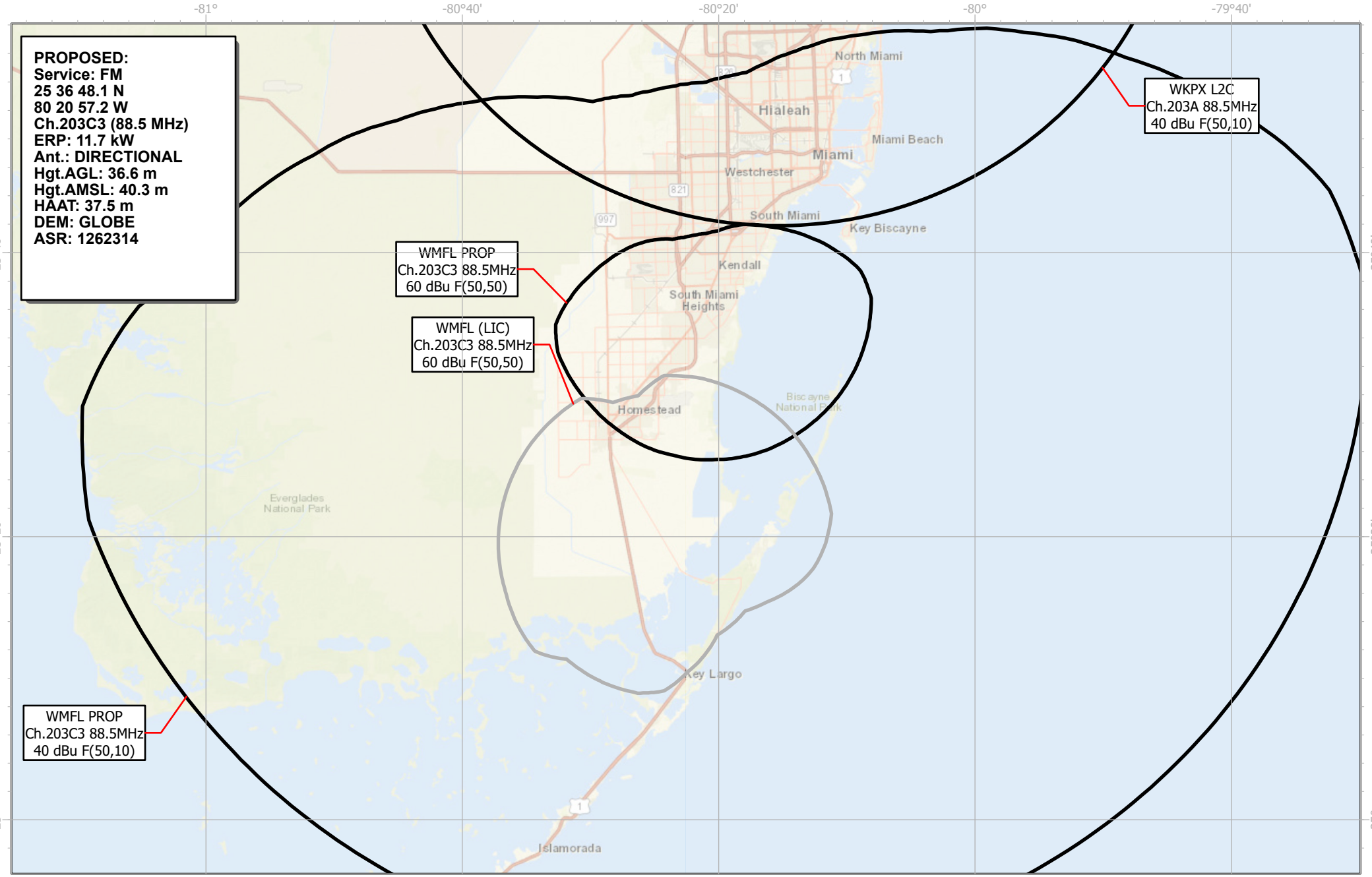

WMFL FLORIDA CITY, FL Proposed Channel 203C3 (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - MINOR CHANGE

Figure 1

Co-channel and minor change showing.

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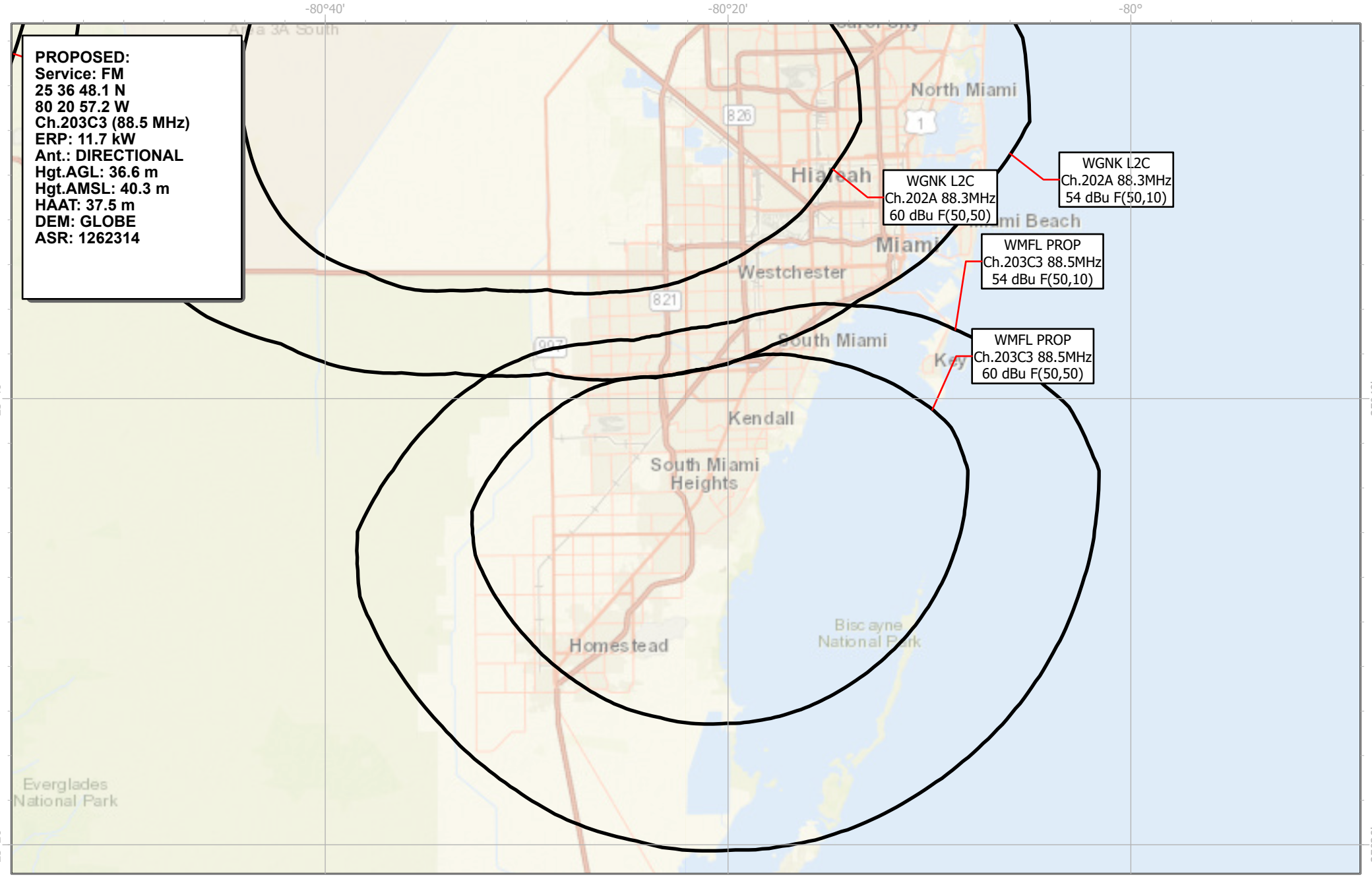

WMFL FLORIDA CITY, FL Proposed Channel 203C3 (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - MINOR CHANGE

Figure 2

1st adjacent-channel showing.

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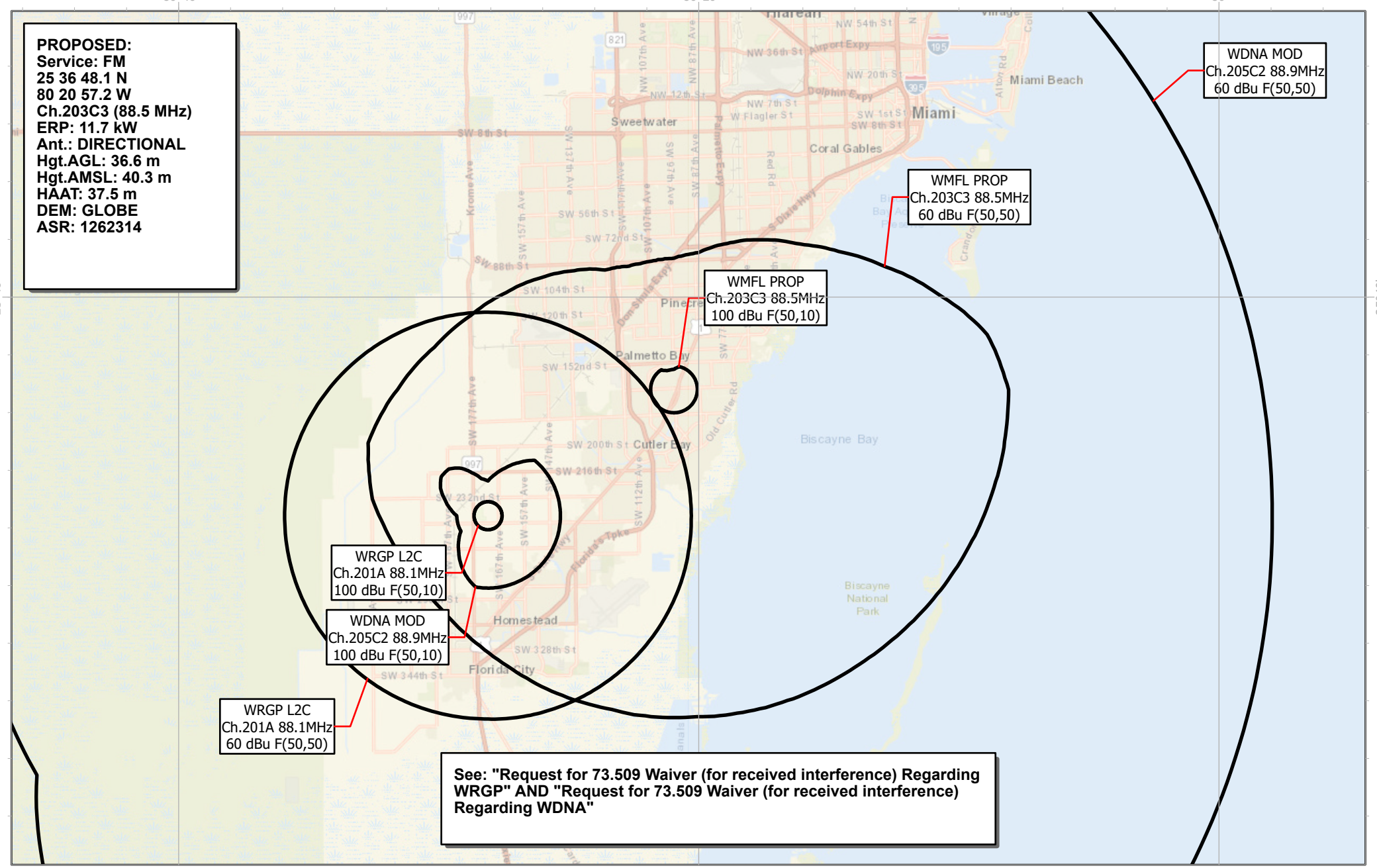

WMFL FLORIDA CITY, FL Proposed Channel 203C3 (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - MINOR CHANGE

Figure 3

2nd and 3rd adjacent-channel showing.

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Table 1 - 73.509 Channel Study

WMFL FLORIDA CITY, FL - CALL COMMUNICATIONS GROUP, INC.

MINOR CHANGE June 2021 (Ch.203C3 proposed)

Chan	Class	Call Letters	Type	Status	City	State	Country	Owner	Bearing TO (deg)	Distance (km)	Req. Dist. (km)	Clearance (km)	
201	A	WRGP	FM	L-L2C	HOMESTEAD	FL	US	FLORIDA INTERNATIOI	235.8	14.4	21.5	**-7.0**	**(see 73.509 waiver)**
202	A	WGNK	FM	L-L2C	PENNSUCO	FL	US	GENESIS LICENSE SUBS	335.2	31.9	31.9	**0.0**	
203	C3	WMFL	FM	L-MOD	FLORIDA CITY	FL	US	CALL COMMUNICATIO	189.8	32.5	107.9	**-75.4**	**(applicant)**
203	A	WKPX	FM	L-L2C	SUNRISE	FL	US	SCHOOL BOARD OF BR	8.4	63.4	62.1	**1.3**	
205	C2	WDNA	FM	L-MOD	MIAMI	FL	US	BASCOMB MEMORIAL	235.9	14.4	51.8	**-37.4**	**(see 73.509 waiver)**

Terrain data DEM: GLOBE

Table 2 - 73.207 Channel Study

WMFL FLORIDA CITY, FL - CALL COMMUNICATIONS GROUP, INC.

MINOR CHANGE June 2021 (Ch.203C3 proposed)

Chan	Class	Call Letters	Type	Status	City	State	Country	Owner	Bearing TO (deg)	FCC Dist.(km)	Req. Dist. (km)	Clearance (km)
256	C1	WEDR	FM	L-L2C	MIAMI	FL	US	COX RADIO, LLC	19.7	40.7	24	16.7

Distance separations determined per §73.208(c)

Request for 73.509 Waiver (for received interference) Regarding WDNA

Applicant respectfully requests a waiver of 73.509 of the Commission's rules to allow WMFL to **receive interference to approximately 1.6% of the population** within the WDNA predicted interfering contour (100 dBu F(50,10)) which would occur within the predicted protected (60 dBu F(50,50)) contour of WMFL's proposed facility.

WDNA's authorized protected 60 dBu F(50,50) contour has fully encompassed WMFL's 100 dBu F(50,10) interfering contour since the Commission granted a *Major* Modification application filed by WDNA in July 1997 and, for the past 24 years, WDNA's license has carried the special operation condition:

*"Further modifications of FM station **WMFL(FM), Florida City**, **FL**, Facility ID#61088, will not be construed as a per se modification of WDNA's license. (See Educational Information Corporation, 6 FCC Rcd.2207 (1991))."*

WMFL's existing 60 dBu service area contains 119,334 persons (2010 Census) and covers 1,290 km^2 (primarily water and wetlands).

WMFL's proposed 60 dBu service area would contain 485,476 persons (2010 Census) and cover 960 km^2. The population served by WMFL's 60 dBu service contour would increase by 366,142 persons (307% more than the current population served).

WMFL would receive interference from WDNA's 100 dBu interfering contour over 46.1 km^2 and containing 7,711 persons currently outside of the existing WMFL service contour (SEE FIGURE 3). This would be 1.6% of the total proposed WMFL population served.

The WDNA field strength at the proposed WMFL site is 83.7 dBu which means that the area of received interference by WDNA (the proposed WMFL 124 dBu contour) would be 0.46 km^2. Since the current WMFL to WDNA interference area is 3.33 km^2, the area of interference received by WDNA will be reduced by 86%.

Therefore, a waiver of section 73.509 overlap requirements with respect to second adjacent station WDNA regarding proposed overlap is requested in conjunction with this application.

[See 'Educational Information Corporation (WCPE)', 6 FCC Rcd 2207 (1991)]

Request for 73.509 Waiver (for received interference) Regarding WRGP

Applicant respectfully requests a waiver of 73.509 of the Commission's rules to allow WMFL to **receive interference to approximately 0.04% of the population** within the WRGP predicted interfering contour (100 dBu F(50,10)) which would occur within the predicted protected (60 dBu F(50,50)) contour of WMFL's proposed facility.

WMFL's existing 60 dBu service area contains 119,334 persons (2010 Census) and covers 1,290 km^2 (primarily water and wetlands).

WMFL's proposed 60 dBu service area would contain 485,476 persons (2010 Census) and cover 960 km^2. The population served by WMFL's 60 dBu service contour would increase by 366,142 persons (307% more than the current population served).

WMFL would receive interference from WRGP's 100 dBu interfering contour over 2.5 km^2 and containing only 163 persons currently outside of the existing WMFL service contour (SEE FIGURE 3). This would be 0.04% of the total WMFL population served.

Therefore, a waiver of section 73.509 overlap requirements with respect to second adjacent station WRGP regarding proposed overlap is requested in conjunction with this application.

[See 'Educational Information Corporation (WCPE)', 6 FCC Rcd 2207 (1991)]

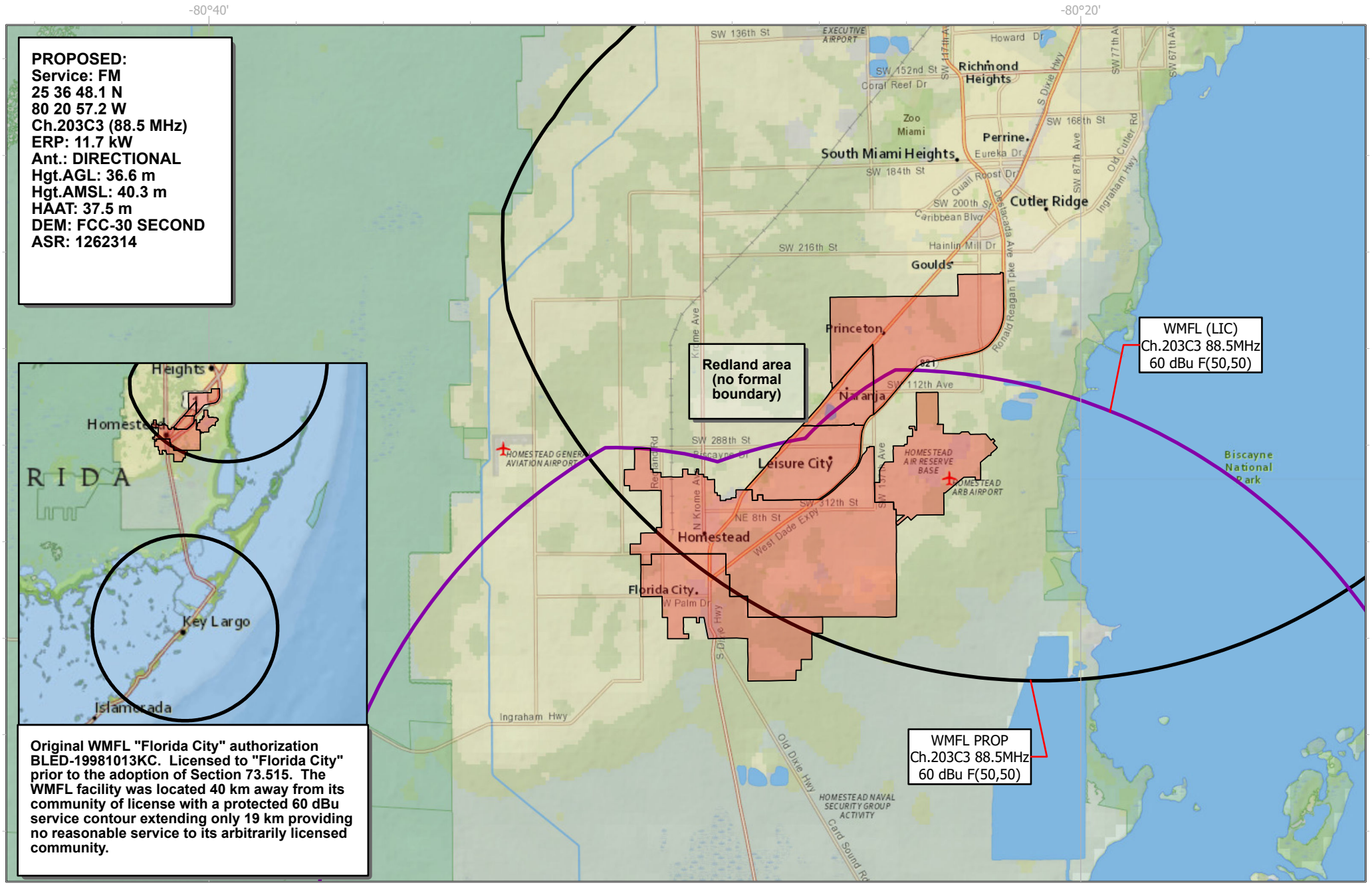
73.515 Community of License Coverage: "Florida City" Florida

This proposed minor modification continues protected, 60 dBu coverage of the Florida City community. Florida City, along with Homestead, comprises the "Greater Homestead-Florida City" area which is contiguous with the notable unincorporated communities of Redland, Leisure City, Naranja, and Princeton (SEE FIGURE 4).

Prior to the adoption of Section 73.515 of the Commission's Rules, the original WMFL authorized facility (BLED-19981013KC) was located near Key Largo, Florida approximately 40 km away from the Florida City community. The original facility's protected 60 dBu service contour extended only 19 km and providing no reasonable service to the arbitrarily licensed Florida City community (SEE FIGURE 4).

However, WMFL was modified in 2006 to the current facility (BLED-20060109AAA) to cover more than 50% of the Greater Homestead-Florida City community including the contiguous unincorporated areas. However due to a lack of suitable tower sites, the WMFL antenna was located more than 15 km outside of the community with a 2 dB pattern null placed directly over the community (SEE FIGURE 4).

WMFL has obtained permission to collocate on a new tower site that will allow greater coverage of its licensed community (without a directional antenna pattern null toward the community) including increased coverage of the unincorporated neighborhoods that comprise the Greater Homestead-Florida City community (SEE FIGURE 4).



WMFL FLORIDA CITY, FL Proposed Channel 203C3 (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - MINOR CHANGE

Figure 4

Community of license coverage: "Florida City", Florida:

Florida City and Homestead comprise the Greater Homestead-Florida City area which is contiguous with the notable unincorporated communities of Redland, Leisure City, Naranja, and Princeton.

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Radiofrequency Electromagnetic Exposure Analysis

Source	Height AGL(m)	Antenna type	Bays	Horizontal ERP (kw)	Vertical ERP (kw)	Power Density $\mu W/cm^2$ at 2 meters AGL: within 10 meters distance	% controlled environment limit (1000 $\mu W/cm^2$)	Max. PD	% uncontrolled environment limit (200 $\mu W/cm^2$)	Distance to maximum PD (m)
WMFL (proposed)	36.6	SHI-6810-2	2	11.7	11.7	35.6	3.56%	58.1	29.1%	18.6
						35.6	**3.56%**	58.1	**29.1%**	18.6

The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments).

Calculations made using Equation 10 from OET 65 and manufacturer's antenna data