

TECHNICAL STATEMENT  
W287DQ CLEVELAND, OHIO 287D  
RADIO.COM, LLC  
FCC FORM 349  
JULY 2020

This Technical Statement is in support of an amendment to a minor change application FCC form 349, being filed on behalf of RADIO.COM, LLC in regards to the license of W287DQ, file no. 0000117958, for Cleveland, Ohio, facility ID 157726.

RADIO.COM, LLC is requesting to change the antenna from 2 Nicom BKG88 to 2 Nicom BKG77, still utilizing 2 bays that are 0.75 wavelength spaced.

The rest will remain the same including an Effective Radiated Power of 180 Watts, an Above Ground Level of 14 meters, and a Center of Radiation of 292 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. There is an apparent short spacing to the 2nd line in the table, but this is a record for the current licensed facility that this application is proposing to change. The only pertinent records for further study are:

- 1) WMJI Cleveland, Ohio 289B License

The proposed site is located within the protected contours of 2<sup>nd</sup> adjacent station WMJI Cleveland, Ohio on channel 258B. The predicted F(50-50) field strength of WMJI at the proposed transmitter site is 91.6 dBμ. Therefore, the predicted interfering signal contour F(50-10) generated by the proposed facility to WMJI is an additional 40 dBμ at 131.6 dBμ. The maximum distance to the 131.6 dBμ interference contour is 24.7 meters. Figure 3 shows an aerial view of the transmitter site.

Figure 3 is a table for an ERP of 25 Watts showing the vertical clearance of the interfering contour based on the antenna relative field for various depression angles below horizontal for the antenna. The minimum vertical clearance is 6.9 meters, over 22.5 feet.

All of the buildings within 24.7 meters distance from the transmitting antenna are single story floors. Therefore, the 2<sup>nd</sup> adjacent interference zone does not reach any population and the applicant, RADIO.COM, LLC, respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference.

Because the transmitter site is not changing, there will be overlap between the 60 dBμ contours of the proposed facility and the current licensed facility.

This proposed facility will be a fill-in for WKDD-HD2, Munroe Falls, Ohio, facility ID No. 43863. Figure 4 shows that the 54 dBμ coverage area of the proposed facility lies within the 54 dBμ coverage area of WKDD.

This proposal meets Section 4 of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement between the Government of Canada and the Government of the United States of America relating to the FM Broadcasting Service. Figure 5 shows that the proposed 34 dBμ interference contour F(50,10) does not cross the common border of Canada and the United States.

It was concluded that the proposed operation of a new translator in Cleveland, Ohio on 287D will not cause any harmful interference to any existing stations and will be in full compliance with the Commission's rules. Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.