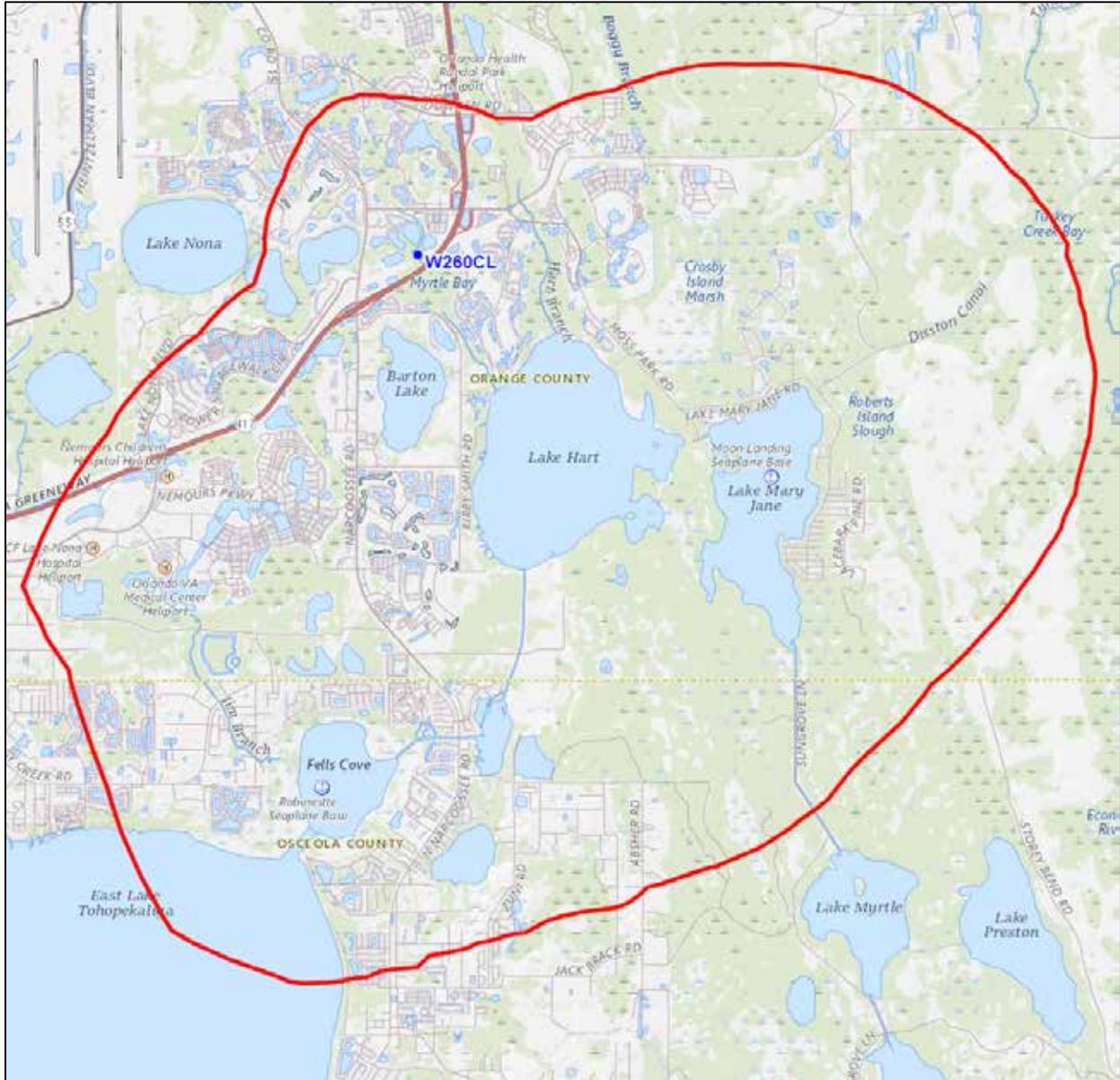




REC Networks/Michelle Bradley CBT
11541 Riverton Wharf Rd.
Mardela Springs, MD 21837
844.REC.LPFM/202.621.2355
recnet.com

Minor change for W260CL
COCOA, FL / ORLANDO, FL
BLACK MEDIA WORKS, INC.
BLFT-20161028ACD

PROPOSED 60dBu F(50,50) SERVICE CONTOUR

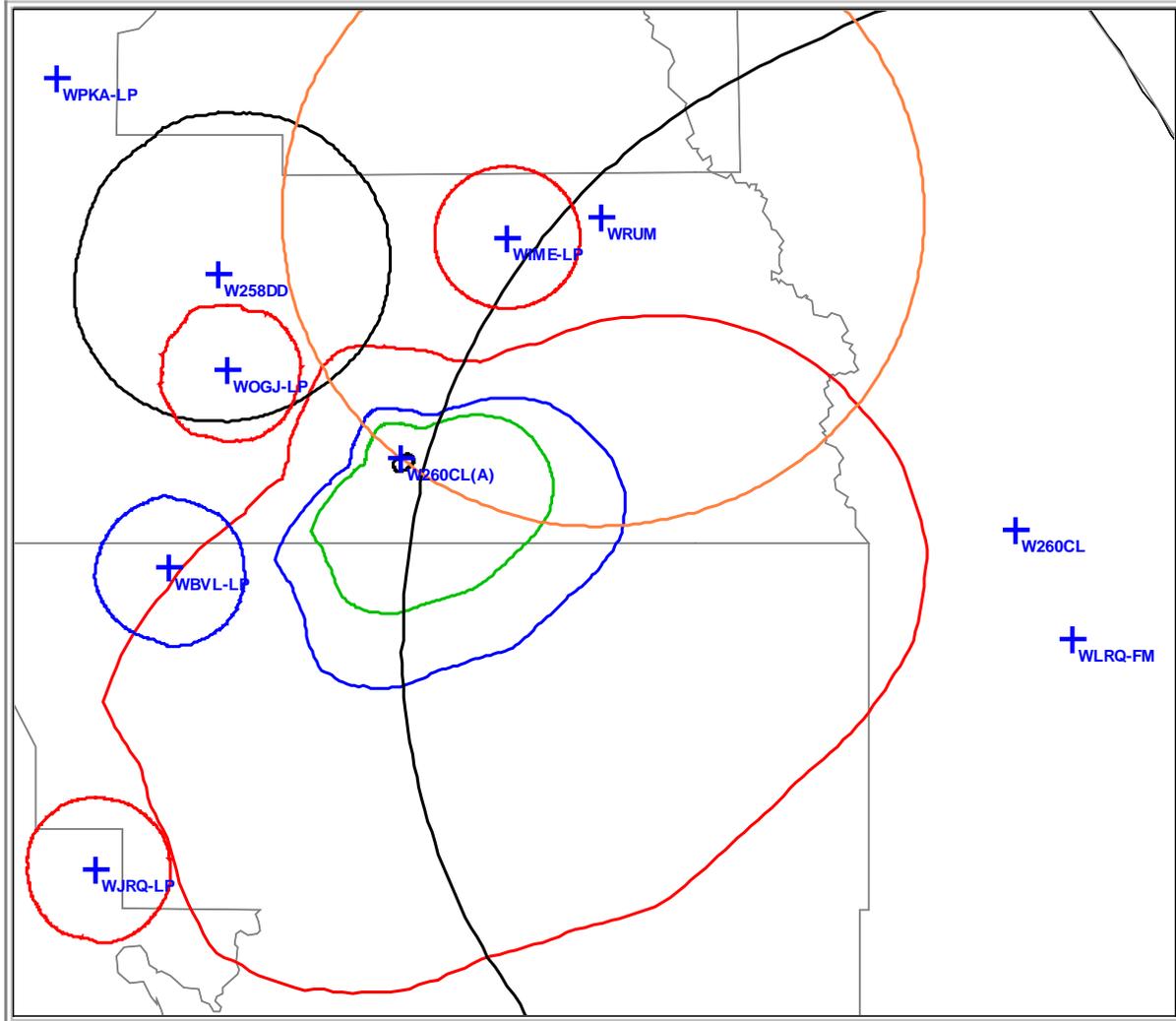


ORLANDO, FL ~ Channel 260D (99.9 MHz) ~ ERP 0.250 kW
Elev: 21.9 meters ~ RCAGL: 88.5 meters ~ RCAMSL: 110.4 meters
Overall tower height: 89.5 meters AGL ~ ASR: 1030509
NAD83 Latitude: 28° 24' 29.1" NL ~ Longitude: 81° 14' 04.9" WL
No nearby AM stations within 3km of proposed site.
Existing tower.

ComStudy 2.2 search of channel 260 (99.9 MHz Class D) at 28-24-29.1 N, 81-14-04.9 W.

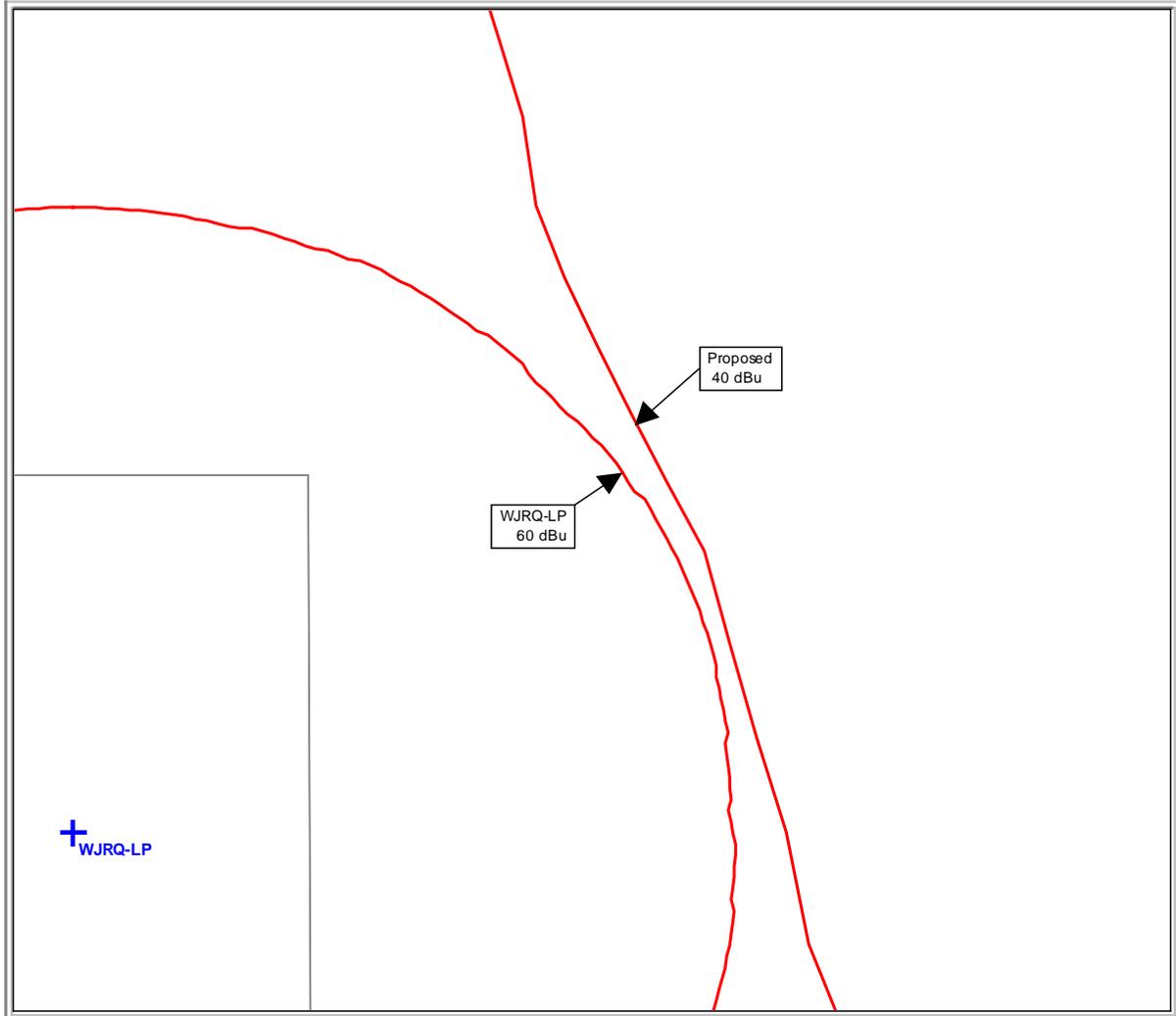
CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
WRUM	ORLANDO	FL	262	C	24.68	0.00	39.0	-28.99 dB
>> Waiver requested.								
WJRQ- LP	POINCIANA	FL	260	LP100	40.44	24.00	216.0	0.03 dB
WLRQ- FM	COCOA	FL	257	C2	54.28	0.00	105.3	0.44 dB
WOGJ- LP	ORLANDO	FL	260	LP100	15.13	24.00	297.7	1.78 dB
WBVL- LP	KISSIMMEE	FL	259	LP100	19.98	13.00	244.1	3.60 dB
WIME- LP	ORLANDO	FL	260	LP100	19.37	24.00	25.3	6.03 dB
W258DD	ORLANDO	FL	258	D	20.34	0.00	316.0	8.63 dB
W260D0	DAYTONA BEACH	FL	260	D	85.15	0.00	5.1	8.95 dB
W260DA	BARTOW	FL	260	D	84.18	0.00	232.3	12.69 dB
WJKD	VERO BEACH	FL	259	C2	106.75	0.00	134.3	17.52 dB
WPKA- LP	APOPKA	FL	260	LP100	40.26	24.00	318.7	21.61 dB
WQYK- FM	ST. PETERSBURG	FL	258	C1	126.15	0.00	245.4	24.21 dB
WXJB	HOMOSASSA	FL	260	C3	120.51	0.00	282.7	29.37 dB
WLOV- FM	DAYTONA BEACH SHORES	FL	258	A	93.15	0.00	9.7	32.02 dB
WGPD- LP	WINTER GARDEN	FL	257	LP100	39.37	6.00	295.2	32.34 dB
WIDT- LP	WINTER GARDEN	FL	259	LP100	39.24	13.00	294.4	32.74 dB
WWRG- LP	LAKE MARY	FL	259	LP100	39.26	13.00	351.3	32.28 dB
W261BA	Ocala	FL	261	D	126.26	0.00	317.1	33.97 dB
WZJZ	PORT CHARLOTTE	FL	261	C1	188.18	0.00	197.2	36.33 dB
WCYZ	Ocala	FL	259	A	116.32	0.00	317.9	37.10 dB
WCYZ	SILVER SPRINGS SHORE	FL	259	A	116.33	0.00	317.9	37.10 dB
WGNE- FM	MIDDLEBURG	FL	260	C1	215.89	0.00	349.6	39.93 dB

Contour Protection



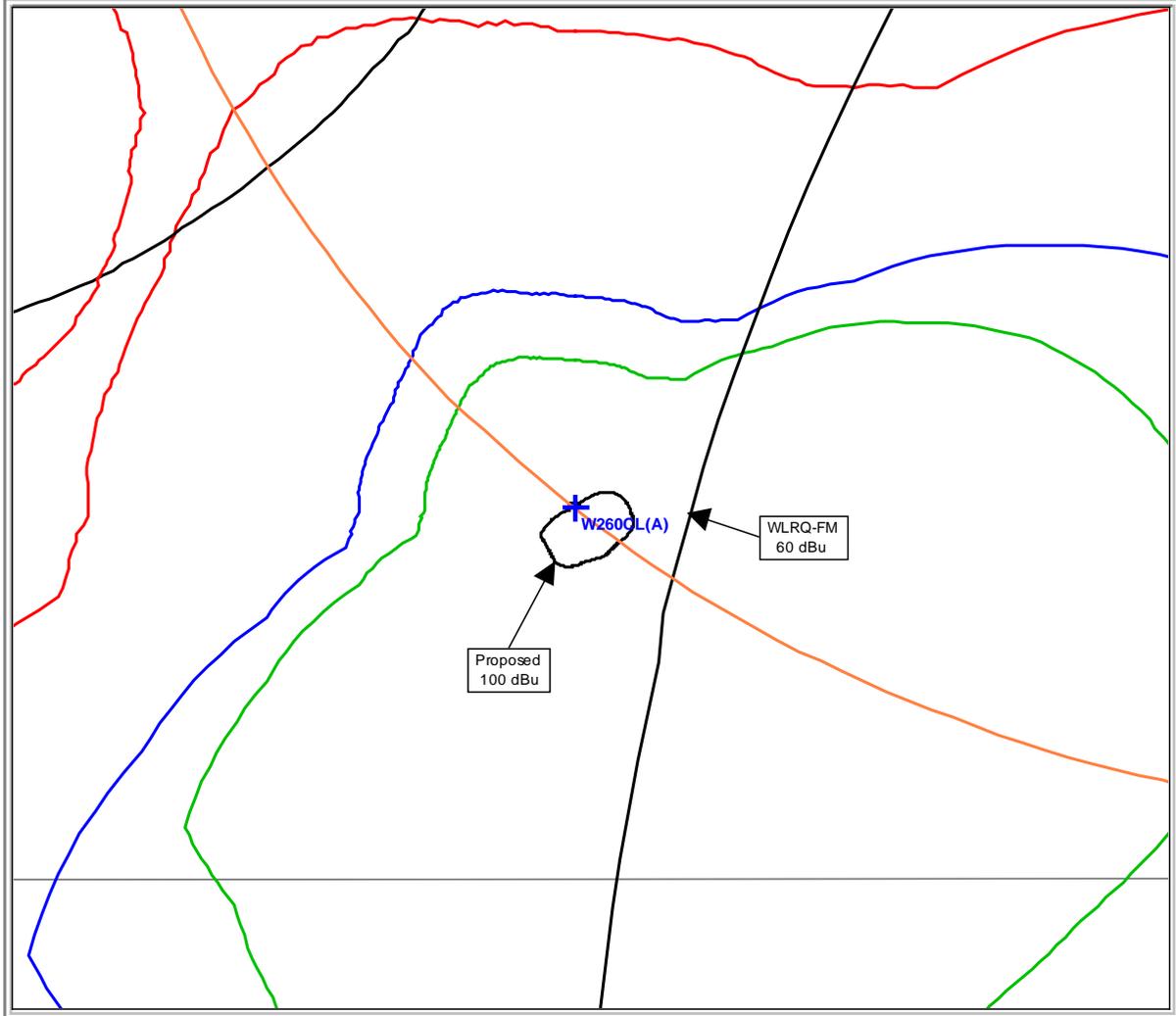
Red = Co-channel | Blue = First-adjacent | Black = Second/Third-adjacent

Contour Protection vs. WJRQ-LP



Red = Co-channel | Blue = First-adjacent | Black = Second/Third-adjacent

Contour Protection vs. WLRQ-FM



Red = Co-channel | Blue = First-adjacent | Black = Second/Third-adjacent

REQUEST FOR WAIVER OF §74.1204(a)
SECOND AND THIRD ADJACENT CHANNEL

W260CL
Orlando, Florida
Ch. 260D ~ 99.9 MHz

The proposed facility does not meet the §74.1204(a) contour overlap requirements with second-adjacent full-service FM station WRUM, Orlando, Florida. We will address this deficiency as set forth:

WRUM operations on Channel 262B with an effective radiated power (ERP) of 100 kW at 484 meters height above average terrain (HAAT) into a nondirectional antenna. WRUM places an 88.5 dBu service contour at the proposed site.

Utilizing the U/D method¹, the proposed translator is predicted to create an undesired interference overlap in respect to WRUM to the proposed translator's 125.5 dBu interfering contour (overlap zone). At 250 watts ERP, the overlap zone extends to 59 meters using free-space methodology. The proposed facility is on a registered leased tower at a radiation center height of 88.5 meters above ground level. There are no nearby adjacent tall buildings. As the radiation center is well above the extent of the overlap zone, the predicted interference from the proposed facility will not reach the ground and thus, into no occupied structures or signed 4-lane highways.

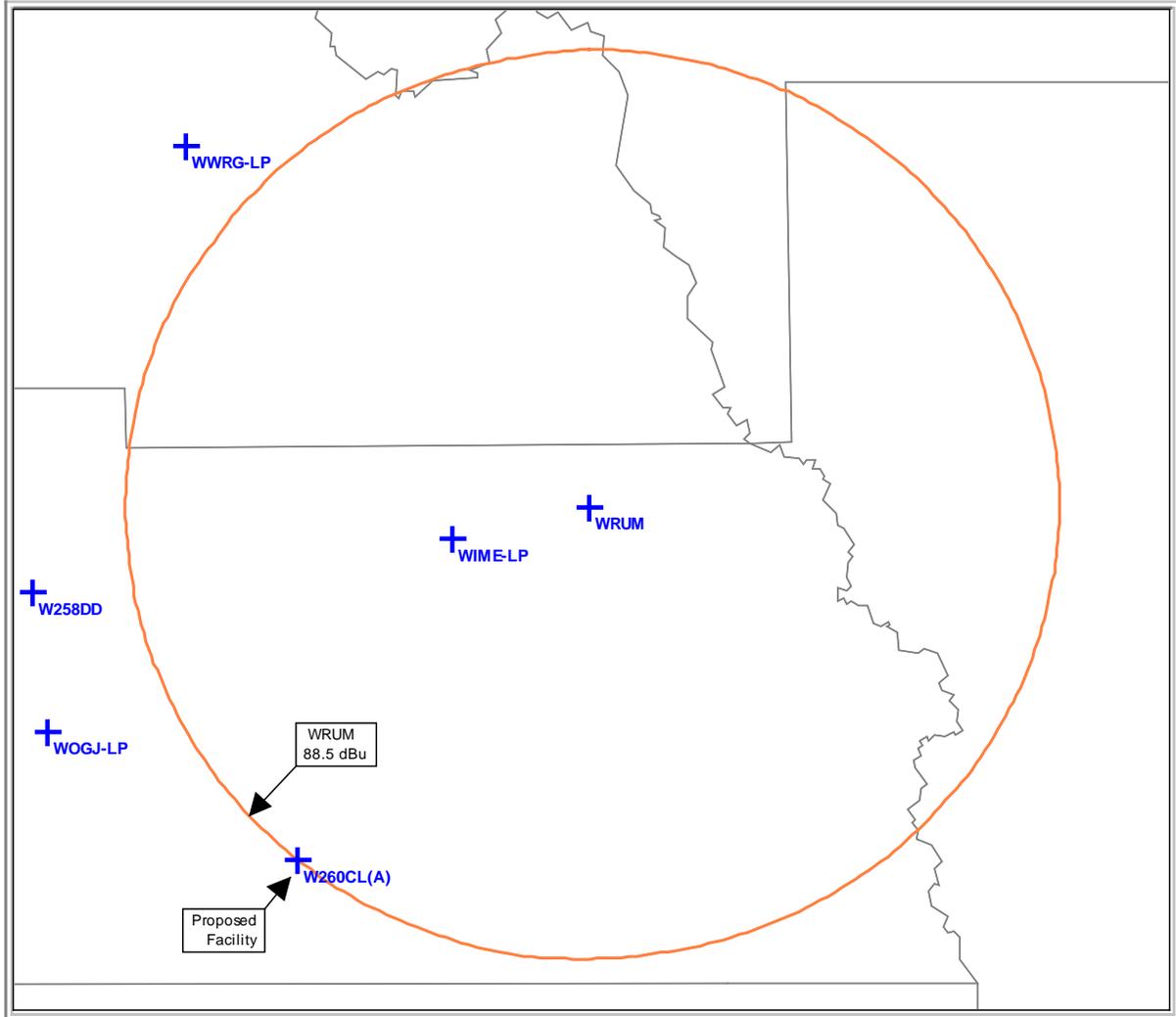
Based on the information provided, it is demonstrated that the proposed translator facility will not create any interference to listeners or potential listeners of WRUM. Therefore, applicant is requesting a waiver of §74.1204(a) in respect to WRUM, Orlando, Florida.

Prepared by
/S/
Michelle Bradley, CBT
REC Networks

August 30, 2023

¹ See Living Way Ministries, Inc., *Memorandum Opinion and Order*, 17 FCC Rcd. 17054, 17056 (2002) at 5. *Recon denied* 23 FCC Rcd. 15070 (2008).

Second/Third Adjacent Channel Protection



REQUEST FOR WAIVER OF §74.1233(a)
MATTOON WAIVER

W260CL
Orlando, Florida
Ch. 260D ~ 99.9 MHz

The instant application does not meet the definition of a minor change as described in §74.1233(a) of the Commission's Rules. To address this, the applicant is requesting a waiver of §74.1233(a) under the existing *Mattoon* policy.² We will address each of the points of the *Mattoon* criteria as set forth.

Serial Filings

This facility has been at its licensed location since November 29, 2016.³ Therefore, the proposed move should not be construed as a "hop" and therefore is not a serial modification, pursuant to the *Mattoon* criteria.⁴

Mutual Exclusivity

The proposed facility is mutually exclusive to the currently licensed facility as noted in the contour map on the following page.

LPFM Considerations

The proposed facility is within the Orlando market grid and as noted in the LPFM *Fourth Report and Order*, was a "Spectrum Available" market.⁵ In an updated Channel Points study conducted by REC Networks on August 18, 2022, it was determined that there are 16 LPFM stations located within the 30 minute by 30 minute grid. Using the "channel floors" criteria of the *Fourth Report and Order*, Orlando remains a spectrum available market. Therefore, under current Commission policy, the LPFM Considerations prong of this waiver request is met.

Translator to be used for an AM station

Finally, this translator is being moved in order to service WNDO(AM), Apopka, Florida (Facility ID # 1185).

Applicant concludes that the instant proposed application does meet all of the *Mattoon* criteria and therefore applicant requests a waiver of §74.1233(a), which is in the public interest in order to revitalize the AM Broadcast Service.

Prepared by

Michelle Bradley, CBT
REC Networks
August 30, 2023

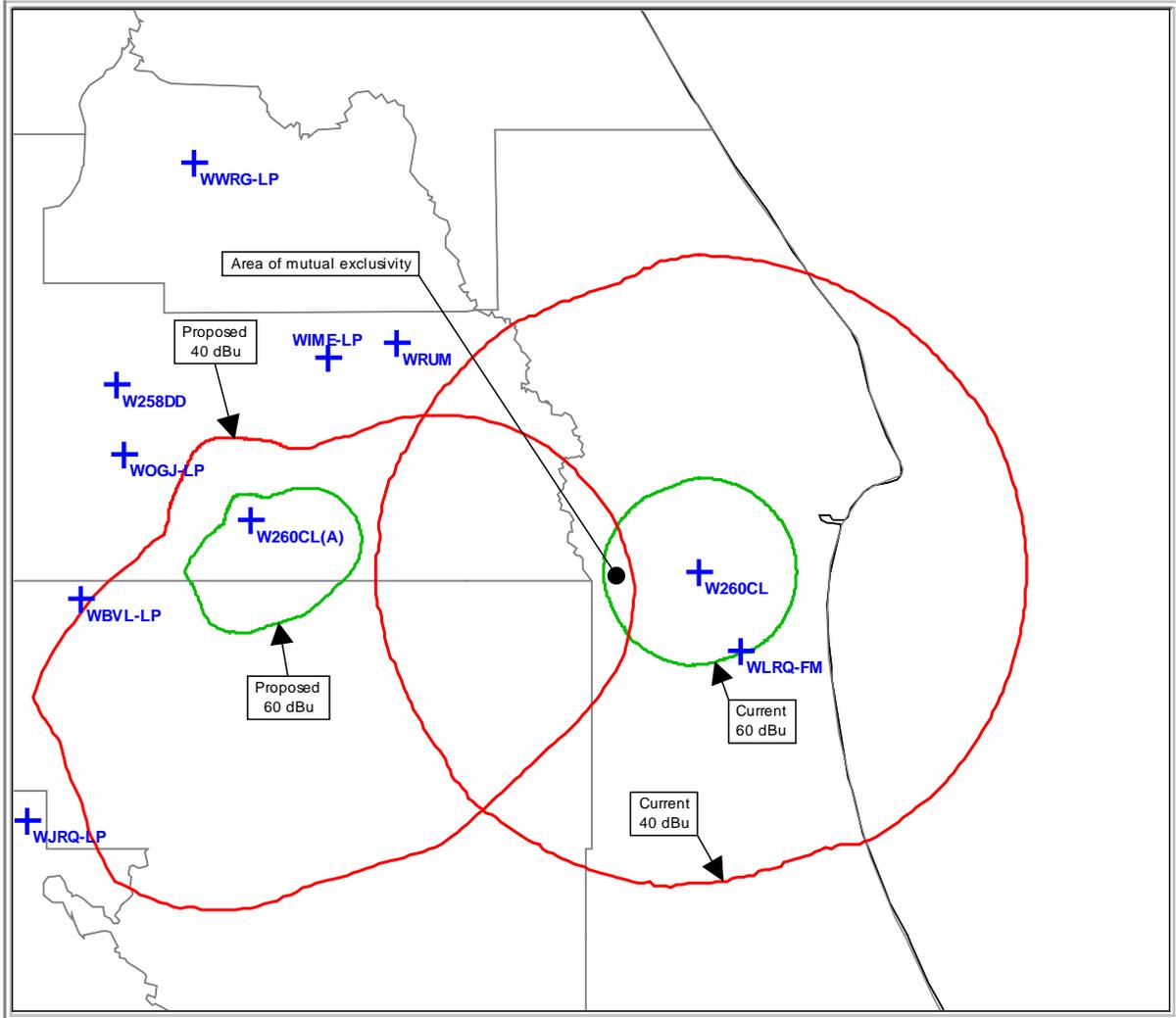
² *The Cromwell Group of Illinois*, Letter, 26 FCC Rcd. 12685-12689 (MB, 2011) ("*Mattoon*").

³ See File No. BLFT-20161028ACD..

⁴ *Mattoon* at 12686-12687.

⁵ 27 FCC Rcd. 3364.

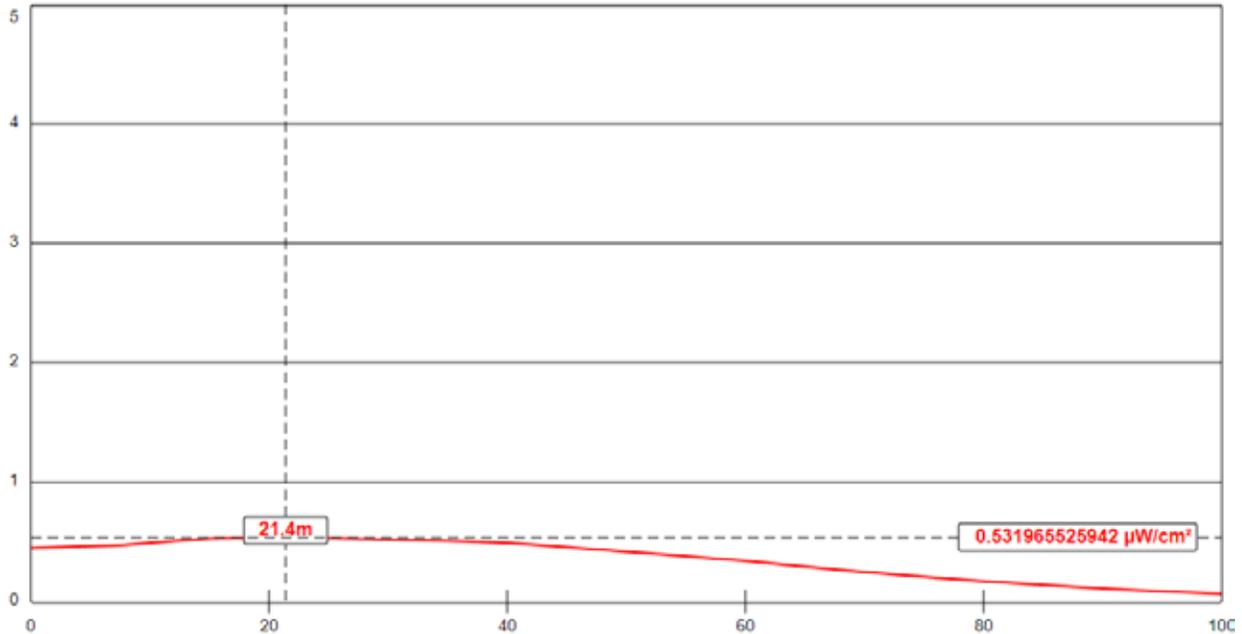
Area of Mutual Exclusivity for Mattoon Waiver request



NEPA COMPLIANCE

W260CL
Orlando, Florida
Ch. 260D ~ 99.9 MHz

Utilizing the Commission's FM MODEL software, it has been determined that at no point will the power density exceed $0.531 \mu\text{W}/\text{cm}^2$ at any point. Therefore, the peak power density from this tower site does not exceed the general population/controlled exposure guideline of $200 \mu\text{W}/\text{cm}^2$.



Based on 99.9 MHz, EPA-1 antenna, 250 watts horizontal and vertical, 2 sections, worst-case 1-wavelength spacing at 88.5 meters AGL.

REC is not aware of any other non-exempt services using this tower.

Prepared by

/S/
Michelle Bradley, CBT
REC Networks

August 30, 2023