

WMFL PALMETTO BAY, FL Proposed Channel 203A (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - MINOR MOD

Co-channel and minor change showing.

0 3 6 12 Kilometers **Figure 1**

Robert J. Robbins, Ph.D.
www.radiodataservices.com
radiodataservices@radiodataservices.com
(305) 234-9309

PROPOSED:
Service: FM
25 36 48.1 N
80 20 57.2 W
Ch.203A (88.5 MHz)
ERP: 2 kW
Ant.: DIRECTIONAL
Hgt.AGL: 36.6 m
Hgt.AMSL: 40.3 m
HAAT: 40.3 m
DEM: FCC-30
ASR: 1262314

WGNK L2C
Ch.202A 88.3MHz
60 dBu F(50,50)

WGNK L2C
Ch.202A 88.3MHz
54 dBu F(50,10)

WMFL PROP
Ch.203A 88.5MHz
54 dBu F(50,10)

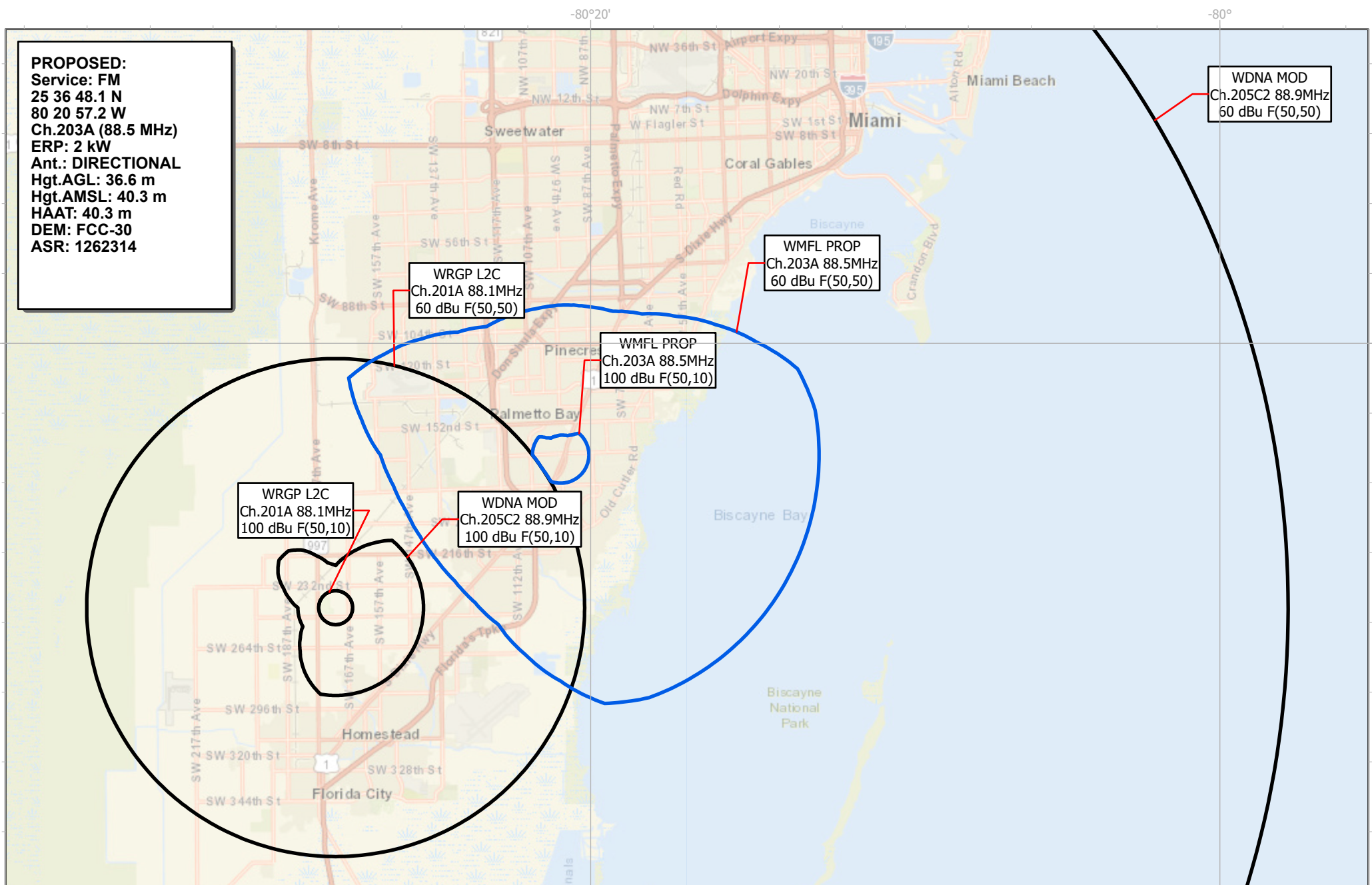
WMFL PROP
Ch.203A 88.5MHz
60 dBu F(50,50)

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1st adjacent-channel showing.

0 2.25 4.5 9 Kilometers **Figure 2**

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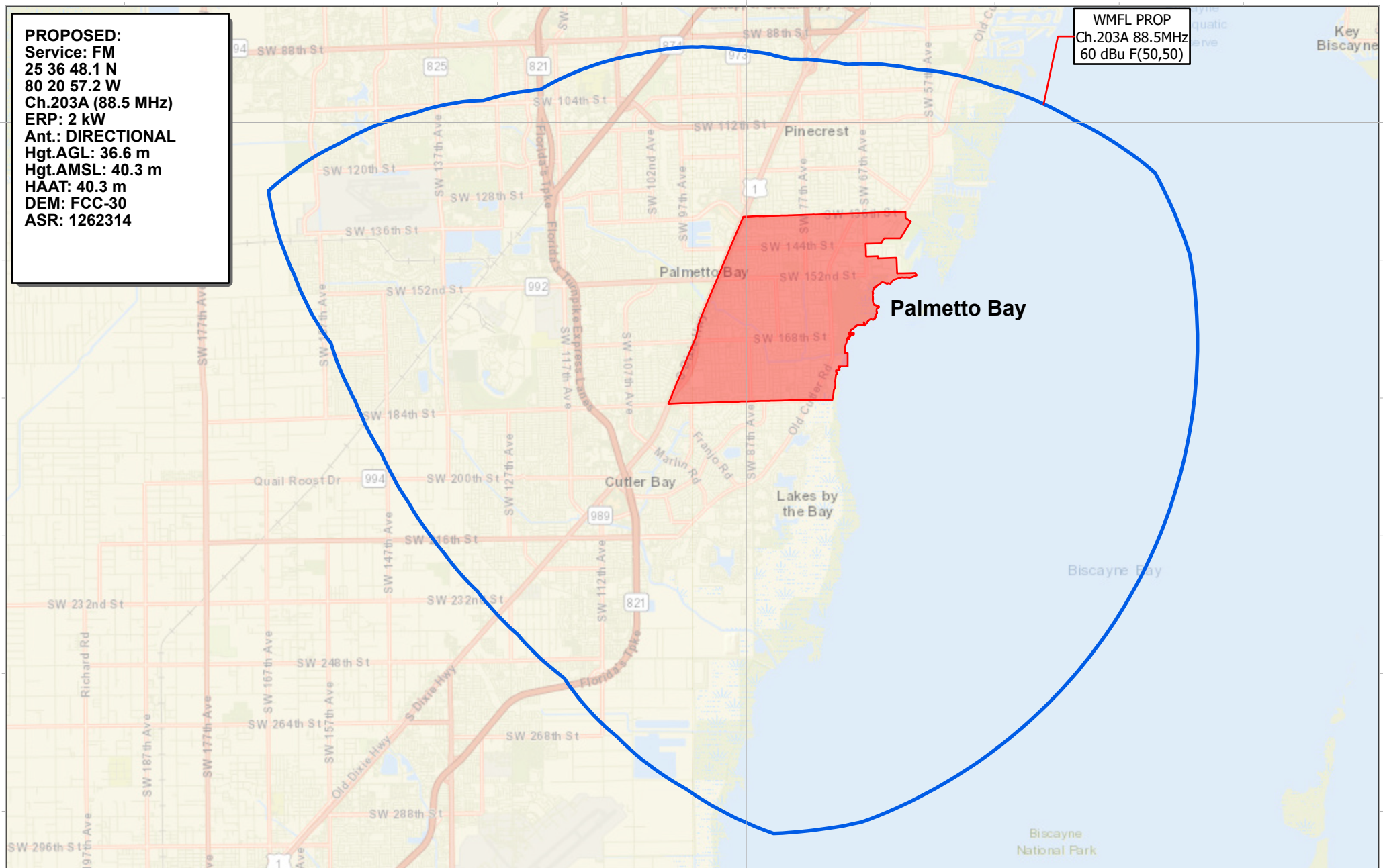
WMFL PALMETTO BAY, FL Proposed Channel 203A (88.5 MHz)
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2nd and 3rd adjacent-channel showing.

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60 dBu F(50,50)



WMFL PALMETTO BAY, FL Proposed Channel 203A (88.5 MHz)
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0 1.75 3.5 7 Kilometers

Figure 4

Community of license showing.

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www.radiodataservices.com
radiodataservices@radiodataservices.com
(305) 234-9309

Table 1 - 73.509 Channel Study**WMFL PALMETTO BAY, FL - CALL COMMUNICATIONS GROUP, INC.****MINOR MOD June 2022 (Ch.203A 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 INTERNATIONAL	235.8	14.4	14.4	0.0
201	A	WMKJ	FM	L-L2C	TAVERNIER	FL	US	CALL COMMUNICATIONS	195.6	71.9	10.8	61.1
202	A	WGNK	FM	L-L2C	PENNSUCO	FL	US	GENESIS LICENSE SUBS	335.2	31.9	31.6	0.3
203	C3	WMFL	FM	L-MOD	FLORIDA CITY	FL	US	CALL COMMUNICATIONS	189.8	32.5	92.3	-59.8 (appliant)
203	A	WKPX	FM	L-L2C	SUNRISE	FL	US	SCHOOL BOARD OF BR	8.4	63.4	63.4	0.1
205	C2	WDNA	FM	L-MOD	MIAMI	FL	US	BASCOMB MEMORIAL	235.9	14.4	51.8	-37.4 (see waiver exhibit)

Terrain data DEM: FCC-30

Table 2 - 73.207 Channel Study
WMFL PALMETTO BAY, FL - CALL COMMUNICATIONS GROUP, INC.
MINOR MOD June 2022 (Ch.203A 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	22	18.7

Distance separations determined per §73.208(c)

The proposed antenna location is not within 320 kilometers of the common border between the United States and Canada or Mexico.

Request for 73.509 Waiver Regarding WDNA

Applicant respectfully requests a waiver of Section 73.509 of the Commission's rules with respect to 2nd adjacent NCE-FM station WDNA in order to be allowed to move WMFL's licensed facility to the proposed location specified in this minor modification. The applicant believes that this waiver is warranted and supported by the FCC's statement in its March 25, 1997 letter to WDNA that "Further modification to construction permit BPED-940531MB, Florida City, FL, will not be construed as a per se modification of WDNA's license (See Educational Information Corporation, 6 FCC Rcd. 2207 (1991))."

WMFL will not receive any interference from WDNA's predicted interfering contour (100 dBu F(50,10)) which will remain outside 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 nearly 25 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 151,243 persons (2020 Census) and covers 1,290 km² (85% water and wetlands). Excluding water, WMFL's actual land area is only 187.7 km².

WMFL's proposed 60 dBu service area will contain 334,954 persons (2020 Census) and cover 196.2 km² excluding water. The population served by WMFL's 60 dBu service contour will increase by 183,711 persons (125% more than the current population served).

The area of overlap of the WDNA 60 dBu F(50,50) protected contour by the proposed WMFL 100 dBu F(50,10) contour will be **reduced** to 5.97 km² from the current existing 13.87 km² area of overlap. The original area of overlap, nearly 25 years ago when WDNA modified its license agreeing to accept interference from WMFL, was 12.85 km². **This proposed facility will result in the smallest amount of WMFL-WDNA overlap since WDNA created the situation nearly 25 years ago.**

Based on the above, the applicant requests a waiver of Section 73.509 in order to be allowed to move WMFL's licensed facility to the proposed location specified in this minor modification. The applicant believes that this waiver is warranted and supported by the FCC's statement in its March 25, 1997 letter to WDNA that "Further modification to construction permit BPED-940531MB, Florida City, FL, will not be construed as a

per se modification of WDNA's license (See Educational Information Corporation, 6 FCC Rcd. 2207 (1991))."

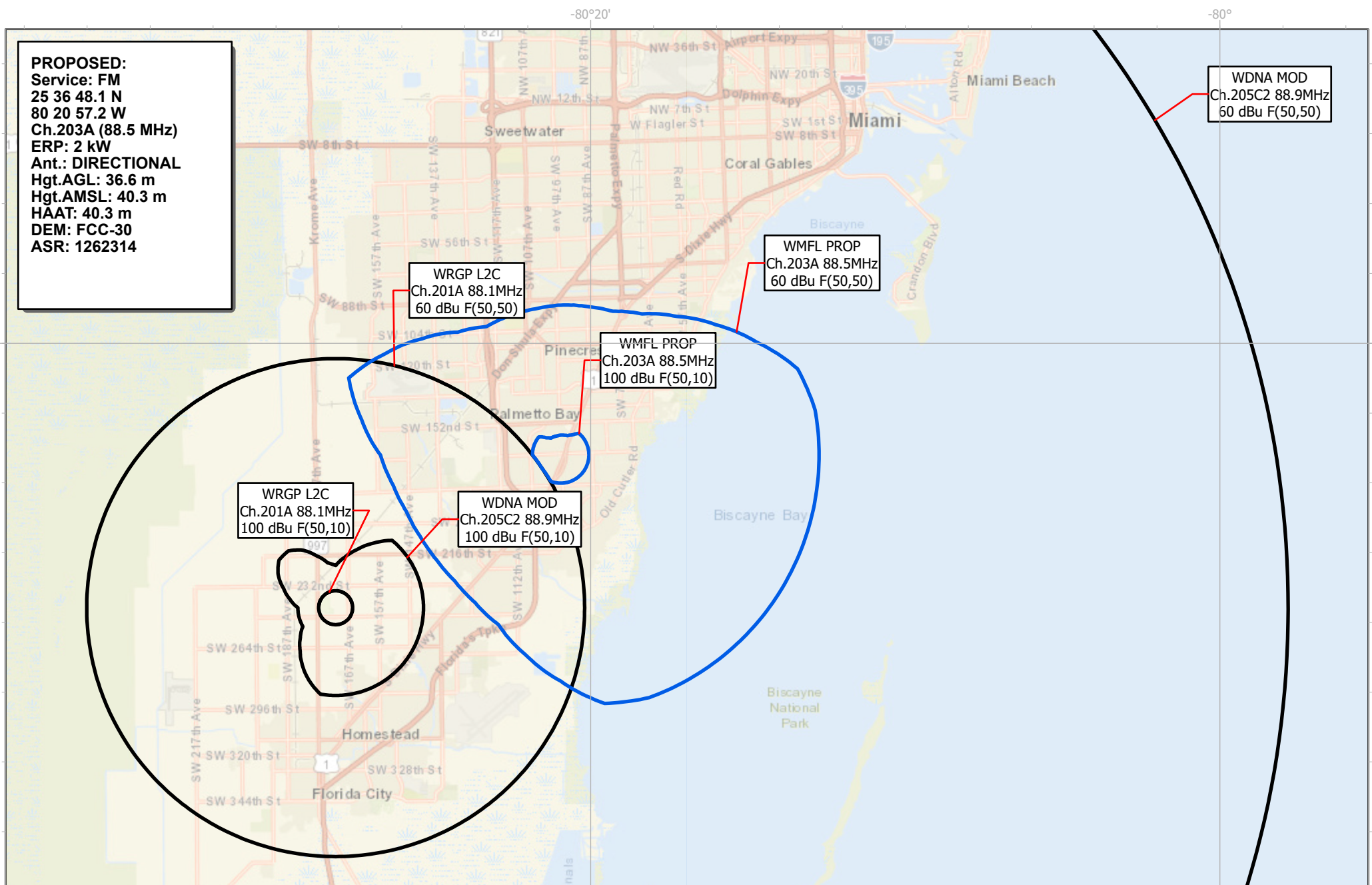
Therefore, a waiver of section 73.509 overlap requirements with respect to second adjacent station WDNA regarding proposed overlap is requested in conjunction with this application.

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

Table 1 - 73.509 Channel Study**WMFL PALMETTO BAY, FL - CALL COMMUNICATIONS GROUP, INC.****MINOR MOD June 2022 (Ch.203A proposed)**

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Terrain data DEM: FCC-30



WMFL PALMETTO BAY, FL Proposed Channel 203A (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - MINOR MOD

0 3.25 6.5 13 Kilometers

Figure 3

2nd and 3rd adjacent-channel showing.

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Radiofrequency Electromagnetic Exposure Analysis

Source	Height AGL(m)	Antenna type	Bays	Horizontal ERP (kw)	Vertical ERP (kw)	Power Density $\mu\text{W}/\text{cm}^2$ at 2 meters AGL				
						within 10 meters distance	% controlled environment limit (1000 $\mu\text{W}/\text{cm}^2$)	Max. PD	% uncontrolled environment limit (200 $\mu\text{W}/\text{cm}^2$)	Distance to maximum PD (m)
WMFL (proposed)	36.6	(EPA Type 1) SHI-SLV-1	1	2.0	2.0	67.1	6.71%	67.1	33.6%	10.0
						67.1	6.71%	67.1	33.6%	10.0

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 FCC FMModel (Revised version)

Community of License Change - Section 307(b)

WMFL proposes to change community of license to Palmetto Bay, Florida from Florida City, Florida. Because both Palmetto Bay and nearby Florida City are located within the same Miami, Florida Urbanized Area, the licensee requests consideration of WMFL's **intra-urbanized area relocation** under "Priority 4" based on compelling "other public interest matters." (See Figure 4.1)

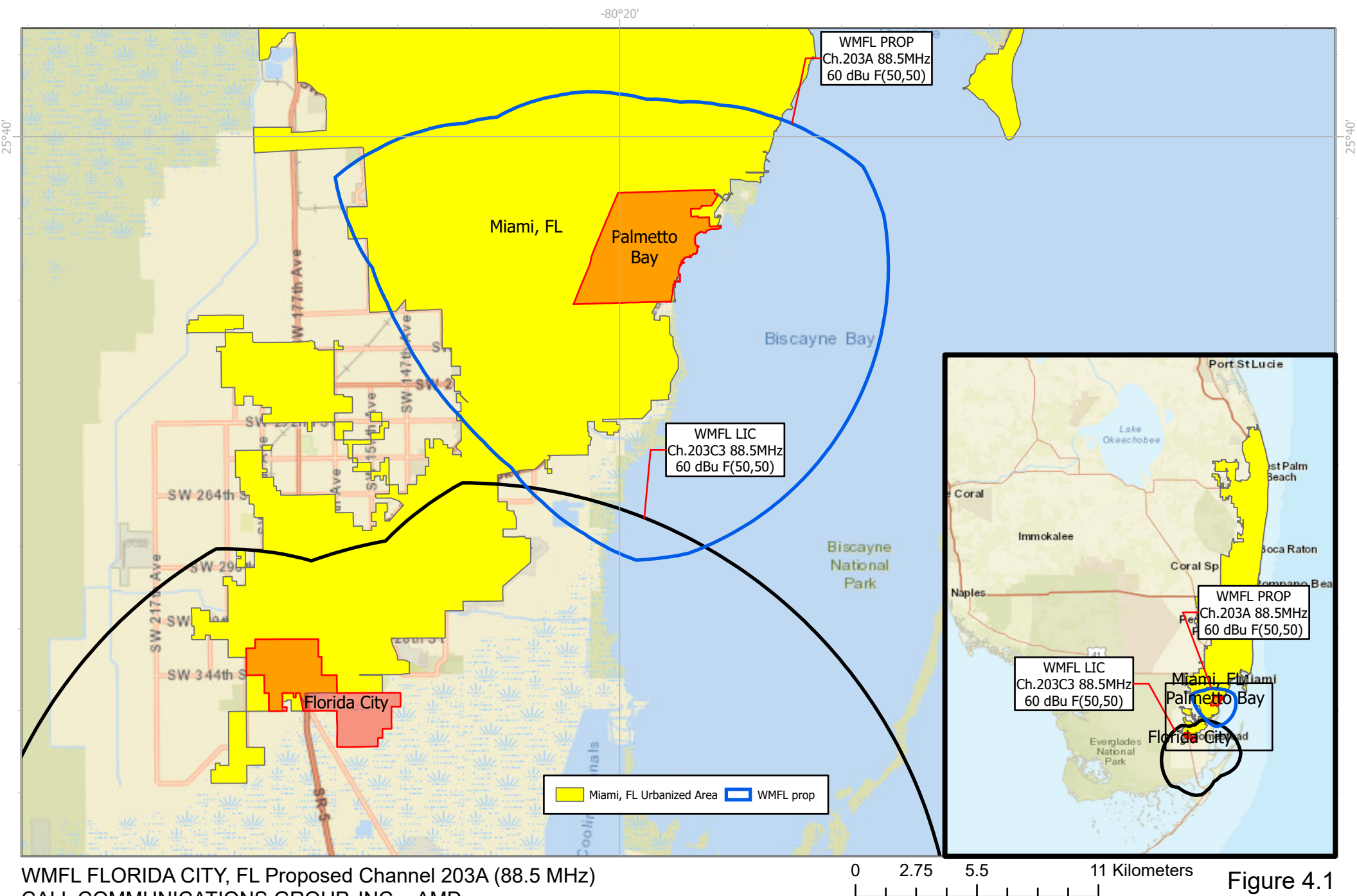
The existing WMFL 60 dBu population served is 151,243 persons. WMFL proposes a net increase of 183,711 persons (125% increase) resulting in a total population of 334,954 within the proposed 60 dBu service contour (2020 Census). (See Figure 4.2)

The existing WMFL 60 dBu areal coverage is 187.7 km² (excluding areas of water). WMFL proposes a net areal coverage increase of 8 km² (4.2% increase) resulting in a total 60 dBu areal coverage of 195.5 km² (excluding areas of water). (See Figure 4.2)

Florida City, without WMFL, would retain 17 FM and AM local services (which includes 4 NCE-FM services). The WMFL service "loss" area (excluding areas of water) would retain 27 FM and AM local services (which includes 6 NCE-FM services) (See Table 4.1).

WMFL (original authorization BLED-19981013KC) was licensed to "Florida City" prior to the adoption of Section 73.515. This original WMFL facility was located 40 km away from its community of license with a protected 60 dBu service contour extending only 19 km providing no reasonable service to its arbitrarily licensed community. (See Figure 4.3). Due to limited available sites, WMFL has been unable to feasibly provide non-commercial educational service from any existing tower site while complying with Section 73.515 with Florida City as the community of license.

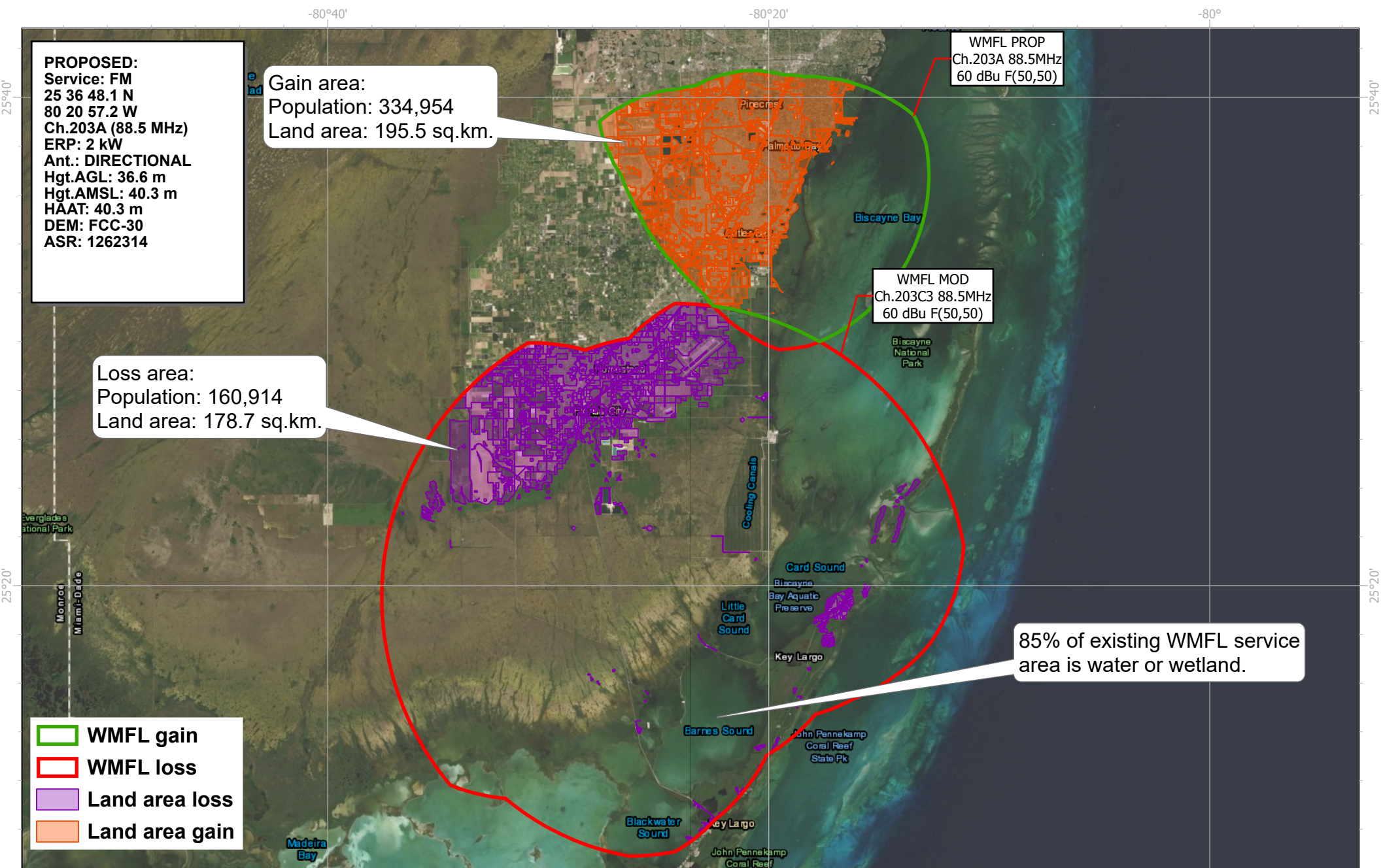
Therefore, these compelling "other public interest matters," under Priority 4, warrant consideration of WMFL's proposed intra-urbanized area move to Palmetto Bay, Florida as constituting a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).



WMFL FLORIDA CITY, FL Proposed Channel 203A (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - AMD

Change of community of license within Miami, FL Urbanized Area.

Robert J. Robbins, Ph.D.
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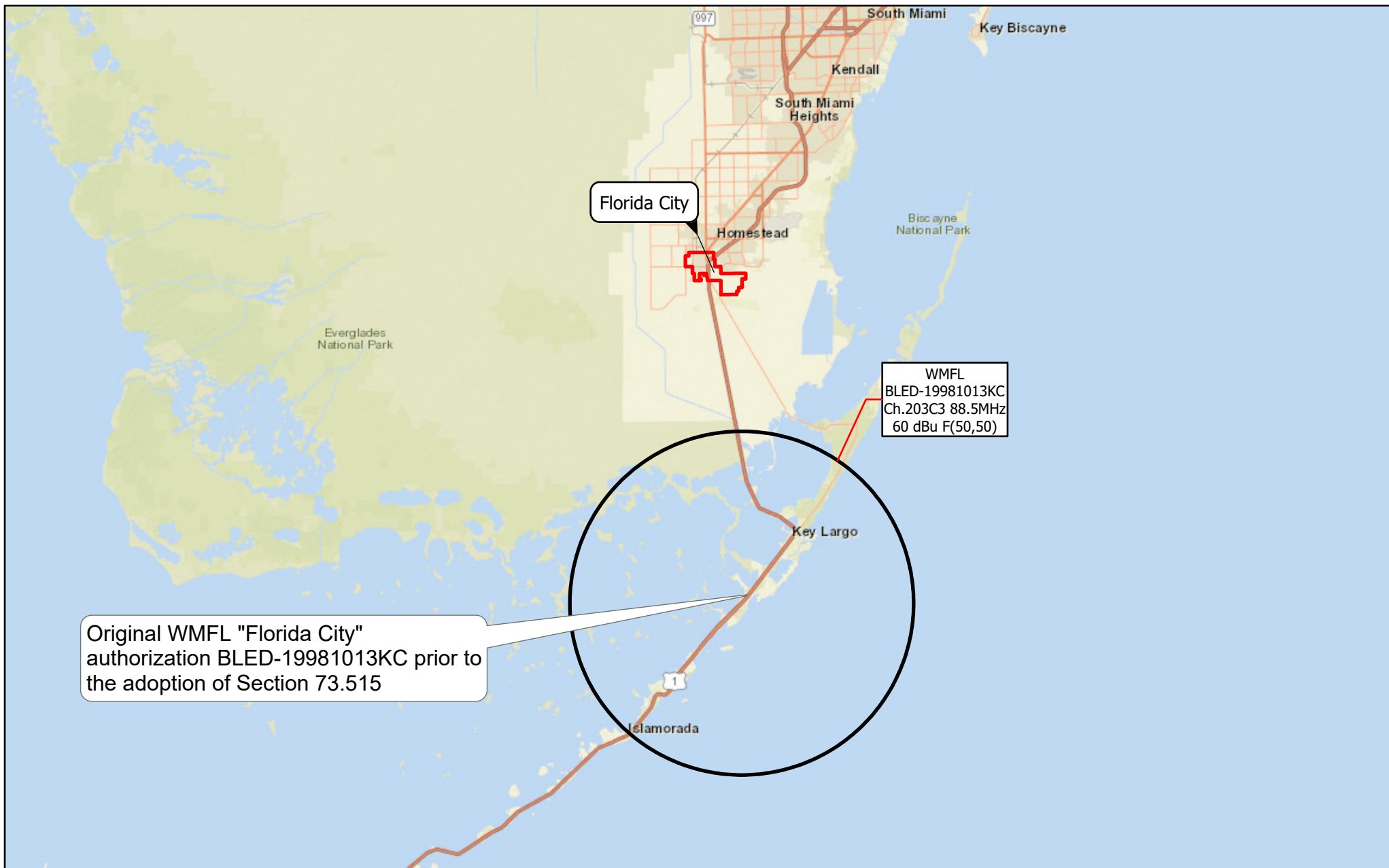
0 4.75 9.5 19 Kilometers

Figure 4.2

WMFL proposed gain and loss areas. Population based on 2020 Census block data. Land area includes all area not designated as any type of wetland or water body area. 85% of existing WMFL service area is water.

[Sources: Unites States Census Bureau file tlgdb_2021_a_us_areawater.gdb; South Florida Water Management District file SFWMD_Land_Cover_Land_Use_2014-2016-f.gdb]

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CALL COMMUNICATIONS GROUP, INC. - MINOR MOD

0 5 10 20 Kilometers
| | | | |

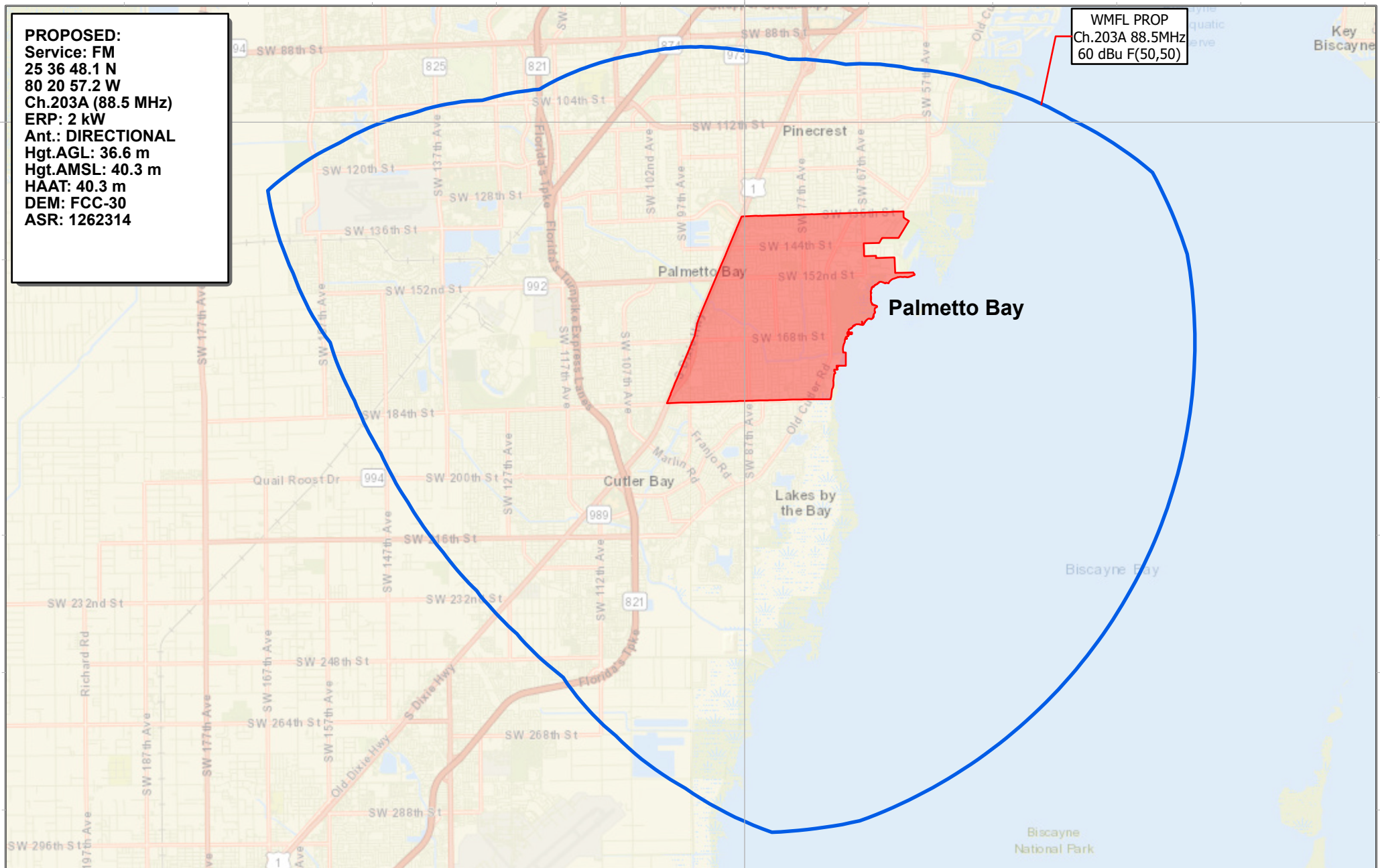
Figure 4.3

Original WMFL "Florida City" authorization BLED-19981013KC. Licensed to "Florida City" prior to the adoption of Section 73.515. The WMFL facility was located 40 km away from its community of license with a protected 60 dBu service contour extending only 19 km providing no reasonable service to its arbitrarily licensed community.

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WMFL PROP
Ch.203A 88.5MHz
60 dBu F(50,50)



WMFL PALMETTO BAY, FL Proposed Channel 203A (88.5 MHz)
CALL COMMUNICATIONS GROUP, INC. - MINOR MOD

0 1.75 3.5 7 Kilometers

Figure 4

Community of license showing.

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Table 4.1. Existing local aural services (AM and FM)

Existing local aural services inside boundary of Florida City, Florida:

Service	Call sign	Contour	Service	File Number	City	State	Owner
1	WAQI	5 mV (daytime)	AM	BL-19850910AA	MIAMI	FL	UNIVISION RADIO STATIONS GROUP, INC.
2	WINZ	5 mV (daytime)	AM	BL-19880317AB	MIAMI	FL	IHM LICENSES, LLC
3	WIOD	5 mV (daytime)	AM	BL-	MIAMI	FL	IHM LICENSES, LLC
4	WNMA	5 mV (daytime)	AM	BL-20031028AEK	MIAMI SPRINGS	FL	MULTICULTURAL RADIO BROADCASTING LICENSEE, LLC
5	WOIR	5 mV (daytime)	AM	BL-20010202ABA	HOMESTEAD	FL	ERJ MEDIA LLC
6	WQAM	5 mV (daytime)	AM	BL-19871027AI	MIAMI	FL	ENTERCOM LICENSE, LLC
7	WQBA	5 mV (daytime)	AM	BMML-20180502ACO	MIAMI	FL	UNIVISION RADIO STATIONS GROUP, INC.
8	WURN	5 mV (daytime)	AM	BMML-20170322ABK	MIAMI	FL	ACTUALIDAD 1040AM LICENSEE, LLC
9	WWFE	5 mV (daytime)	AM	BL-19890601AC	MIAMI	FL	FENIX BROADCASTING CORP.
10	WRGP	60 dBu F(50,50)	FM	BLED-19990624KB	HOMESTEAD	FL	FLORIDA INTERNATIONAL UNIVERSITY BOARD OF TRUSTEES
11	WDNA	60 dBu F(50,50)	FM	BMLED-20130605AAC	MIAMI	FL	BASCOMB MEMORIAL BROADCASTING FOUNDATION
12	WMLV	60 dBu F(50,50)	FM	BLED-19940802KA	MIAMI	FL	EDUCATIONAL MEDIA FOUNDATION
13	WLFE	60 dBu F(50,50)	FM	BLED-20090507ACP	CUTLER BAY	FL	CALVARY CHAPEL OF KENDALL, INC.
14	WLRN-FM	60 dBu F(50,50)	FM	BLED-20030411ABJ	MIAMI	FL	THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA
15	WRTO-FM	70 dBu F(50,50)	FM	BLH-19920311KD	GOULDS	FL	UNIVISION RADIO STATIONS GROUP, INC.
16	WRAZ-FM	70 dBu F(50,50)	FM	BLH-20071211AAV	LEISURE CITY	FL	SOUTH BROADCASTING SYSTEM, INC.
17	WURN-FM	70 dBu F(50,50)	FM	BLH-20160517ABE	KEY LARGO	FL	ACTUALIDAD KEY LARGO FM LICENSEE, LLC
18	WMFL	60 dBu F(50,50)	FM	BMLED-20131118ALV	FLORIDA CITY	FL	CALL COMMUNICATIONS GROUP, INC.

Existing local aural services inside proposed WMFL "loss" area (excluding water):

Service	Call sign	Contour	Service	File Number	City	State	Owner
1	WAQI	5 mV (daytime)	AM	BL-19850910AA	MIAMI	FL	UNIVISION RADIO STATIONS GROUP, INC.
2	WINZ	5 mV (daytime)	AM	BL-19880317AB	MIAMI	FL	IHM LICENSES, LLC
3	WIOD	5 mV (daytime)	AM	BL-	MIAMI	FL	IHM LICENSES, LLC
4	WMYM	5 mV (daytime)	AM	BMML-20170328ABI	KENDALL	FL	ACTUALIDAD 990AM LICENSEE, LLC
5	WNMA	5 mV (daytime)	AM	BL-20031028AEK	MIAMI SPRINGS	FL	MULTICULTURAL RADIO BROADCASTING LICENSEE, LLC
6	WOIR	5 mV (daytime)	AM	BL-20010202ABA	HOMESTEAD	FL	ERJ MEDIA LLC
7	WQAM	5 mV (daytime)	AM	BL-19871027AI	MIAMI	FL	Audacy License, LLC
8	WQBA	5 mV (daytime)	AM	BMML-20180502ACO	MIAMI	FL	UNIVISION RADIO STATIONS GROUP, INC.
9	WQOS	5 mV (daytime)	AM	BMML-20101229ABT	CORAL GABLES	FL	RELEVANT RADIO, INC.
10	WSUA	5 mV (daytime)	AM	BMML-20140530AUK	MIAMI	FL	WSUA BROADCASTING CORPORATION
11	WURN	5 mV (daytime)	AM	BMML-20170322ABK	MIAMI	FL	ACTUALIDAD 1040AM LICENSEE, LLC
12	WWFE	5 mV (daytime)	AM	BL-19890601AC	MIAMI	FL	FENIX BROADCASTING CORP.
13	WRGP	60 dBu F(50,50)	FM	BLED-19990624KB	HOMESTEAD	FL	FLORIDA INTERNATIONAL UNIVERSITY BOARD OF TRUSTEES
14	WDNA	60 dBu F(50,50)	FM	BMLED-20130605AAC	MIAMI	FL	BASCOMB MEMORIAL BROADCASTING FOUNDATION
15	WMLV	60 dBu F(50,50)	FM	BLED-19940802KA	MIAMI	FL	EDUCATIONAL MEDIA FOUNDATION
16	WLFE	60 dBu F(50,50)	FM	BLED-20090507ACP	CUTLER BAY	FL	CALVARY CHAPEL OF KENDALL, INC.
17	WLRN-FM	60 dBu F(50,50)	FM	BLED-20030411ABJ	MIAMI	FL	THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA
18	WMKL	60 dBu F(50,50)	FM	BLED-20160801AFE	HAMMOCKS	FL	RADIO MARIA, INC.
19	WZFL	70 dBu F(50,50)	FM	BLH-20170214ABC	ISLAMORADA	FL	ZOO COMMUNICATIONS, LLC
20	WKEZ-FM	70 dBu F(50,50)	FM	166688	TAVERNIER	FL	MAGNUM BROADCASTING, INC.
21	WRTO-FM	70 dBu F(50,50)	FM	BLH-19920311KD	GOULDS	FL	UNIVISION RADIO STATIONS GROUP, INC.
22	WCTH	70 dBu F(50,50)	FM	BLH-20070126AFO	PLANTATION KEY	FL	FLORIDA KEYS MEDIA, LLC
23	WKLG	70 dBu F(50,50)	FM	BLH-20050527AAS	ROCK HARBOR	FL	WKLG, INC.
24	WFKZ	70 dBu F(50,50)	FM	BLH-20180515AAG	PLANTATION KEY	FL	FLORIDA KEYS MEDIA, LLC
25	WWWK	70 dBu F(50,50)	FM	BLH-20070518AAI	ISLAMORADA	FL	UNIVERSAL BROADCASTING NETWORK LLC
26	WRAZ-FM	70 dBu F(50,50)	FM	BLH-20071211AAV	LEISURE CITY	FL	SOUTH BROADCASTING SYSTEM, INC.
27	WURN-FM	70 dBu F(50,50)	FM	BLH-20160517ABE	KEY LARGO	FL	ACTUALIDAD KEY LARGO FM LICENSEE, LLC
28	WMFL	60 dBu F(50,50)	FM	BMLED-20131118ALV	FLORIDA CITY	FL	CALL COMMUNICATIONS GROUP, INC.