Exhibit EE-1: Engineering Statement in support of

FCC FORM 2100, Schedule 349

APPLICATION FOR AUTHORITY TO CONSTRUCT OR MAKE CHANGES IN AN FM TRANSLATOR OR FM BOOSTER

STATION

(For an Existing FM Translator)

This engineering exhibit supports a minor site change for FM translator W294CR (Facility ID 203078). This application

changes location, changes height, antenna type and antenna pattern.

The proposed W294CR 100dBµ contour is within the protected contour of 3rd adjacent station, WXGL, St. Petersburg, FL

(FID# 74199). WXGL's 87dBµ contour completely encompasses the W294CR proposed 127dBµ interfering contour. A

D/U analysis shows that no interference reaches or approaches the ground nor any occupied structure or elevated roadway.

Therefore this proposal should be acceptable under 74.1204(d) and a "Living Way" waiver is hereby requested. Free space

loss calculations confirm that no interference reaches the ground.

The proposed facility is in compliance with 47 C.F.R. Section 1.1306 with regards to radio-frequency electromagnetic

exposure in that the contribution to the rf environment is less than 5% of the maximum public exposure.

This application was prepared using FCC 30-arc-second terrain data.

This translator will continue to operate as a fill-in facility for WQBN (FID # 74155), an AM radio station licensed to Temple

Terrace, Florida. The maximum ERP is limited by interference, the WQBN 2mV contour and the 250W class limit.

Attached as Figures 1, 2 and 3 are maps showing the protected contours and interfering contours of all relevant FM facilities.

The proposed facility employs a directional antenna, protecting 1st adjacent facilities W295CF and WRUB (figure 2).

Figure 4 shows the proposed 1mV service contour of this application compared with the licensed 1mV service contour.

Since there is overlap of the two conours, the instant application is a minor change.

Figure 5	shows the proposed	1mV service con	tour of this applica	tion compared	with the 2mV	service contour	of WQBN.	. The
60dBµ	conour of the propos	al is contained en	tirely within the W	QBN 2mV/m	contour.			

The proposal is sufficiently distant from all facilities mentioned in 73.1030(a), (b) & (c) so that notification under 73.1030 is not required.

Respectfully submitted

Kyle Magrill, Consultant 12 December, 2021 2805 NW 6th Street Gainesville, FL 32609 352-335-6555

Exhibits:

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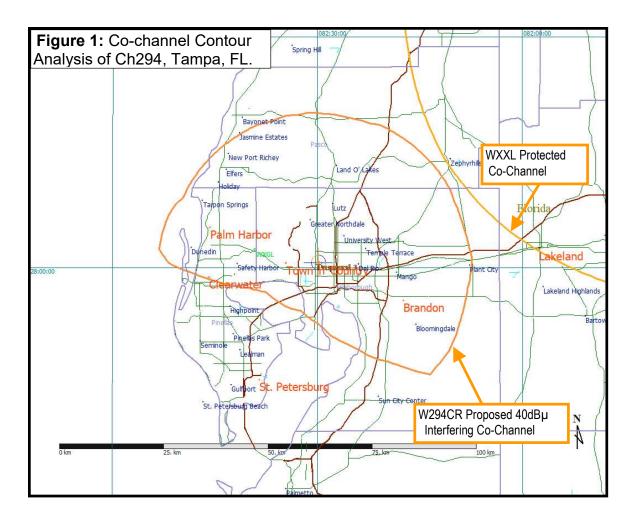


Figure 1 shows that the proposed co-channel $40dB\mu$ interfering contour does not affect WXXL. No other nearby co-channel facilities exist.

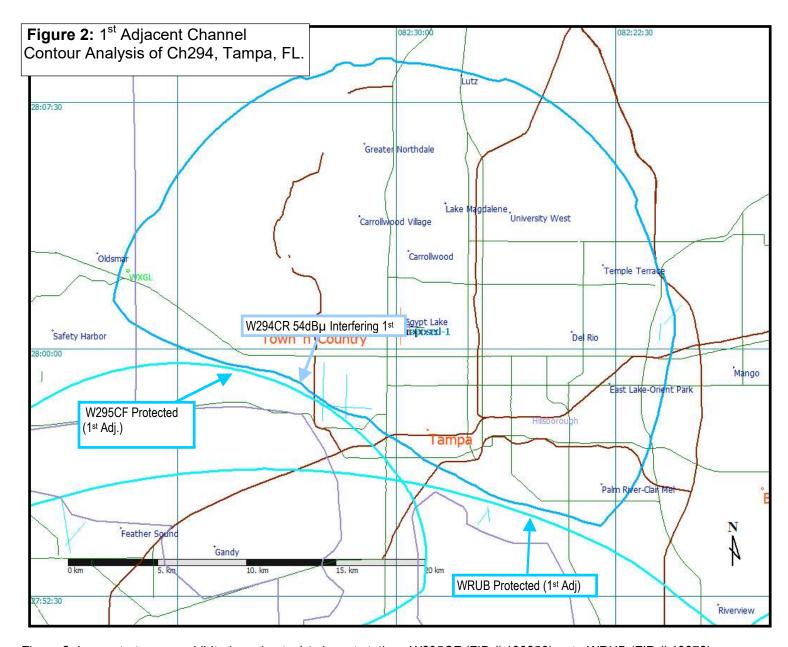
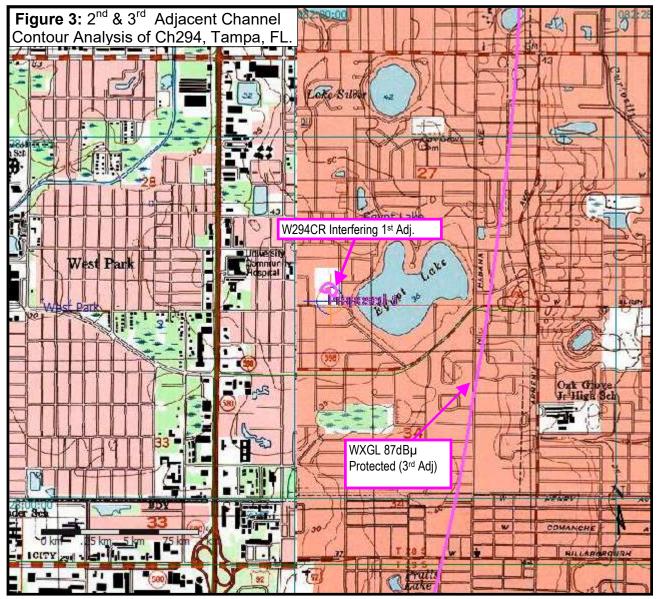
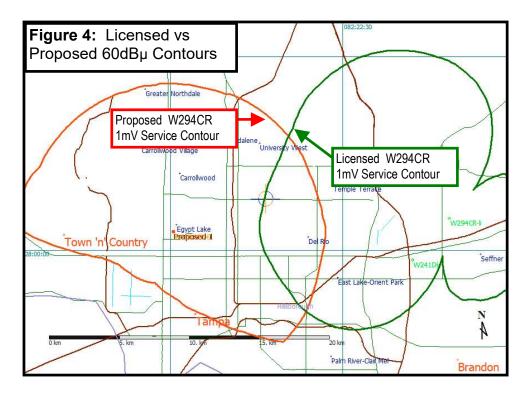
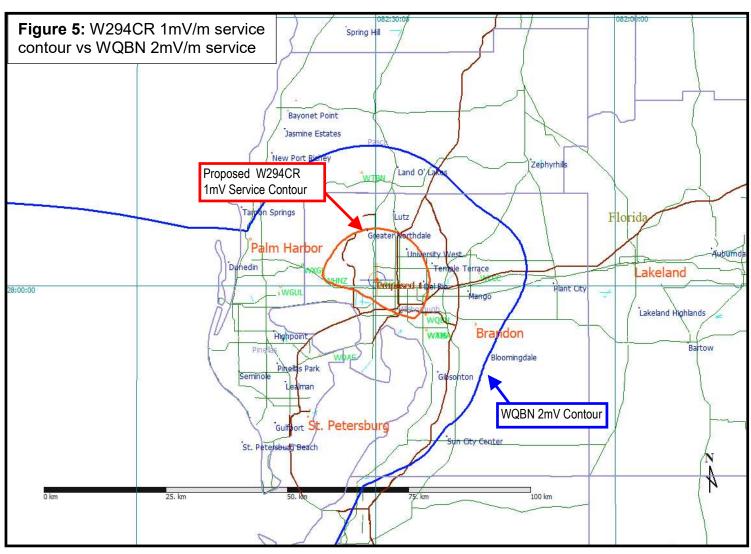


Figure 2 demonstrates no prohibited overlap to 1st ajacent stations W295CF (FID # 139253) or to WRUB (FID # 48672).



The protected contour of WXGL is $87dB\mu$. The interfering contour is $127dB\mu$. 250W ERP calculates to a field of $169.67dB\mu$ at the antenna. Using freespace loss calculations, the field at the tower base is $121.37dB\mu$ (-48.3dB loss). Therefore the interfering contour does not approach the ground. Additionally, Figure 3 above shows that the interfering contour does not extend off of the transmitter site property, thus no further analysis is necessary. No interference will occur to 3^{rd} adjacent WXGL as a result of this proposal.





Section VII Engineering Data:

Tech Box Data:

Channel: 294

Primary Station: FID: 74155

WQBN

Temple Terrace, FL

1300 kHz

Delivery Method: **Direct**

Antenna Location Coordinates: (NAD83):

28° 00' 43.1" N 82° 29' 52.3" W

Antenna Structure Registration: 1030544

Antenna Location Site Elevation Above Mean Sea Level: 13.1 meters

Overall Tower Height Above Ground Level: 71 meters

Height of Radiation Center Above Ground Level: 61 meters AGL

ERP: 0.25 kW (H)

0.25 kW (V)

Transmitting Antenna: Composite, Directional 1-bay (PSI – FML-1-DA or equiv)

Fill-in Translator: **Yes** (see EE-1, Figure 5)

Section 74.1204, 1205 YES. See EE-1, Figures 1 through 3

NEPA: No. This proposal is excluded from environmental processing: The rf exposure was modeled using "FM Model" from the FCC website using an opposed V single element antenna at a height of 59m. The modeled maximum rf near the base of the tower is under $2\mu W/cm^2$, so no further processing is required. No changes to structure, lighting, land or water are proposed. Applicant will cease radiating if workers are near the antenna.

Kyle Magrill Technical Consultant (352) 335-6555 kyle@circuitwerkes.com