

**Section 74.1204 - Statement of Compliance
Amendment to AM Revitalization 250-Mile Window
Application FCC File No. BMPFT-20160729ANY
W262CY, Cleveland, OH, to Channel 245
FM Translator Facility ID. 145205
August, 2017**

The Applicant proposes herein to amend an application to modify the above-referenced, non-reserved band, FM translator authorization pursuant to the announced “*Second FM translator application modification window for AM stations to modify and/or relocate FM translator stations (Second Modification Window)*”.¹ As proposed in the original application, the FM translator will relocate, change frequency and rebroadcast Class B AM station WHKW(AM), Cleveland, OH (Facility ID 14772). However, this technical amendment proposes a channel change to resolve a conflict with full-service station WNIR(FM), Kent, OH (Channel 261A) which caused the Media Bureau to rescind the translator’s construction permit on Channel 262D and dismiss the above-referenced application. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent first-adjacent channel (See Exhibit 1) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

The required protection to second-adjacent channel station WAKS(FM), Akron, OH (Channel 243B) and WONE-FM, Akron, OH (Channel 248B) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of the second and third adjacent channel, full service stations listed above resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, WAKS(FM) is predicted to produce an F(50,50) signal strength of 76 dBu while WONE-FM is predicted to produce an F(50,50) signal strength of only 60 dBu. Therefore, WONE-FM provides for a worst-case interference analysis.

¹ See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

In the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 100 dBu contour relative to WONE-FM. According to free space calculations, the translator's worst-case predicted 100 dBu contour will extend, at most, 154 meters from the proposed antenna. Because the proposed transmit antenna will be located 173 meters above ground level, the predicted interference area will neither reach ground level nor will the predicted interference area reach any buildings within a 154 meter horizontal distance from the proposed antenna location (See Exhibit 2). Therefore, the instant proposal will cause no interference to any population served by either WONE-FM or WAKS(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been "demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable".

Amended
 Section 74.1204 First-Adjacent
 Channel Contour Overlap Study

 Exhibit 1 August, 2017

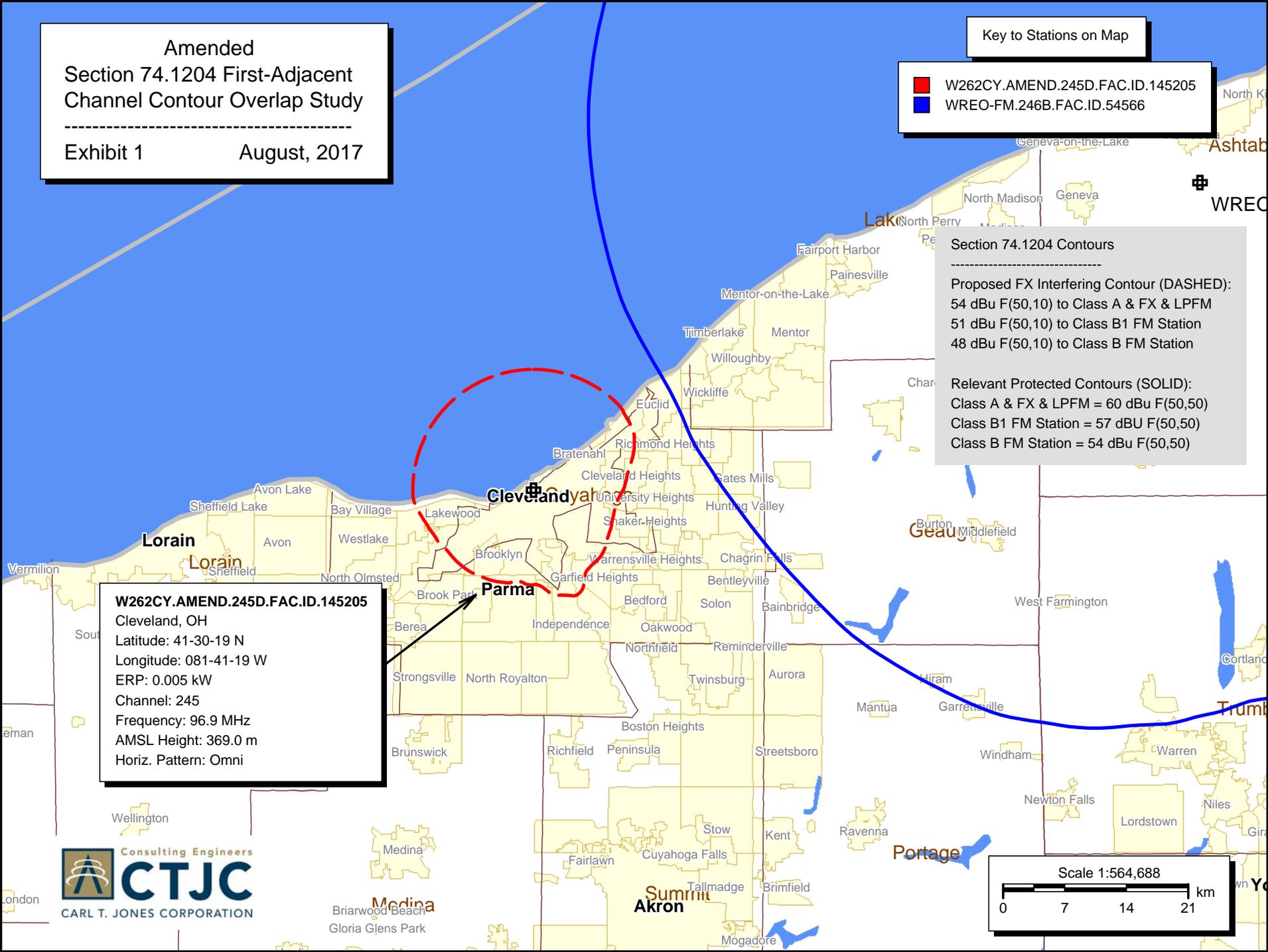
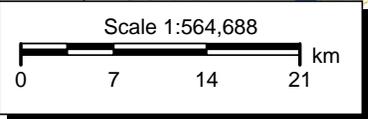
Key to Stations on Map

- W262CY.AMEND.245D.FAC.ID.145205
- WREO-FM.246B.FAC.ID.54566

- Section 74.1204 Contours

 Proposed FX Interfering Contour (DASHED):
 54 dBu F(50,10) to Class A & FX & LPFM
 51 dBu F(50,10) to Class B1 FM Station
 48 dBu F(50,10) to Class B FM Station
- Relevant Protected Contours (SOLID):
 Class A & FX & LPFM = 60 dBu F(50,50)
 Class B1 FM Station = 57 dBu F(50,50)
 Class B FM Station = 54 dBu F(50,50)

W262CY.AMEND.245D.FAC.ID.145205
 Cleveland, OH
 Latitude: 41-30-19 N
 Longitude: 081-41-19 W
 ERP: 0.005 kW
 Channel: 245
 Frequency: 96.9 MHz
 AMSL Height: 369.0 m
 Horiz. Pattern: Omni



There are no taller buildings within the maximum 154 meter radius worst-case interfering contour.



Rooftop FM Translator Antenna Placement
Channel 245D, Cleveland, Ohio
Facility ID 145205
1301 E. Ninth St. Cleveland, Ohio
August, 2017