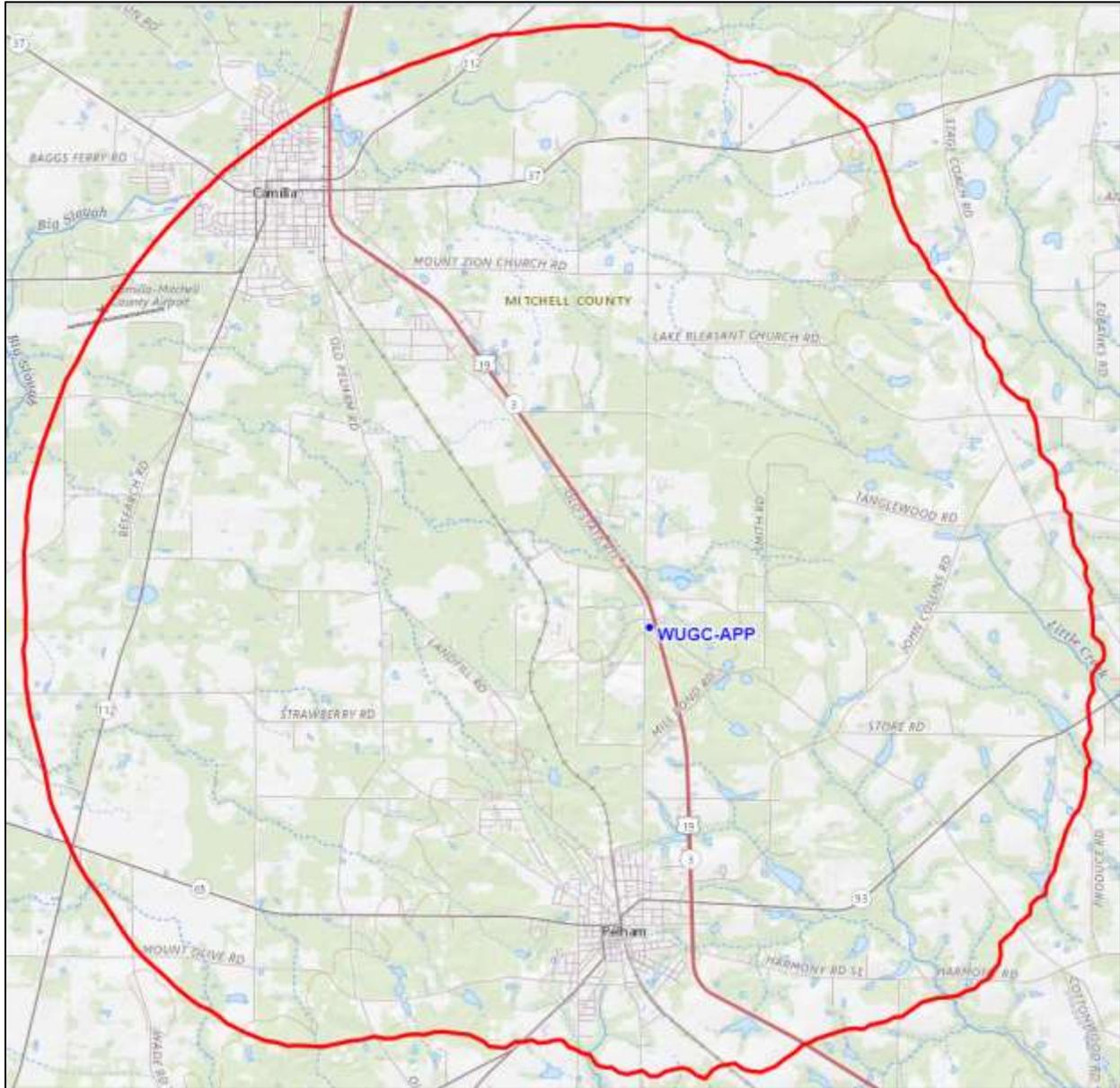




REC Networks/Michelle Bradley, CBT
 11541 Riverton Wharf Rd.
 Mardela Springs, MD 21837
 844.REC.LPFM/202.621.2355
 recnet.com

Original Construction Permit
PELHAM, GA
MITCHELL COUNTY PUBLIC RADIO, LLC

PROPOSED 60dBu F(50,50) SERVICE CONTOUR



PELHAM, GA – Channel 215A (90.9 MHz) ~ ERP 0.086 kW ~ Service Contour: 8.657 km
 Elev: 73.7 meters ~ RCAGL: 76 meters ~ RCAMSL: 149.7 meters ~ HAAT: 76 meters
 Overall tower height: 94.5 meters – ASR: 1258391
 NAD83 Latitude: 31° 10' 10.0" NL – Longitude: 84° 08' 50.0" WL
 NAD27 Latitude: 31° 10' 09.3" NL – Longitude: 84° 08' 50.4" WL

COMPREHENSIVE EXHIBIT – PELHAM, GA

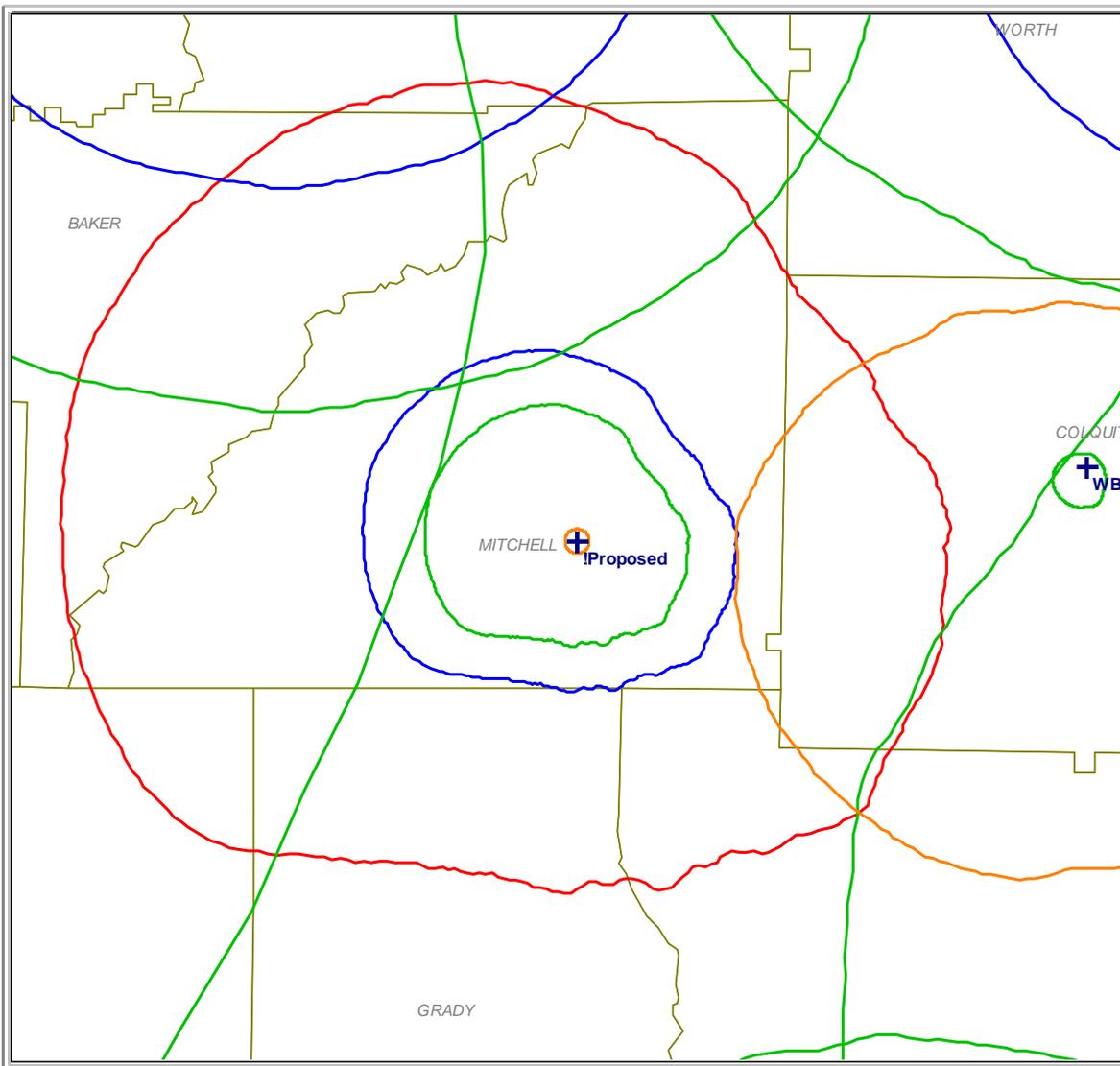
Mitchell County Public Radio, LLC
NEW(FM) – Pelham, Georgia
Channel 215A – 90.9 MHz

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ComStudy 2.2 search of channel 215 (90.9 MHz Class A) at 31-10-09.3 N, 84-08-50.4 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
WJWV	FORT GAINES	GA	215	C1	96.71	200.00	300.3	0.00 dB
WWQA	ALBANY	GA	214	A	56.30	72.00	339.7	1.02 dB
WVVS-FM	VALDOSTA	GA	215	A	94.00	115.00	112.2	4.28 dB
WBGF	MOULTRIE	GA	217	A	34.72	31.00	81.5	6.49 dB
WABR	TIFTON	GA	216	C2	68.75	106.00	58.4	9.83 dB
WUJC	ST. MARKS	FL	216	C1	77.16	133.00	160.0	11.48 dB
WAEF	CORDELE	GA	212	C2	64.42	55.00	35.7	13.25 dB
WFSQ	TALLAHASSEE	FL	218	C1	100.22	75.00	206.3	14.84 dB
WFSL	THOMASVILLE	GA	214	A	40.09	72.00	156.9	15.31 dB
WGLA	NASHVILLE	GA	213	C3	71.85	42.00	92.6	16.31 dB
WKGC-FM	PANAMA CITY	FL	214	C1	174.38	133.00	236.5	16.86 dB
WJKV	JACKSONVILLE	FL	215	C2	266.49	166.00	111.2	21.46 dB
WOWB	BREWTON	AL	215	C1	276.67	200.00	273.9	21.61 dB
WGLA	NASHVILLE	GA	213	C2	73.70	55.00	90.8	22.15 dB
WOAK	LA GRANGE	GA	215	A	214.36	115.00	338.6	25.48 dB
WHMF	MARIANNA	FL	216	A	109.77	72.00	245.2	26.48 dB
WJEP	CUSSETA	GA	216	A	118.92	72.00	334.6	28.27 dB
WVAS	MONTGOMERY	AL	214	C1	242.86	133.00	303.8	29.96 dB
WDYF	DOTHAN	AL	212	C2	139.61	55.00	277.5	33.45 dB
WJTG	FORT VALLEY	GA	217	C1	170.83	75.00	8.9	34.59 dB
WMVV	GRIFFIN	GA	214	C2	244.04	106.00	0.3	35.21 dB
WAQV	CRYSTAL RIVER	FL	215	A	288.04	115.00	145.1	35.92 dB
WANM	TALLAHASSEE	FL	213	A	83.07	31.00	189.5	37.58 dB
WDYF	DOTHAN	AL	212	C2	139.61	55.00	277.5	38.28 dB
WKCC	COLUMBUS	GA	213	C3	159.42	42.00	331.8	39.68 dB
WSVH	SAVANNAH	GA	216	C0	263.23	152.00	64.9	39.04 dB
WEGL	AUBURN	AL	216	A	203.74	72.00	321.6	39.28 dB

Contour Protection §73.509(a)

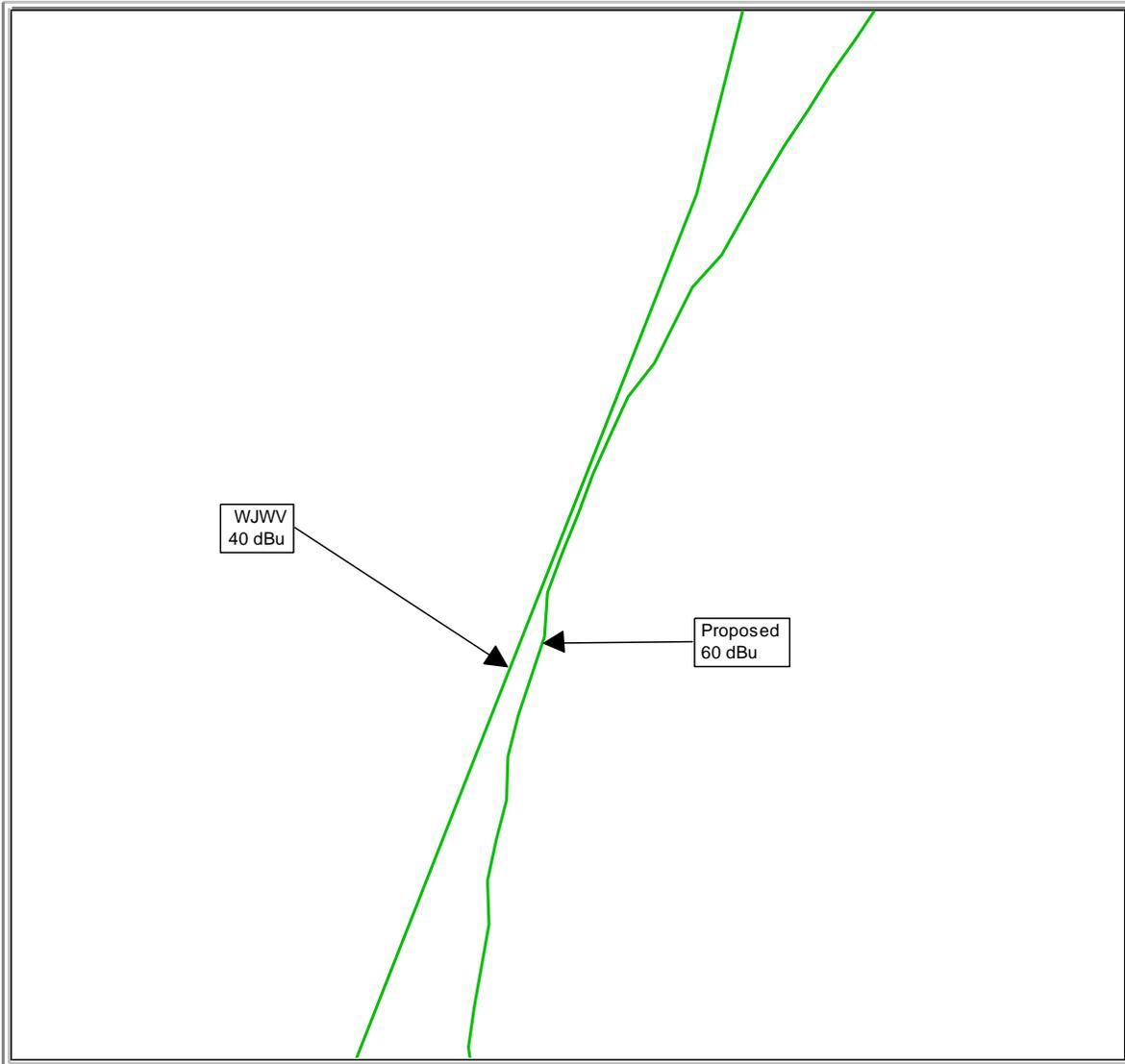


Pelham, GA - Channel 215

Map Scale: 1:389402 1 cm = 3.89 km V/H Size: 72.13 x 74.63 km

- GREEN: Incumbent interfering contour into Proposed 60 dBu service contour.
- RED: Proposed 40 dBu interfering contour into Incumbent 60 dBu service contour (co-channel)
- BLUE: Proposed 54 dBu interfering contour into Incumbent 60 dBu service contour (first-adjacent)
- ORANGE: Proposed 100 dBu interfering contour into Incumbent 60 dBu service contour (second/third-adjacent)

Contour Protection §73.509(a) - vs. WJVV



Pelham, GA - Channel 215

TV CHANNEL 6 PROTECTION STUDY

NEW(FM) – Pelham, GA
Channel 215A – 90.9 MHz

As the proposed facility is within the 246-kilometer radius of TV Channel 6 station WABW-TV, Pelham, Georgia, pursuant to §73.525(a) of the Commission's Rules, we must evaluate the protection that the proposed facility will provide to WABW-TV. There are no other TV Channel 6 stations within 246 kilometers of the proposed facility.

We will evaluate WABW-TV based on the following facility licensed on 0000016505:

Latitude (NAD83);	31-08-08.7 N
Longitude (NAD83):	84-06-15.7 W
ERP:	10.5 kW
RCAMSL:	460.5 m
Antenna:	Nondirectional

WABW-TV places a 100 dBu service contour at the proposed site.

In accordance with the charts in §73.599, proposed NCE stations that receive more than a 90 dBu field strength are treated as 90 dBu. In the instant case, the proposed facility will be considered to have an interfering contour of 91.9 dBu (based on a 1.9 dB undesired to desired (U/D) ratio). Based on 2010 Census Block centroid data, the total population within the proposed 91.9 dBu predicted interference area is 91 persons.

2010 Census Block Centroid data for target facility (91.9 dBu interfering contour):

Population: 91 persons
Land Area: 7.57 square kilometers

This satisfies the requirement of §73.525(c), which requires FM stations operating inside of the Grade B (47 dBu) contour of Channel 6 stations to demonstrate a predicted interference area of 3,000 persons or less. As no portion of the 91.9 dBu contour is outside of the Grade A contour of WABW-TV, a 6 dBu adjustment, pursuant to §73.525(e)(1)(iii) is not required.

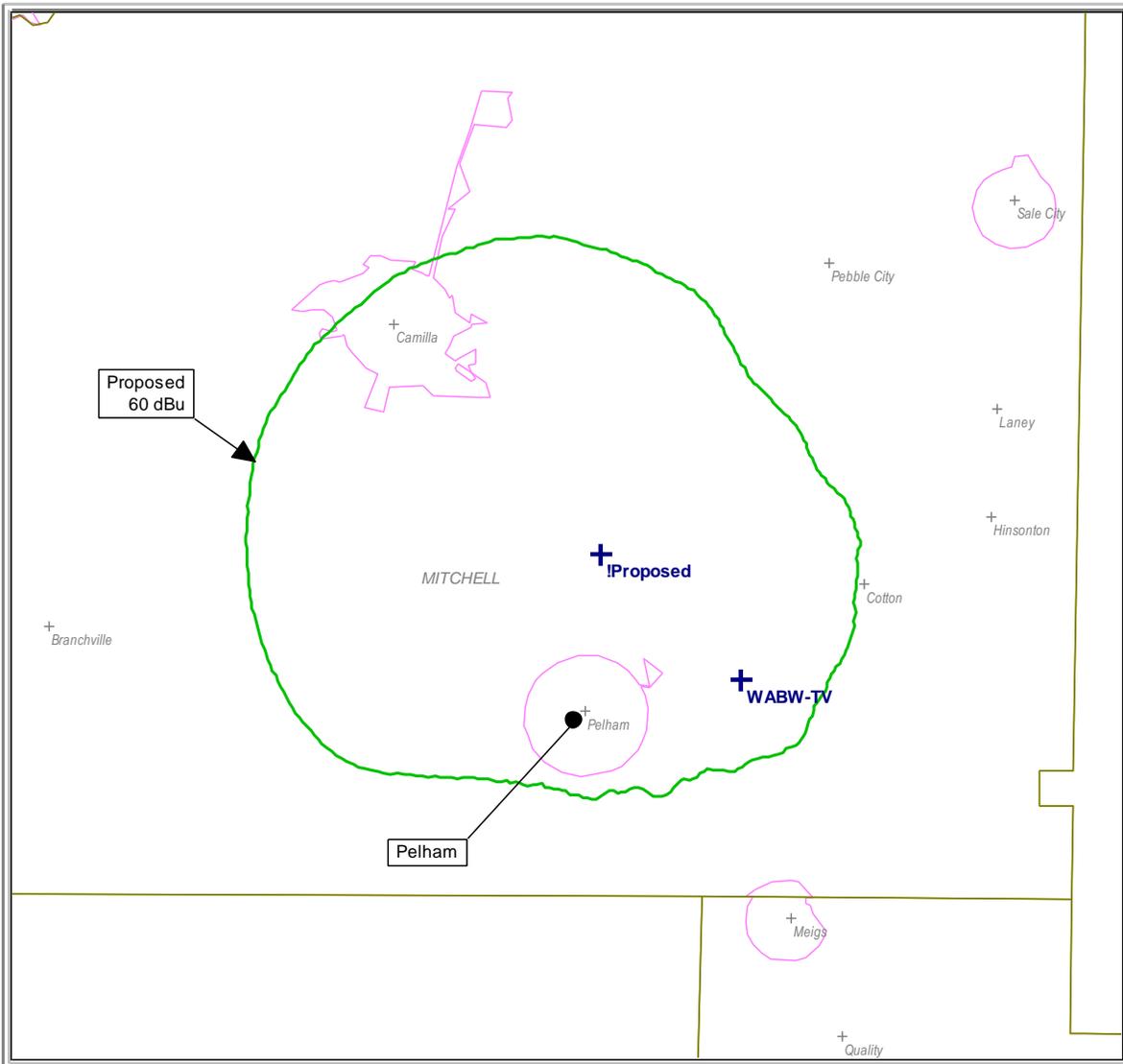
In the instant case, the proposed facility is able to demonstrate that, while within the Grade A contour of WABW-TV, the potential interference area is less than 3,000 persons and therefore the proposed application satisfies §73.525 of the Commission's Rules.

Prepared by,

/S/
Michelle Bradley, CBT
REC Networks

September 7, 2021

Service Contour Showing - §73.515



Pelham, GA - Channel 215

Map Scale: 1:167102 1 cm = 1.67 km V/H Size: 30.95 x 32.03 km

Proposed facility places a 60 dBu contour over 100 percent of the community of license.

POPULATION AND LAND AREA STUDY
§307(b) FAIR DISTRIBUTION SHOWING

NEW(FM) – Pelham, Georgia
Channel 215A – 90.9 MHz

PROPOSED FACILITY CLAIMING SECOND EDUCATIONAL SERVICE PRIORITY
BASED ON 7,255 PERSONS (56.0%) AND 113.04 SQ KM LAND AREA (53.1%)

2010 Census Block Centroid data for target facility:

Population: 12946 persons

Land Area: 212.99 square kilometers

Overlapping facilities considered:

WAYT - File No. BLED-20120827ACZ

Overlapping population: 5691 persons

Overlapping land area: 99.95 square kilometers.

WFSU-FM - File No. BLED-19950120KD

Overlapping population: 12946 persons

Overlapping land area: 212.99 square kilometers.

WBJY - File No. BLED-20020305AAP

Overlapping population: 0 persons

Overlapping land area: 0.00 square kilometers.

First Educational Service:

Population: 0 persons

Land area: 0.00 square kilometers

Second Educational Service:

Population: 7255 persons

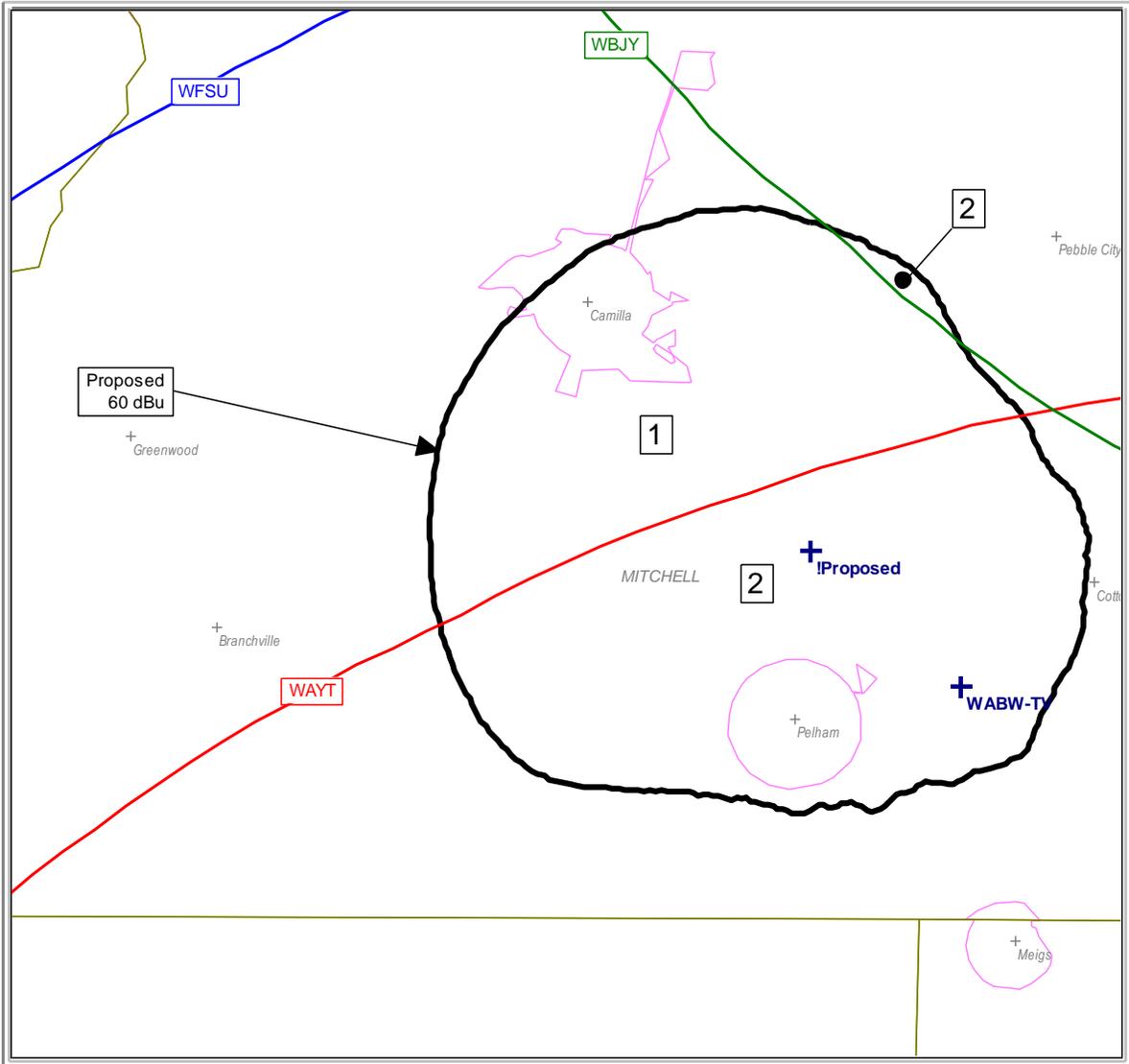
Land area: 113.04 square kilometers

At Least Third Educational Service:

Population: 5691 persons

Land area: 99.95 square kilometers

Current Educational Services



Pelham, GA - Channel 215

NON-COMMERCIAL EDUCATIONAL QUALIFICATION

NEW(FM) – Pelham, Georgia
Channel 215A – 90.9 MHz

Applicant was determined qualified to be a noncommercial educational broadcast by virtue of the grant of original construction permit application BNPL-20131028ARX on January 28, 2014. Applicant organization has a local establishment date of November 30, 2013.

LPFM ATTRIBUTABLE INTEREST DIVESTITURE

Applicant is currently the licensee of Low Power FM (LPFM) station WUGC-LP, Pelham, Georgia (Facility ID No. 193585). Pursuant to §§ 73.858 and 73.860, applicant pledges to divest of WUGC-LP prior to commencing program test operations. Applicant also pledges to divest WUGC-LP for the purpose of ownership diversity in the point system.

OTHER ATTRIBUTABLE INTERESTS

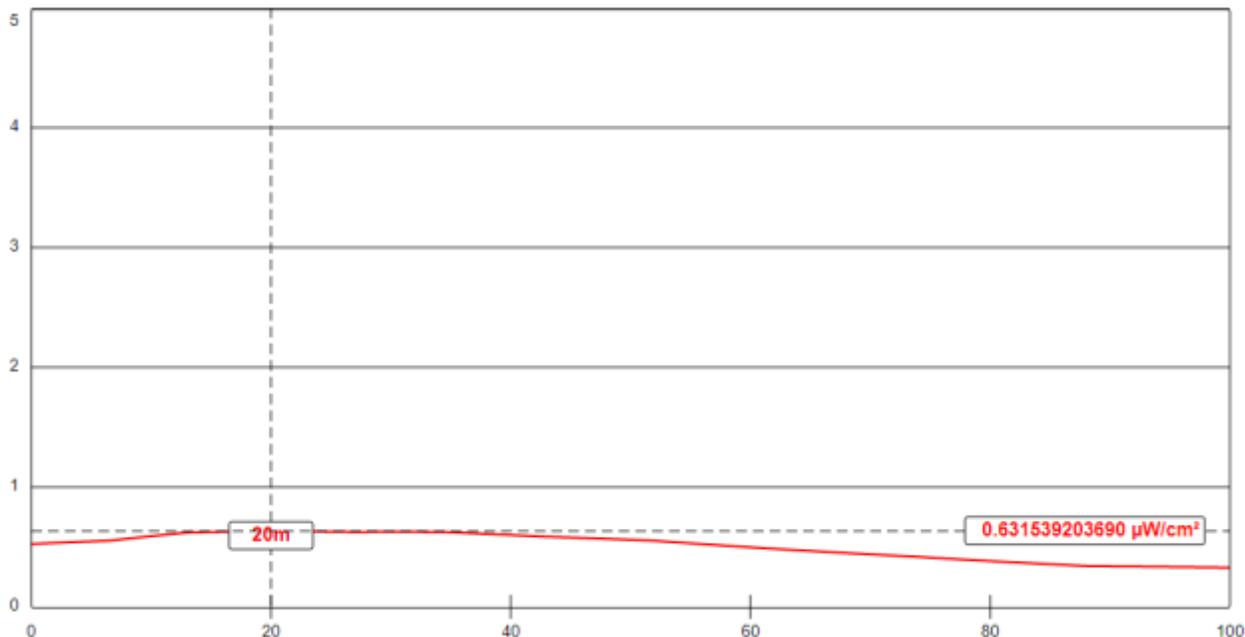
Other than WUGC-LP disclosed *supra*, applicant certifies that no parties to this application have any attributable interests in any other broadcast station, including non-fill in FM translators, either overlapping or not overlapping the 1 mV/m service contour of the proposed facility.

SITE ASSURANCE CONTACT INFORMATION

Yale Whigham
Site Owner
229 294-8755

NEPA COMPLIANCE

NEW(FM) – Pelham, Georgia
Channel 215A – 90.9 MHz



The instant application is proposed an effective radiated power of 0.086 kW vertical and 0.086 kW horizontal. Using the Commission’s FM MODEL software and a single-bay ERI 101A-1M and based on a height of 76 meters, it has been determined that the power density would be no greater than 0.632 $\mu\text{W}/\text{cm}^2$ at any point, which would met the general population/controlled exposure guideline of 200 $\mu\text{W}/\text{cm}^2$.¹

In the instant application, the applicant is certifying that the RF exposure in all occupied areas is well within the guidelines of in accordance with OET Bulletin No. 65, Edition 97-01, August 1997.

Report prepared by:

Michelle Bradley, CBT
REC Networks

September 7, 2021

¹ The only other non-exempt service on this tower commonly owned WUGC-LP. As WUGC-LP will be divested prior to program testing, the proposed station will be directly replacing the LPFM station using the same site and height already authorized to the LPFM. Therefore, WUGC-LP and the proposed station will not operate simultaneously. Even if both stations were to operate simultaneously (such as with a different owner on a combined antenna), the LPFM would only contribute 0.125 $\mu\text{W}/\text{cm}^2$ to the overall power density, for a total of 0.757 $\mu\text{W}/\text{cm}^2$, which still is well below the 200 $\mu\text{W}/\text{cm}^2$ general population/controlled exposure guideline.