



Application for Minor Change
Translator W266DW Miami FL
FCC Facility ID 202459

TECHNICAL EXHIBITS

This technical exhibit is prepared on behalf of WSUA Broadcasting Corporation, permittee of Translator W266DW Miami fl. This instant application requests a non-adjacent channel change of operating frequency from the authorized tower location and height a slightly increased effective radiated power and a slight reorientation of the authorized directional FM antenna.

NON ADJACENT CHANNEL REQUEST

In MB Docket No. 18-119 the Commission established the 45dBu contour as the reasonably expected coverage for co-channel full power stations relative to translator interference potential. WSUA Broadcasting Corporation has been notified by formal complaint that there is co-channel interference to LPFM station WDVS-LP Miami located 18.3km away. The Attached Petition from WDVS-LP is a matter of record with the Commission and WSUA Broadcasting Corporation feels that this sufficiently demonstrates the interference between the stations and respectfully requests the Commission to consider this non-adjacent channel requested herein.

In addition, in order to mitigate future interference from co-channel signals, the application herein has preemptively examined the requested non-adjacent channel for similar issues. The Channel 232 translator facility herein protects the co-channel WQPN-LP 45dBu contour is still 8km from the closest point of the proposed translator 60dBu contour. The proposed facility is also clear of the 45dBu contour of first adjacent stations WSQF-LP and WVGK-LP, making the move to Channel 232 a prudent and efficient request.

CONTOUR OVERLAP REQUIREMENTS

The attached maps of contours and channel study depict the proposed allocation situation with respect to all pertinent co-channel and adjacent channel facilities. All facilities have been depicted utilizing either the maximum ERP or directional pattern data as on file with the commission. 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 232-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 over 100 watts, therefore protection to intermediate frequency facilities has been calculated and meets all mileage separation requirements.
- The proposed location is within the protected 60dbu (50,50) contour of second-adjacent station WMIA-FM channel 230-C0; and within the protected 60dBu (50,50) contour of third-adjacent station WZTU (FM), channel 235-C0 which are both combined into a single antenna located 30.2 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 both adjacent stations at the proposed location is 79.0 dBu (50,50) making the relevant interfering contour of the proposed facility 119.0 dBu (50,10). The free space distance to this contour in a worse-case scenario utilizing a single dipole antenna is 124 meters. The antenna height is 150 meters AGL, and the interfering contour is incapable of reaching the ground or any area where the public can be present at any time.

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.

Respectfully,

A handwritten signature in black ink, reading "Jim Turvaille". The signature is stylized with a large, looping "J" and "T".

Jim Turvaille, Owner
Turbo Tech Services
Certified Radio Engineer – Consultant

Attachments:

Co-Channel Interference Showing
Map of Contours

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Applications of:

WSUA Broadcasting Corporation

LMS File No. 0000126735

LMS File No. 0000124931

Facility ID: 202459

*License to Cover Construction Permit
For a New FM Translator
W266DW, Miami, FL*

**INFORMAL OBJECTION AND
MOTION TO HOLD IN ABEYANCE**

South Florida FM, Inc. FCC Call Sign WDVS-LP in Miami Florida (“Petitioner”), by and through undersigned counsel, submits this Informal Objection and Motion to Hold Application in Abeyance to the above-captioned pending License application¹ of WSUA Broadcasting Corporation (“WSUA”) seeking permit and license for translator facility W266DW (“W266DW”) in Miami, Florida. Petitioner has standing as licensee of low power FM station to which WSUA’s translator imposed a short-spacing to WDVS-LP on the 101.1 MHz channel.

Petitioner respectfully requests the Commission hold WSUA Application for W266DW, as modified by LMS application 1249312 (“LMS 1249312”), in Abeyance to allow it as a licensee, as well as the public in Miami, Florida, a fair and appropriate opportunity to submit comments and objections under a regular Public Comment calendar period. Petitioner’s initial review of WSUA’s most recently filed modification of W266DW under LMS 1249313, shows several factors related to short-spaced conditions that implicate harmful co-channel interference will more-likely-than-not occur to WDVS-LP should the Commission grant the Application, as most recently modified by WSUA. Typically such concerns are addressed in the Public Comment Period established by the Commission. However, Petitioner was precluded comment and objection to this Application because the Commission granted WSUA’s modification, at an eighteen (18) day Public Notice window for objection or comment from the public. This irregular Public Notice period before the grant of modification, coupled with the specifics contained within the LMS 1249314 modification

¹ W266DW License application 126735 filed in LMS on Nov.20, 2020.
² Modification for W266DW filed in LMS, Appl. No. 124931.
³ Modification for W266DW filed in LMS, Appl. No. 124931.
⁴ Modification for W266DW filed in LMS, Appl. No. 124931.

itself, is material to the interests of the Petitioner as a low power FM station licensee operating in Miami, Florida.

Furthermore, any expedited Commission grant of W266DW as modified by LMS 1249315 will only: (1) further preclude Petitioner's participation in a fair process of comment and objection to a radio frequency license application in its licensed area; (2) allow for imminent harm to its interests as a low power FM station licensee operating in Miami, Florida outside of a fair process of comment and objection established by the Commission; and (3) foreclose on comments and objections from the public in Miami, Florida who desire to voice their concerns as listeners to Petitioner or other stations that may be impacted by the modifications of LMS 1249316 to W266DW

Petitioner therefore requests Commission hold in Abeyance and withhold any further processing of the license application (as modified by LMS 126735) pending a prioritized review of LMS 124931, by way of a forthcoming Petition for Reconsideration to be submitted by Petition.

CERTIFICATION OF LICENSEE

I certify that I have read the forgoing Informal Objection and Motion for Abeyance of South Florida FM, Inc. (WDVS-LP) and under penalty of perjury that the information presented herein is correct and to the best of my knowledge.

/s/ Milton Lopez /s/

November 23, 2020

Milton Lopez, President
South Florida FM, Inc.
Call Sign WDVS-LP

Respectfully Submitted, by and through attorneys for
WDVS-LP counsel of record for this submission:

/s/ Edward A. Maldonado /s/

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⁵ Modification for W266DW filed in LMS, Appl. No. 124931.

⁶ Modification for W266DW filed in LMS, Appl. No. 124931.

CERTIFICATE OF SERVICE

I hereby certify on this 23rd day of November, 2020 that I have caused a copy of the foregoing document to be served electronically and/or by United States first class mail upon the following:

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Respectfully Submitted,

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