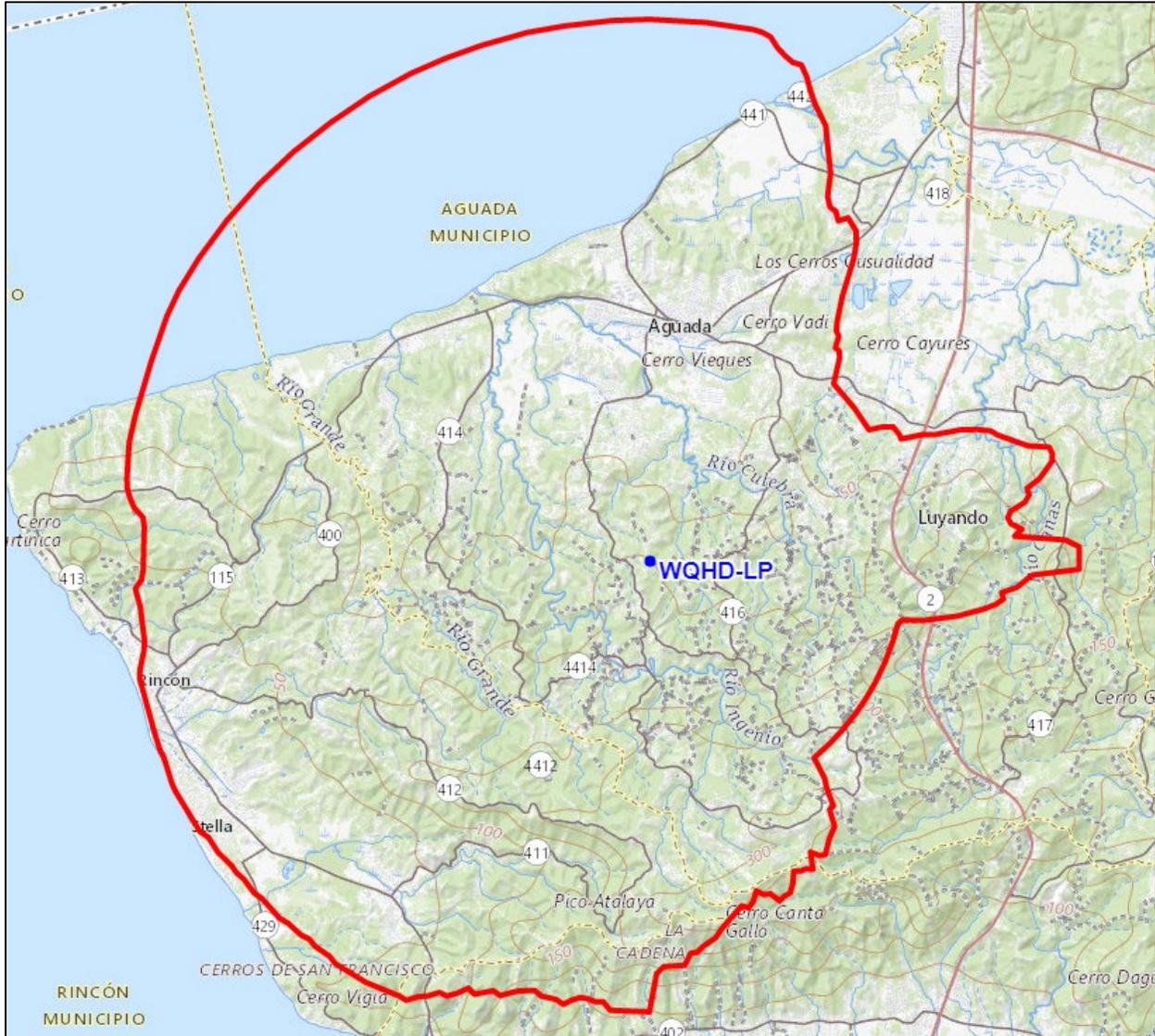




REC Networks/Michelle Bradley CBT  
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Minor change for WQHD-LP  
AGUADA-AGUADILLA, PR  
**WEST COAST BROADCASTING**  
BLL-20190226AAI

## PROPOSED 60dBu F(50,50) SERVICE CONTOUR



AGUADA-AGUADILLA, PR ~ Channel 216LP100 (91.1 MHz) ~ ERP 0.012 kW  
Elev: 123 meters ~ RCAGL: 11 meters ~ RCAMSL: 134 meters ~ HAAT: 85 meters  
Support structure: 0 meters AGL  
Overall tower height: 12 meters AGL ~ ASR: None (no airports within 5 miles)  
NAD83 Latitude: 18° 21' 8.7" NL ~ Longitude: 67° 11' 32.4" WL  
No AM facilities within 5 km of proposed location.  
Channel change only from 214LP100 to 216LP100.  
Full-service distance separation based on §73.807(b)(1) for Puerto Rico.

R E C NETWORKS  
CHANNEL REPORT

NAD83 LATITUDE: 18 - 21' 08.6" - LONGITUDE: 67 - 11' 32.3"  
CHANNEL: 216 - CLASS: LP100(PR/VI)

CHAN	FREQ	CALL	LOCATION	CLS	DIST	REQ	CLEAR	BEAR
Channel-6		W06DA-D	AGUADA	PR	31.7	89.0	-57.3	135.8
: *								
: * No change of LPFM station site location thus no increase in short-spacing.								
: * More information on Channel 6 protections in this exhibit.								
: * Decrease in interference towards W06DA-D.								
Channel-6		W06DA-D	AGUADA	PR	47.4	89.0	-41.6	106.3
: *								
: * No change of LPFM station site location thus no increase in short-spacing.								
: * More information on Channel 6 protections in this exhibit.								
: * Decrease in interference towards W06DA-D.								
213	90.5	WIDA-FM	CAROLINA	PR B	123.6	0.0	123.6	102.4
: RADIO VIDA INCORPORADO								
: * Grandparented superpower NCE station. Protected as Class C0.								
214	90.7	WQHD-LP	AGUADA-AGUADILLA	PR L1	0.0	0.0	0.0	321.6
: WEST COAST BROADCASTING								
: Currently licensed facility.								
215	90.9	WLYM-LP	MAYAGUEZ- ANASCO	PR L1	18.9	14.0	4.9	172.2
: FEEDING HOMELESS CORP.								
217	91.3	WIPR-FM	SAN JUAN	PR B	123.7	123.0	0.7	102.4
: PUERTO RICO PUBLIC BROADCASTING CORPORATION								
: * Grandparented superpower NCE station. Normally protected as Class C at 120 km,								
: * however Class B Puerto Rico minimum distance is 123 km. Proposed facility meets								
: distance separation of both the non-PR/VI Class C distance and the PR/VI								
: class B distance.								
219	91.7	WNNV	SAN GERMAN	PR A	35.1	0.0	35.1	154.3
: SIEMBRA FERTIL P.R., INC.								
: * Does not meet third adjacent channel spacing under LCRA Sect 7.								
219	91.7	WZCA	QUEBRADILLAS	PR A	30.2	0.0	30.2	60.4
: LA GIGANTE SIEMBRA INC.								
: * Does not meet third adjacent channel spacing under LCRA Sect 7.								

## **CHANNEL 6 SHORT-SPACING**

WQHD-LP  
Aguada-Aguadilla, Puerto Rico  
Channel 216LP100(PR) ~ 91.1 MHz

Currently operating on Channel Channel 214LP100(PR), WOHD-LP is short-spaced to Low Power TV (LPTV) station W06DA-D, Aguada, Puerto Rico. Pursuant to §73.825, the minimum distance separation is 90 kilometers.

On Channel 216LP100(PR), the minimum distance requirement is 89 kilometers.

Using accepted engineering standards in §74.1205 of the Commission's Rules, WQHD-LP on Channel 214 did not create any interference to W06DA-D due to a lack of overlap between the 77 dBu interfering F(50,10) contour of WQHD-LP and the 47 dBu service F(50,50) contour of W06DA-D. On December 30, 2021, a subsequent construction permit (0000177742) was granted to W06DA-D to change location and convert to a nondirectional antenna. This change has resulted in overlap.

As a result of the proposed channel change, the interfering contour requirement for WOHD-LP will reduce in size from a 77 dBu to an 80 dBu interfering F(50,10) contour. Thus as a result, there will be a reduction in "interference" towards the W06DA-D CP facility.

As the minimum distance separation for Channel 216 is 89 kilometers where the minimum distance separation for Channel 214 is 90 kilometers and considering that the WQHD-LP antenna location is not changing, short spacing is *decreasing*.

While in my opinion, this change can be done without a waiver since the proposal does not increase short-spacing to W06DA-D. If necessary to prosecute this application, a waiver of §73.825 is requested, pursuant to the *LPFM Tech Order*.<sup>1</sup>

Pursuant to the *LPFM Tech Order*, notification will be provided via email to W06DA-D owner, John C. Matos Barreto and Aron Shainis, counsel for W06DA-D.

Respectfully submitted,

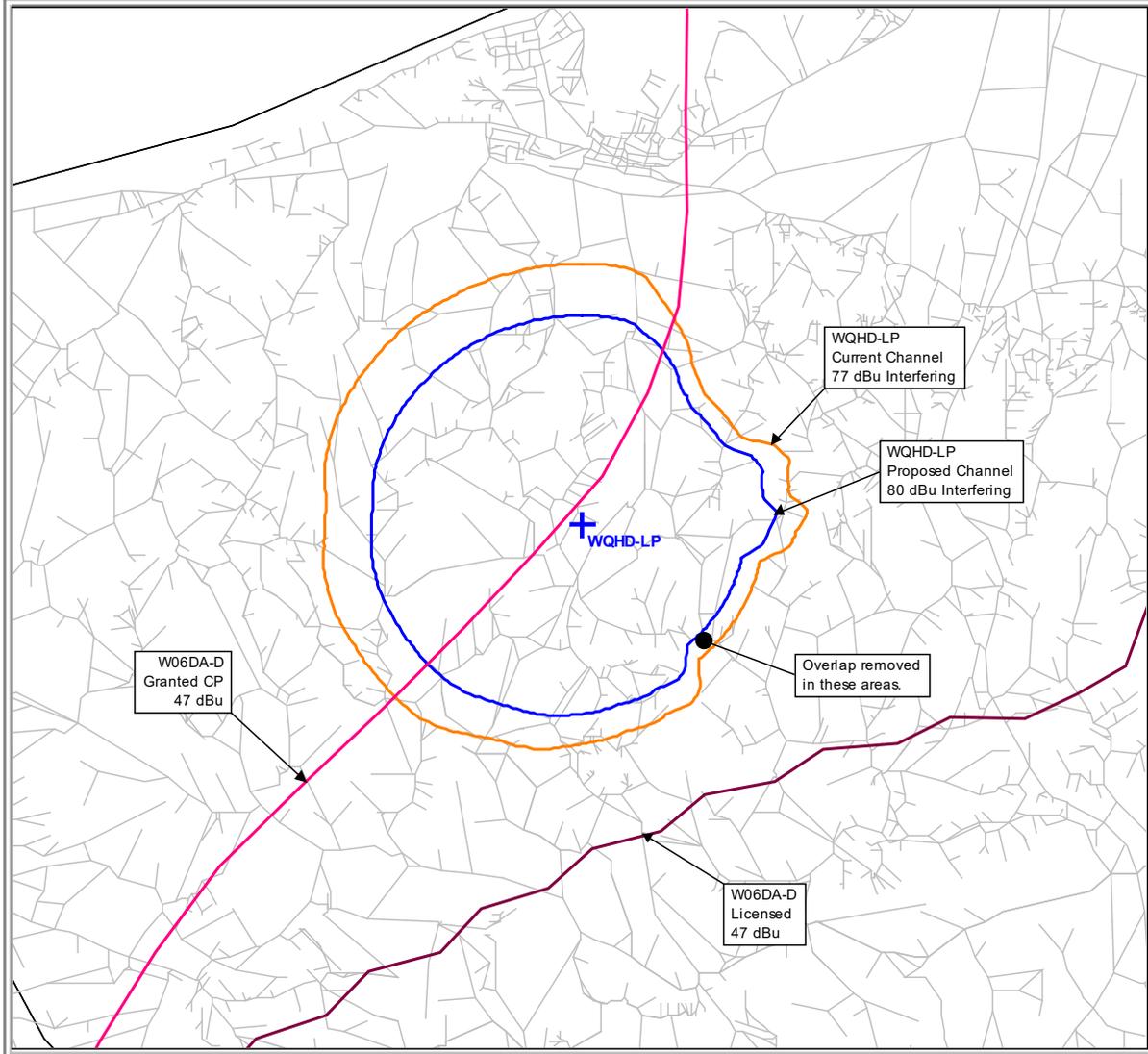
/S/  
Michelle Bradley, CBT  
REC Networks

January 24, 2023

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<sup>1</sup> *Amendments of Parts 73 and 74 to Improve the Low Power FM Radio Service Technical Rules, Report and Order*, 35 FCC Rcd. 4115, 4126-4127 (2020) ("LPFM Tech Order").

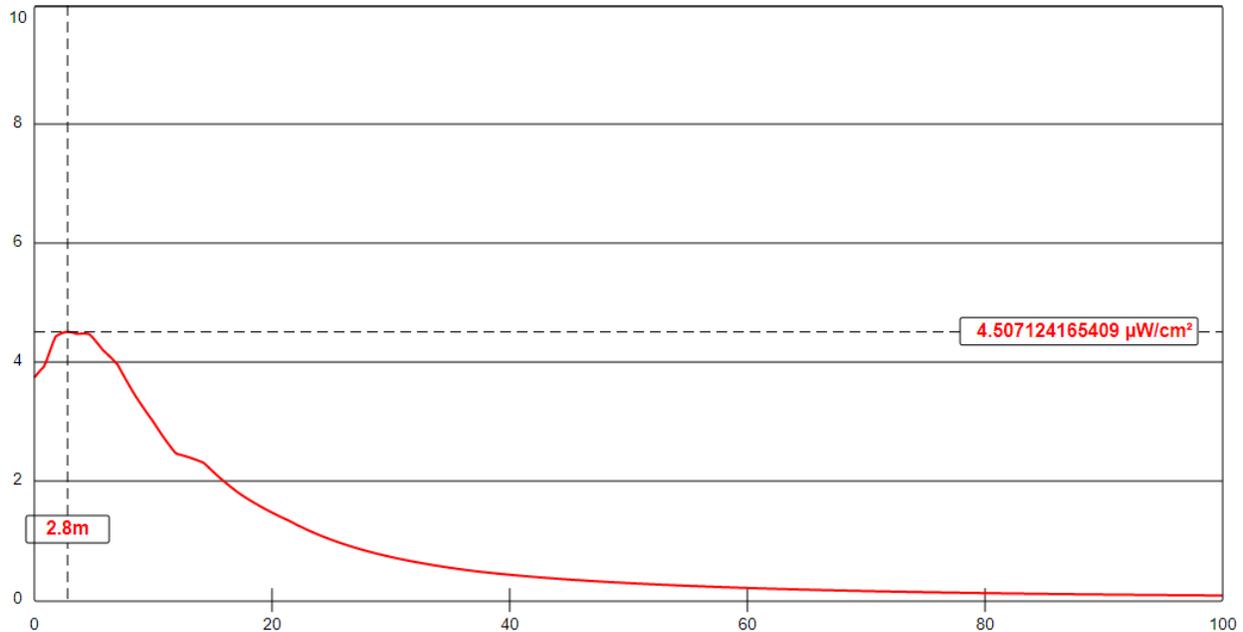
### WQHD-LP - Channel 6 Showing §73.825/§74.1205



## NEPA COMPLIANCE

WQHD-LP  
Aguada-Aguadilla, Puerto Rico  
Channel 216LP100(PR) ~ 91.1 MHz

Using the Commission's FM MODEL tool, we have determined the peak power density from the tower with all proposed facilities to be as follows:



Power density is based on a type EPA-1 antenna with 1 section at 11 meters above ground level.

There are no other non-exempt services on the tower structure.

Based on this study, we can conclude that the maximum power density for this tower reaches 4.507  $\mu\text{W}/\text{cm}^2$  at 2.8 meters from the tower base.

Therefore, it has been determined that there is no point that will exceed the general population/controlled exposure guideline of 200  $\mu\text{W}/\text{cm}^2$ .

Prepared by,

/S/  
Michelle Bradley, CBT  
REC Networks

January 24, 2023