

TECHNICAL EXHIBIT
APPLICATION FOR CONSTRUCTION PERMIT
FM STATION WWYY
BELVIDERE, NEW JERSEY
CH 296A 0.84 KW 266 M

Technical Narrative

The technical exhibit of which this narrative is a part was prepared in support an application for construction permit (CP) for FM station WWYY at Belvidere, New Jersey. Station WWYY is currently licensed (BMLH-20010716AAK) to operate on channel 296A (107.1 MHz) with a maximum nondirectional effective radiated power (ERP) of 1.2 kilowatts (kW) and an antenna height above average terrain (HAAT) of 219 meters. The purpose of this instant application is to modify WWYY's facilities from its current location. Specifically, it is proposed to operate from its current site on channel 296A at Belvidere, New Jersey with a maximum nondirectional ERP of 0.84 kW and an HAAT of 266 meters.¹ The proposed WWYY facilities are considered to be equivalent Class A maximum facilities. The instant application is considered to be a "minor" change in facilities in accordance with Section 73.3573(a)(2).

Response to Paragraph 16 - Interference

Figure 1 is a Section 73.207 separation study for channel 296A operation from WWYY's licensed site. As shown, WWYY is currently short-spaced to WEZX on channel 295A at Scranton, Pennsylvania and WQFM on channel 296A at Hancock, New York. These existing short-spacings were created by WEZX and WQFM under 73.215. Therefore, WWYY is considered to be fully-spaced to both WEZX and WQFM under Section 73.207. As such, WWYY is permitted to operate with the equivalent maximum Class A facilities being proposed by this application.

Response to Paragraph 14 - Community Coverage

Figure 2 is a map which demonstrates that the proposed WWYY operation complies with the provisions of Section 73.315. Specifically, the proposed 70 dBu contour covers 100 percent of the Belvidere 2010 Census limits.

¹ It is proposed to diplex with WSBG (Ch. 228A, Stroudsburg, PA) using a Shively 6017, 2-bay, 1-wavelength antenna from the WWYY tower.

Response to Paragraph 17 - RFR Hazard Statement

The proposed facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with the OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields.

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. Using a worst-case vertical relative field value of 1.0, the total ERP of 1.68 kW (H+V) and an antenna center of radiation height above ground level of 79 meters, the calculated power density at two meters above ground level at the base of the tower is 9.5 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$), or 4.8 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($200 \mu\text{W}/\text{cm}^2$ for FM channel 296). Thus, it is believed that the proposed WWYY facility is in full compliance with the FCC's requirements with regard to radio frequency radiation exposure.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, procedures will be in effect in the event that workers or other authorized personnel enter the restricted area to ensure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

Finally, it is noted that this technical exhibit only addresses the potential for radiofrequency electromagnetic field exposure.

If there are any questions, or additional information is required, please contact the office of the undersigned.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, FL 34237-6019
(941) 329-6000
JEFF@DLR.COM

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SECTION 73.207 SEPARATION STUDY FROM LICENSED WWYY SITE

Channel: 296 Coordinates: 040-56-53 075-09-38 (NAD 27)
 Class: A Buffer Distance: 10 km

Date: 02/27/2015
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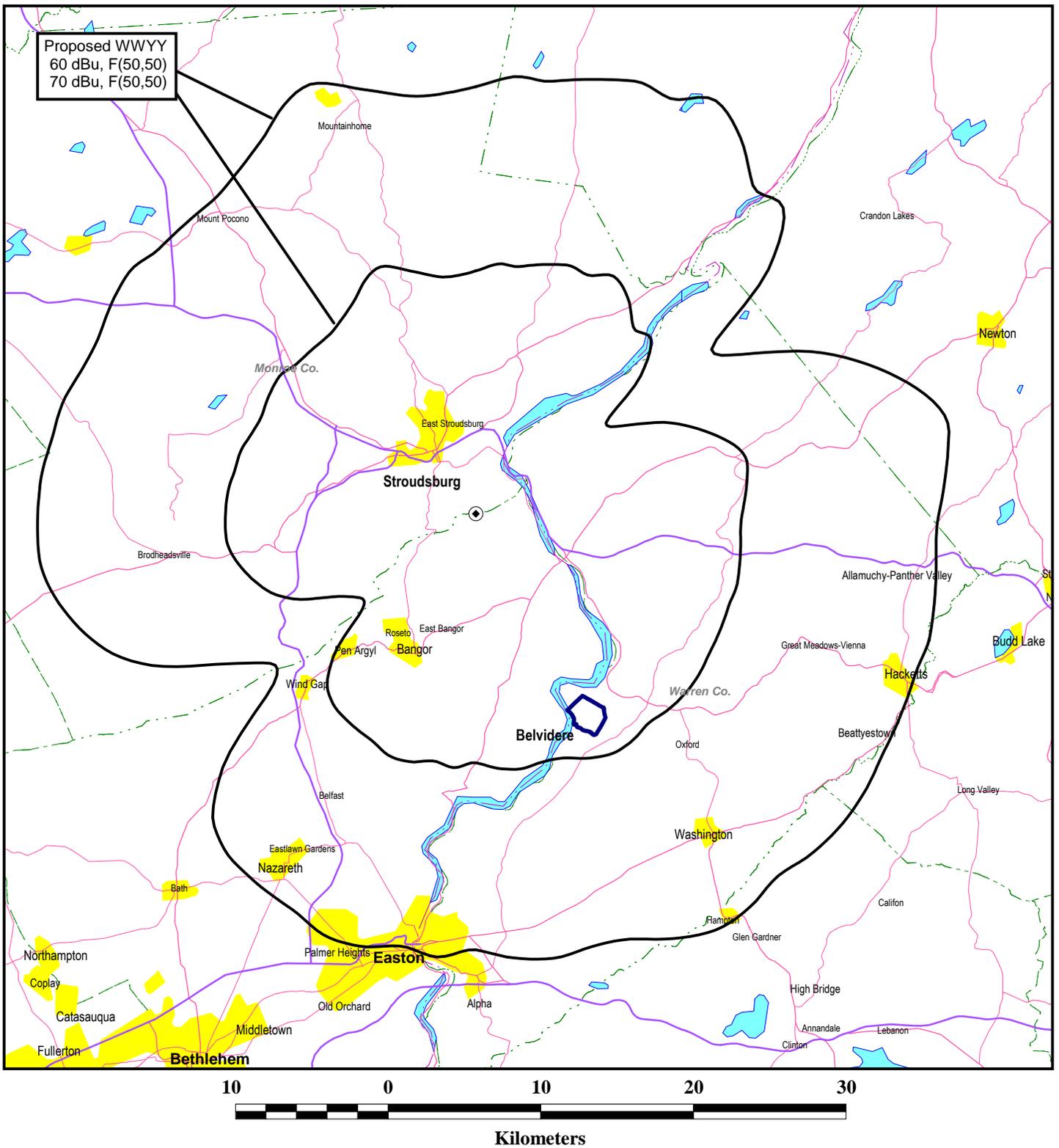
Callsign	Status	Chan.	Serv.	Freq.	City	State	Latitude	Dist.(km)	Sep.(km)	Spacing(km)
Fac. ID	ARN			Class DA	Ant. ID	ERP(kW)	Longitude	Bear.(deg)	73.215	Comment
WEZX 66364	LIC BMLH	295 20110818ABC	FM	106.9 A	SCRANTON N	PA 188	041-20-52 075-39-03	60.54 317.44	72 49 Y	-11.46 SHORT¹
WKVP 20842	LIC BMLD	295 20130828AAG	FM	106.9 B	CAMDEN N	NJ 168	039-54-33 075-06-00	115.47 177.44	113 96 N	2.47 CLOSE
WWYY 54689	LIC BMLH	296 20010716AAK	FM	107.1 A	BELVIDERE N	NJ 219	040-56-53 075-09-38	0 180	115 92 N	-115 SHORT²
WQFM 165339	LIC BLH	296 20090522AFP	FM	107.1 A	HANCOCK N	NY 33.8	041-57-43.4 075-16-16.9	113 355.35	115 92 Y	-2 SHORT³
WXPX 50056	LIC BLH	296 19980521KA	FM	107.1 A	BRIARCLIFF MANOR D 15399	NY 180	041-04-49 073-48-26	114.78 82.18	115 92 Y	-0.22 CLOSE
WWZY 32983	LIC BLH	296 20060711ACK	FM	107.1 A	LONG BRANCH N	NJ 110	040-18-17 073-59-08	122.42 125.42	115 92 N	7.42 CLOSE
WBYN-FM 71310	LIC BLH	298 20041116ABG	FM	107.5 B	BOYERTOWN D 67782	PA 186	040-24-15 075-39-09	73.33 214.61	69 63 Y	4.33 CLOSE
WRRC 6109	LIC BLED	299 19921202KF	FM	107.7 D	LAWRENCEVILLE N	NJ 11	040-16-44 074-44-15	82.48 154.22		INFO

¹ Existing short-spacing created by WEZX under 73.215. Therefore, WWYY is considered to be fully-spaced to WEZX under Section 73.207.

² Licensed WWYY operation.

³ Existing short-spacing created by WQFM under 73.215. Therefore, WWYY is considered to be fully-spaced to WQFM under Section 73.207.

Figure 2



COMPLIANCE WITH SECTION 73.315

**STATION WWYY
BELVIDERE, NEW JERSEY
CH 296A (107.1 MHZ) 0.84 KW 266 M**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida