

### **Request for Special Temporary Authorization**

Cumulus Licensing LLC (“Cumulus”), pursuant to Section 73.1635 of the FCC’s rules, hereby requests a special temporary authorization (“STA”) for FM translator station W255CJ, Atlanta, Georgia (Facility ID 148550) (“W255CJ”) for a period of 180 days.

W255CJ is licensed to operate on Channel 255 with 250 watts at 303.3 meters height above average terrain. In response to complaints that W255CJ was causing interference to certain listeners of co-channel station WWGA(FM), Tallapoosa, Georgia (Facility ID 183308) (“WWGA”), the FCC issued a letter dated April 11, 2018 ordering W255CJ to cease operations. Accordingly, Cumulus is filing this STA request in an effort to return W255CJ to on-air operation.

As demonstrated in the attached Technical Report of Charles M. Anderson, the proposed STA facility will significantly reduce radiation in the direction of WWGA.<sup>1</sup> As a result of the reduction in power and the significant null in the direction of WWGA, the proposed STA operation will not cause interference to any listener of that station.

Further, as noted in Mr. Anderson’s Technical Report, there currently is contour overlap between the service contours of three (3) low power FM (“LPFM”) stations and one (1) FM translator station and W255CJ’s interfering contour. As demonstrated therein, those contour overlaps either will be eliminated entirely or reduced by W255CJ’s proposed STA operation. Specifically, the existing contour overlap between W255CJ’s interfering contour and the 60 dBu service contours of LPFM stations WMKP-LP, Oakwood, Georgia (Facility ID 191643), and WIEH-LP, Marietta, Georgia (Facility ID 195127), will be eliminated. Technical Report at 1 and Exhibits E1A & E1B thereto. The existing contour overlap between W255CJ’s interfering contour and the 60 dBu service contours of LPFM station WGRU-LP, Riverdale, Georgia (Facility ID 197385), and unbuilt FM translator station W256DJ, Conyers, Georgia (Facility ID 201381), will be reduced.<sup>2</sup> *Id.* at Exhibit E1B.

For the reasons stated herein, Cumulus respectfully requests an STA for a period of 180 days pursuant to Section 73.1635 of the Commission’s rules to operate W255CJ with the technical parameters set forth in the attached STA request. As a result of the directional antenna and reduced power proposed therein, W255CJ will not cause interference to any WWGA listener, and the proposed STA facility will either eliminate or reduce existing contour overlaps to three LPFM stations and one FM translator station. Furthermore, the requested STA also will serve the public interest because, by returning W255CJ to on-air operation, it will enable

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<sup>1</sup> While operating as a licensed facility, W255CJ was radiating between 121 watts (250° azimuth) and 250 watts (290° azimuth) in the direction of WWGA. W255CJ’s STA facility, however, will radiate only between eight (8) watts (260° and 270°) and 34 watts (230°) in the azimuths most pertinent to WWGA.

<sup>2</sup> The licenses and construction permit for each of the above facilities were granted on the following dates: WMKP-LP (File No. BLL-20160111ABR, granted January 12, 2016); WIEH-LP (File No. BLL-20150625AAU, granted June 29, 2015); WGRU-LP (File No. BLL-20150715ABV, granted July 20, 2015); W256DJ (Construction Permit File No. BNPFT-20171204AAD, granted January 16, 2018).

thousands of listeners in the Atlanta area to enjoy the off-air programming of W255CJ's primary station which they had grown accustomed to prior to the translator being taken off the air.<sup>3</sup>

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<sup>3</sup> Prior to being forced off the air, W255CJ enjoyed a weekly cume audience of between 42,100 and 56,800 radio listeners. Nielsen January-April 2016 Monday-Friday 6:00 a.m. to 7:00 p.m. persons age 6+.