

Engineering Statement

W237ER Huntington, West Virginia (Facility ID # 200426)

Licensee - Bristol Broadcasting Company, Inc.

Application - Minor Modification to Licensed Facilities

By this Application, the Licensee (Bristol Broadcasting Company, Inc. "Bristol") seeks authority to modify the authorized facilities of FM Translator Station W237ER including changing the antenna/transmitter location and the antenna height above average terrain.

Engineering Discussion - Rules Compliance

W237ER rebroadcasts station WYSN(AM) at Huntington, West Virginia (Facility ID # 61277) as a "fill-in" translator. The service contour of Translator Station W237ER with the proposed facilities will be completely encompassed by the 2.0 mV/m daytime contour of WYSN(AM) and will not extend outside a circle with a 25-mile radius centered at the WYSN(AM) transmitter site. See Figure 1 "Primary Station Data/Rules Compliance Showing" attached herewith.

As is also shown on Figure 1, the predicted 60 dBu contour of the proposed facility will overlap the 60 dBu contour of the W237ER licensed facilities as is required for the filing of a "minor change" application.

Applicant proposes to employ a non-directional antenna for W237ER.

The W237ER antenna will be side-mounted on an existing lattice-type guyed tower which is listed in the Commission's database as Antenna Structure Registration # 1057824.

Contour Overlap Analysis

An analysis of contour overlap to co-channel, adjacent channel, and IF channel facilities created by the instant proposal to operate W237ER on channel 237D (95.3 MHz) was completed. This analysis (see Figure 2) demonstrated that there will be no prohibited contour overlap to any present or proposed facilities.

Based on the foregoing, the instant application is in full compliance with all applicable FCC rules regarding interference to other existing or proposed facilities.

Radiofrequency Radiation Exposure and Environmental Considerations

The RF contribution from the proposed 0.250 kW facility with the center of radiation at 26 meters above ground level was evaluated using the Commission's FM Model Program and assuming a "worst case" single bay, opposed-V dipole circularly polarized antenna. The maximum RF contribution of the facility at a height of 2 meters above ground was calculated to be 7.978 $\mu\text{W}/\text{cm}^2$ at a horizontal distance of 24.6 meters from the tower base. This is below the 5% threshold of the maximum permissible of 200 $\mu\text{W}/\text{cm}^2$ for general public exposure, and, therefore, may be excluded from consideration of a detailed analysis. Accordingly, the proposed facility will be in full compliance with the FCC-specified guidelines for human exposure to radiofrequency radiation in both the "controlled" and "uncontrolled" environments.

The proposed W2237ER antenna will be side-mounted on an existing tower and will create no significant visual impact to the tower.

The area at the base of the existing tower is secured to prevent unauthorized or accidental access to the area. Signs will be posted warning of potential RF danger. Additionally, the licensee in cooperation with other users at the site will reduce operating power or cease transmissions entirely to comply with ANSI guidelines whenever persons require access to the area for maintenance purposes.

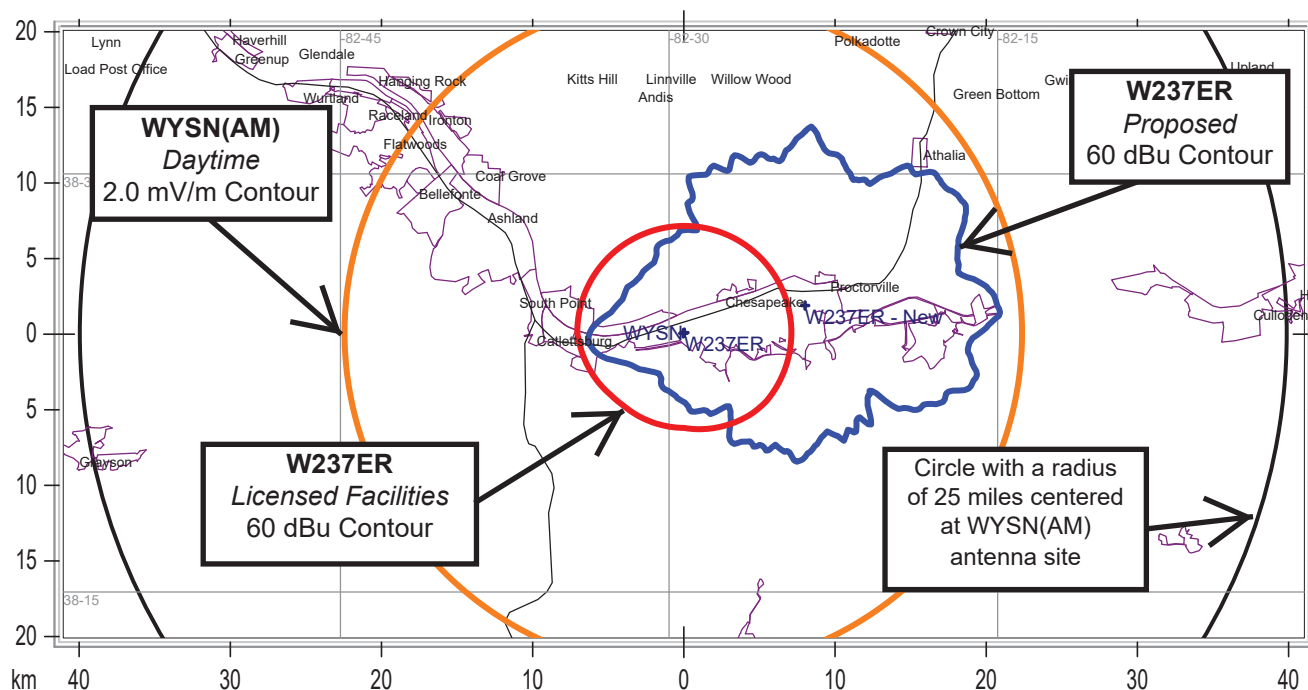
In light of the foregoing, it is clear that the proposed facility will have no significant impact on the environment.

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Application to Modify Licensed Facilities

Figure 1 - Primary Station Data/Rules Compliance Showing



FM Translator Station W237ER rebroadcasts Station WYSN(AM) at Huntington, West Virginia. The service contour of W237ER with the proposed facilities will not exceed the 2.0 mV/m daytime contour of WYSN(AM) nor will it extend outside a circle with a 25-mile radius centered at the WYSN(AM) transmitter site. WYSN(AM) is co-owned with W237ER by Bristol Broadcasting Company, Inc.

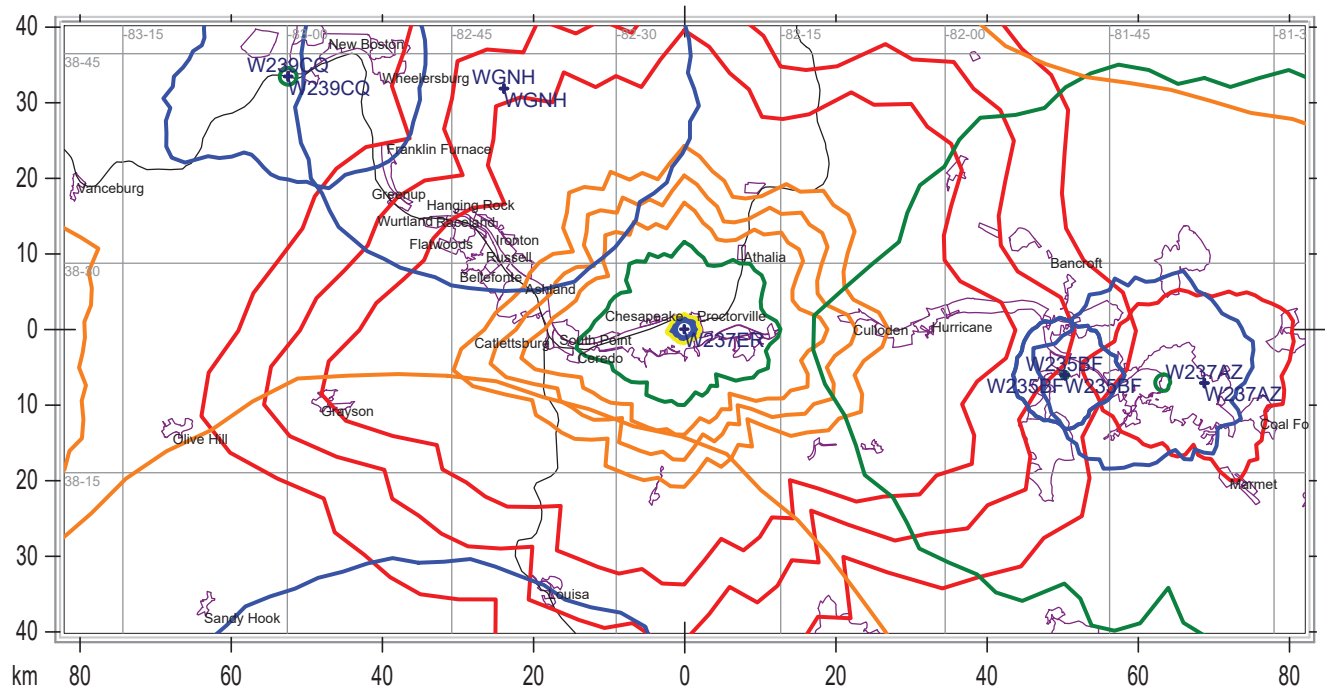
The 60 dBu contour of the proposed W237ER facilities will have overlap with the 60 dBu contour of licensed facilities authorized of W237ER as required for a "minor change" application.

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Application to Modify Station License

Figure 2 - Channel 237D Usability Study



Callsign	City	State	Freq	Channel	ERP Watts	Class	Status	Distance Kilometer	Clr
W237AZ	CHARLESTON	WV	95.3	237	175	D	LIC	69.44	0.98 dB
WQHY	PRESTONSBURG	KY	95.5	238	100000	C	LIC	86.49	-0.04 dB
WGNH	SOUTH WEBSTER	OH	94.9	235	2200	A	LIC	39.84	7.87 dB
WXIL	ELIZABETH	WV	95.1	236	50000	B	LIC	121.79	12.81 dB
WRLB	RAINELLE	WV	95.3	237	13000	B1	LIC	152.13	17.01 dB
WKLW-FM	PAINTSVILLE	KY	94.7	234	4900	C3	LIC	78.03	17.72 dB
WXMG	LANCASTER	OH	95.5	238	45000	B	LIC	141.34	23.41 dB
WXMG	LANCASTER	OH	95.5	238	21000	B	LIC	141.33	23.27 dB
WFLE-FM	FLEMINGSBURG	KY	95.1	236	2350	A	LIC	103.19	24.75 dB
W239CQ	PORTSMOUTH	OH	95.7	239	250	D	LIC	62.25	25.46 dB
WRLB-FM1	LEWISBURG	WV	95.3	237	190	D	LIC	178.91	26.72 dB
W239CH	CHARLESTON	WV	95.7	239	250	D	LIC	64.05	26.81 dB

BOULDIN
ENGINEERING

22299 Campground Road, Bristol, Virginia 24202
Telephone (423) 794-0857