

ENGINEERING STATEMENT
Cram Communications, LLC.
August, 2023

Cram Communications, LLC. (“CCL”) is the licensee of FM translator W255DC, Fulton, NY which is utilized as a fill-in translator for WOLF-FM, HD3, Baldwinsville, NY (Fac. ID 7716). CCL is commonly owned with Foxfur Communications, LLC, the licensee of WOLF-FM.

CCL now seeks to relocate the FM translator, modify to channel 256 (99.1 MHz), as well as the antenna height, and Effective Radiated Power. The new site, which is an existing tower (ASR 1011849), would permit WOLF-FM HD3, and its translator, to provide more effective coverage of Oswego County. No change is proposed in the overall height of the existing tower at the proposed site. The antenna system is proposed to be designed to accommodate multiple translator stations, and a multi-station combiner would be employed to mitigate any potential intermodulation.¹

Figure 1 is an Allocation Map which depicts protection to any pertinent co-, first, second, and third adjacent channel stations or authorizations as well as demonstrating that the proposed 34 dBu (50,10) contour does not encroach upon any landmass of Canada, and therefore is not expected to require international coordination. However, the 34 dBu (50,10) contour slightly exceeds 60 km. at the 280, 285 and 290 degree True azimuths (60.03, 60.14 & 60.05 km. respectively). As a cautionary measure, a waiver of Section 74.1235(d)(3) of the Commission’s Rules is requested, as well as requesting an exception to Section 4, Paragraph 4.3 of the Working Arrangement under the U.S./Canadian FM Broadcasting Agreement. Also, there are no pertinent stations or

¹ FM translator station W253BZ is concurrently filing a relocation application proposing to utilize the same antenna system with W255DC as a common antenna system for both stations.

authorizations 53 or 54 channels removed from the channel proposed regarding I.F. spacing requirements.

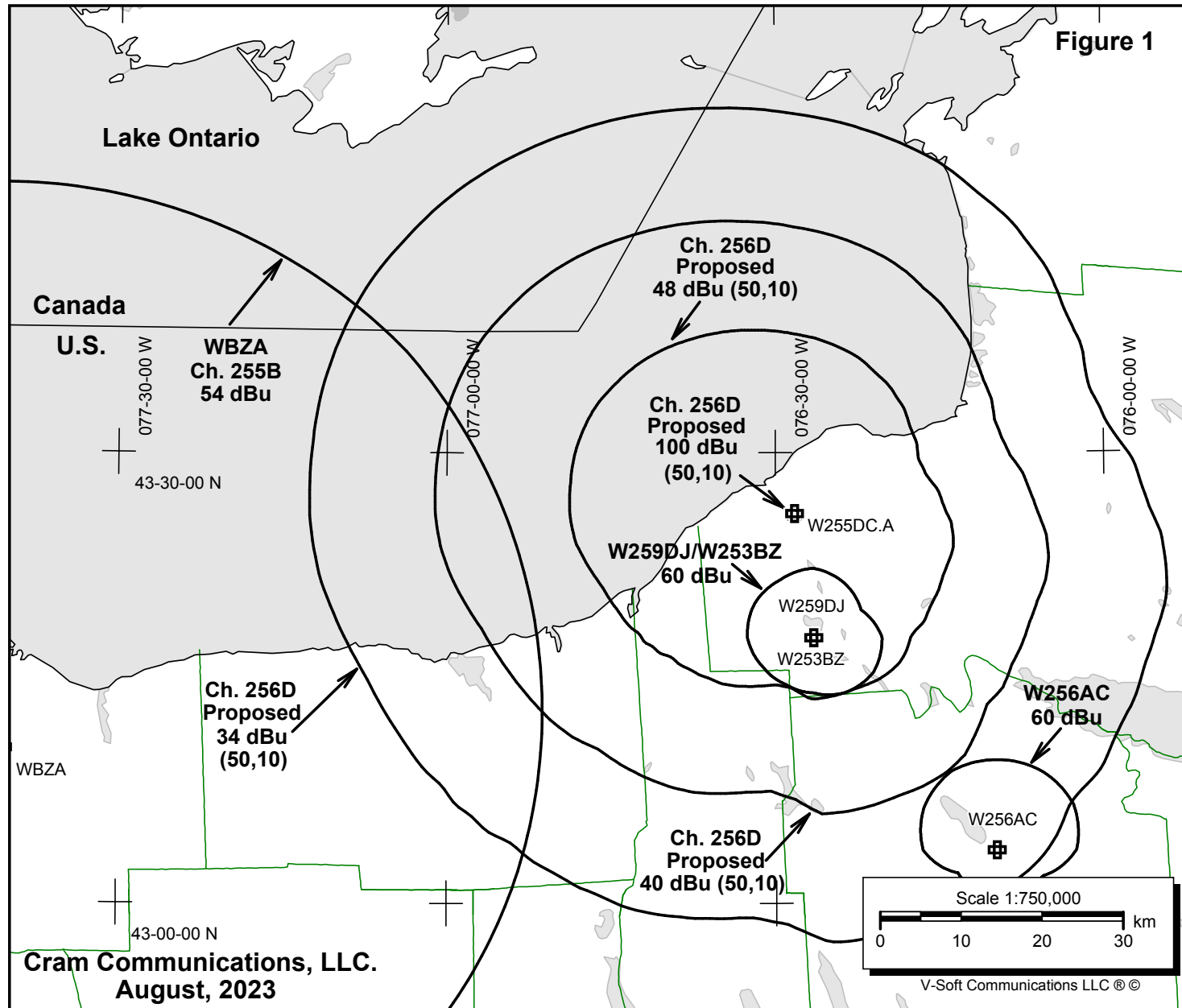
Figure 2 shows that the 60 dBu contours of both the licensed and proposed parameters of the translator overlap. Figure 2 also depicts that the proposed 57 dBu fill-in coverage area of the translator would be encompassed within the 57 dBu contour of the primary station, WOLF-FM, except in the area that extends over Lake Ontario. Figure 3 is an expanded view depicting fill-in compliance of Section 74.1201(h) of the Commission's Rules utilizing the high resolution coastline feature of V-Soft Communications' Probe mapping program. The distance to the 57 dBu contours were determined using 360 degree evenly spaced radials.

W255DC.A - Proposed Ch. 256D - Allocation Map

W255DC.A

Latitude: 43-25-57.10 N
Longitude: 076-28-16 W
ERP: 0.19 kW
Channel: 256
Frequency: 99.1 MHz
AMSL Height: 201.8 m
Elevation: 115.8 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: NoProp

Figure 1



Comparison of Primary and Translator Stations 57 dBu & 60 dBu Contours

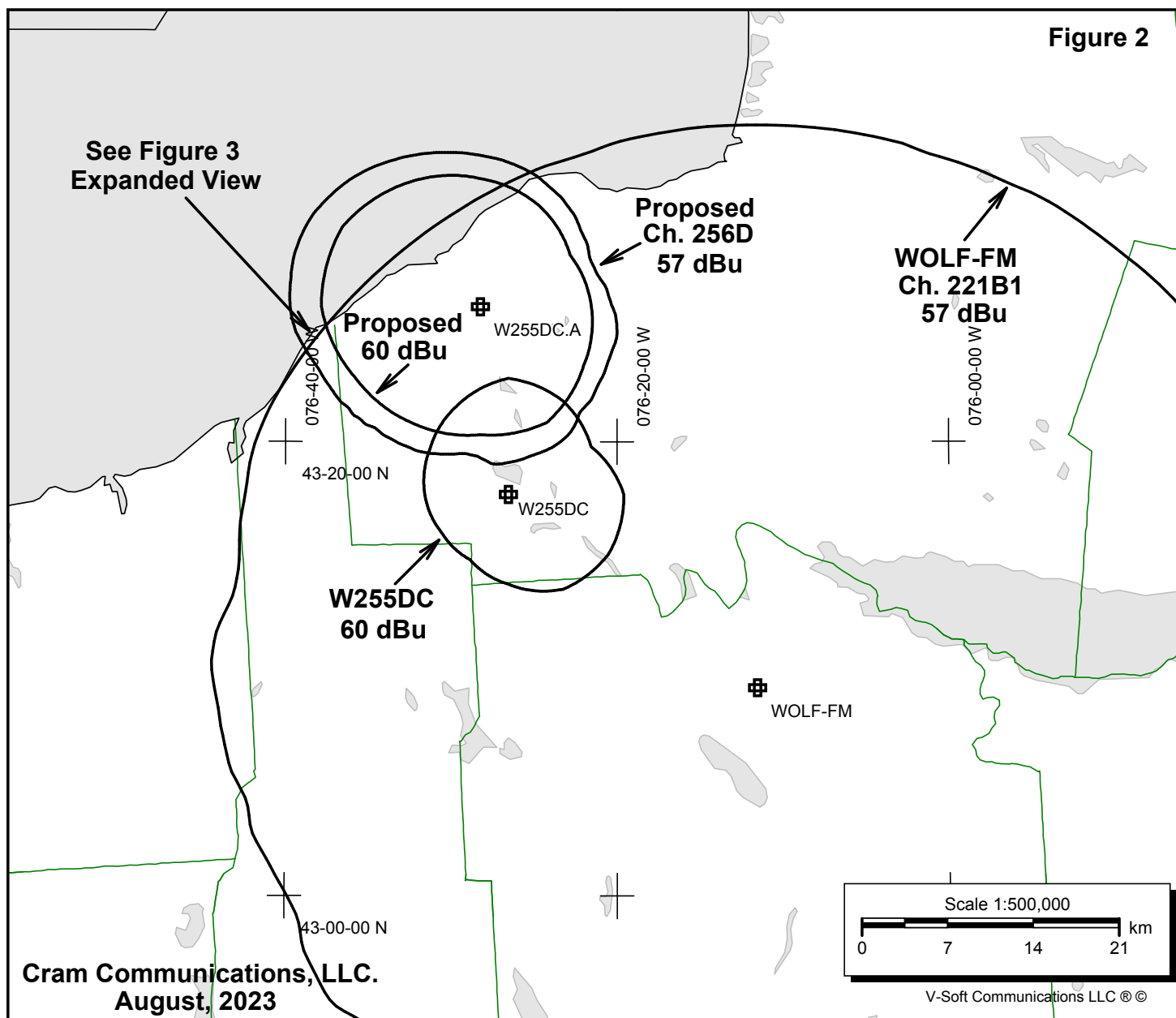
Figure 2

W255DC.A

Latitude: 43-25-57.10 N
Longitude: 076-28-16 W
ERP: 0.19 kW
Channel: 256
Frequency: 99.1 MHz
AMSL Height: 201.8 m
Elevation: 115.8 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: NoProp

WOLF-FM

BLH20171221AFE
Latitude: 43-09-10.20 N
Longitude: 076-11-33.70 W
ERP: 25.00 kW
Channel: 221
Frequency: 92.1 MHz
AMSL Height: 227.0 m
Elevation: 114.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: NoProp



Comparison of Primary and Translator Stations 57 dBu Contours - Expanded View

Figure 3

W255DC.A

Latitude: 43-25-57.10 N
Longitude: 076-28-16 W
ERP: 0.19 kW
Channel: 256
Frequency: 99.1 MHz
AMSL Height: 201.8 m
Elevation: 115.8 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: NoProp

WOLF-FM

BLH20171221AFE
Latitude: 43-09-10.20 N
Longitude: 076-11-33.70 W
ERP: 25.00 kW
Channel: 221
Frequency: 92.1 MHz
AMSL Height: 227.0 m
Elevation: 114.0 m
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