TECHNICAL STATEMENT AND REQUEST FOR 73.215 PROCESSING
WMNA-FM HALIFAX, VIRGINIA 292C3
3 DAUGHTERS MEDIA, INC.
FCC FORM 301
JULY 2020

This technical statement is in support of an FCC application by 3 Daughters Media, Inc. for a minor change to WMNA-FM changing the class and the City of License from Gretna, Virginia on channel 292A to Halifax, Virginia on channel 292C3 . The facility ID is 9985.

The city of license was already granted in CP application file number BPH-20190211ACD on 07/17/2019. The new allotment is for Halifax, Virginia on channel 292C3 at the coordinates of N. 36°-54'-34", W. 79°-03'-05" NAD27.

Figure 1 is a channel spacing study for 292C3 from the proposed transmitter on ASR 1016916 which is northwest of Halifax at the coordinates of N. 36°-58'-22.30", W. 79°-05'-30.90 NAD83". The proposed facility will operate at an RCAMSL of 302 meters, HAAT of 132.8 meters, and with an ERP of 15 kW. There are apparent short spacings in the first two lines of the table to other records for WMNA, which will be eliminated by the change proposed in this application.

Figure 1 also shows that the proposed operation of WMNA-FM will be separated to all other stations as required under 73.207, with the exception of WLRX Vinton, Virginia on channel 291A. (Note that the license for WBTJ Richmond, Virginia meets the spacing requirements even though the allotment is too close.)

WLRX is spaced 88.5 kilometers from the proposed site of WMNA. Under 73.215 the minimum spacing required between these two facilities is 72 kilometers, thus, processing under 73.215 of the commissions rules is being respectfully requested in

regards to WLRX Vinton, Virginia. Figures 2 and 3 show that there will not be any overlap of either of the stations' (F50,10) interference contours, with the other station's corresponding (F50,50) protected contour. Both stations are 73.215 stations and the map reflects their operating parameters. (Fig 3 is a magnification of Fig 2.)

Figure 4 shows the 60 and 70 dBμ predicted F(50,50) contours from the proposed facility. It also shows an alternate coverage method using Longley-Rice. Note that the Longley-Rice predicted method shows 70 dBμ coverage in all of the 1 degree radials to the edge of or beyond the actual Halifax official boundaries.

Figure 5 shows that there is line of sight from the transmission tower to the community center of Halifax at an azimuth of 147 degrees. This alternate prediction method of the 70 dBμ coverage goes more than 10%, in fact many of the relevant radials more than 50%, beyond the FCC predicted 70 dBμ coverage. All of Halifax is within the FCC predicted 60 dBμ contour.

It was concluded that the proposed facility to be operated at Halifax, Virginia on channel 292C3, will be in full compliance with Commission rules and regulations.