

# *APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT*

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W267CS - ASHLAND, WISCONSIN  
BNPFT-20171212AAK  
FACILITY ID: 201524  
101.3 MHz / 250 W ERP ND

HEARTLAND COMM. LICENSE, LLC

NOVEMBER, 2019

## **APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT**

The following engineering statement and attached exhibits have been prepared for **Heartland Comm. License, LLC** ("Heartland"), permittee of FM translator station W267CS at Ashland, Wisconsin, and are in support of their application for modification of construction permit.<sup>1</sup> This application is being filed solely to change the antenna model associated with the facility. No other changes to the authorization under FCC File No. BNPFT-20171212AAK is proposed under this application.

W267CS as authorized and proposed would operate on FM channel 267 with a maximum effective radiated power of 250 Watts utilizing a non-directional antenna. The center of radiation for the antenna is 282 meters above mean sea level, or 65 meters above ground. No change to the values on the current construction permit is proposed.

The proposed facility would serve as a translator for AM station WATW at Ashland, Wisconsin.<sup>2</sup> Exhibit E-1 provides a comparison between the proposed translator 60 dBu service contour, the WATW 2 mV/m service contour, and a twenty-five mile radius centered on the WATW transmitter site. This map demonstrates that the proposed translator 60 dBu service contour is wholly contained within both the WATW 2 mV/m service contour and a twenty-five mile radius centered on the WATW transmitter site. WATW is a class C facility with identical technical parameters during both daytime and nighttime hours of operation.

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<sup>1</sup> The Facility ID for W267CS at Ashland, Wisconsin is 201524.

<sup>2</sup> The Facility ID for WATW at Ashland, Wisconsin is 4078.

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W267CS would continue to comply with the provisions of Section 74.1204 of the Commission's Rules. Due to the channel of operation, Section 74.1205 is not applicable. Exhibit E-2 is a tabular interference study for the proposed translator facility. This study demonstrates that the contour overlap provisions of Section 74.1204 would continue to be met by W267CS. This tabular interference study is graphically depicted in the contour map that comprises Exhibit E-3. This map also demonstrates that the 34 dBu F(50,10) contour from the proposed translator resides fully within the continental United States.

The proposed facility would not constitute a significant environmental impact, and is exempt from environmental processing. The translator antenna would utilize an existing tower that is registered with the Commission. The addition of the translator antenna to this tower would not increase the existing environmental impact already present the tower.

Additionally, the proposed facility would not constitute a radiofrequency radiation hazard to persons at the site. The Commission's online *FM Model* utility returns a calculated maximum power density of 0.790  $\mu\text{W}/\text{cm}^2$  at a distance of 36 meters from the tower. This value complies with the uncontrolled environment of the Commission's safety standard, and is sufficiently low to categorically exclude the facility. The Jampro JLLP-2 antenna is considered a "type-2" antenna, and was analyzed as such.

Heartland certifies that it will coordinate with all other users of the site to ensure that workers and other personnel are not exposed to levels of radiofrequency radiation in excess of the

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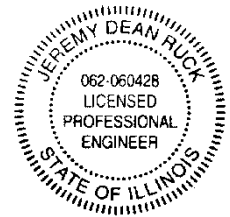
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11.22.2019

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applicable safety standards. Coordination activities will include, but are not necessarily limited to, a reduction in transmitter power or cessation of operation.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2021

Jeremy D. Ruck, PE  
December 11, 2017

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**W267CS.X**

BNPFT20171212AAK  
Latitude: 46-34-25 N  
Longitude: 090-51-57 W  
ERP: 0.25 kW  
Channel: 267  
Frequency: 101.3 MHz  
AMSL Height: 282.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: FCC Contour

*Jeremy Ruck & Associates, Inc.*

- W267CS 60 dBu Service Contour
- WATW 2 mV/m Service Contour
- WATW 25-mile Site Radius

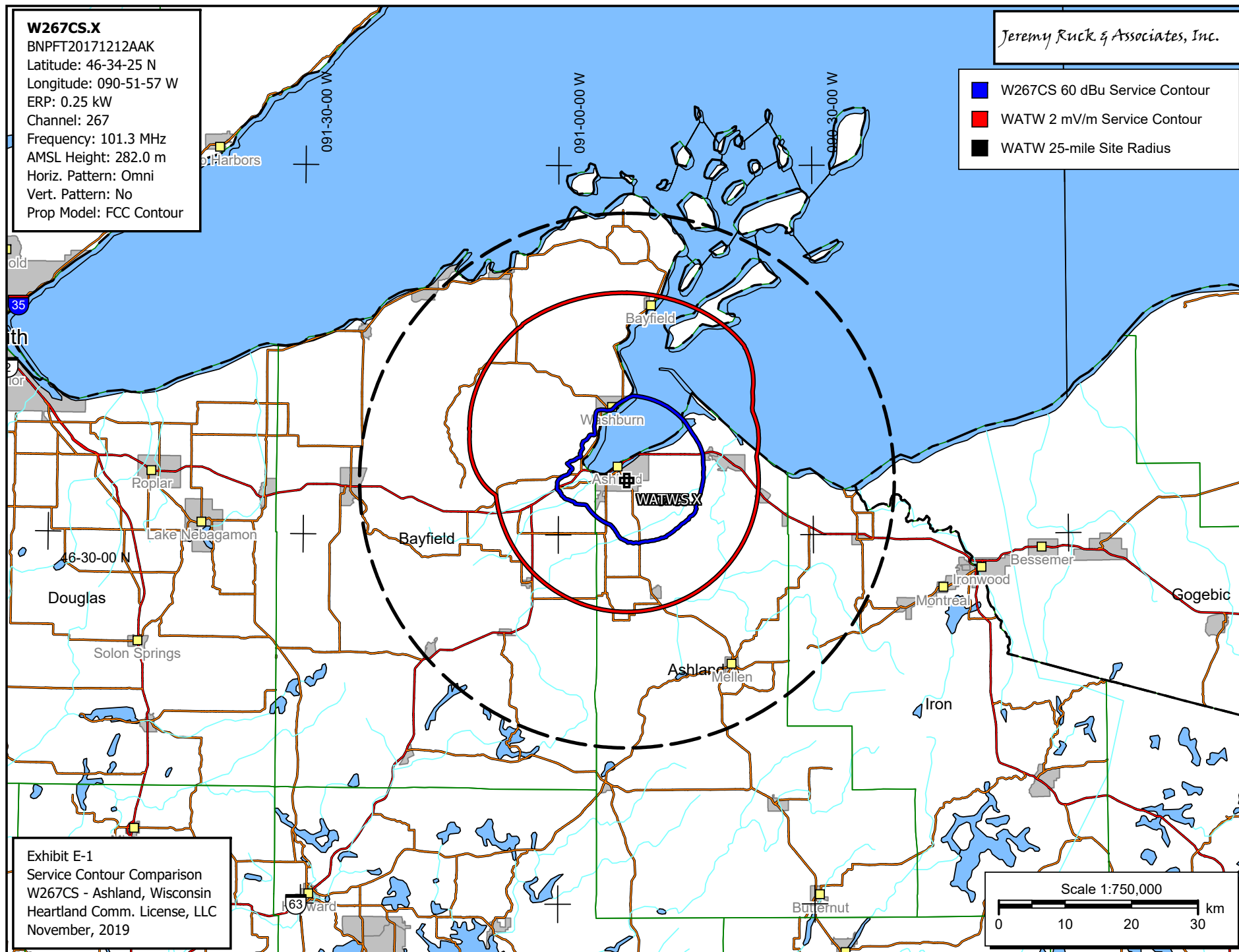


Exhibit E-1  
Service Contour Comparison  
W267CS - Ashland, Wisconsin  
Heartland Comm. License, LLC  
November, 2019

Scale 1:750,000

0 10 20 30 km

## Exhibit E-2 - Tabular Interference Study

w267CS - Ashland, Wisconsin

REFERENCE CH# 267D - 101.3 MHz, Pwr= 0.25 kW, HAAT= 61.9 M, COR= 282 M  
 46 34 25.00 N.  
 90 51 57.00 W.

Average Protected F(50-50)= 10.32 km  
 Omni-directional

DISPLAY DATES  
 DATA 11-19-19  
 SEARCH 11-22-19

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
267D Ashland	w267CS	CP	WI	0.0 314.1	0.00 BNPFT20171212AAK	46 34 24.80 90 51 56.70	0.250	282	---Reference---		
266C1 Ontonagon	WUPY	RSV-A	MI	80.7 261.9	130.15	46 45 00.79 89 10 46.50	100.000 299	105.9 584	72.7 Snrn Broadcasting, Inc.	12.4	39.3
266C1 Ontonagon	WUPY	LIC	MI	80.7 261.9	130.15 BLH20070111ABS	46 45 01.20 89 10 46.70	100.000 212	96.4 491	64.9 Snrn Broadcasting, Inc.	21.8	46.6
269C2 Duluth	KLDJ	LIC	MN	284.4 103.5	98.77 BLH20150423ABC	46 47 15.00 92 07 22.00	18.500 249	6.6 556	60.6 Townsquare Media Duluth Li	82.1	37.0
266A Hayward	WHSM-FM	LIC N	WI	218.6 38.1	83.43 BLH19950627KF	45 59 06.80 91 32 23.60	1.500 126	32.7 499	22.0 Zoe Communications, Inc.	43.1	50.6
265D Ironwood	W265AI	LIC	MI	102.7 283.3	57.94 BLFT19980508TC	46 27 22.80 90 07 40.60	0.010 94	0.2 534	6.5 White Pine Community Broad	46.5	49.9

Terrain database is FCC 30 meter , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM  
 In & Out distances between contours are shown at closest points. Reference zone= East Zone, Co to 3rd adjacent.  
 All separation margins (if shown) include rounding.  
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)  
 "\*"affixed to 'IN' or 'OUT' values = site inside restricted contour.  
 Reference station has protected zone issue: AM tower

**W267CS.X**

BNPFT20171212AAK

Latitude: 46-34-25 N

Longitude: 090-51-57 W

ERP: 0.25 kW

Channel: 267

Frequency: 101.3 MHz

AMSL Height: 282.0 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model: FCC Contour

*Jeremy Ruck & Associates, Inc.*W267CS 34 dBu  
F(50,10) Contour

- 60 dBu F(50,50) Service Contour
- 40 dBu F(50,10) Interference Contour
- 54 dBu F(50,10) Interference Contour
- 100 dBu F(50,10) Interference Contour

