

**Comprehensive Engineering Exhibit**  
**Long Form of BNPFT-20030314BRS**  
**Facility ID No. 139935**

This Long Form application seeks to modify the facilities proposed in BNPFT-20030314BRS by changing the proposed location, channel, antenna type and height above ground. The applicant proposed to utilize 250 watts ERP, with a non-directional antenna mounted 100 meters above ground level, on a tower identified by ASR No. 1053747 on Channel 288 to serve as a fill-in translator for station WVOC-FM.

Below as Figure 1 is a spacing/clearance table from which it can be determined that the "Living Way" method is to be utilized to demonstrate no actual interference will be caused to, or received from proposed translator BNPFT-20030317AFG. As shown in Figure 2, in the vicinity of the location proposed herein, BNPFT-20030317AFG is predicted to have a signal of 73.5 dBu, thus the respective +40 dB interfering signal is 113.5 dBu. Figure 2 also shows that, in the vicinity of the location proposed by BNPFT-20030317AFG, this instant proposal is predicted to have a signal of 70.5 dBu, thus the respective +40 dB interfering signal is 110.5 dBu. No actual interference will be caused to BNPFT-20030317AFG due to the vertical directivity of the antenna and its height above ground, as shown in Figures 3. Figure 4 is an aerial image allowing determination that no habitable space is located near the antenna. In a similar manner, no actual interference will be received from BNPFT-20030317AFG due to the vertical directivity of the antenna and its height above ground proposed by BNPFT-20030317AFG, as shown in Figures 5. Figure 6 is an aerial image allowing determination that no habitable space is located near the antenna proposed by BNPFT-20030317AFG.

As shown in Figure 7, the entire 60 dBu contour fits within the 60 dBu contour of the primary station for which this translator is to be "fill-in". Figure 7 also demonstrates that the proposed 60 dBu contour overlaps that of the original application.

The proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio Frequency Radiation."

The proposed antenna system is a Nicom BKG77, two-element, half-wave spaced antenna mounted 100 meters above ground. For purposes of this analysis the FM Model program has been set to calculate values for a worst case "Ring Stub" antenna element, operated with an effective radiated power of 0.250 Kilowatts in both the horizontal and vertical polarizations. At 2 meters above the surface, at 154 meters from the base of the tower, this proposal will contribute worst case, 0.21 microwatts per square centimeter, or 0.021 percent of the allowable ANSI limit for controlled exposure, and 0.105 percent of the allowable limit for uncontrolled exposure. This figure is less the 5% of the applicable FCC limit at all locations extending out from the base of the tower. Section 1.1307(b)(3) excludes applications when the calculated level is predicted to be less than 5% of the applicable exposure limit. It is therefore believed that his proposal is in compliance with OET Bulletin Number 65 as required by the FCC.

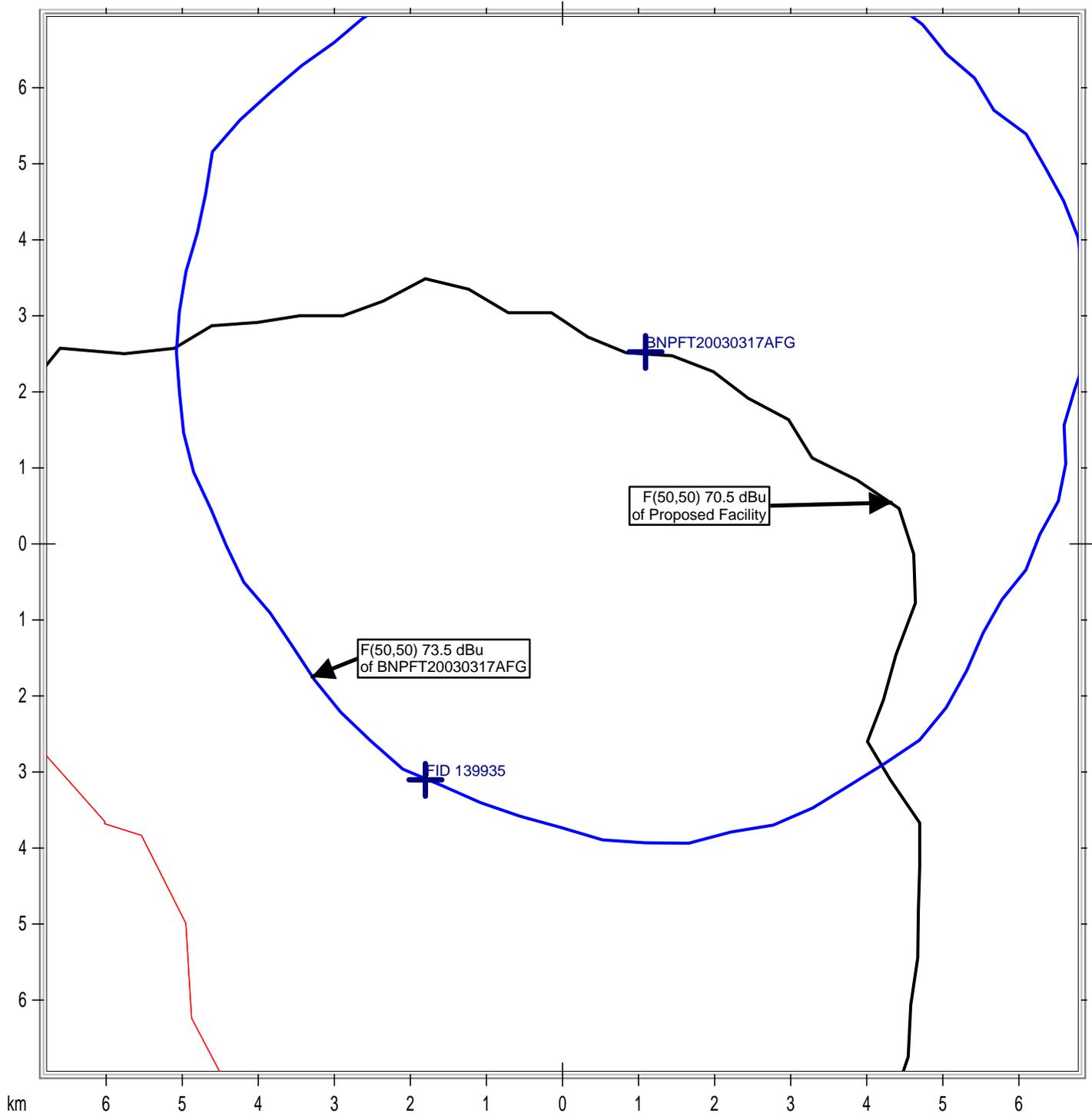
Further, the applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The site itself is restricted from public access. The applicant will

cooperate with other users of the tower to reduce power of the facility, or discontinue operation, was necessary to limit human exposure to levels less than specified by the FCC should anyone be required to climb the tower for maintenance or inspection.

**Figure 1. Spacing/Clearance Table**

| Callsign | Channel | ERP_w  | ARN              | Class | Status | Dist_km | Sep | Clr       | Clr Notes  |
|----------|---------|--------|------------------|-------|--------|---------|-----|-----------|------------|
| NEW      | 286     | 99     | BNPFT20030317AFG | D     | APP    | 6.41    | 0   | -16.44 dB | Living Way |
| WEKL     | 289     | 100000 | BPH20130514AAA   | C0    | CP     | 100.29  | 0   | 1.57 dB   | Clear      |
| WEKL     | 289     | 100000 | BMLH20090107AGS  | C0    | LIC    | 100.29  | 0   | 1.57 dB   | Clear      |
| WGFG     | 287     | 12500  | BLH20091216ACT   | C3    | LIC    | 65.23   | 0   | 2.85 dB   | Clear      |
| WDAR-FM  | 288     | 17000  | BLH199601115K    | C3    | LIC    | 109.26  | 0   | 9.54 dB   | Clear      |
| WLXM-LP  | 291     | 100    | BPL20110511ACU   | LP100 | CP     | 21.8    | 6   | 11.64 dB  | Clear      |
| WCOO     | 288     | 50000  | BLH20011012AAX   | C2    | LIC    | 173.3   | 0   | 20.71 dB  | Clear      |
| WOLS     | 291     | 21000  | BLH20081014ADN   | C2    | LIC    | 99.51   | 0   | 21.55 dB  | Clear      |
| WOSF     | 287     | 51000  | BLH20100429ADK   | C1    | LIC    | 151.62  | 0   | 22.35 dB  | Clear      |
| WCCP-FM  | 288     | 20000  | BPH20130514AAZ   | C3    | CP     | 171.12  | 0   | 23.11 dB  | Clear      |

Figure 2. Contour Map



County Borders      State Borders

**Figure 3. Distance to Signal Contour – No Interference to BNPFT-20030317AFG**

| <b>Proposed Antenna:</b>  |          | Nicom BKG77/2 2-Bay 1/2 wave spaced.                         |        |           |            |            |           |            |                              |
|---|----------|--|--------|-----------|------------|------------|-----------|------------|------------------------------|
| <b>Proposed Power:</b>  |          | 0.25   | kW     |           |            |            |           |            | Fill in<br>"yellow"<br>cells |
| <b>Antenna Height AGL:</b>                                      |          | 100  | meters |           |            |            |           |            |                              |
| <b>Interference Contour:</b>                                    |          | 113.5  | dBu    |           |            |            |           |            |                              |
| <b>Artificial Rcv Antenna Height:<br/>Distance (Free Space)</b> |          | 2  | meters |           |            |            |           |            |                              |
| <b>Equation:</b>  |          | $=(10^{((106.92-[desired\ dBu]+[ERP\ in\ dBk])/20)}) * 1000$ |        |           |            |            |           |            |                              |
| <b>Field Strength (dBu) Equation</b>                            |          | $"=106.92-(20*(LOG10[DistMeters]/1000)))+[ERP\ in\ dBk]$     |        |           |            |            |           |            |                              |
| Depression  |          |  |        | Distance  |            |            |           |            |                              |
| Angle   | Antenna  |  |        | from      | Distance   | Field      | Distance  | Field      |                              |
| Below   | Relative | ERP  | ERP    | to Interf | from Ant.  | Strength   | from Ant. | Strength   |                              |
| Horizon   | Field    | in kW  | in dBk | Contour   | to         | in dBu @   | to Ground | in dBu @   |                              |
|   |          |  |        |           | Artificial | Artificial | Level     | Level      |                              |
|   |          |  |        |           | Plane      | Plane      |           |            |                              |
| 0°  | 1.000    | 0.250  | -6.02  | 234.41 m  | infinite   | ---        | infinite  | ---        |                              |
| -5°   | 0.988    | 0.244  | -6.13  | 231.59 m  | 1124.42 m  | 99.78 dBu  | 1147.37 m | 99.60 dBu  |                              |
| -10°  | 0.947    | 0.224  | -6.49  | 221.98 m  | 564.36 m   | 105.40 dBu | 575.88 m  | 105.22 dBu |                              |
| -15°  | 0.871    | 0.190  | -7.22  | 204.17 m  | 378.64 m   | 108.14 dBu | 386.37 m  | 107.96 dBu |                              |
| -20°  | 0.792    | 0.157  | -8.05  | 185.65 m  | 286.53 m   | 109.73 dBu | 292.38 m  | 109.55 dBu |                              |
| -25°  | 0.682    | 0.116  | -9.34  | 159.87 m  | 231.89 m   | 110.27 dBu | 236.62 m  | 110.09 dBu |                              |
| -30°  | 0.565    | 0.080  | -10.98 | 132.44 m  | 196.00 m   | 110.10 dBu | 200.00 m  | 109.92 dBu |                              |
| -35°  | 0.496    | 0.062  | -12.11 | 116.27 m  | 170.86 m   | 110.16 dBu | 174.34 m  | 109.98 dBu |                              |
| -40°  | 0.376    | 0.035  | -14.52 | 88.14 m   | 152.46 m   | 108.74 dBu | 155.57 m  | 108.56 dBu |                              |
| -45°  | 0.273    | 0.019  | -17.30 | 63.99 m   | 138.59 m   | 106.79 dBu | 141.42 m  | 106.61 dBu |                              |
| -50°  | 0.188    | 0.009  | -20.54 | 44.07 m   | 127.93 m   | 104.24 dBu | 130.54 m  | 104.07 dBu |                              |
| -55°  | 0.131    | 0.004  | -23.68 | 30.71 m   | 119.64 m   | 101.69 dBu | 122.08 m  | 101.51 dBu |                              |
| -60°  | 0.079    | 0.002  | -28.07 | 18.52 m   | 113.16 m   | 97.78 dBu  | 115.47 m  | 97.60 dBu  |                              |
| -65°  | 0.047    | 0.001  | -32.58 | 11.02 m   | 108.13 m   | 93.66 dBu  | 110.34 m  | 93.49 dBu  |                              |
| -70°  | 0.022    | 0.000  | -39.17 | 5.16 m    | 104.29 m   | 87.38 dBu  | 106.42 m  | 87.21 dBu  |                              |
| -75°  | 0.010    | 0.000  | -46.02 | 2.34 m    | 101.46 m   | 80.77 dBu  | 103.53 m  | 80.60 dBu  |                              |
| -80°  | 0.003    | 0.000  | -56.48 | 0.70 m    | 99.51 m    | 70.48 dBu  | 101.54 m  | 70.31 dBu  |                              |
| -85°  | 0.001    | 0.000  | -66.02 | 0.23 m    | 98.37 m    | 61.04 dBu  | 100.38 m  | 60.87 dBu  |                              |
| -90°  | 0.001    | 0.000  | -66.02 | 0.23 m    | 98.00 m    | 61.07 dBu  | 100.00 m  | 60.90 dBu  |                              |

Figure 4. Proposed Location Aerial Image



**Figure 5. Distance to Signal Contour – No Interference from BNPFT-20030317AFG**

| <b>Proposed Antenna:</b> SHI 1 bay 6812  |                  |       |        |                     |                       |                         |                    |                         |  |
|--|------------------|-------|--------|---------------------|-----------------------|-------------------------|--------------------|-------------------------|--|
| <b>Proposed Power:</b> 0.099 kW  |                  |       |        |                     |                       |                         |                    | Fill in "yellow" cells  |  |
| <b>Antenna Height AGL:</b> 122 meters  |                  |       |        |                     |                       |                         |                    |                         |  |
| <b>Interference Contour:</b> 110.5 dBu f(50:10)  |                  |       |        |                     |                       |                         |                    |                         |  |
| <b>Artificial Rcv Antenna Height:</b> 2 meters   |                  |       |        |                     |                       |                         |                    |                         |  |
| <b>Distance (Free Space) Equation:</b> $= (10^{((106.92 - [\text{desired dBu}] + [\text{ERP in dBk}]) / 20)}) * 1000$        |                  |       |        |                     |                       |                         |                    |                         |  |
| <b>Field Strength (dBu) Equation</b> $" = 106.92 - (20 * (\text{LOG}_{10}[\text{DistMeters} / 1000])) + [\text{ERP in dBk}]$ |                  |       |        |                     |                       |                         |                    |                         |  |
| Depression   |                  |       |        | Distance            |                       |                         |                    |                         |  |
| Angle Below  | Antenna Relative | ERP   | ERP    | from Ant. to Interf | Distance from Ant. to | Field Strength in dBu @ | Distance from Ant. | Field Strength in dBu @ |  |
| Horizon  | Field            | in kW | in dBk | Contour             | Artificial Plane      | Artificial Plane        | to Ground Level    | Ground Level            |  |
| 0°   | 1.000            | 0.099 | -10.04 | 208.36 m            | infinite              | ---                     | infinite           | ---                     |  |
| -5°  | 0.996            | 0.098 | -10.08 | 207.53 m            | 1376.85 m             | 94.06 dBu               | 1399.79 m          | 93.92 dBu               |  |
| -10°   | 0.985            | 0.096 | -10.17 | 205.24 m            | 691.05 m              | 99.95 dBu               | 702.57 m           | 99.81 dBu               |  |
| -15°   | 0.967            | 0.093 | -10.34 | 201.49 m            | 463.64 m              | 103.26 dBu              | 471.37 m           | 103.12 dBu              |  |
| -20°   | 0.942            | 0.088 | -10.56 | 196.28 m            | 350.86 m              | 105.45 dBu              | 356.70 m           | 105.31 dBu              |  |
| -25°   | 0.910            | 0.082 | -10.86 | 189.61 m            | 283.94 m              | 106.99 dBu              | 288.68 m           | 106.85 dBu              |  |
| -30°   | 0.871            | 0.075 | -11.24 | 181.48 m            | 240.00 m              | 108.07 dBu              | 244.00 m           | 107.93 dBu              |  |
| -35°   | 0.826            | 0.068 | -11.70 | 172.11 m            | 209.21 m              | 108.80 dBu              | 212.70 m           | 108.66 dBu              |  |
| -40°   | 0.774            | 0.059 | -12.27 | 161.27 m            | 186.69 m              | 109.23 dBu              | 189.80 m           | 109.09 dBu              |  |
| -45°   | 0.717            | 0.051 | -12.93 | 149.40 m            | 169.71 m              | 109.39 dBu              | 172.53 m           | 109.25 dBu              |  |
| -50°   | 0.654            | 0.042 | -13.73 | 136.27 m            | 156.65 m              | 109.29 dBu              | 159.26 m           | 109.15 dBu              |  |
| -55°   | 0.586            | 0.034 | -14.69 | 122.10 m            | 146.49 m              | 108.92 dBu              | 148.93 m           | 108.77 dBu              |  |
| -60°   | 0.514            | 0.026 | -15.82 | 107.10 m            | 138.56 m              | 108.26 dBu              | 140.87 m           | 108.12 dBu              |  |
| -65°   | 0.437            | 0.019 | -17.23 | 91.05 m             | 132.41 m              | 107.25 dBu              | 134.61 m           | 107.10 dBu              |  |
| -70°   | 0.357            | 0.013 | -18.99 | 74.39 m             | 127.70 m              | 105.81 dBu              | 129.83 m           | 105.66 dBu              |  |
| -75°   | 0.273            | 0.007 | -21.32 | 56.88 m             | 124.23 m              | 103.71 dBu              | 126.30 m           | 103.57 dBu              |  |
| -80°   | 0.186            | 0.003 | -24.65 | 38.76 m             | 121.85 m              | 100.55 dBu              | 123.88 m           | 100.41 dBu              |  |
| -85°   | 0.096            | 0.001 | -30.40 | 20.00 m             | 120.46 m              | 94.91 dBu               | 122.47 m           | 94.76 dBu               |  |
| -90°   | 0.001            | 0.000 | -70.04 | 0.21 m              | 120.00 m              | 55.29 dBu               | 122.00 m           | 55.15 dBu               |  |

**Figure 6. BNPFT-20030317AFG Proposed Location Aerial Image**

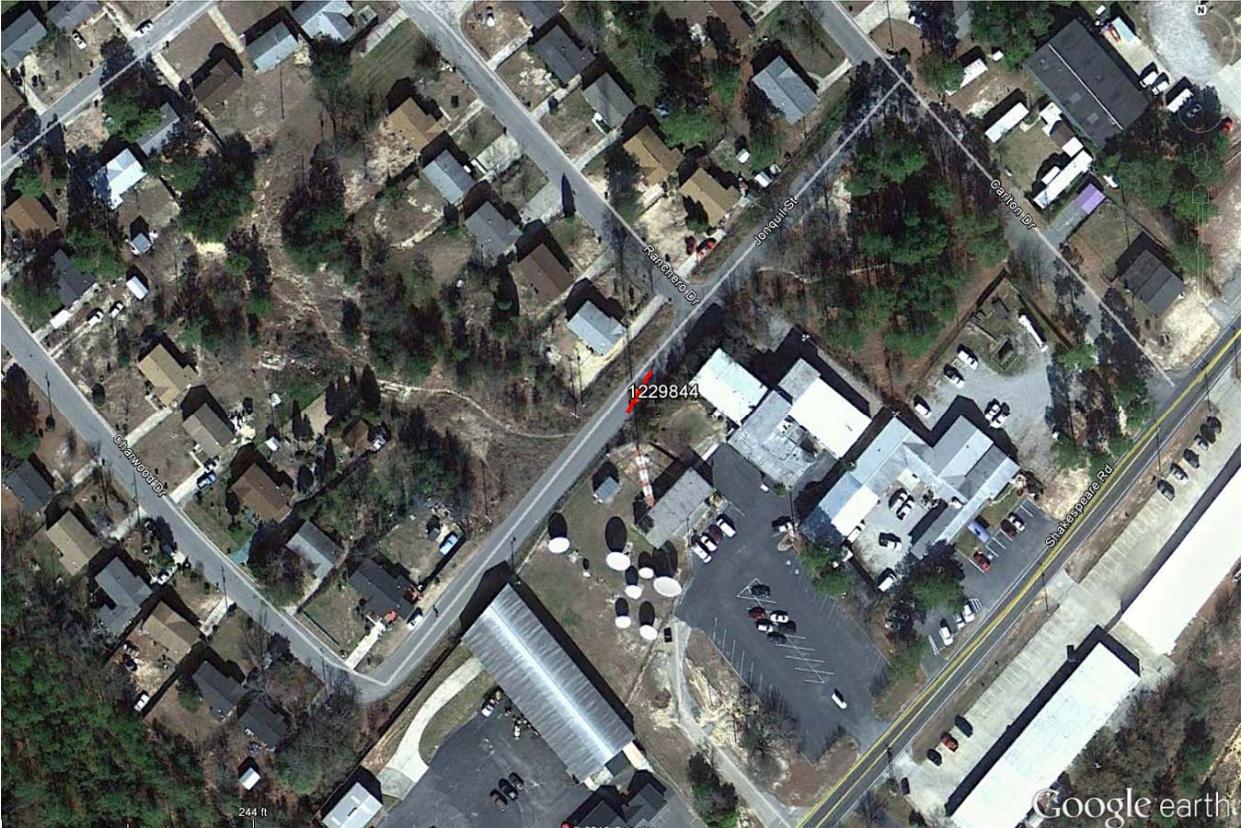
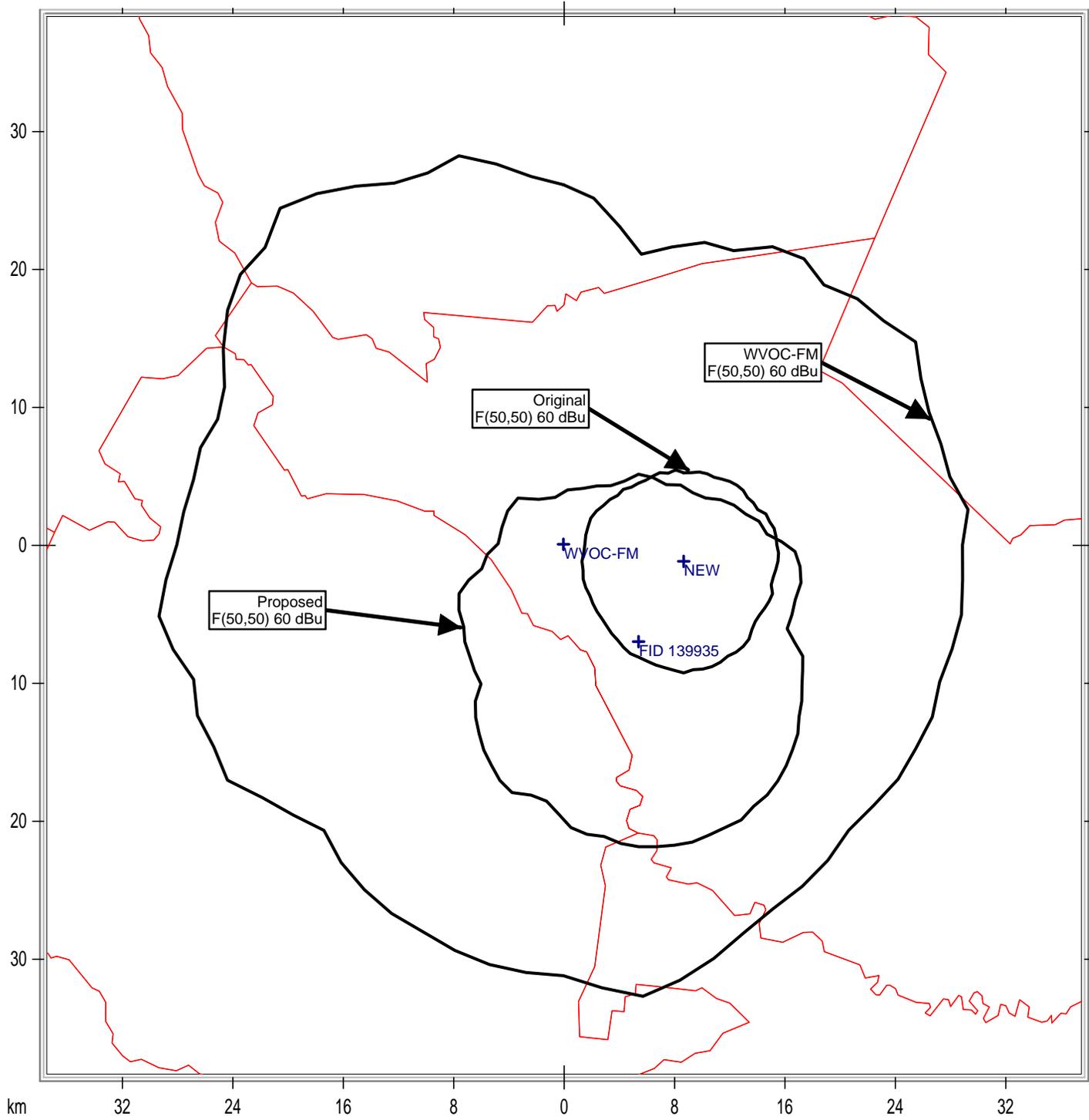


Figure 7. Map of 60 dBu Contours



County Borders      State Borders