

APPLICATION FOR STATION LICENSE  
CUMBERLAND BROADCASTING COMPANY  
W276DQ FM TRANSLATOR STATION  
CH 276D - 103.1 MHZ - 0.155 KW  
CUMBERLAND, MARYLAND  
June 2018

TECHNICAL STATEMENT

This Technical Statement was prepared on behalf of Cumberland Broadcasting Company (“Cumberland”), permittee FM translator station W276DQ, Channel 276, Cumberland, Maryland. Cumberland has a construction permit (BNPFT-20180501AAO) to construct the W276DQ facilities. This instant application seeks a license to cover the outstanding construction permit. Exhibit A is a calculation of the W276DQ transmitter power output.

There are four special operating conditions/restrictions listed on the W225CT permit.

The first condition states:

*“Pursuant to Revitalization of the AM Radio Service, Notice of Proposed Rule Making, 28 FCC Red 15221, 15227, para. 14 (2013), and First Report and Order, 30 FCC Red 12145, 12154, para. 17 and n. 43 (2015), the permittee and any successor in interest (licensee, transferee, or assignee) shall be subject to the following restrictions: (1) this facility may only, in perpetuity, be used to rebroadcast the authorized facilities of the AM primary station set forth in this construction permit, except that it may also originate nighttime programming if the AM primary station set forth in this construction permit is not authorized regular nighttime service, and then only during periods of the broadcast day when the primary AM station is not regularly authorized to operate; (2) if the AM primary station is operating with reduced facilities, this cross-service FM translator facility may only operate if its coverage contour conforms to the limits set forth in 47 CFR Section 74.1201(g) as applied to the reduced facilities of the AM primary station; (3) the authorization for this facility may not be assigned or transferred except in conjunction with the primary AM station set forth in this construction permit; and (4) if the authorization of the AM primary station set forth in this construction permit is rescinded, revoked, surrendered, subject to special temporary authorization (STA) to remain silent, or is otherwise suspended from operation, the authorization of this cross-service FM translator station shall likewise be rescinded, revoked, surrendered, silent for the duration of the AM primary station’s STA to remain silent, or suspended from operation. Minor modifications of this authorization are permitted, provided that the translator meets all of the preceding conditions.”*

*“The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.”*

Cumberland is aware of this condition and pledges compliance.

The second condition states:

*“The AM station identified below may be affected by the facilities authorized by this construction permit. Pursuant to Section 1.30004 of the Commission’s Rules, at least 30 days prior to commencement of construction of the facilities authorized herein, the permittee must provide notification of the construction to the AM station licensee. As part of this notification, the permittee must examine the potential impact of the construction of the authorized facilities on the AM station using a moment method analysis. The analysis shall consist of a model of the AM antenna together with the potential re-radiating tower in a lossless environment. The model shall employ the methodology specified in Section 73.151(c) of the Commission’s Rules, except that the AM antenna elements may be modeled as a series of thin wires driven to produce the required radiation pattern, without any requirement for measurement of tower impedances. If the AM station was authorized pursuant to a directional proof of performance based on field strength measurements, the permittee may, in lieu of the moment method analysis, demonstrate with measurements taken before and after construction that field strength values at the monitoring points do not exceed the licensed values. If the construction results in radiation values in excess of the AM station’s licensed standard pattern or augmented pattern values, the permittee is responsible for the installation and maintenance of any detuning apparatus necessary to restore proper operation of the directional antenna. (See Section 1.30002 of the Commission’s Rules.) The permittee must submit confirmation of completion of these notice and analysis requirements in the application for license to cover this construction permit. If the facilities authorized by this Construction Permit do not result in a significant modification of the existing tower specified as defined in Section 1.30002(d) of the Commission’s Rules, the permittee shall submit a certification and any necessary evidence supporting that certification in the Application for License.*

*Station WCBC(AM), Cumberland, MD, 1270 kHz”*

The tower on which the translator’s antenna has been in existence for many years. In fact, this tower was constructed before the original proof of performance on WCBC was conducted. This tower is not base insulated or de-tuned at the AM station operating frequency. Cumberland requests this condition be deleted and/or a waiver of this condition.

The third condition states:

*“The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.”*

Cumberland is aware of this condition and pledges compliance.

The fourth condition states:

*“Prior to commencing program test operations, FM Translator or FM Booster permittee must have on file at the Commission, FCC Form 350, Application for an FM Translator or FM Booster Station License, pursuant to 47 C.F.R. Section 74.14.”*

This application satisfies that condition.

Based on the foregoing, it is believed that Cumberland has complied with all conditions and can operate W276DQ in accordance with Commission's rules.