

Engineering Statement in Support of Change to the Community of License

Introduction

Family Life Ministries, Inc. (Family Life), requests a community of license change for WMTT-FM (FIN 10688) from Horseheads, NY to Enfield, NY.

This statement is included to show that the proposed move will comply with the 307(b) fair distribution guidelines.

Discussion

In the instructions for the new Form 340, the FCC describes several points that are suggested for a showing that the proposed community of license change would result in a preferential arrangement of allotments under section 307(b).

1. Minimum Requirements

The commission has requested that any 307(b) showing contain the following minimum information:

- Since new technical facilities are proposed, the population and area for the new facility are as follows: the 60 dBu contour will contain 135,430 persons and 2,765.2 sq. km.
- The number of stations licensed to the current community of license of Horseheads, NY is 3 (including WMTT).
- The number of stations licensed to the proposed community of Enfield, NY is 0.
- The number of stations that completely cover the current community of license of Horseheads, NY. Is 19 (including WMTT). The number of stations that completely cover the proposed community of Enfield, NY is 10 (not including the proposed move of WMTT).
- The population of the proposed community is 3,512, according to the 2010 U.S. Census data.
- Description of the civic, cultural, religious, social, and commercial attributes of the proposed community of license. The proposed community of Enfield, NY is a licensable community as shown in Exhibit 5-G.

2. Other Relevant Information

A. Service Area

To show that the community of license that is currently served by WMTT continues to be served when the proposed move is granted, several exhibits have been attached.

- Exhibit 5-A is a list of the 19 facilities (including WMTT) that fully serve the current WMTT-FM community of license area of Horseheads, NY
- Exhibit 5-B provides a color-coded showing of the number of stations that provide service within the WMTT-FM currently licensed 60dbu(F50-50) contour. As can be seen, the currently licensed service contour area is well served by 5 or more stations in all of the service contour, not including WMTT. Exhibit 5-B1 is a list of the facilities included in this study along with the population counts of each of the “service count areas” as represented by the color shading. The population in the 5 service area (yellow) is 107,979.

B. Gain/Loss

The proposed move of WMTT will make more efficient use of the FM spectrum by increasing the service area and population. Not that the increases are mainly to the rural public. These increases are illustrated by the exhibits below:

- Exhibit 5-C shows the WMTT-FM licensed and proposed service contours along with an overlap report showing the area and population contained in the overlap areas. As can be seen, the current facility serves a total area of 1709 sq. km and a population of 108,176 persons. The proposed facility serves a total area of 2679 sq. km (2765 sq. km – 86.0 sq. km water area) and a population of 135,430 persons. The shared area is 107.76 sq. km and the shared population is 1,176 persons.
- Therefore, there is a gain of persons of 24.1% (26,078) in the population coverage and the area over land served increases by 50.45% (862.24 sq. km).

C. Urban Area Consideration

Exhibit 5-D is a map which depicts the licensed and proposed 60dbu contours along with the Elmira, NY Urbanized Area and the Ithaca, NY Urbanized Area. Note this proposed change in the community of license will move the service coverage of WMTT from one urbanized area (Elmira, NY) to another urbanized area (Ithaca, NY). The currently licensed 70dbu(F50-50) contour covers more than 50% of the Elmira, NY UA as seen in Exhibit 5-D1. The proposed 70dbu(F50-50) contour covers more than 50% of the Ithaca, NY Urbanized Area as seen in Exhibit 5-D2. No change in service from a rural area into an Urbanized Area is proposed.

3. Aural Service Counts For Proposed Community of License - Enfield, NY

The proposed community of license change for WMTT-FM will result in preferential arrangement of facilities. This facility will provide the community of Enfield, NY with its first local service³.

- Exhibit 5-E is a list of the 10 facilities (not including the proposed move of WMTT-FM) that fully serve the proposed community of license area of Enfield, NY
- Exhibit 5-F provides a color-coded showing of the number of stations that provide service within the WMTT-FM proposed 60dbu(F50-50) contour. As can be seen, the proposed service contour area is served by 5 or more stations in all of the service contour, not including WMTT. Exhibit 5-F1 is a list of the facilities included in this study along with the population counts of each of the “service count areas” as represented by the color shading. The population in the 5 service area (yellow) is 135,400.

Conclusion

Family Life believes the change of Community of License is in the Public Interest due to the increased population and coverage area as well as a first local service to Enfield, NY. The community of Horseheads, NY will continue to be more than adequately served even with this proposed change of community of license for WMTT-FM. The following fulltime aural services are currently licensed to Horseheads, NY:

WMTT(AM) FIN 10687 820khz Horseheads, NY

WLNL(AM) FIN 37481 1000khz Horsehead, NY

WMTT-FM FIN 10688 Ch 265A 100.9mhz Horseheads, NY

Family Life Proposes to Amend the Table of Allotments as Follows:

Remove WMTT-FM FIN 10688 Ch 265A 100.9mhz Horseheads, NY

Add WMTT-FM FIN 10688 Ch 266A 101.1 Enfield, NY

Respectfully submitted,

James L Travis
April 6, 2021

¹*Revision of FM Assignment Policies and Procedures*, Second Report and Order, 90 FCC 2d 88 (1988). The FM allotment priorities are: (1) First fulltime aural service; (2) Second fulltime aural service; (3) First local service; and (4) Other public interest matters. Co-equal weight is given to Priorities (2) and (3).

Service Count Report

Reference Area: PLST: Horseheads, NY






Contours that completely cover the reference area (19):

WMTT-FM (265) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WMTQ (201) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WSQE (216) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WLVE (232) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WCBF (241) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WYXL (247) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WENY-FM (249) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WGMM (254) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WOKN (258) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WQNY (279) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WPHD (285) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WNKI (291) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WENI-FM (224) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WATS : Imported: 2.0 mV/m
WMTT : Imported: 2.0 mV/m
WEHH : Imported: 2.0 mV/m
WLNL : Imported: 2.0 mV/m
WELM : Imported: 2.0 mV/m
WENY : Imported: 2.0 mV/m






Contours that partially cover the reference area (6):

WCII (203) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WCIH (212) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WQBF (234) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WABH : Imported: 2.0 mV/m
WCBA : Imported: 2.0 mV/m
WENI : Imported: 2.0 mV/m

Service Count: WMTT-FM (265): FCC F(50-50) 60.00 dBu (FCC HAAT)

	1
	2
	3
	4
	5 or more

Service Count: WMTT-FM (265): FCC F(50-50) 60.00 dBu (FCC HAAT)

	1
	2
	3
	4
	5 or more

WMTT-FM
BMLH19930414KD
Latitude: 42-12-00.20 N
Longitude: 076-51-28.80 W
ERP: 3.80 kW
Channel: 265
Frequency: 100.9 MHz
AMSL Height: 472.0 m
Elevation: 430.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

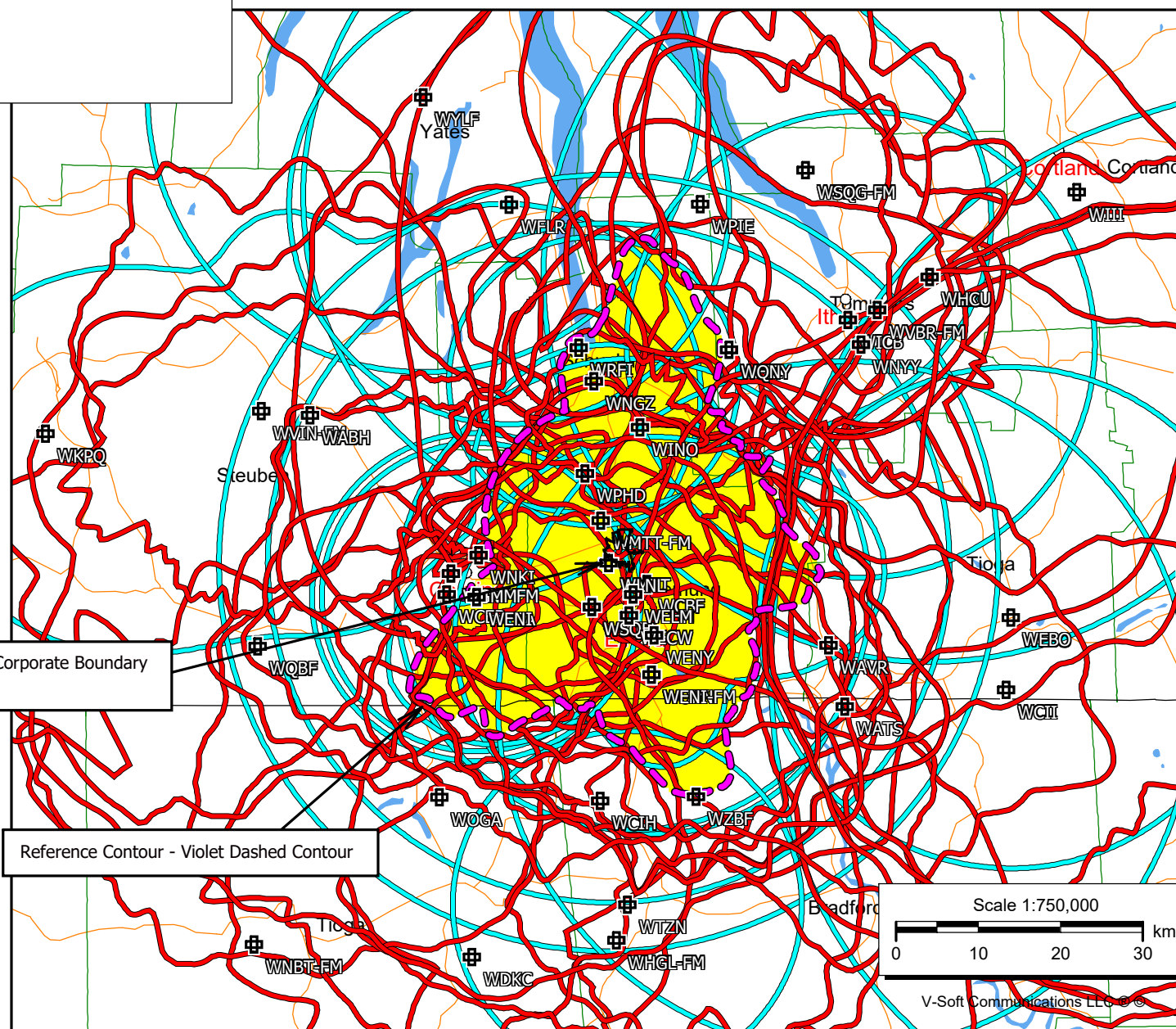
WMTT-FM
BMLH19930414KD
Latitude: 42-12-00.20 N
Longitude: 076-51-28.80 W
ERP: 3.80 kW
Channel: 265
Frequency: 100.9 MHz
AMSL Height: 472.0 m
Elevation: 430.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Current Community of License Corporate Boundary
Horseheads, NY

Reference Contour - Violet Dashed Contour

Exhibit 5-B
Service Counting of Licensed WMTT-FM
60dbu Service Contour


Exhibit 5-B
Service Counting of Licensed WMTT-FM
60dbu Service Contour



Scale 1:750,000

0 10 20 30 km

Scale 1:750,000



0 10 20 30 km

Service Count Report

Service count area for WMTT 60dbu Licensed Contour Horseheads, NY

Population Database: 2010 US Census (PL)

Count Area	Population	Housing Units	Area (sq. km)
-----	-----	-----	-----
1 Service	0	0	0.00
2 Service	0	0	0.00
3 Service	0	0	0.00
4 Service	0	0	0.00
5 or more	107,979	47,121	1708.09
Reference Area	107,979	47,121	1708.09

Reference Area: WMTT-FM (265): FCC F(50-50) 60.00 dBu (FCC HAAT)

Contours that completely cover the reference area (3):

WNKI (291) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WMTT : Imported: 2.0 mV/m

WLNL : Imported: 2.0 mV/m

Contours that partially cover the reference area (52):

WMTQ (201) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WCII (203) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WSKG-FM (207) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WINO (210) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WITH (211) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WSQG-FM (215) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WSQE (216) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WICB (219) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WRFI (220) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WCEB (220) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WVBR-FM (228) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WLKY (232) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WFIZ (238) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WCBF (241) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WYXL (247) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WENY-FM (249) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WHWK (251) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WVIN-FM (252) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WGMM (254) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WAAL (256) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WOKN (258) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WIII (260) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WAVR (271) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WQNY (279) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WPHD (285) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WKPQ (287) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WBNW-FM (289) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WECW (299) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WCIH (212) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WOGA (222) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WENI-FM (224) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WQBF (234) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WZBF (245) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WHGL-FM (262) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WDKC (268) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WNBT-FM (283) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WATS : Imported: 2.0 mV/m
WTZN : Imported: 2.0 mV/m
WINR : Imported: 2.0 mV/m
WFLR : Imported: 2.0 mV/m
WEHH : Imported: 2.0 mV/m
WNGZ : Imported: 2.0 mV/m
WEBO : Imported: 2.0 mV/m
WPIE : Imported: 2.0 mV/m
WNYX : Imported: 2.0 mV/m
WELM : Imported: 2.0 mV/m
WHCU : Imported: 2.0 mV/m
WENY : Imported: 2.0 mV/m
WYLF : Imported: 2.0 mV/m
WABH : Imported: 2.0 mV/m
WCBA : Imported: 2.0 mV/m
WENI : Imported: 2.0 mV/m

Overlap Population Report
WMTT.P (266) / WMTT-FM (265)

Overlap Area Type: Intersection
Areas Included:
WMTT.P (266): FCC F(50-50) 60.00 dBu (FCC HAAT)
WMTT-FM (265): FCC F(50-50) 60.00 dBu (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 1,176
Overlap Area: 107.76 sq. km (Area determined using 0.073 km cells)

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
WMTT.P (266): FCC F(50-50) 60	135,430	2,765	0.9 %	3.9 %
WMTT-FM (265): FCC F(50-50)	108,176	1,709	1.1 %	6.3 %

Exhibit 5-C

WMTT-FM Licensed and Proposed 60dbu Service Contours

■ WMTT.P (266)

■ WMTT-FM (265)

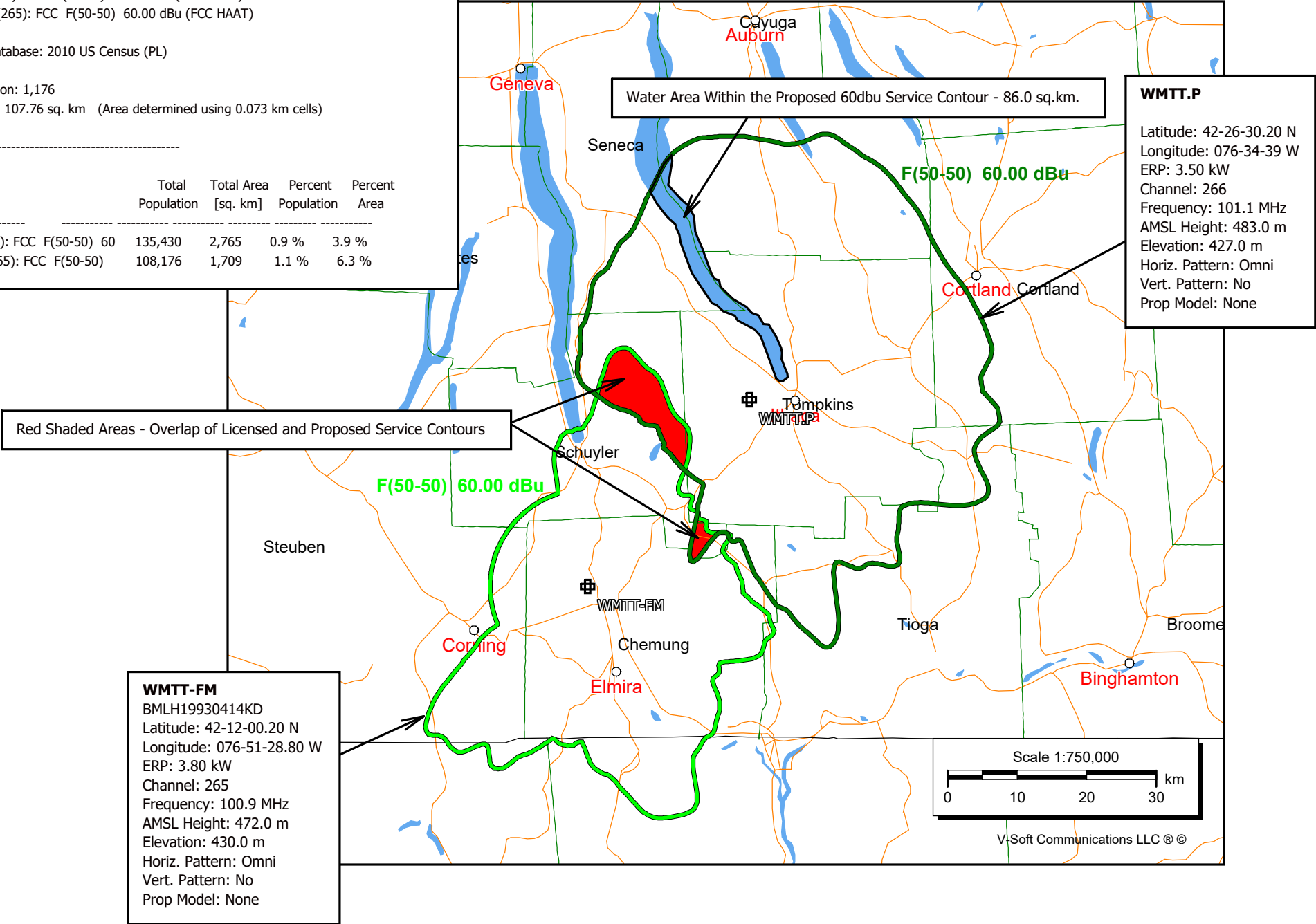
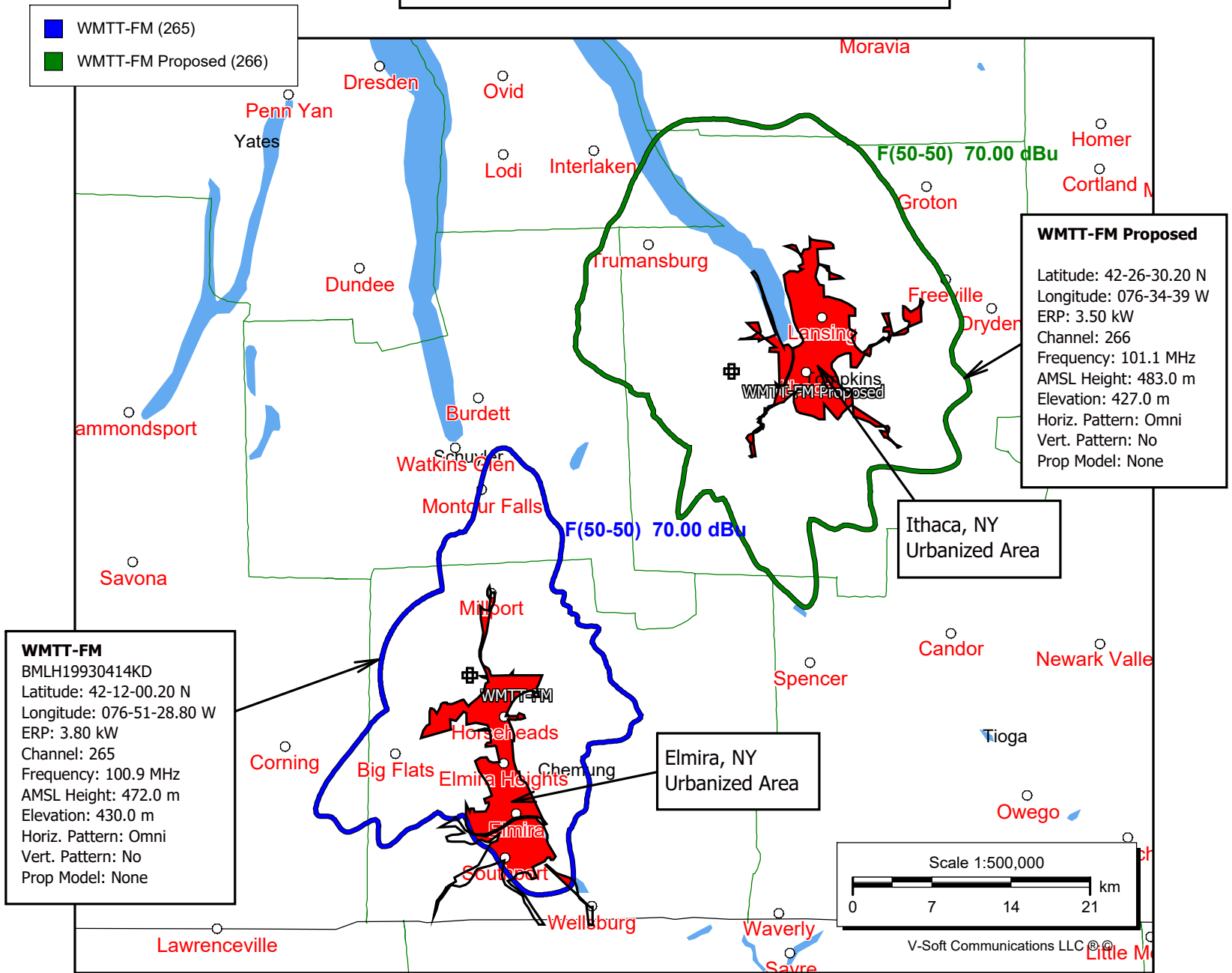


Exhibit 5-D Licensed and Proposed Urbanized Area Coverage



Service Count Report

Overlap Population Report
WMTT-FM (265) / Elmira, NY

Overlap Area Type: Intersection

Areas Included:

WMTT-FM (265): FCC F(50-50) 70.00 dBu (FCC HAAT)

PLST: Elmira, NY Urbanized Area

Population Database: 2010 US Census (PL)

Total Population: 61,928

Housing Units: 26,959

Overlap Area: 79.36 sq. km (Area determined using 0.04 km cells)

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
WMTT-FM (265): FCC F(50-50)	80,265	554.23	77.2 %	14.3 %
PLST: Elmira, NY	64,109	89.67	96.6 %	88.5 %

Service Count Report

Overlap Population Report

WMTT-FM Proposed (266) / Ithaca, NY

Overlap Area Type: Intersection

Areas Included:

WMTT-FM Proposed (266): FCC F(50-50) 70.00 dBu (FCC HAAT)

PLST: Ithaca, NY Urbanized Area

Population Database: 2010 US Census (PL)

Total Population: 53,936

Housing Units: 20,492

Overlap Area: 77.46 sq. km (Area determined using 0.051 km cells)

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
-----	-----	-----	-----	-----
WMTT-FM Proposed (266): FCC F	89,240	933	60.4 %	8.3 %
PLST: Ithaca, NY	53,936	77.46	100.0 %	100.0 %

Service Count Report

Reference Area: PLST: Enfield, NY

Contours that completely cover the reference area (11):

WMTT.P (266) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WSQG-FM (215) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WVBR-FM (228) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WFIZ (238) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WYXL (247) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WIII (260) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WQNY (279) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WMTT(AM): Imported: 2.0 mV/m
WPIE(AM): Imported: 2.0 mV/m
WNYN(AM): Imported: 2.0 mV/m
WHCU(AM): Imported: 2.0 mV/m

Contours that partially cover the reference area (7):

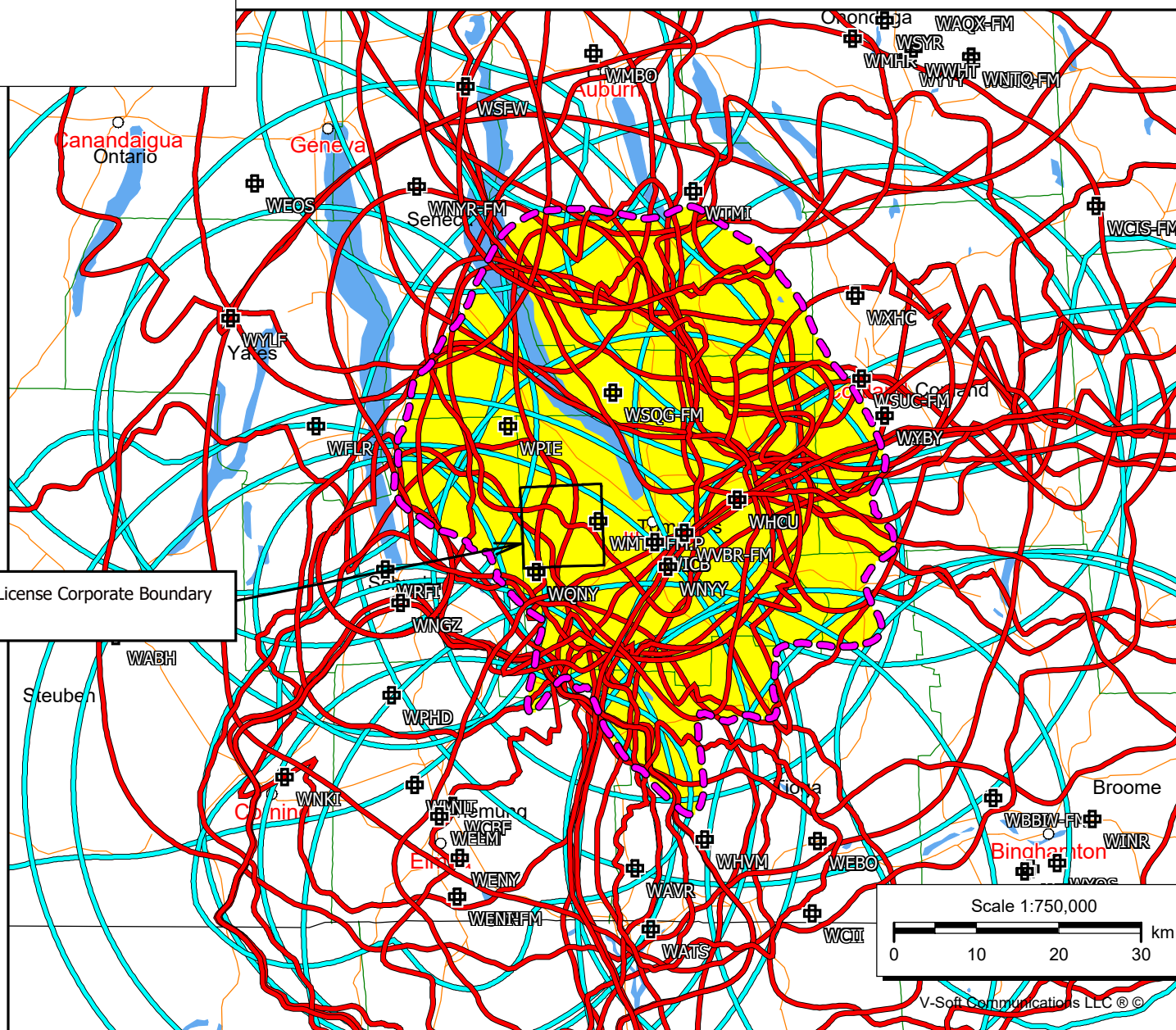
WITH (211) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WICB (219) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WPHD (285) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WNKI (291) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WFLR : Imported: 2.0 mV/m
WNGZ : Imported: 2.0 mV/m
WLNL : Imported: 2.0 mV/m

	1
	2
	3
	4
	5 or more

WMTT-FM.P

Latitude: 42-26-30.20 N
Longitude: 076-34-39 W
ERP: 3.50 kW
Channel: 265
Frequency: 100.9 MHz
AMSL Height: 483.0 m
Elevation: 427.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Proposed Community of License Corporate Boundary
Enfield, NY



V-Soft Communications LLC ® ©

Service Count Report

Service count area for WMTT 60dbu Proposed Contour Enfield, NY

Population Database: 2010 US Census (PL)

Count Area	Population	Housing Units	Area (sq. km)
-----	-----	-----	-----
1 Service	0	0	0.00
2 Service	0	0	0.00
3 Service	0	0	0.00
4 Service	0	0	0.00
5 or more	135,400	56,993	2765.82
Reference Area	135,400	56,993	2765.82

Reference Area: WMTT-FM.P (265): FCC F(50-50) 60.00 dBu (FCC HAAT)

Contours that completely cover the reference area (3):

WYXL (247) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WQNY (279) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WHCU : Imported: 2.0 mV/m

Contours that partially cover the reference area (56):

WCII (203) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WTMI (204) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WSKG-FM (207) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WEOS (208) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WITH (211) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WSUC-FM (213) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WSQG-FM (215) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WCNY-FM (217) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WICB (219) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WRFI (220) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WHVM (220) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WNTQ (226) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WVBR-FM (228) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WLVI (232) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WYYY (233) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WFIZ (238) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WAQX-FM (239) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WCBF (241) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WHWK (251) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WNYR-FM (253) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WAAL (256) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WOKN (258) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WIII (260) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WXHC (268) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WAVR (271) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WMHR (275) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WBBS (284) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WPHD (285) : FCC F(50-50) 60.00 dBu (FCC HAAT)

WCIS-FM (286) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WBNW-FM (289) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WNKI (291) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WBBI (298) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WWHT (300) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WWHT (300) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WENI-FM (224) : FCC F(50-50) 60.00 dBu (FCC HAAT)
WATS : Imported: 2.0 mV/m
WINR : Imported: 2.0 mV/m
WNBK : Imported: 2.0 mV/m
WYOS : Imported: 2.0 mV/m
WSYR : Imported: 2.0 mV/m
WMTT : Imported: 2.0 mV/m
WFLR : Imported: 2.0 mV/m
WEHH : Imported: 2.0 mV/m
WNGZ : Imported: 2.0 mV/m
WEBO : Imported: 2.0 mV/m
WPIE : Imported: 2.0 mV/m
WNYX : Imported: 2.0 mV/m
WLNL : Imported: 2.0 mV/m
WELM : Imported: 2.0 mV/m
WMBO : Imported: 2.0 mV/m
WENY : Imported: 2.0 mV/m
WSFW : Imported: 2.0 mV/m
WYBY : Imported: 2.0 mV/m
WYLF : Imported: 2.0 mV/m
WABH : Imported: 2.0 mV/m
WHEN : Imported: 2.0 mV/m

Enfield, NY

Enfield, NY is a *bona fide* community for allotment purposes. Enfield is a township with a 2010 census population of 3,512. Enfield continues to maintain relevant municipal, residential, social and business characteristics.

Enfield has its own elected government which includes a Town Supervisor and four Town Council Members. Enfield has a Town Clerk and two Town Justices. Enfield has its own highway department with a Highway Superintendent. Enfield maintains offices at its own Town Hall. Enfield also has a planning board and code enforcement officer.

Enfield has its own volunteer fire department, The Enfield Fire Company.

Enfield is home to three houses of worship including Agape Bible Church, Enfield United Methodist Church, and First Baptist Church of Enfield.

The Enfield Elementary School serves the local community of Enfield.

Enfield has numerous businesses and commercial establishments within its borders, such as Dandy Mart, Johnny's Wholesale, Dollar General Store, Newharts Lodge, Sapsquatch Maple Syrup, Ryan's Veggies, and Snug Planet.

The Robert H Treman State Park is located within Enfield and is a popular destination for residents and tourists alike. The Hillendale Golf Course is located in Enfield.

Enfield, NY is indeed an established place of business, government, and residential opportunity.

For more information on the town of Enfield visit: <http://townofenfield.org>