

TECHNICAL MODIFICATION STATEMENT

W247AT Madison, Alabama

CHANNEL CHANGE REQUEST:

THE LICENSED FACILITY IS FIRST ADJACENT TO STATION WLLX(FM) CHANNEL 248-C2 LOCATED 69.9 KM AWAY. THE 54 DBU (50,10) OF THE LICENSED FACILITY HEREIN ON CHANNEL 247 CLEARS THE LICENSED 60 DBU (50,50) CONTOUR OF STATION WLLX (FM) BY ONLY 6.1 KM AT THE NEAREST POINT. THE WLLX (FM) 45 DBU (50,50) CONTOUR IN WHICH INTERFERENCE COMPLAINTS ARE PERMITTED EXTENDS 20.2 KM PAST THE W247AT SITE AND FULLY ENCOMPASSES THE W247AT AUTHORIZED 60 DBU (50,50) CONTOUR. THE LICENSEE OF WLLX (FM), PROSPECT COMMUNICATIONS, HAS MADE WRITTEN NOTICE TO THE W247AT LICENSEE OF THE PRESENCE OF INTERFERENCE COMPLAINTS FROM THE OPERATION OF THE TRANSLATOR FACILITY. IN A GESTURE COOPERATION, THIS LICENSEE IS REQUESTING A NON-ADJACENT CHANNEL MOVE TO ELIMINATE FUTURE LITIGATION AND ADMINISTRATIVE INCONVENIENCE WHICH WOULD ARISE FROM THE COMPLAINT PROCESS. SEE ATTACHED MAP.

THE LICENSEE REQUESTS THE USE OF CHANNEL 253 WHICH HAS NO CO-CHANNEL FULL POWER FACILITIES IN THE ALLOCATION PICTURE. CO-CHANNEL LPFM WZZK-LP HAS BEEN STUDIED AND THAT FACILITY'S 45 DBU (50,50) CONTOUR DOES NOT INTERSECT THE PROPOSED 60 DBU (50,50) CONTOUR OF THE W247AT CHANNEL 253 FACILITY AT ANY POINT. THE UN-BUILT CONSTRUCTION PERMIT FOR FIRST-ADJACENT TRANSLATOR W254DM CLEARS REQUIRED PROTECTION DISTANCES BY OVER 4 KM.

THE USE OF NON-ADJACENT CHANNEL 253 WILL PERMIT TRANSLATOR W247AT TO MAINTAIN THE SERVICE TO THE COMMUNITY REPEATING THE PRIMARY LPFM FACILITY.

OVERLAP REQUIREMENTS

THE ATTACHED MAP OF CONTOURS DEPICT THE PROPOSED ALLOCATION SITUATION WITH RESPECT TO ALL PERTINENT CO AND ADJACENT FACILITIES. ALL FACILITIES HAVE BEEN DEPICTED UTILIZING EITHER THE MAXIMUM ERP OR DIRECTIONAL PATTERN DATA AS ON FILE WITH THE COMMISSION AND 1 DEGREE RADIAL INTERVALS ON CLOSE IN CONTOURS IN THE INTEREST OF ACCURACY. AAT DATA FOR THE PROPOSED FACILITY WAS DERIVED FROM THE FCC'S 30 SECOND DATABASE, COMSTUDY.

AS SEEN ON THE ATTACHED MAPS OF CONTOURS, CHANNEL 253-D IS OPERABLE AT THE PROPOSED LOCATION WITH THE FOLLOWING FACILITY NOTES:

- IN COMPLIANCE WITH 47 CFR 74.1204(G) THE PROPOSED FACILITY OPERATES AT AN EFFECTIVE RADIATED POWER WHICH IS NOT OVER 100 WATTS, THEREFORE PROTECTION TO INTERMEDIATE FREQUENCY FACILITIES HAS NOT BEEN CALCULATED.

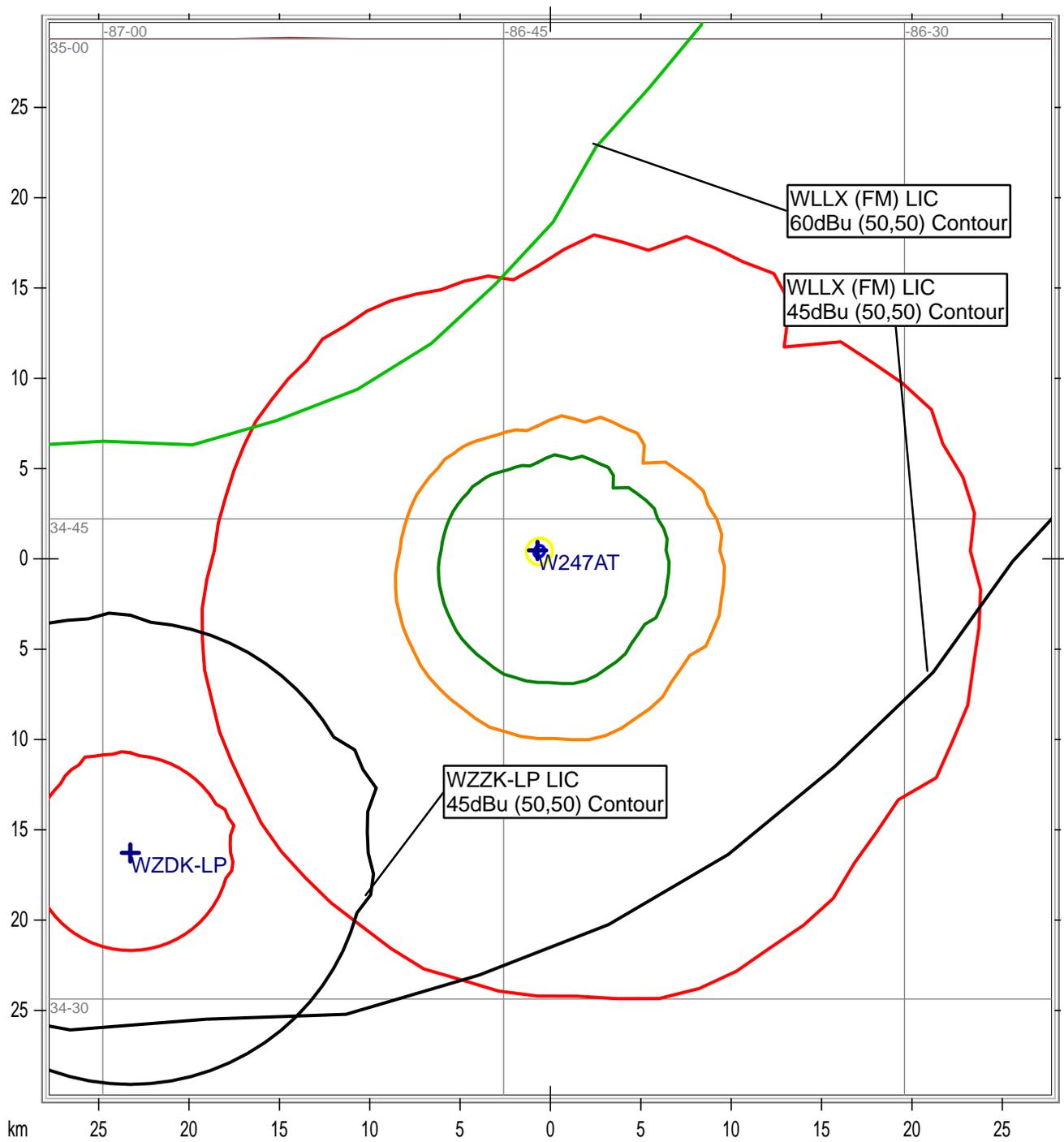
- THE PROPOSED LOCATION IS WITHIN THE PROTECTED 60DBU (50,50) CONTOUR OF SECOND-ADJACENT STATION WAHR (FM) CHANNEL 256-C0 LOCATED 10.8 KM AWAY. THEREFORE, AN INTERFERENCE ANALYSIS HAS BEEN CONDUCTED BASED ON THE U/D RATIO OF +40 DB AT THE PROPOSED SITE. THE SIGNAL OF WAHR(FM) AT THE PROPOSED LOCATION IS 99.0 DBU (50,50) MAKING THE RELEVANT INTERFERRING CONTOUR OF THE PROPOSED FACILITY 139.0 DBU (50,10). THE FREE SPACE DISTANCE TO THIS CONTOUR IN A WORSE-CASE SCENARIO UTILIZING A SINGLE DIPOLE ANTENNA IS 2.4 METERS.

- THE PROPOSED LOCATION IS WITHIN THE PROTECTED 60DBU (50,50) CONTOUR OF THIRD-ADJACENT TRANSLATOR STATION W251AC CHANNEL 251-D LOCATED 10.8 KM AWAY. THEREFORE, AN INTERFERENCE ANALYSIS HAS BEEN CONDUCTED BASED ON THE U/D RATIO OF +40 DB AT THE PROPOSED SITE. THE SIGNAL OF W215AC AT THE PROPOSED LOCATION IS 69.0 DBU (50,50) MAKING THE RELEVANT INTERFERRING CONTOUR OF THE PROPOSED FACILITY 109.0 DBU (50,10). THE FREE SPACE DISTANCE TO THIS CONTOUR IN A WORSE-CASE SCENARIO UTILIZING A SINGLE DIPOLE ANTENNA IS 78.8 METERS.

- THE ATTACHED AERIAL PHOTO OF THE W247AT TOWER SITE DEPICTS THE RURAL NATURE AND THE RESTRICTED ACCESS OF THE TOWER COMPOUND AND HAS THE ENTIRE 78.8 METER DISTANCE OVERLAID TO DEMONSTRATE THAT THE INTERFERING CONTOUR IS INCAPABLE OF REACHING THE GENERAL PUBLIC.

BASED ON THIS SHOWING, A WAIVER OF SECTION 74.1204 IS REQUESTED IN ACCORDANCE WITH LIVING WAY MINISTRIES, INC. (FCC 08-242) ON THE BASIS OF ZERO POPULATION IN THE AREA OF INTERFERENCE.

IT SHOULD BE NOTED THAT SHOULD ANY ACTUAL REAL WORLD INTERFERENCE OCCUR, THE APPLICANT ACKNOWLEDGES THAT IT WILL PROMPTLY SUSPEND OPERATION OF THIS TRANSLATOR IN ACCORDANCE WITH 47 C.F.R. 74.1203.



WLLX (FM) LIC
60dBu (50,50) Contour

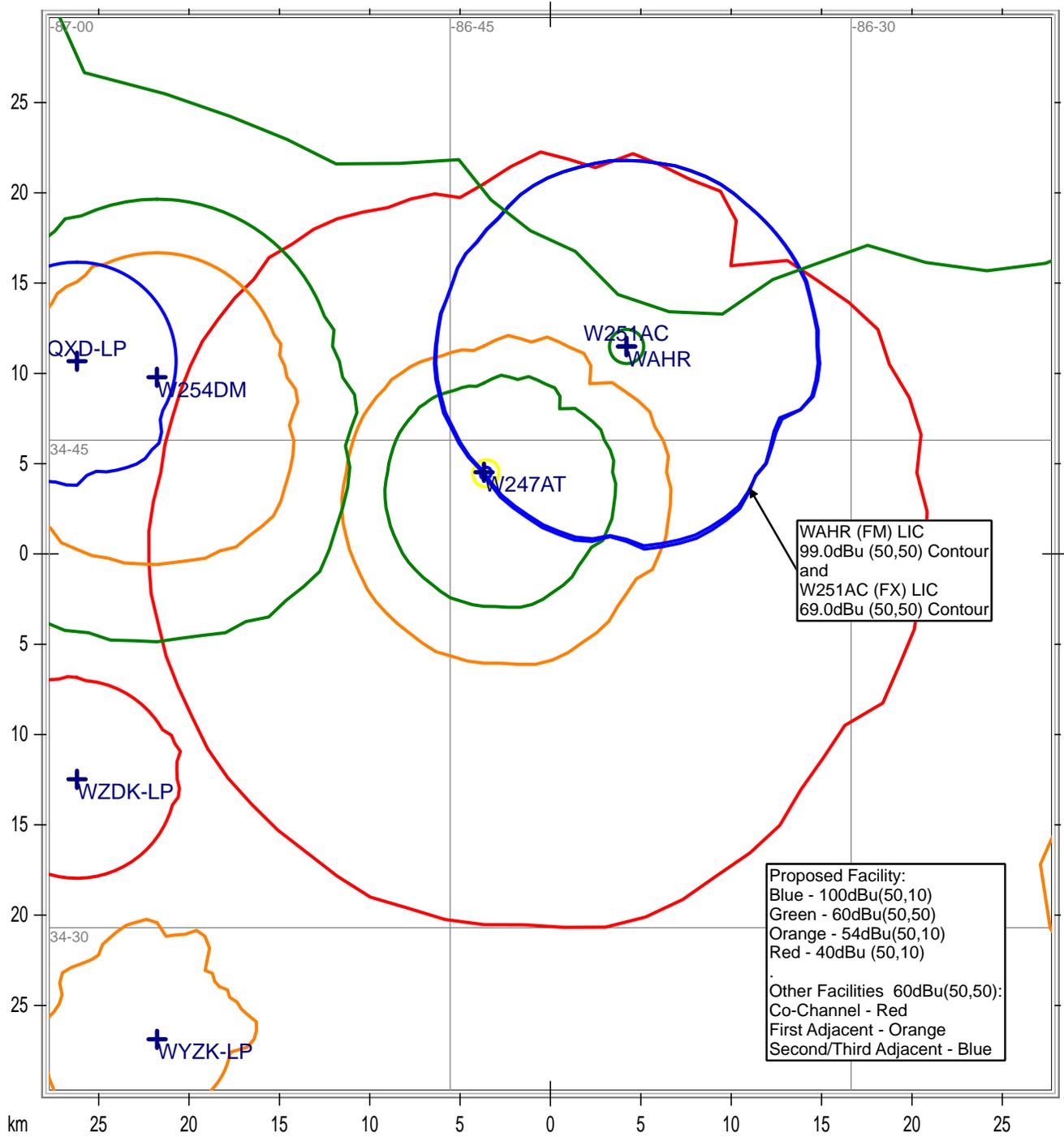
WLLX (FM) LIC
45dBu (50,50) Contour

WZZK-LP LIC
45dBu (50,50) Contour

W247AT

WZDK-LP

State Borders Lat/Lon Grid



State Borders Lat/Lon Grid