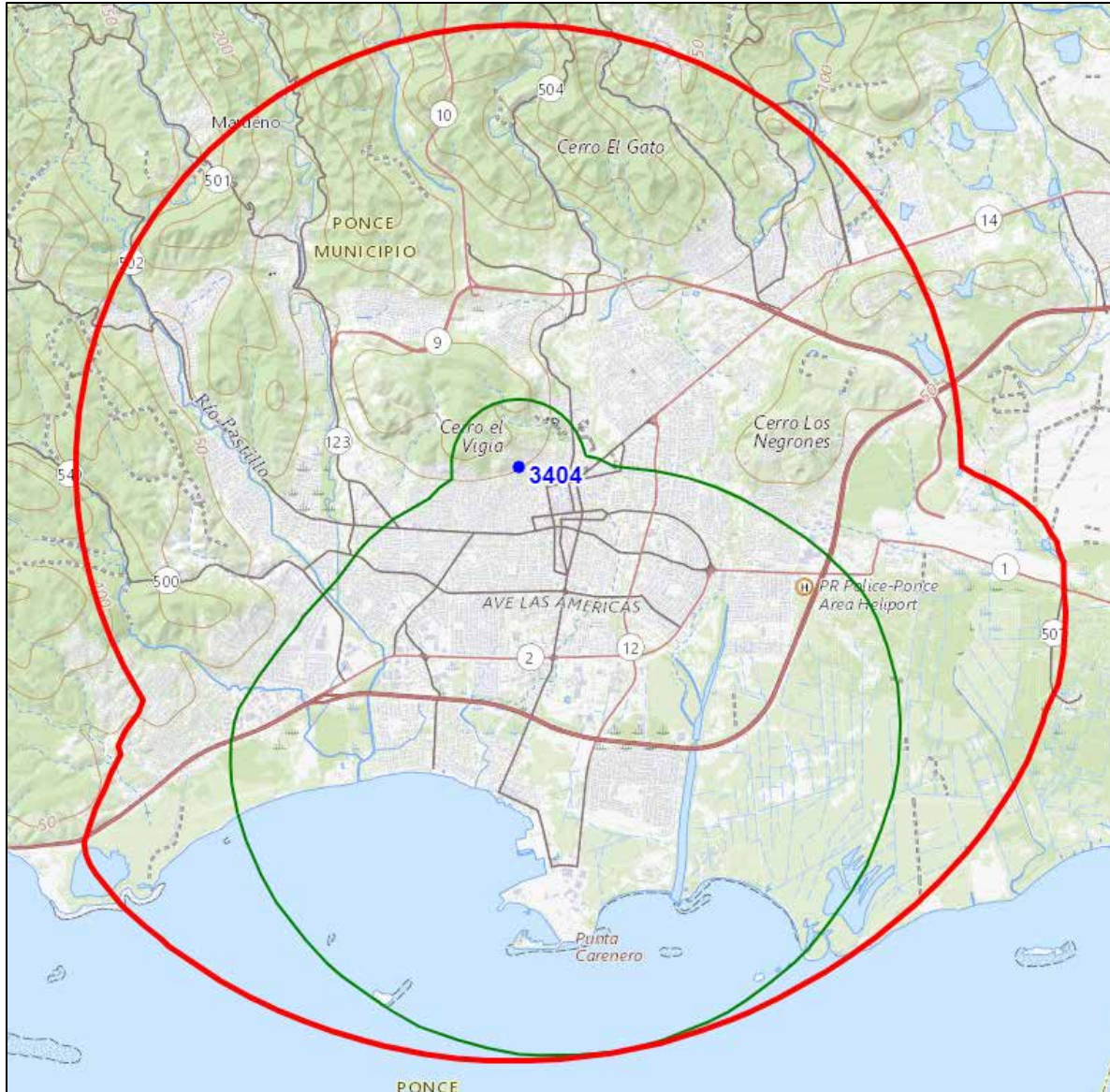




REC Networks/Michelle Bradley CBT
11541 Riverton Wharf Rd.
Mardela Springs, MD 21837
844.REC.LPFM/202.621.2355
recnet.com

Original Construction Permit Application
PONCE, PR
IMPARCIAL, INC.
Facility ID: 778336

PROPOSED 60dBu F(50,50) SERVICE CONTOUR



PONCE, PR ~ Channel 207LP100 (89.3 MHz) ~ ERP 0.100 kW
Elev: 49 meters ~ RCAGL: 5.8 meters ~ RCAMSL: 54.8 meters ~ HAAT: minus 67.3 meters
Overall tower height: 6.1 meters AGL ~ ASR: None (20 foot rule – tower at ground level)
NAD83 Latitude: 18° 01' 04.3" NL ~ Longitude: 66° 37' 06.8" WL
No AM stations within 3 km.
Elevation and HAAT based on NED1 data from FCC Contours API.
New antenna and mast construction.
Arecibo Observatory notified.

IMPARCIAL, INC.

New(LP)
Ponce, Puerto Rico
Channel 207LP100 (89.3 MHz)

Distance separation	<i>\$73.807</i>	3
Second-Adjacent Channel Waiver Request	<i>\$73.807</i>	4
TV Channel 6 Protection	<i>\$73.825</i>	9
Educational Statement	<i>\$73.503(a)</i>	10
Evidence of Corporation Status	<i>\$73.503(a)</i>	11
LPFM Point System factors	<i>\$73.872</i>	12
Demonstration of localism	<i>\$73.853</i>	13

R E C NETWORKS
CHANNEL REPORT

NAD83 LATITUDE: 18 - 01' 04.3" - LONGITUDE: 66 - 37' 06.8"
CHANNEL: 207 - CLASS: LP100(PR/VI)

CHAN	FREQ	CALL	LOCATION	CLS	DIST	REQ	CLEAR	BEAR
Channel-6	WO6DA-D		AGUADA	PR	41.2	91.0	-49.8	290.6
:								
> See consent letter from TV licensee.								
Channel-6	WO6DA-D		AGUADA	PR	28.2	91.0	-62.8	327.6
:								
> See consent letter from TV licensee.								
205	88.9	WPUC-FM1	CAGUAS	PR D	58.9	6.0	52.9	75.2
:			PONTIFICAL CATHOLIC UNIV OF PUERTO RICO SERVICE ASSN, INC.					
205	88.9	WPUC-FM	PONCE	PR B	17.6	92.0	-74.4	9.1
:			PONTIFICAL CATHOLIC UNIV OF PUERTO RICO SERVICE ASSN, INC.					
> See waiver request.								
206	89.1	W206AF	MAYAGUEZ	PR D8	41.2	28.0	13.2	290.5
:			PONTIFICAL CATHOLIC UNIV OF PUERTO RICO SERVICE ASSN, INC.					
207	89.3	WJVP	CULEBRA	PR B	143.0	138.0	5.0	75.9
:			TABERNACULO DE SANTIDAD INC.					
208	89.5	W208AE	MAYAGUEZ	PR D8	68.0	28.0	40.0	299.2
:			LA GIGANTE SIEMBRA, INC.					
209	89.7	WRTU	SAN JUAN	PR B	62.8	92.0	-29.2	64.0
:			UNIVERSITY OF PUERTO RICO					
> See waiver request.								
210	89.9		UTUADO	PR A	29.1	0.0	29.1	340.8
:								
* Does not meet third adjacent channel spacing under LCRA Sect 7.								
210	89.9	WMLG	GUAYANILLA	PR A	16.3	0.0	16.3	269.2
:			CAGUAS EDUCATIONAL TV, INC.					
* Does not meet third adjacent channel spacing under LCRA Sect 7.								
210	89.9	WIVH	CHRISTIANSTED	VI A	195.0	0.0	195.0	98.3
:			GOOD NEWS FOR LIFE					

REQUEST FOR WAIVER OF §73.807(a)
SHORT-SPACED SECOND-ADJACENT CHANNEL

New(LP)
Ponce, Puerto Rico
Channel 207LP100 (89.3 MHz)

The instant application meets all §73.807 distance separation requirements with the exception of second-adjacent channel stations WPUC-FM, Ponce, Puerto Rico (Facility ID No. 9351) and WRTU, San Juan, Puerto Rico (Facility ID No. 69090). To address these shortcomings, we propose the following as set forth:

In respect to WRTU

WRTU operates on Channel 209B in the noncommercial educational (NCE) reserved band with 50 kW effective radiated power at 244 meters height above terrain (HAAT). WRTU places a 46.8 dBu service contour at the proposed LPFM site. Due to intervening terrain, the 100 dBu interfering contour of the proposed LPFM station (as a nondirectional facility) does not overlap the 60 dBu protected contour of WRTU. Therefore, the proposed facility will not cause any interference to listeners or potential listeners of WRTU.

In respect to WPUC-FM

WPUC operates on Channel 205B in the NCE reserved band with 12 kW ERP at 827 meters HAAT. WPUC-FM places a 90.5 dBu service contour at the proposed LPFM site.

Using the U/D method¹, the proposed LPFM station is predicted to produce an undesired interference overlap in respect to WPUC-FM to the proposed LPFM station's 130.5 dBu interfering contour ("overlap zone"). At 100 watts ERP, the overlap zone extends to 21 meters from the base of the antenna structure. The overlap zone reaches the ground and includes adjacent structures at the same and higher elevations to the north as well as other structures at lower elevations to the south.

To address this issue, the applicant is proposing the use of a directional antenna, a single-bay Katherin Scala CL-FM log periodic antenna using vertical polarization at a rotation of 170 degrees.² As a result of the antenna, the overlap zone is eliminated towards the structures to the north. The overlap zone still gives the impression that it continues to impact two structures.

¹ See *Living Way Ministries, Inc.* Memorandum Opinion and Order, 17 FCC Rcd 17054, 17056 (2002) at 5. *Recon denied* 23 FCC Rcd 15070 (2008).

² An LPFM authorization in which the applicant proposed a directional antenna for the sole purpose of achieving a second-adjacent channel waiver is considered as a nondirectional authorization in respect to protection from FM translator modification applications; see *Creation of a Low Power Radio Service*, Sixth Report and Order, 27 FCC Rcd. 15402, 15430 (2012) ("*Sixth Order*"). Further, the use of a directional antenna by an LPFM station for the sole purpose of achieving a second-adjacent channel waiver does not require the applicant to provide the information identified in 47 C. F. R. §73.316(c) in respect to proof-of-performance as well as statements from the installer and a licensed surveyor; see 47 C. F. R. §73.816(d)(3). As such, the application is written as a nondirectional proposal in the tech box to assure that the LPFM facility is provided the protections that it is entitled to, pursuant to the *Sixth Order*.

Those structures are located at lower elevations with the highest ground level elevation being 5 meters below the elevation at the base of the tower. The structures within the overlap zone are single-story.

Further, utilizing the manufacturer's specifications of the Katherin Scala CL-FM antenna, we can further demonstrate that the antenna's elevation pattern will result in the overlap zone not reaching any occupied structure within the horizontal 130.5 dBu directional contour.³

As we have determined that the proposed facility will not cause any interference, the applicant is requesting a waiver of §73.807(a) in respect to WPUC-FM, Ponce, Puerto Rico and WRTU, San Juan, Puerto Rico.

Prepared by,
/S/
Michelle Bradley, CBT
REC Networks
November 1, 2023

³ To further demonstrate this, we include an engineering report that demonstrates the elevation patterns of this antenna and the field strengths reached at the "artificial floor". For the purposes of this report, the "Antenna Height AGL:" is the antenna radiation center above mean sea level (54.8 meters) and the "Artificial RX Antenna Height" is the highest elevation above mean sea level at ground level within the directional 130.5 dBu contour plus an additional 2 meters to compensate for human occupation. (49 AMSL – 5 meters (highest adjacent structure at 41m AMSL) + 2 (the height of a person) = 46 meters (artificial floor)).

Nearby structures



Blue curve = 130.5 dBu interfering contour if nondirectional.

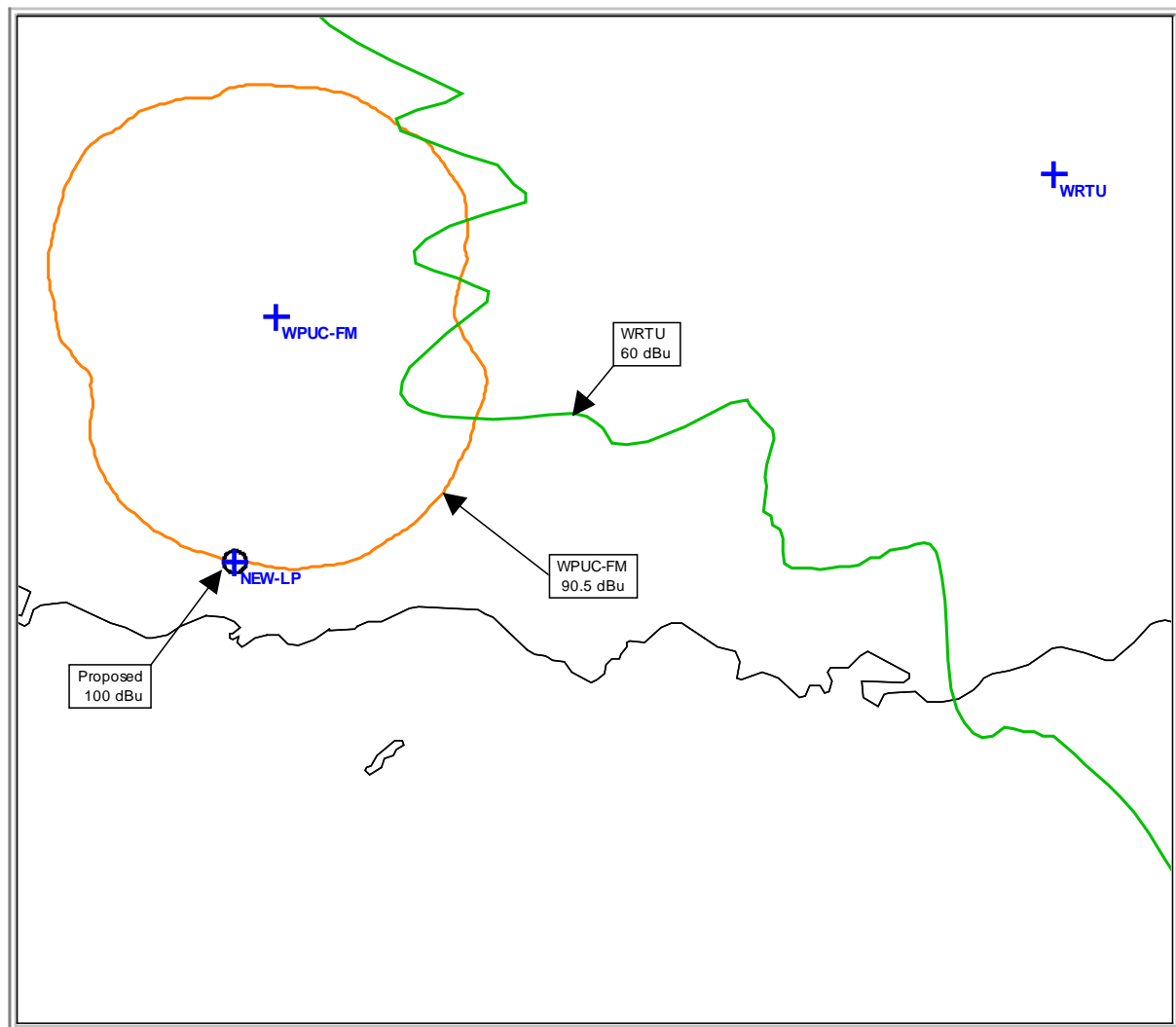
Yellow curve = 130.5 dBu interfering contour with directional antenna proposed.

Green polygons = Occupied structures within directional 130.5 dBu interfering contour.

+ & - numbers indicate the elevation difference between those structures (at ground level) and the ground level elevation of the tower base.

Contours were determined using the FCC Contours API using NED_1 terrain data.

Second-adjacent channel short spaced facilities



Map Scale: 1:406077 1 cm = 4.06 km V/H Size: 70.86 x 79.48 km

Proposed facility depicted using nondirectional antenna.
Demonstrates lack of overlap between WRTU and the proposed facility.
Shows arriving service contour of WPUC-FM at the proposed facility.

Proposed Power:		0.1 kW						
Antenna Height AGL:		54.8 m						
Interference Contour:		130.5 dBu						
Artificial RX Antenna Height:		46 m						
Antenna Type:		SCA CL-FM - 1 bay 0 wave spacing						
Angle Below Horizon	Antenna Relative Field	ERP in kW	ERP in dBk	Distance from Ant to Interference Contour	Distance from Ant to Artificial Plane	Field Strength in dBu @ Artificial Plane	Distance from Ant to Ground Level	Field Strength in dBu @ Ground Level
5	0.980	0.096	-10.18	20.52	100.97	116.66	628.76	100.77
10	0.950	0.090	-10.45	19.89	50.68	122.38	315.58	106.49
15	0.895	0.080	-10.96	18.74	34.00	125.33	211.73	109.44
20	0.820	0.067	-11.72	17.17	25.73	126.99	160.22	111.10
25	0.735	0.054	-12.67	15.39	20.82	127.88	129.67	111.99
30	0.645	0.042	-13.81	13.51	17.60	128.20	109.60	112.31
35	0.562	0.032	-15.01	11.77	15.34	128.20	95.54	112.31
40	0.470	0.022	-16.56	9.84	13.69	127.63	85.25	111.75
45	0.360	0.013	-18.87	7.54	12.45	126.15	77.50	110.26
50	0.250	0.006	-22.04	5.24	11.49	123.67	71.54	107.79
55	0.155	0.002	-26.19	3.25	10.74	120.10	66.90	104.22
60	0.085	0.001	-31.41	1.78	10.16	115.37	63.28	99.48
65	0.040	0.000	-37.96	0.84	9.71	109.22	60.47	93.33
70	0.020	0.000	-43.98	0.42	9.36	103.51	58.32	87.62
75	0.010	0.000	-50.00	0.21	9.11	97.73	56.73	81.84
80	0.010	0.000	-50.00	0.21	8.94	97.90	55.65	82.01
85	0.010	0.000	-50.00	0.21	8.83	98.00	55.01	82.11
90	0.010	0.000	-50.00	0.21	8.80	98.03	54.80	82.14

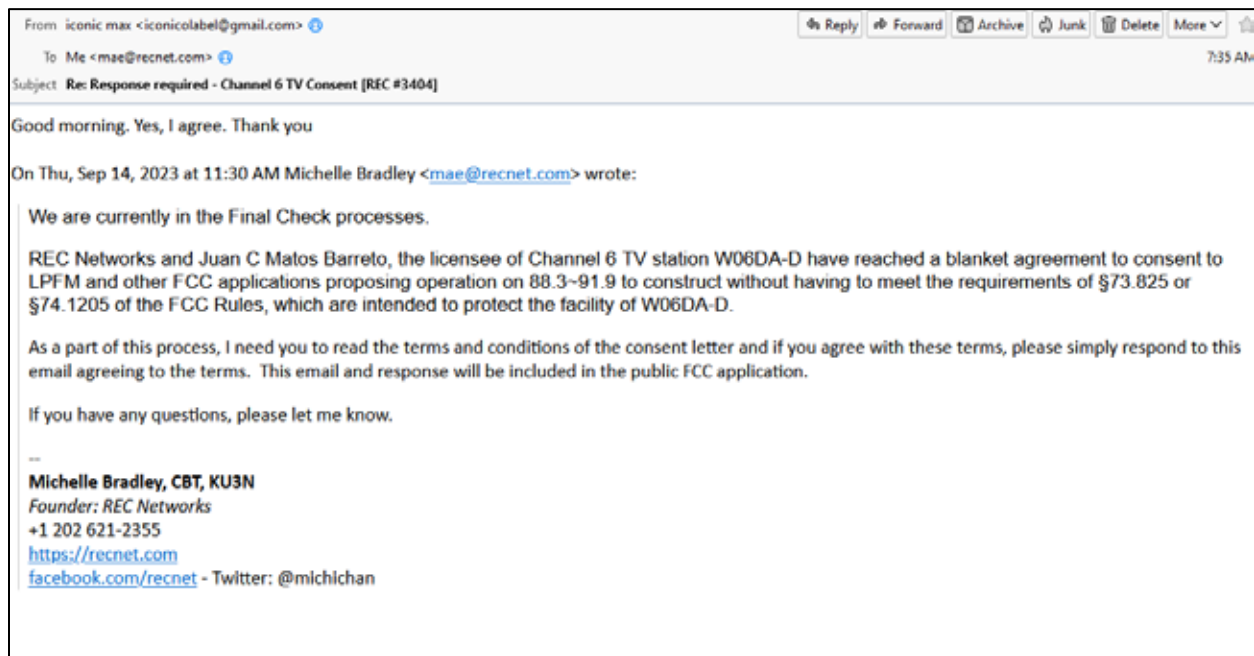
TV CHANNEL 6 PROTECTION §73.825

New(LP)
Ponce, Puerto Rico
Channel 207LP100 (89.3 MHz)

The proposed facility does not meet the §73.825 required minimum distance separation in respect to Low Power TV (LPTV) station W06DA-D, Augada, Puerto Rico.

To address this shortcoming, REC Networks ("REC") has reached an agreement with Juan C. Matos Barreto, licensee of W06DA-D in which blanket consent has been given to REC handled LPFM, FM Translator and FM Booster applications which propose operations on Channels 203 through 220.

A copy of this blanket consent letter is included as a separate PDF file in this application package. The following is an email response from the applicant, also consenting to the terms of the blanket agreement:



EDUCATIONAL STATEMENT

New(LP)
Ponce, Puerto Rico
Channel 207LP100 (89.3 MHz)

Existing educational program and objectives of applicant:

Imparcial is a Puerto Rico nonprofit corporation, whose mission is "to preach the Gospel and deliver humanitarian help." Imparcial preaches the Gospel by sharing our faith and helping those in need. Our team is prepared to respond during natural disasters such as hurricanes and earthquakes. We have provided aid during the hardest times in the last 10 years in Puerto Rico.

Good News Today is our humanitarian program which involves helping the community through providing emergency goods and food to any person in need and providing support to people with disabilities, special needs and illness as well as families with financial struggles.

Our educational program consists of teaching the backbone values of our organization: preaching the Gospel and helping those in need.

The workshops and seminars that we provide to our community are given by our consolidation team formed by our leaders who are well capable in different subjects of social interest. Our workshops and seminars also cover topics such as resource administration, spirituality, self-value, global warming and preparation for natural and catastrophic events. With the workshops and seminars, we prepare our community so they can respond effectively during an emergency or need while developing their ability to manage resources in the process.


How the radio station will advance our educational objectives:

We believe that the radio station will enable us to continue teaching to the importance to be prepared for natural disasters and preaching the Gospel. The radio station will be used as an over the air extension of our workshops and seminars to provide instruction to the community on the various subjects we cover in our live sessions such as resource administration, spirituality, self-value and disaster preparedness.

With no doubt, it will maximize our organization's values: Love, Compassion and Mercy.

EVIDENCE OF CURRENT CORPORATION STATUS

New(LP)
Ponce, Puerto Rico
Channel 207LP100 (89.3 MHz)

**Government of Puerto Rico**
Department of State

CORPORATIONS AND ENTITIES ▾

CORPORATION INFORMATION

Corporation Information

IMPARCIAL INC.

Details

Articles

Annual Filings

Certificates

General Information

Name	IMPARCIAL INC.
Register No.	422534
Status	ACTIVE
Class	Corporation
Type	Non-Profit
Jurisdiction	Domestic
Formation Date	09-Feb-2019 04:27 PM
Effective Date	09-Feb-2019 04:27 PM
Expiration Date	Does not expire
Category	Art and Culture
Organization Form	Foundation

LPFM POINT FACTORS

New(LP)
Ponce, Puerto Rico
Channel 207LP100 (89.3 MHz)

County of transmitting antenna	Market Name	Market Rank
Ponce, Puerto Rico	Puerto Rico	16

The proposed facility will claim 5 points as set forth:

Established Community Presence – 1 point

This organization was established on February 9, 2019 and 75% of the board members have been residing within 10 miles of the transmitting site for a period of at least two years. Pursuant to §73.872(b)(1), the Established Community Presence point is claimed.

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 make available an accessible main studio, capable of program origination for a Applicant of 20 hours per week. Applicant claims the Main Studio point, 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 additional Local Programming and Main Studio "bonus" point is also claimed, 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

