km

Terrain
149 241 m

Scale 1:100,000



Asher Broadcast Consulting LLC
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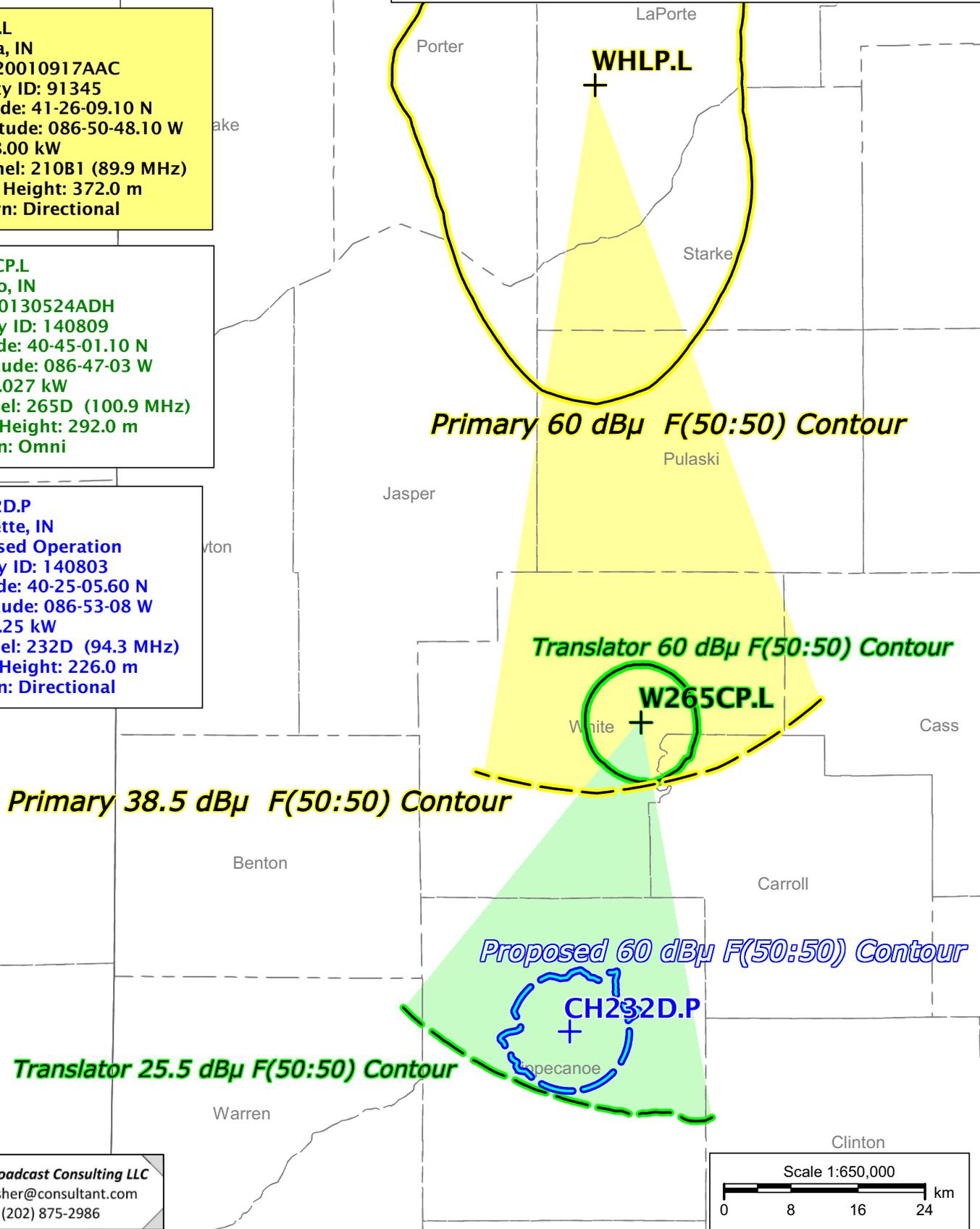
NED 03 SEC Terrain Database
US Census 2010 PL Database
NED 1983 Coordinate Datum

Exhibit 2 Service Contour Study: Proposed vs Primary Operations

WHLP.L
Hanna, IN
BLED20010917AAC
Facility ID: 91345
Latitude: 41-26-09.10 N
Longitude: 086-50-48.10 W
ERP: 8.00 kW
Channel: 210B1 (89.9 MHz)
AMSL Height: 372.0 m
Pattern: Directional

W265CP.L
Buffalo, IN
BLFT20130524ADH
Facility ID: 140809
Latitude: 40-45-01.10 N
Longitude: 086-47-03 W
ERP: 0.027 kW
Channel: 265D (100.9 MHz)
AMSL Height: 292.0 m
Pattern: Omni

CH232D.P
Lafayette, IN
Proposed Operation
Facility ID: 140803
Latitude: 40-25-05.60 N
Longitude: 086-53-08 W
ERP: 0.25 kW
Channel: 232D (94.3 MHz)
AMSL Height: 226.0 m
Pattern: Directional



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Exhibit 3

Copy of Existing Antenna Structure Registration

(public record copy)

Registration Detail

Reg Number	1222470	Status	Constructed
File Number	A1069276	Constructed	03/09/2001
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type POLE - Any type of Pole

Location (in NAD83 Coordinates)

Lat/Long	40-25-05.6 N 086-53-08.0 W	Address	101 North Tenth Street
City, State	Lafayette , IN		
Zip	47901	County	TIPPECANOE
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	172.0	Overall Height Above Ground (AGL)	60.7
Overall Height Above Mean Sea Level	232.7	Overall Height Above Ground w/o Appurtenances	59.4

Painting and Lighting Specifications

None

FAA Notification

FAA Study	00-AGL-2599-OE	FAA Issue Date	11/07/2000
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Owner & Contact Information

FRN	0002891919	Owner Entity Type	
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Owner

Metro Electronics Inc. d/b/a Communications Service Co.
101 N. 10th St.
Lafayette , IN 47901

P: (765)474-3776
F:
E:

Contact

Stevenson , David M
101 N. 10th St.
Lafayette , IN 47901

P: (765)474-3776
F:
E:

Last Action Status

Status	Constructed	Received	03/20/2017
Purpose	Notification	Entered	03/20/2017
Mode	Interactive		

Related Applications

03/20/2017	A1069276 - Notification (NT)
02/15/2002	A0247380 - Notification (NT)
02/09/2001	A0167797 - New (NE)

Comments

Comments

None

History

Date	Event
03/20/2017	Construction Notification Received
02/15/2002	Construction Notification Received
02/11/2002	Construction Reminder Letter Sent

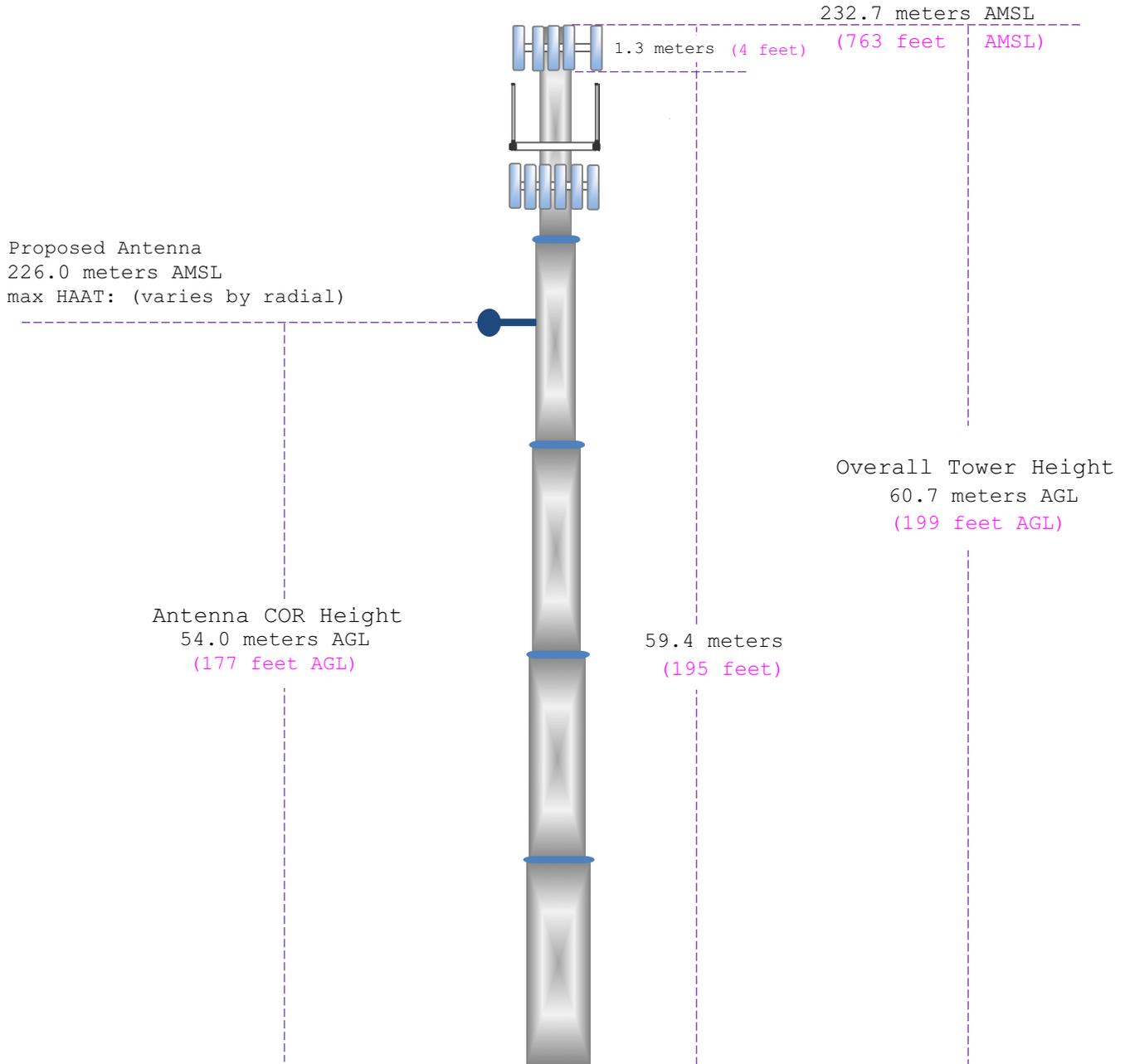
All History (5)

Automated Letters

02/11/2002	Construction Reminder, Reference 200722
02/14/2001	Authorization, Reference 105313

Exhibit 4

Vertical Plan of Antenna System



Ground Elevation: 172.0 meters AMSL (564 feet AMSL)		
Address: 101 North Tenth Street		
City: Lafayette	Latitude (D M S)	Longitude (D M S)
County: Tippecanoe	---	---
State: Indiana	(NAD 1927)	
	Lat/Long 40-25-05.6 N 086-53-08.0 W (NAD 1983)	
Antenna Structure Registration	Drawing	Asher Broadcast Consulting, LLC
1222470	Is Not To Scale	justinasher@consultant.com 1(202)875-2986

Exhibit 5

HAAT and Miscellaneous Coordinate Information

HAAT Calculation (1983):

N. Lat. = 402505.6 W. Lng. = 865308.0
 HAAT and Distance to Contour,
 FCC, FM 2-10 Mi, 51 pts Method - NED 03 SEC

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	191.9	34.1	0.1702	-7.69	0.825	6.81
030	172.2	53.8	0.0801	-10.96	0.566	7.12
060	200.1	25.9	0.2500	-6.02	1.000	7.09
090	198.0	28.0	0.2500	-6.02	1.000	7.09
120	205.9	20.1	0.2500	-6.02	1.000	7.09
150	209.1	16.9	0.2500	-6.02	1.000	7.09
180	206.2	19.8	0.2500	-6.02	1.000	7.09
210	205.3	20.7	0.2500	-6.02	1.000	7.09
240	180.0	46.0	0.1201	-9.21	0.693	7.26
270	183.7	42.3	0.1201	-9.21	0.693	6.94
300	209.8	16.2	0.2500	-6.02	1.000	7.09
330	214.8	11.2	0.2500	-6.02	1.000	7.09

Ave E1= 198.08 M HAAT= 27.92 M AMSL= 226.0

NAD 1983 to NAD 1927 Conversion:

Various Coordinate Conversion Calculations (NAD 1983):

Position Type	Lat Lon
Degrees Lat Long	40.4182222°, -086.8855556°
Degrees Minutes	40°25.09333', -086°53.13333'
Degrees Minutes Seconds	40°25'05.6000", -086°53'08.0000"
UTM	16T 509709mE 4474183mN
UTM centimeter	16T 509709.08mE 4474183.76mN
MGRS	16TEK0970974183
Grid North	0.1°
GARS	187LW12
Maidenhead	EN60NK30RI69
GEOREF	GJDL06862509

Exhibit 6

Tabulation of Proposed Allocation

Blue Text indicates contour protection studies toward select stations as included in **Exhibit(s) 7(a-c)**.

		CSN International									
REFERENCE	CH#	232D - 94.3 MHz, Pwr= 0.25 kW DA, HAAT= 28.0 M, COR= 226 M						DISPLAY DATES			
40 25 05.60 N.		Average Protected F(50-50)= 7.09 km						DATA 02-19-20			
86 53 08.00 W.		Standard Directional						SEARCH 02-19-20			
CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR(kW)	INT(km)	PRO(km)	*IN*	*OUT*
CITY	STATE		<--	FILE #	LNG	HAAT(M)	COR(M)	LICENSEE	(Overlap in km)		
234B	WFBQ	LIC		134.8	82.23	39 53 43.10	58.000	7.6	74.6	67.5	6.0
Indianapolis	IN			315.2	BLH19980707KB	86 12 04.00	245	502	Capstar Tx, LLC		
231B	WGFA-FM	LIC		299.9	84.40	40 47 37.10	50.000	69.9	57.2	7.4	13.0
Watseka	IL			119.4	BLH19970711KC	87 45 17.10	111	305	Iroquois County Broadcasti		
233D	W233BT	LIC		13.0	37.90	40 45 01.10	0.027	9.8	6.9	20.9	20.6
Monticello	IN			193.1	BLFT20160419ABD	86 47 03.00		292	CSN International		
232B1	WZOC	LIC		22.6	133.93	41 31 42.20	11.500	103.4	43.6	23.6	62.6
Plymouth	IN			203.0	BLH20140124ALI	86 15 58.00	150	395	Wsjm, Inc.		
232A	WREB	LIC		180.4	84.23	39 39 38.10	3.000	53.3	13.2	23.9	47.3
Greencastle	IN			0.4	BLH3278	86 53 34.00	49	285	The Original Company, Inc		
235A	WRHK	LIC		242.3	57.20	40 10 40.10	6.000	3.0	31.2	46.8	25.2
Danville	IL			61.9	BLH19930415KA	87 28 55.10	100	295	Neuhoff Media Danville, LL		
233B	WLRW	LIC		255.2	123.50	40 07 35.10	50.000	76.3	63.4	39.3	44.0
Champaign	IL			74.3	BLH20051107ABO	88 17 25.20	138	357	Saga Communications Of Ill		
229A	WFRR	LIC		60.1	68.98	40 43 31.10	6.000	2.7	28.3	59.1	39.6
Walton	IN			240.6	BLH19951120KB	86 10 32.90	100	324	Christian Friends Broadcas		
232D	W232DM	CP D		142.1	97.34	39 43 32.20	0.250	43.2	12.6	47.0	61.0
Indianapolis	IN			322.5	BNPFT20171204ADJ	86 11 08.00		323	Continental Broadcast Grou		
235D	W235CU	LIC		52.2	61.23	40 45 17.10	0.250	1.1	11.0	53.0	49.1
Logansport	IN			232.5	BLFT20170804AAP	86 18 41.00		286	Mid-America Radio Group, I		
230B1	WNDX	LIC N		130.2	101.13	39 49 39.10	8.400	3.6	42.8	90.4	56.8
Lawrence	IN			310.8	BLH20120301AEG	85 58 50.90	140	393	Radio License Holding Src		
232A	WIFE-FM	LIC		123.3	142.38	39 42 22.20	1.050	72.8	24.4	62.5	94.2
Rushville	IN			304.2	BMLH20000913AAR	85 29 40.90	171	462	Rodgers Broadcasting Corp.		
232L1	WIWU-LP	LIC		83.3	103.74	40 31 15.10	0.100			78.1	74.4
Marion	IN			264.1	BLL20071001AJP	85 39 58.90	25	281	Indiana Wesleyan Universit		
285A	WAXI	LIC		204.7	84.43	39 43 38.10	1.700	18.8	12.7	9.5R	74.9M
Rockville	IN			24.5	BLH20160421AAO	87 17 56.10	134	317	Dlc Media, Inc.		

Terrain database is NED 03 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= East Zone, Co to 3rd adjacent.
 All separation margins (if shown) include rounding.
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
 < = Station meets FCC minimum distance spacing for its class.
 < = Contour Overlap

Exhibit 7a

Contour Protection Studies Toward Select Allocation Concern(s)

CSN International

FMCommander Single Allocation Study - 02-19-2020 - NED 03 SEC
CH232D.P's Overlaps (In= 67.54 km, Out= 6.01 km)

CH232D.P CH 232 D DA
Lat= 40 25 05.60, Lng= 86 53 08.00
0.25 kW 28 m HAAT, 226 m COR
Prot.= 60 dBu, Intef.= 94 dBu

WFBQ CH 234 B BLH19980707KB
Lat= 39 53 43.10, Lng= 86 12 04.00
58.0 kW 245 m HAAT, 502 m COR
Prot.= 54 dBu, Intef.= 100 dBu

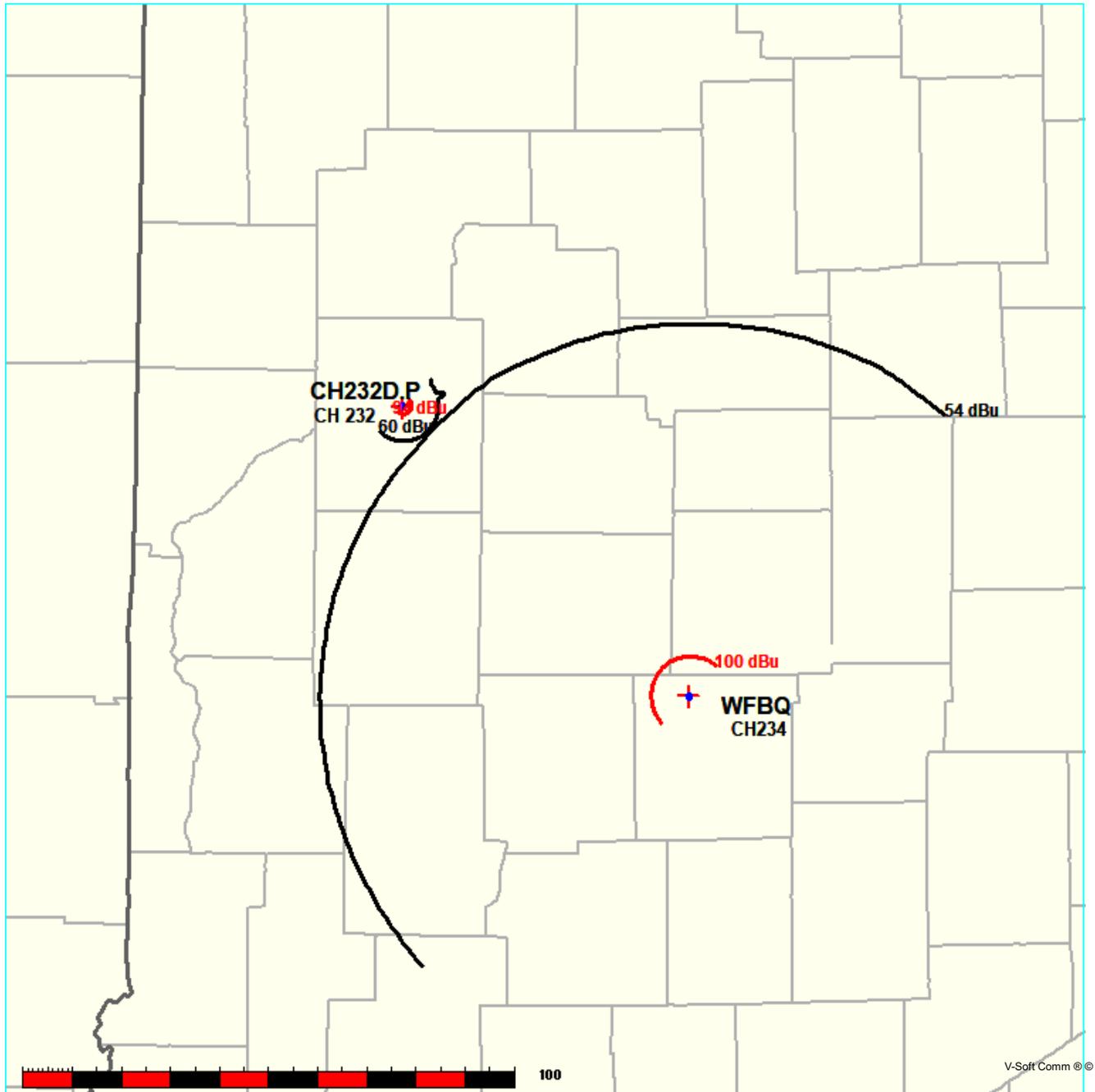


Exhibit 7b

Contour Protection Studies Toward Select Allocation Concern(s)

CSN International

FMCommander Single Allocation Study - 02-19-2020 - NED 03 SEC
CH232D.P's Overlaps (In= 7.4 km, Out= 13.05 km)

CH232D.P CH 232 D DA
Lat= 40 25 05.60, Lng= 86 53 08.00
0.25 kW 28 m HAAT, 226 m COR
Prot.= 60 dBu, Intef.= 48 dBu

WGFA-FM CH 231 B BLH19970711KC
Lat= 40 47 37.10, Lng= 87 45 17.10
50.0 kW 111 m HAAT, 305 m COR
Prot.= 54 dBu, Intef.= 54 dBu

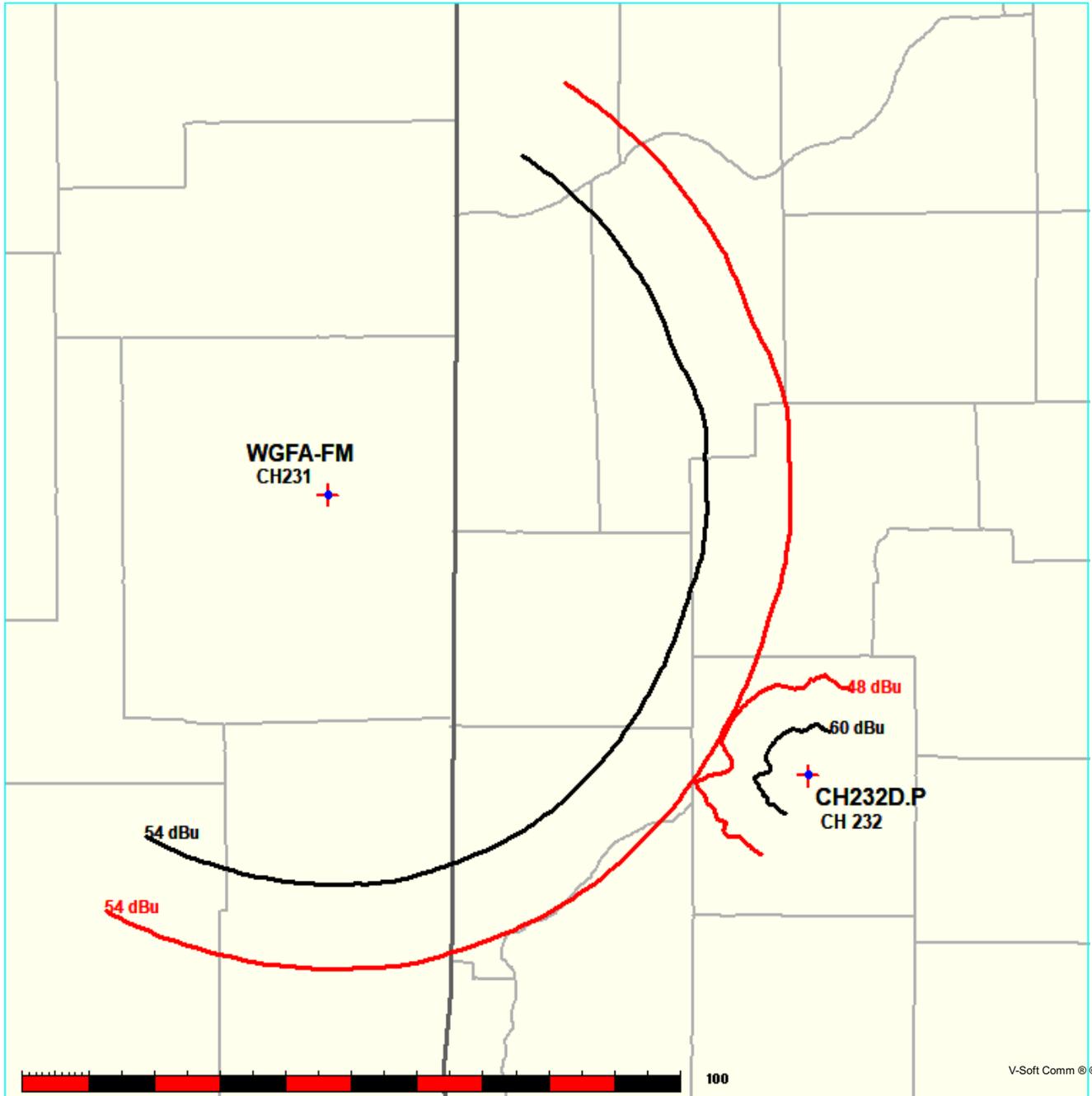


Exhibit 7c

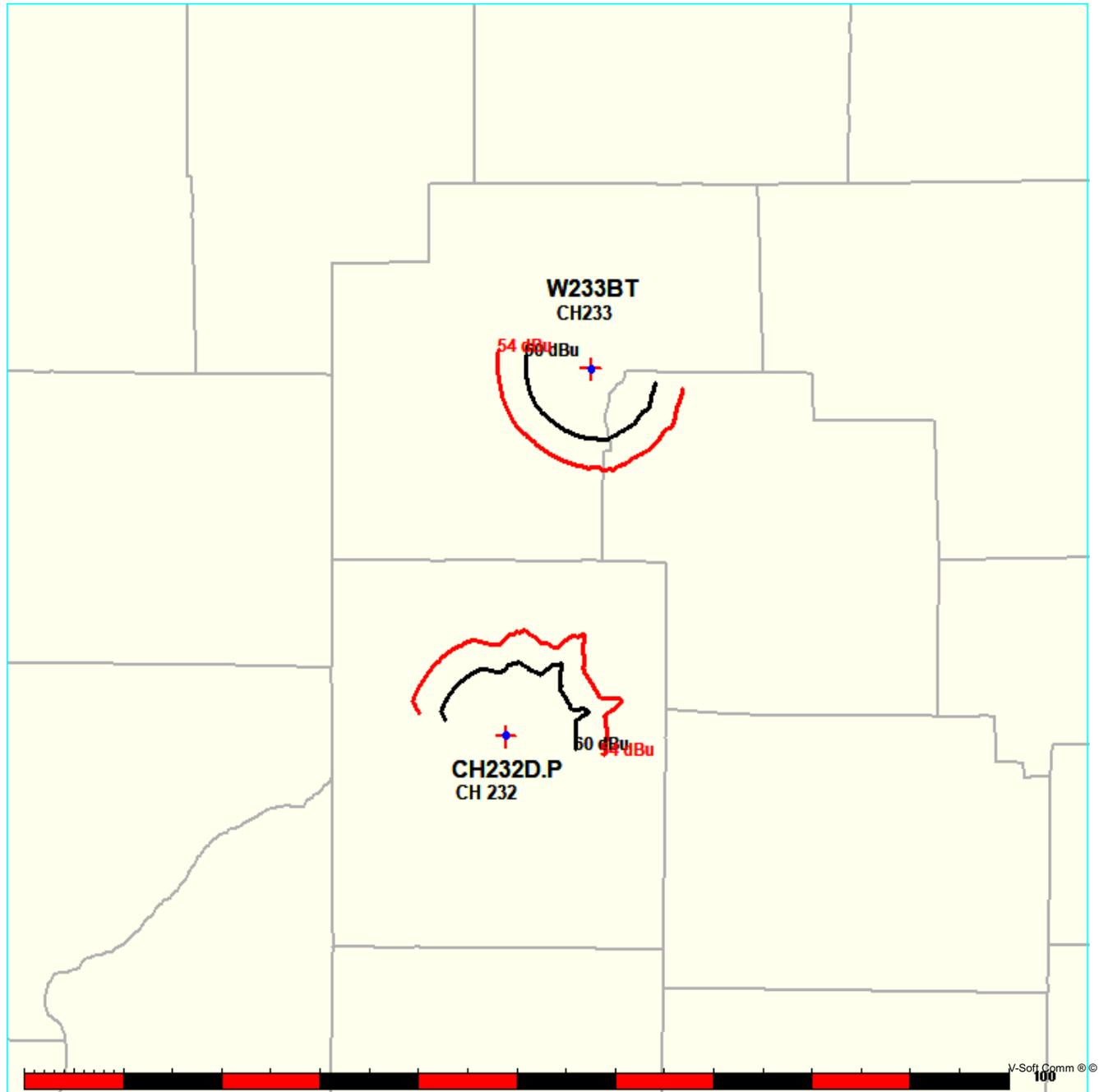
Contour Protection Studies Toward Select Allocation Concern(s)

CSN International

FMCommander Single Allocation Study - 02-19-2020 - NED 03 SEC
CH232D.P's Overlaps (In= 20.86 km, Out= 20.6 km)

CH232D.P CH 232 D DA
Lat= 40 25 05.60, Lng= 86 53 08.00
0.25 kW 28 m HAAT, 226 m COR
Prot.= 60 dBu, Intef.= 54 dBu

W233BT CH 233 D BLFT20160419ABD
Lat= 40 45 01.10, Lng= 86 47 03.00
0.027 kW 0 m HAAT, 292 m COR
Prot.= 60 dBu, Intef.= 54 dBu

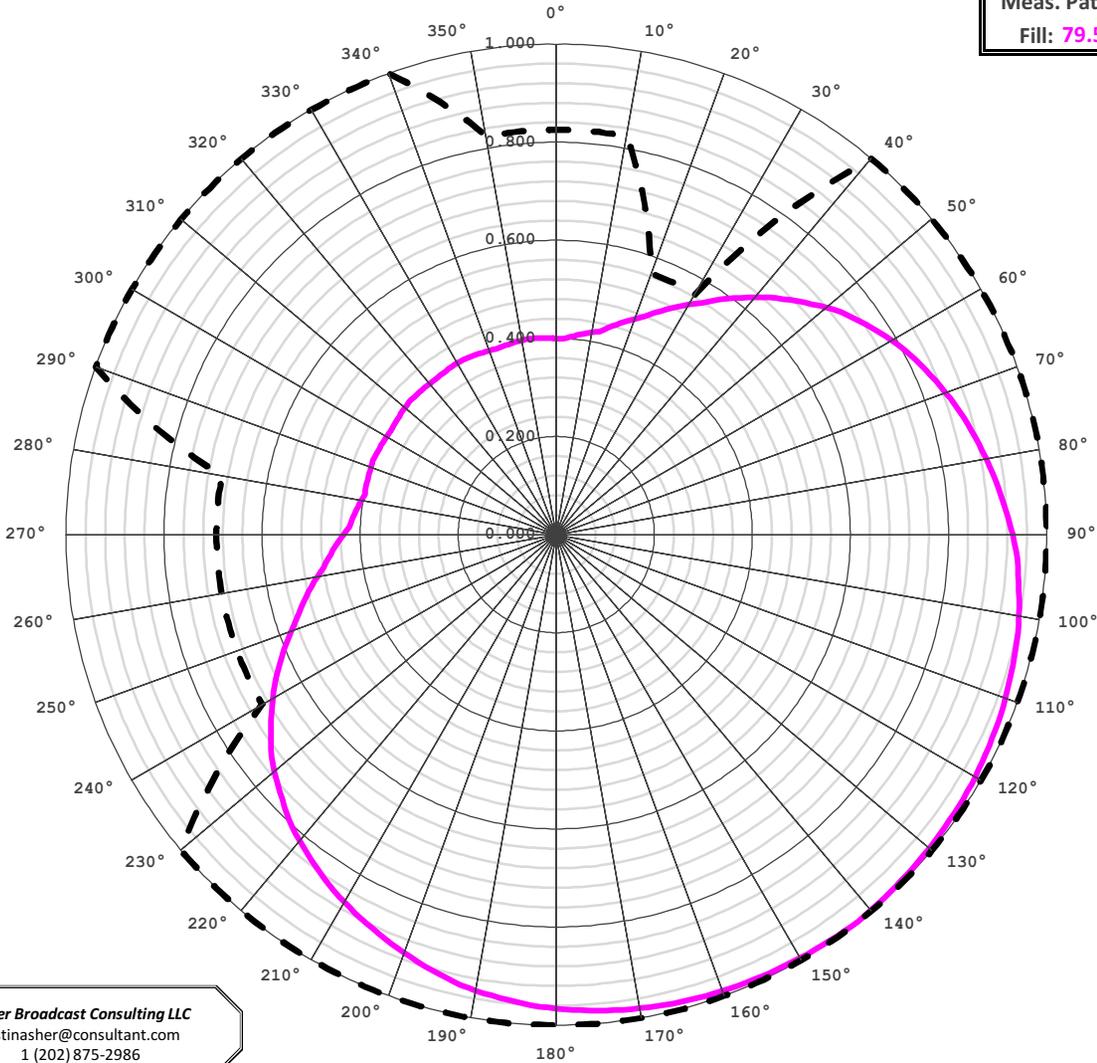


Manufacturer's	Make/Model	Orientation	Power
Element 1:	BKG1/P(Slant45)	142° True	100.0%
Element 2:			
Element 3:			
Element 4:			

Composite Power: 100%

Exhibit 8 - Copy of Manufacturer's Directional Antenna Pattern Data

Meas. Pattern
Fill: 79.5%



Azimuth ° True	FCC Pattern	Manufacturer's Pattern
0°	0.825	0.400
10°	0.825	0.418
20°	0.566	0.468
30°	0.566	0.541
40°	1.000	0.631
50°	1.000	0.720
60°	1.000	0.791
70°	1.000	0.846
80°	1.000	0.890
90°	1.000	0.931
100°	1.000	0.958
110°	1.000	0.975
120°	1.000	0.987
130°	1.000	0.994
140°	1.000	0.999
150°	1.000	0.996
160°	1.000	0.990
170°	1.000	0.980
180°	1.000	0.966
190°	1.000	0.944
200°	1.000	0.907
210°	1.000	0.865
220°	1.000	0.814
230°	1.000	0.750
240°	0.693	0.667
250°	0.693	0.576
260°	0.693	0.495
270°	0.693	0.434
280°	0.693	0.404
290°	1.000	0.402
300°	1.000	0.399
310°	1.000	0.403
320°	1.000	0.402
330°	1.000	0.403
340°	1.000	0.399
350°	0.825	0.402

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Allocation (FCC) Pattern: ---
Manufacturer's Pattern: ———

Exhibit 8

Copy of Manufacturer's Directional Antenna Documentation

(Actual Antenna Pattern rotated to 142.0°T)

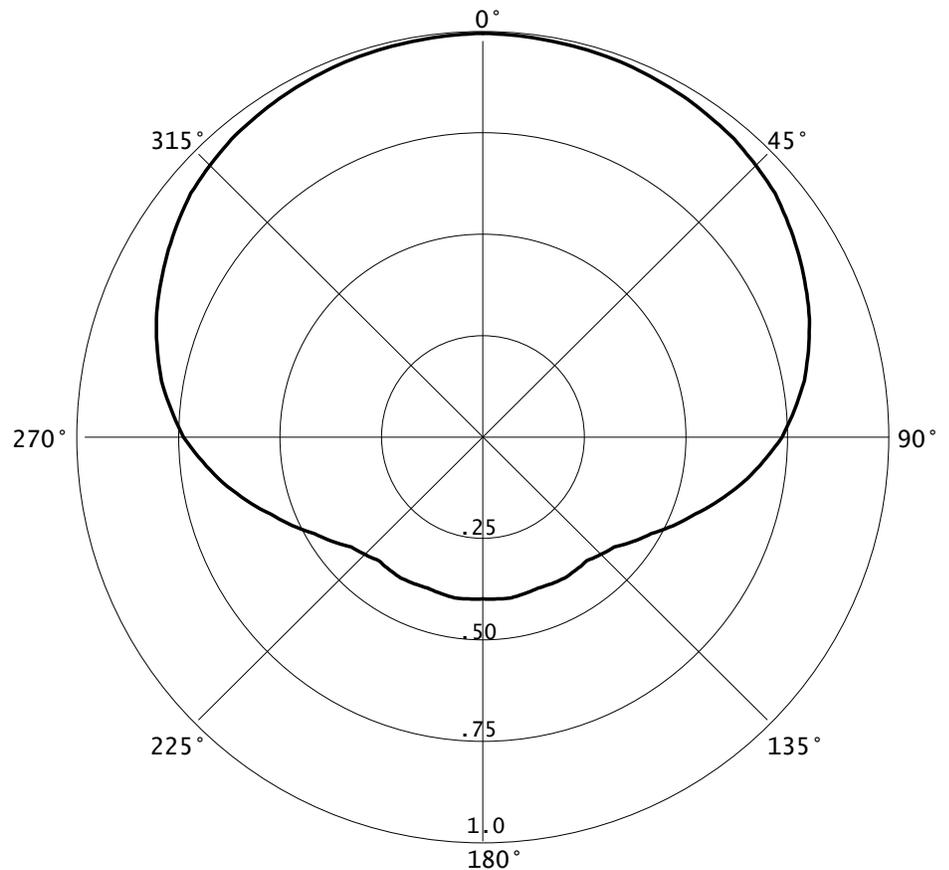
(public record copy)

BKG1/P-1DA(Slant45) COMPOSITE PATTERN

RMS(V)= .739

Graph is Relative Field

Azi	Field	dBk
000	1.000	-10.000
010	0.995	-10.044
020	0.989	-10.096
030	0.978	-10.193
040	0.963	-10.327
050	0.939	-10.547
060	0.899	-10.925
070	0.856	-11.351
080	0.804	-11.895
090	0.737	-12.651
100	0.650	-13.742
110	0.557	-15.083
120	0.479	-16.393
130	0.423	-17.473
140	0.399	-17.981
150	0.403	-17.894
160	0.398	-18.002
170	0.404	-17.872
180	0.401	-17.937
190	0.404	-17.872
200	0.398	-18.002
210	0.403	-17.894
220	0.399	-17.981
230	0.423	-17.473
240	0.479	-16.393
250	0.557	-15.083
260	0.650	-13.742
270	0.737	-12.651
280	0.804	-11.895
290	0.856	-11.351
300	0.899	-10.925
310	0.939	-10.547
320	0.963	-10.327
330	0.978	-10.193
340	0.989	-10.096
350	0.995	-10.044



The directional antenna pattern will be produced by means of a Nicom Dipole BKG1/P broadcast element mounted at a 45° (degree) slant orientation to achieve horizontal and vertical polarization. The BKG1/P-1DA(Slant45) Directional Pattern is therefore a maximum composite pattern of the current horizontal and vertical broadcast patterns as notified by Nicom USA, Inc.

The maximum antenna gain for a single BKG1/P-1DA(Slant45) element will be -3.0 dBd or the common horizontal or vertical maximum antenna gain of 0.0 dBd adjusted by 3 dBd for dual broadcast in the Horizontal and Vertical planes (-3.0 dBd = 0.0 dBd - 3.0 dBd). The maximum gain for multiple bay options of the Nicom BKG1/P-DA(Slant45) antenna would therefore also be adjusted by -3 dBd to account for operation in the horizontal and vertical planes.

The antenna proposed in this application will be mounted in accordance with specific instructions provided by the antenna manufacturer. 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. In addition, the antenna will be assembled under the supervision of a qualified engineer and installed pursuant to the manufacturer's instructions and manufacturer specified antenna orientation.

Exhibit 8

Copy of Manufacturer's Directional Antenna Documentation (Actual Antenna Pattern rotated to 142.0°T) (public record copy)



BKG1/P

Medium Power Portable Broadband FM Dipole

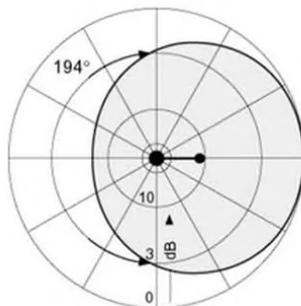
This broadband dipole antenna is constructed of stainless steel and is designed to last a long time in any weather condition. Because of its sturdy construction, it can support up to 2.5 KW of input power with the appropriate connector. Since it has a wide angle of radiation, it is strongly recommended for omni-directional arrays. Due to the fact that it is easily disassembled and reassembled, it can be placed in a compact container making it very portable and inexpensive to ship.

TECHNICAL SPECIFICATIONS

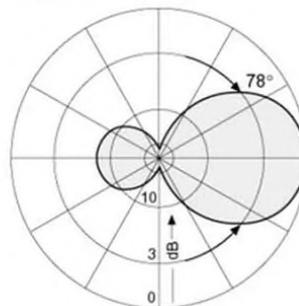
- Antenna Type:** dipole
- Front-to-Back Ratio:** 7 dB
- Frequency Range:** 87.5 - 108 MHz
- Polarization:** vertical
- Gain:** 0 dBd (unity gain)
- Bandwidth:** 20 MHz Max
- VSWR:** < 1.3
- H Plane:** 194 degrees
- V Plane:** 78 degrees
- Impedance:** 50 Ohms
- Connectors:** N type (1 kw) - 7/8 type (2 kw)
- Power Rating:** 2000 Watts max.
- Wind Load:** 39.6 Lbs (18 kg)
- Wind Velocity:** 119 mph (190 km/h)
- Wind Surface:** 1.2 ft² (0.11 m²)
- Lightning Protection:** all parts grounded
- Material:** (external) stainless steel
- Mounting:** from 2" to 4"
- Weight:** 18 Lbs (8.1kg)
- Average Dimensions:** 50"×30"×2"
- Packing:** 46"×22"×4"



Radiation Patterns (at mid-band)



in H-plane
Horizontal Radiation Pattern



in E-plane
Vertical Radiation Pattern

Exhibit 8

Copy of Manufacturer's Directional Antenna Documentation (Actual Antenna Pattern rotated to 142.0°T) (public record copy)

TX station: BKG1/P

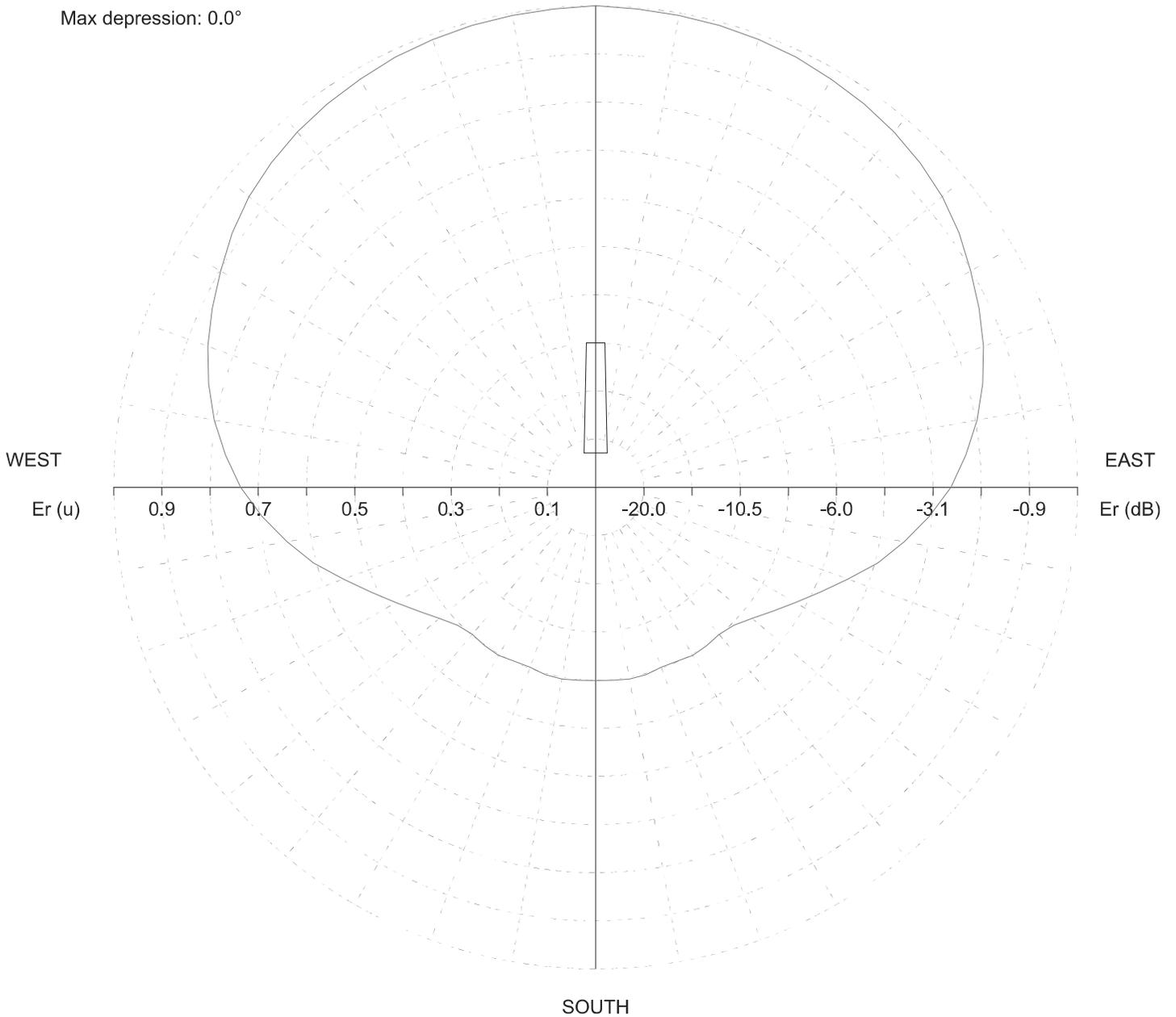
Site name:

Frequency: 100.00 MHz

Horizontal diagram of Maxima

NORTH

Max azimuth: 0°
Max depression: 0.0°



—— 0.0° depres. (Total antenna), Gain (dBd): 0.00 ERP T.max (KW): 1.

ERP E.max (KW): 0.776

Exhibit 8

Copy of Manufacturer's Directional Antenna Documentation (Actual Antenna Pattern rotated to 142.0°T) (public record copy)

TX station: BKG1/P

Site name:

Frequency: 100.00 MHz

Horizontal diagram of Maxima

Az (°)	Dep (°)	Er (%)	ERP (W)	Az (°)	Dep (°)	Er (%)	ERP (W)	Az (°)	Dep (°)	Er (%)	ERP (W)
0.0	0.0	100.0	776.2	120.0	0.0	47.9	178.0	240.0	0.0	47.9	178.0
5.0	0.0	99.7	772.1	125.0	0.0	44.8	156.0	245.0	0.0	51.5	205.9
10.0	0.0	99.5	768.1	130.0	0.0	42.3	139.1	250.0	0.0	55.7	240.8
15.0	0.0	99.3	765.7	135.0	0.0	40.5	127.4	255.0	0.0	60.6	285.0
20.0	0.0	98.9	759.7	140.0	0.0	39.9	123.3	260.0	0.0	65.0	328.3
25.0	0.0	98.5	753.4	145.0	0.0	40.1	125.1	265.0	0.0	69.5	374.7
30.0	0.0	97.8	743.2	150.0	0.0	40.3	126.0	270.0	0.0	73.7	421.3
35.0	0.0	97.2	733.2	155.0	0.0	39.9	123.5	275.0	0.0	77.1	461.6
40.0	0.0	96.3	720.1	160.0	0.0	39.8	122.8	280.0	0.0	80.4	501.4
45.0	0.0	95.2	703.9	165.0	0.0	40.3	126.1	285.0	0.0	83.2	536.8
50.0	0.0	93.9	684.4	170.0	0.0	40.4	126.9	290.0	0.0	85.6	569.2
55.0	0.0	92.1	658.3	175.0	0.0	40.3	125.8	295.0	0.0	87.8	598.3
60.0	0.0	89.9	627.1	180.0	0.0	40.1	125.0	300.0	0.0	89.9	627.1
65.0	0.0	87.8	598.3	185.0	0.0	40.3	125.8	305.0	0.0	92.1	658.3
70.0	0.0	85.6	569.2	190.0	0.0	40.4	126.9	310.0	0.0	93.9	684.4
75.0	0.0	83.2	536.8	195.0	0.0	40.3	126.1	315.0	0.0	95.2	703.9
80.0	0.0	80.4	501.4	200.0	0.0	39.8	122.8	320.0	0.0	96.3	720.1
85.0	0.0	77.1	461.6	205.0	0.0	39.9	123.5	325.0	0.0	97.2	733.2
90.0	0.0	73.7	421.3	210.0	0.0	40.3	126.0	330.0	0.0	97.8	743.2
95.0	0.0	69.5	374.7	215.0	0.0	40.1	125.1	335.0	0.0	98.5	753.4
100.0	0.0	65.0	328.3	220.0	0.0	39.9	123.3	340.0	0.0	98.9	759.7
105.0	0.0	60.6	285.0	225.0	0.0	40.5	127.4	345.0	0.0	99.3	765.7
110.0	0.0	55.7	240.8	230.0	0.0	42.3	139.1	350.0	0.0	99.5	768.1
115.0	0.0	51.5	205.9	235.0	0.0	44.8	156.0	355.0	0.0	99.7	772.1

Exhibit 8

Copy of Manufacturer's Directional Antenna Documentation (Actual Antenna Pattern rotated to 142.0°T) (public record copy)

TX station: BKG1/P

Site name:

Frequency: 100.00 MHz

Vertical diagram

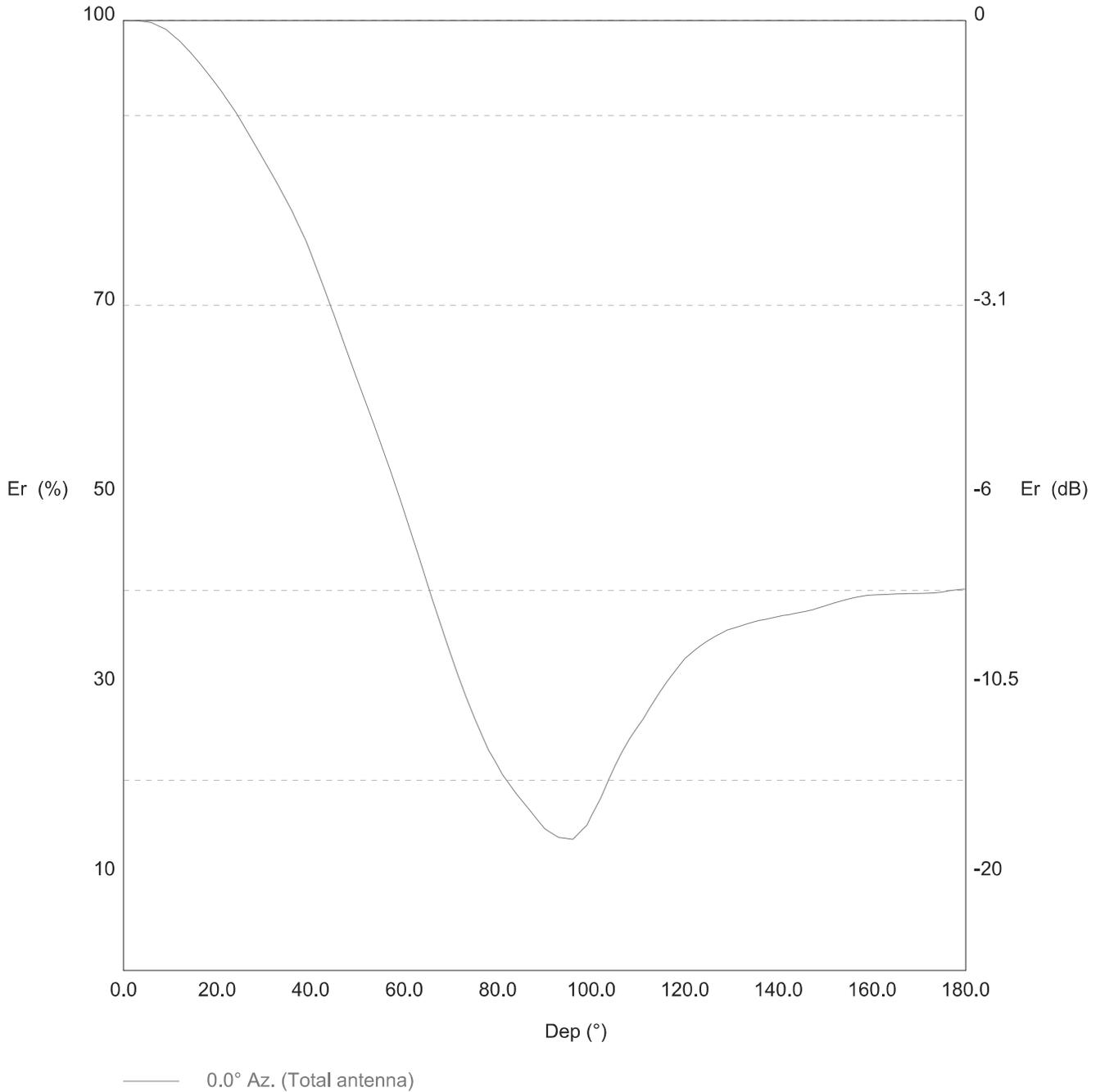


Exhibit 8

Copy of Manufacturer's Directional Antenna Documentation (Actual Antenna Pattern rotated to 142.0°T) (public record copy)

TX station: BKG1/P

Site name:

Frequency: 100.00 MHz

Vertical diagram at an azimuth of 0° degrees

Dep (°)	Er (%)	ERP (W)	Dep (°)	Er (%)	ERP (W)	Dep (°)	Er (%)	ERP (W)
0.0	100.0	776.2	60.0	48.3	180.9	120.0	32.8	83.6
1.0	100.0	776.1	61.0	46.8	169.7	121.0	33.2	85.8
2.0	100.0	775.9	62.0	45.2	158.9	122.0	33.7	88.0
3.0	100.0	775.7	63.0	43.7	148.5	123.0	34.1	90.2
4.0	99.9	774.8	64.0	42.2	138.1	124.0	34.4	91.9
5.0	99.8	773.8	65.0	40.6	128.0	125.0	34.7	93.6
6.0	99.8	772.9	66.0	39.1	118.4	126.0	35.0	95.3
7.0	99.5	769.2	67.0	37.6	109.6	127.0	35.3	96.8
8.0	99.3	765.6	68.0	36.1	101.1	128.0	35.6	98.2
9.0	99.1	762.0	69.0	34.6	92.9	129.0	35.8	99.6
10.0	98.7	755.7	70.0	33.2	85.4	130.0	36.0	100.4
11.0	98.3	749.5	71.0	31.7	78.1	131.0	36.1	101.3
12.0	97.9	743.2	72.0	30.3	71.2	132.0	36.3	102.1
13.0	97.3	735.2	73.0	29.0	65.4	133.0	36.4	103.0
14.0	96.8	727.2	74.0	27.8	59.9	134.0	36.6	103.8
15.0	96.3	719.2	75.0	26.5	54.6	135.0	36.7	104.7
16.0	95.7	710.3	76.0	25.4	50.1	136.0	36.8	105.3
17.0	95.1	701.4	77.0	24.3	45.8	137.0	36.9	105.9
18.0	94.5	692.6	78.0	23.2	41.7	138.0	37.0	106.5
19.0	93.8	683.0	79.0	22.3	38.7	139.0	37.1	107.1
20.0	93.1	673.5	80.0	21.5	35.8	140.0	37.2	107.7
21.0	92.5	664.1	81.0	20.6	33.1	141.0	37.3	108.2
22.0	91.8	653.7	82.0	19.9	30.9	142.0	37.4	108.8
23.0	91.0	643.4	83.0	19.2	28.8	143.0	37.5	109.3
24.0	90.3	633.1	84.0	18.6	26.7	144.0	37.6	109.8
25.0	89.5	621.6	85.0	17.9	25.0	145.0	37.7	110.4
26.0	88.7	610.3	86.0	17.3	23.4	146.0	37.8	111.0
27.0	87.8	599.0	87.0	16.7	21.8	147.0	37.9	111.6
28.0	87.0	587.3	88.0	16.1	20.2	148.0	38.1	112.5
29.0	86.1	575.7	89.0	15.5	18.7	149.0	38.2	113.4
30.0	85.3	564.3	90.0	14.9	17.3	150.0	38.4	114.2
31.0	84.4	552.9	91.0	14.6	16.5	151.0	38.5	115.2
32.0	83.5	541.7	92.0	14.3	15.8	152.0	38.7	116.1
33.0	82.7	530.6	93.0	14.0	15.2	153.0	38.8	117.1
34.0	81.7	518.8	94.0	13.9	15.0	154.0	39.0	117.9
35.0	80.8	507.1	95.0	13.9	14.9	155.0	39.1	118.6
36.0	79.9	495.6	96.0	13.8	14.8	156.0	39.2	119.4
37.0	78.9	482.9	97.0	14.3	15.9	157.0	39.3	119.9
38.0	77.8	470.4	98.0	14.8	17.0	158.0	39.4	120.4
39.0	76.8	458.0	99.0	15.3	18.1	159.0	39.5	120.9
40.0	75.5	442.7	100.0	16.2	20.5	160.0	39.5	121.1
41.0	74.2	427.7	101.0	17.2	23.0	161.0	39.5	121.3
42.0	72.9	412.9	102.0	18.1	25.5	162.0	39.5	121.4
43.0	71.6	398.0	103.0	19.3	28.8	163.0	39.6	121.6
44.0	70.3	383.3	104.0	20.4	32.3	164.0	39.6	121.7
45.0	68.9	368.9	105.0	21.5	35.9	165.0	39.6	121.9
46.0	67.5	354.2	106.0	22.4	39.1	166.0	39.6	122.0
47.0	66.2	339.7	107.0	23.4	42.4	167.0	39.6	122.0
48.0	64.8	325.5	108.0	24.3	45.8	168.0	39.7	122.1
49.0	63.4	312.3	109.0	25.0	48.5	169.0	39.7	122.1
50.0	62.1	299.4	110.0	25.7	51.3	170.0	39.7	122.2
51.0	60.8	286.8	111.0	26.4	54.2	171.0	39.7	122.2
52.0	59.5	274.4	112.0	27.2	57.6	172.0	39.7	122.4
53.0	58.1	262.3	113.0	28.1	61.1	173.0	39.7	122.5
54.0	56.8	250.4	114.0	28.9	64.6	174.0	39.8	122.7
55.0	55.4	238.3	115.0	29.6	67.9	175.0	39.8	123.2
56.0	54.0	226.6	116.0	30.3	71.1	176.0	39.9	123.7
57.0	52.6	215.1	117.0	31.0	74.4	177.0	40.0	124.2
58.0	51.2	203.3	118.0	31.6	77.5	178.0	40.0	124.5
59.0	49.7	191.9	119.0	32.2	80.5	179.0	40.1	124.7