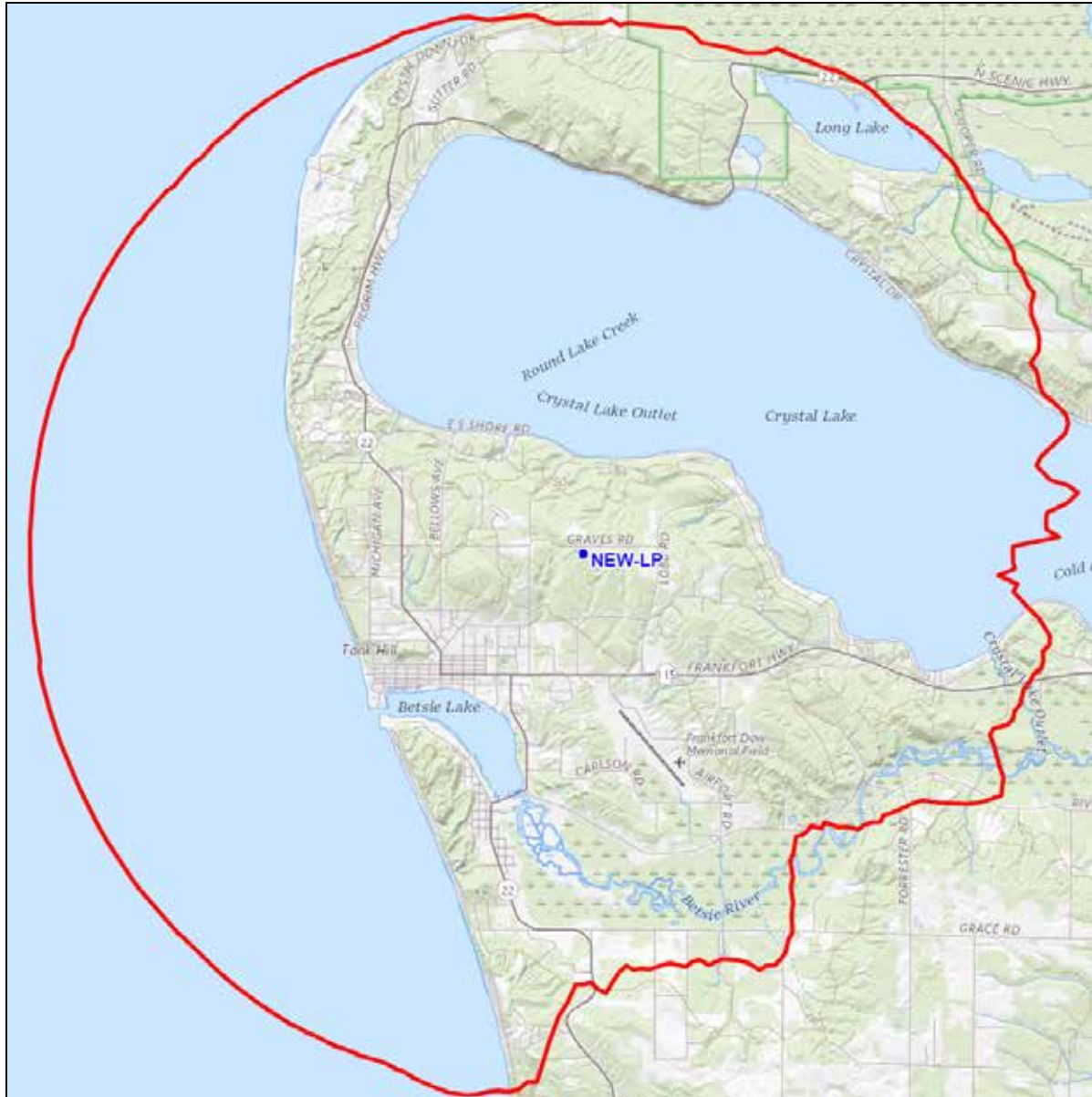




REC Networks/Michelle Bradley CBT  
11541 Riverton Wharf Rd.  
Mardela Springs, MD 21837  
844.REC.LPFM/202.621.2355  
recnet.com

Original Construction Permit Application  
FRANKFORT, MI  
**ELBERTA LABOR HERITAGE CENTER**  
Facility ID: 778340

## PROPOSED 60dBu F(50,50) SERVICE CONTOUR



FRANKFORT, MI ~ Channel 261LP100 (100.1 MHz) ~ ERP 0.015 kW (see calculation)  
Elev: 271 meters ~ RCAGL: 22 meters ~ RCAMSL: 293 meters ~ HAAT: 94.9 meters  
Overall tower height: 29.2 meters AGL ~ ASR: 1274675  
NAD83 Latitude: 44° 38' 49.6" NL ~ Longitude: 86° 12' 42.2" WL  
No AM stations within 3 km.  
Elevation and HAAT based on GLOBE30 data from FCC Contours API.

**ELBERTA LABOR HERITAGE CENTER**

New(LP)  
Frankfort, Michigan  
Channel 261LP100 (100.1 MHz)

Distance separation	<i>\$73.807</i>	3
Determination of HAAT and ERP	<i>\$73.313</i>	4
Educational Statement	<i>\$73.503</i>	7
Evidence of Corporation Status	<i>\$73.503(a)</i>	8
LPFM Point System factors	<i>\$73.872</i>	9
Demonstration of localism	<i>\$73.853</i>	10

R E C NETWORKS  
CHANNEL REPORT

NAD83 LATITUDE: 44 - 38' 49.5" - LONGITUDE: 86 - 12' 42.1"  
CHANNEL: 261 - CLASS: LP100

CHAN	FREQ	CALL	LOCATION	CLS	DIST	REQ	CLEAR	BEAR
258	99.5	WPKR : CUMULUS LICENSING LLC	OMRO	WI C2	216.3	0.0	216.3	245.8
258	99.5	WYSS : SOVEREIGN COMMUNICATIONS, LLC	SAULT STE. MARIE	MI C1	240.6	0.0	240.6	35.3
259	99.7	WDKF : MIDWEST COMMUNICATIONS INC	STURGEON BAY	WI C2	112.3	53.0	59.3	269.7
260	99.9	VAC : ROY E. HENDERSON	CUSTER	MI A	75.7	56.0	19.7	186.9
260	99.9	WHCH :	CUSTER	MI A	75.2	56.0	19.2	184.0
261	100.1	WWIB : RADIO LICENSE HOLDING CBC, LLC	HOLTON	MI A	148.2	67.0	81.2	178.3
261	100.1	WRHN : NRG LICENSE SUB, LLC	RHINELANDER	WI C1	273.0	111.0	162.0	294.6
261	100.1	WSJP-FM : RELEVANT RADIO, INC.	PORT WASHINGTON	WI A	197.5	67.0	130.5	226.8
262	100.3	WQON : BLARNEY STONE BROADCASTING, INC.	GRAYLING	MI C1	120.9	100.0	20.9	93.5
264	100.7	W264DQ : GOOD NEWS MEDIA, INC.	CADILLAC	MI D8	84.1	0.0	84.1	121.5
264	100.7	WOBK : RESULTS BROADCASTING OF IRON MOUNTAIN, INC.	CRYSTAL FALLS	MI C1	194.2	0.0	194.2	312.9
264	100.7	WKKV-FM : IHM LICENSES, LLC	RACINE	WI B	252.6	0.0	252.6	216.3
264	100.7	WWTH : Radio Central, LLC	OSCODA	MI C3	225.1	0.0	225.1	91.0
264	100.7	WITL-FM : Townsquare License, LLC	LANSING	MI B	258.9	0.0	258.9	147.3

**CALCULATION OF HEIGHT ABOVE AVERAGE TERRAIN**  
**DETERMINATION OF PROPOSED LPFM EFFECTIVE RADIATED POWER**

New(LP)  
Frankfort, Michigan  
Channel 261LP100 (100.1 MHz)

A conventional check of height above average terrain (HAAT) for this proposed facility utilizing the FCC Contours API using GLOBE30 terrain data returns 76.46 meters, based on 8 radials. However, in this case, the proposed site is located within 16 kilometers of a large body of water (Lake Michigan) along the 0, 225, 270 and 315 degree radials.

§73.313(d)(2) of the Commission's Rules states that when calculating HAAT, where the 3 to 16 kilometers portion of a radial extends whole or in part over a large body of water or extends into a foreign country and where the 50 uV/m (34 dBu) contour does not encompass United States land area, only the part of the radial from 3 kilometers to the outermost portion of land in the United States covered by the radial must be used in the computation of the antenna HAAT.

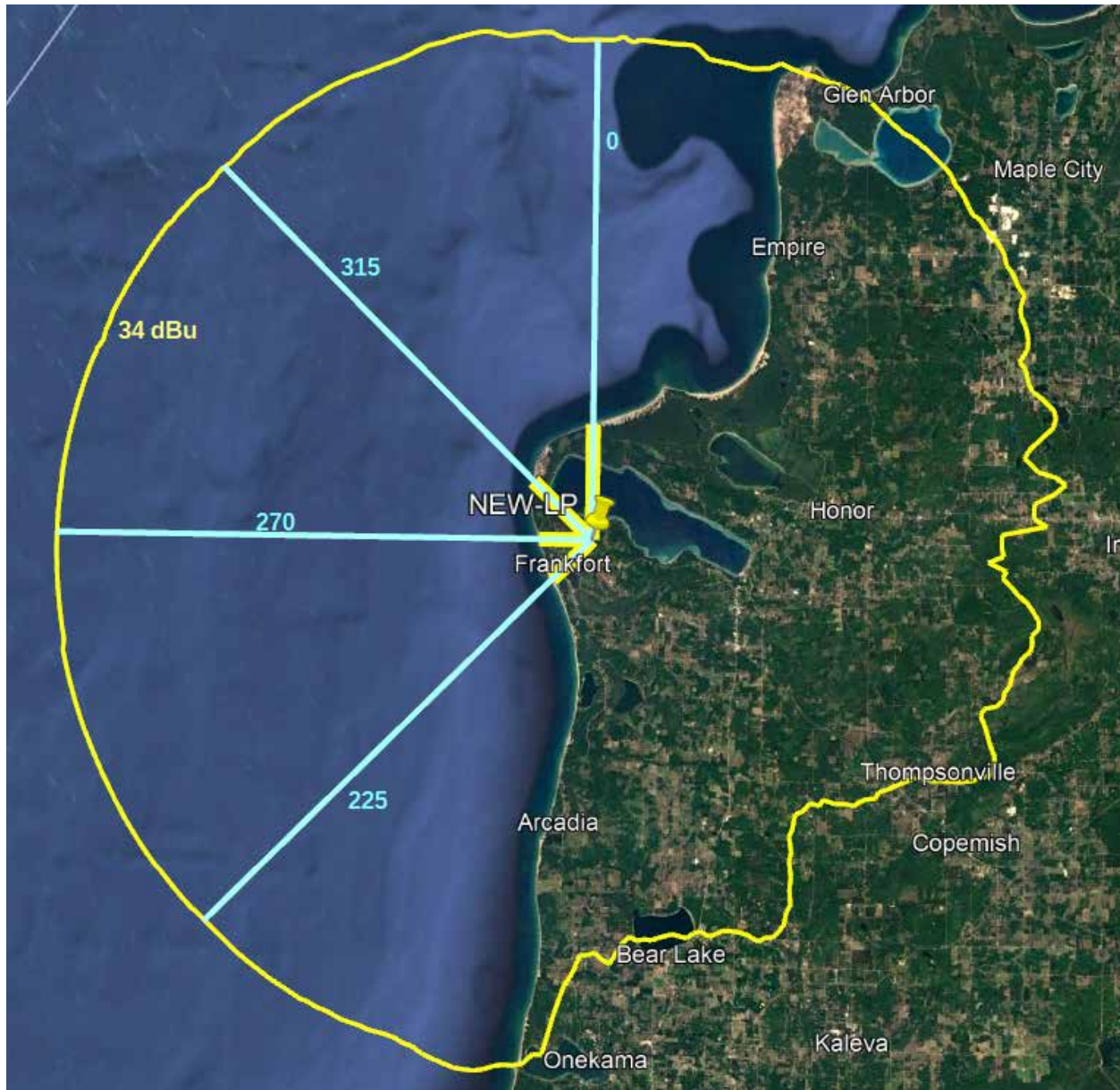
Utilizing the profile functionality of the FCC Contours API, we have recalculated the average elevations along the 0, 45 and 315 degree radials, each utilizing 50 evenly-spaced points utilizing NED1 terrain data. In addition, a contour study demonstrates that there is no other United States land area along those radials within the 34 dBu interfering contour. As such, the calculation of HAAT along each of the 8 radials is calculated as follows:

Azimuth	Original HAAT	Distance checked	Average Elevation	Adjusted HAAT
0	<del>105.65</del>	3 ~ 7.04 km	209.62	<b>61.38</b>
45	106.88			
90	70.12			
135	56.78			
180	70.43			
225	<del>116.02</del>	3 ~ 3.6 km	190.5 m	<b>80.5</b>
270	<del>115.69</del>	3 ~ 3.3 km	182.7 m	<b>88.3</b>
315	<del>114.37</del>	3 ~ 5.1 km	193.7	<b>77.3</b>

Taking these adjustments along the 0, 225, 270 and 315 degree radials into consideration, the adjusted HAAT is **76.46 meters**. Pursuant to §73.811(a) of the Commission's Rules, to achieve a 5.6 kilometer service contour, an effective radiated power of **15 watts** (0.015 kW) must be utilized. Therefore, the minimum ERP from this site is 7 watts and the maximum ERP is 15 watts.

Prepared by,

Michelle Bradley, CBT  
November 1, 2023





## **EDUCATIONAL STATEMENT**

New(LP)  
Frankfort, Michigan  
Channel 261LP100 (100.1 MHz)

The town of Elberta, MI is a case study in the rise and fall of industrialization in America having been home to multiple lumber mills, a railroad, and the first railroad car ferry in the world. The surrounding Benzie County is an agricultural region, home to many fruit orchards and small farms. The educational objectives of the Elberta Labor Heritage Center (ELHC) are as follows:

- To connect generations through gathering, preserving, and sharing Elberta history.
- To preserve and promote knowledge of the cultural heritage of the people that lived and worked in Elberta and the surrounding areas through the arts, including music, poetry, written works, theatre, and artistic works.
- To conduct and share historical research through written and oral histories.
- To facilitate historical walking tours of Elberta.
- To offer adult education classes in traditional crafts like weaving, woodworking, and seasonal food preservation.

The radio station will be a vital informational resource for the village of Elberta and surrounding areas to promote local history through engaging with the community to understand the past, to gain perspective on the present, and to play an informed role in shaping the future. We will partner with the Benzie County Historical Society to offer on-air historical programming and give community members an opportunity to produce locally relevant programs. We will share oral histories on the air; farmers will be invited to share the history of their farms and discuss the changes they have seen over the years. The station will be used for instruction of local history and other topics related to life in Elberta, then and now. We will have programming that shares the music, literature and arts that developed in the region.

## EVIDENCE OF CURRENT CORPORATION STATUS

New(LP)  
Frankfort, Michigan  
Channel 261LP100 (100.1 MHz)

<b>LARA Corporations Online Filing System</b> Department of Licensing and Regulatory Affairs			
<b>ID Number:</b> 802782764		<a href="#">Request certificate</a>	<a href="#">Return to Results</a> <a href="#">New search</a>
<b>Summary for:</b> ELBERTA LABOR HERITAGE CENTER			
<b>The name of the DOMESTIC NONPROFIT CORPORATION:</b> ELBERTA LABOR HERITAGE CENTER			
<b>Entity type:</b> DOMESTIC NONPROFIT CORPORATION			
<b>Identification Number:</b> 802782764			
<b>Date of Incorporation in Michigan:</b> 12/27/2021			
<b>Purpose:</b> Other			
<b>Term:</b> Perpetual			
<b>Most Recent Annual Report:</b> 2023		<b>Most Recent Annual Report with Officers &amp; Directors:</b> 2022	
<b>The name and address of the Resident Agent:</b>			
Resident Agent Name:		MARK CARLIN	
Street Address:		502 CORNING AVENUE	
Apt/Suite/Other:			
City:	FRANKFORT	State:	MI
Zip Code:	48325		

### LPFM POINT FACTORS

New(LP)  
Frankfort, Michigan  
Channel 261LP100 (100.1 MHz)

County of transmitting antenna	Market Name	Market Rank
Benzie, Michigan	Outside Metro	N/A

The proposed facility will claim 4 points as set forth:

Established Community Presence – no points

As the organization was established on December 27, 2021, the applicant is not eligible to claim the Established Community Presence point.

Local Programming – 1 point

Applicant pledges to originate at least 8 hours of local programming, pursuant to Commission policies regarding the LPFM point system, pursuant to §73.872(b)(2).

Main Studio – 1 point

Applicant pledges to staff a local main studio at least 20 hours per week, pursuant to §73.872(b)(3).

Local Programming and Main Studio – 1 point

As both the Local Programming and Main Studio points are being claimed, the applicant is eligible for this point, pursuant to §73.872(b)(4).

Diversity of Ownership – 1 point

Applicant has no other attributable interests and therefore is eligible to claim the Diversity of Ownership point, pursuant to §73.872(b)(5) and Page 5 of the Second Window Notice.

Prepared by,

/S/

Michelle Bradley, CBT  
REC Networks

November 1, 2023

## LOCALISM

New(LP)  
Frankfort, Michigan  
Channel 261LP100 (100.1 MHz)



100% of board members and main studio are located within 20 miles of transmitter site.