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**Iglesia Cristo Salva**  
**Displacement Request**  
**Chattanooga, TN**

This statement is being prepared on behalf of Iglesia Cristo Salva in support of the minor change to the licensed facility of WTCS-LP (Facility ID 194668, Chattanooga, TN,) to show a reduction in interference under the provisions of §73.870(a)(1). The instant application is proposing a change in channel from channel 259 to channel 220 and a change in antenna location coordinates.

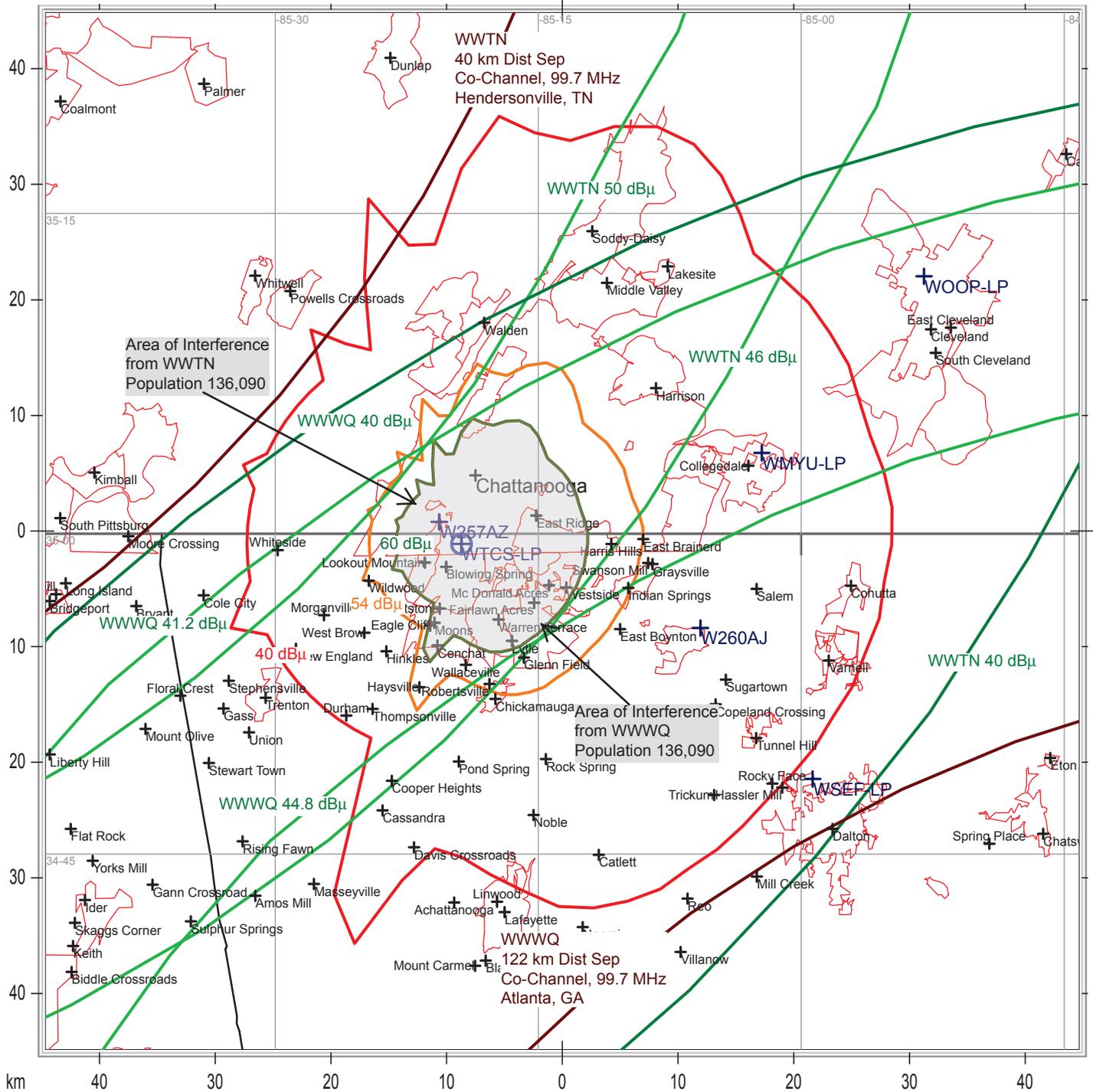
The current license for WTCS-LP is operating on channel 259, which is a co-channel to the licensed primary WWTN (Facility ID 31476, Hendersonville, TN) and the licensed primary WWWQ (Facility ID 73345, Atlanta, GA). While the current license for WTCS-LP meets the LPFM distance separation requirements for WWTN and WWWQ, the predicted 60 dbu contour of WTCS-LP overlaps the 40 dbu contour of both WWTN and WWWQ. Under §73.809 of the Commission's Rules, an authorized LPFM will not be permitted to continue to operate if it causes interference to the transmission of any authorized full service FM station. Therefore, since the 60 dbu contour of WAUF-LP is overlapping the 40 dbu contour of WWTN and WWWQ, and 136,090 people reside within the contour overlap area, actual interference is present to both WWTN and WWWQ. A channel study was conducted, and it was determined there are no clear adjacent or I.F. channels to which the station can move.

§73.870(a)(1) of the Commission's Rules state that "Changes in frequency to adjacent or IF frequencies or, upon a technical showing of reduced interference, to any frequency". The Proposed channel change to 220 reduces interference caused to both WWTN and WWWQ by removing WTCS-LP from their interfering contours. The Proposed WTCS-LP modification to 91.9 (Channel 220) would be inside of the 40 dBu of WUOT (Facility ID 69161, Knoxville, TN). While this proposal for WTCS-LP meets the LPFM distance separation requirements for WUOT, the predicted WTCS-LP 60 dbu contour would overlap the 40 dbu contour of WUOT. New interference received from WUOT would be 85,544 for a reduction of interference of 50,546 people.

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A waiver of Section §73.870 of the Commission's Rules is requested to permit a minor change application for WTCS-LP to a non-adjacent channel due to the showing of reduction of interference. The FCC has previously ruled in favor of this waiver for Core Radio Ministries Inc. Minor Change Application, BPL-20160201AEW. Therefore, Iglesia Cristo Salva respectfully requests a change to a non-adjacent channel in the instant application. The public interest will be served by the continuation of service from WTCS-LP that the public has come to rely on and expect.

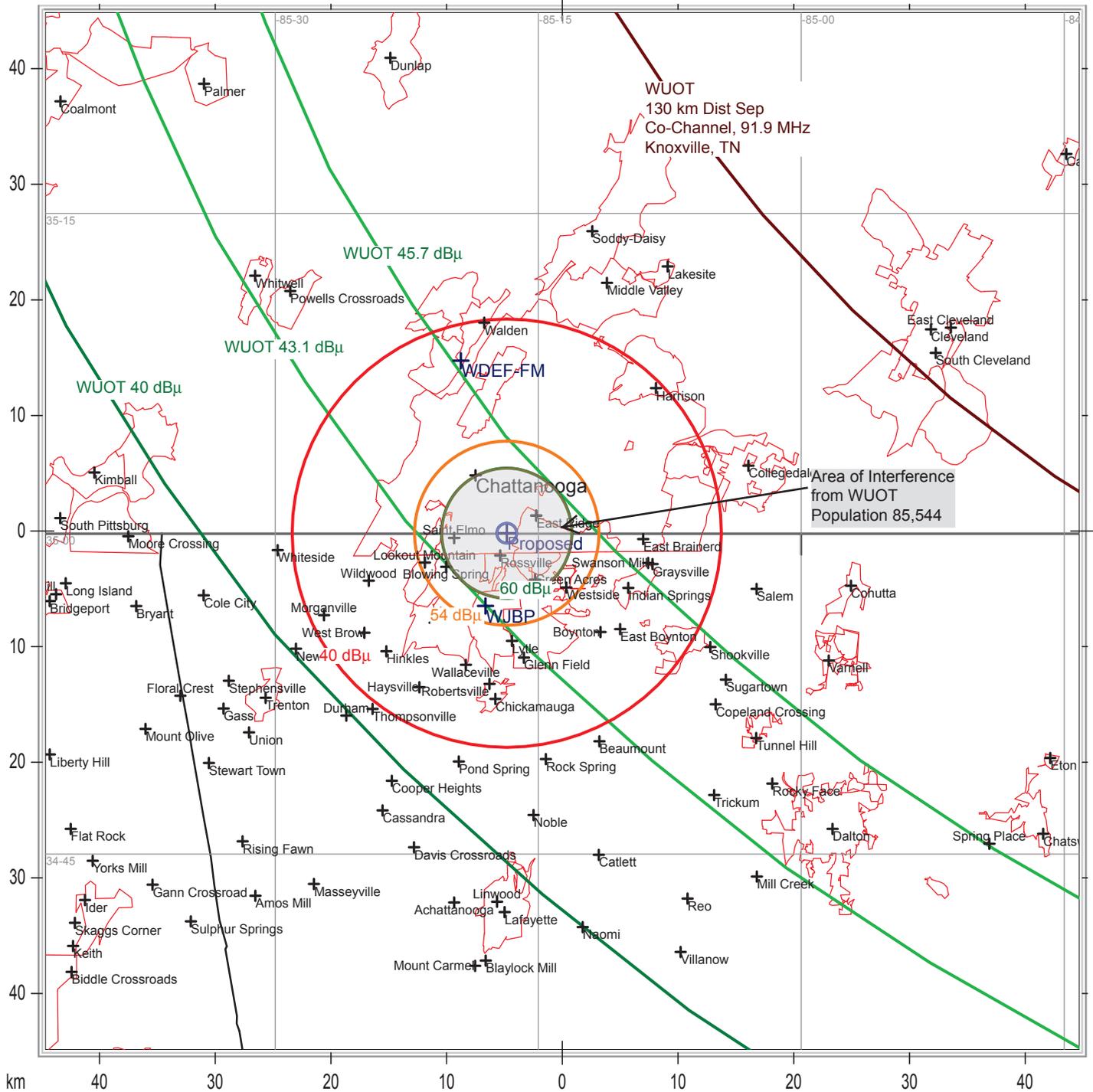
Allocation Study - Received Interference - 99.7 MHz (Channel 259)



Iglesia Cristo Salva  
Interference Study 99.7 MHz  
Chattanooga, TN

State Borders    City Borders    Lat/Lon Grid

Allocation Study - Received Interference - 91.9 MHz (Channel 220)



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Interference Study 91.9 MHz  
Chattanooga, TN**

— State Borders    — City Borders    — Lat/Lon Grid