

**Amended Section 74.1204 - Statement of Compliance**  
**AM Revitalization 250-Mile Window Application**  
**W240CO, Charlotte, MI to Detroit, MI, Channel 268**  
**FM Translator Facility ID. 156770**  
**February, 2016**

The Applicant proposes to modify the above-referenced, non-reserved band, FM translator authorization pursuant to the announced “*First FM translator application modification window for AM stations to modify and/or relocate FM translator stations (First Modification Window)*”.<sup>1</sup> The FM translator will relocate, change frequency and rebroadcast Class C AM station WDTK(AM), Detroit, Michigan (Facility ID 68641). As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules. This amendment requests a frequency change in order avoid the potential for overwhelming co-channel interference received on the FM translator’s presently proposed Channel 240D. This potential interference would result from an operating Canadian radio station (CJWF-FM, Windsor, ON) which does not appear in the FCC’s engineering database.

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 cochannel (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 stations WRIF(FM), Detroit, MI (Channel 266B) and WDET-FM, Detroit, MI (Channel 270B) 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 second-adjacent channel, full service stations listed above which results in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, WRIF(FM) is predicted to produce an F(50,50) signal strength of 100 dBu while WDET-FM is predicted to produce an F(50,50) signal strength of only 85 dBu. Therefore, WDET-FM provides for a worst-case interference analysis.

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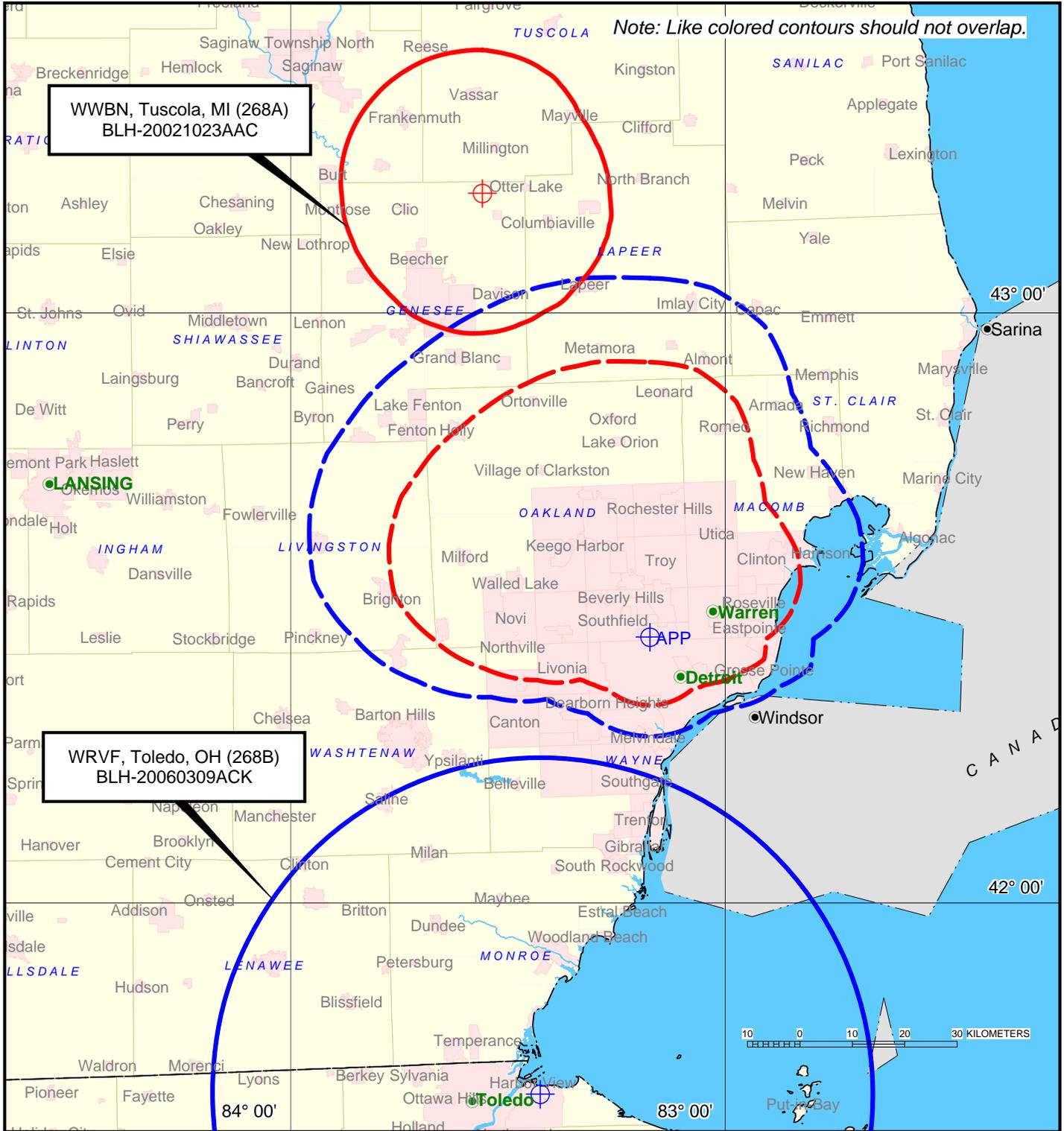
<sup>1</sup> See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

In the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 125 dBu contour relative to WDET-FM. According to free space calculations, the translator's predicted interfering contour will extend only 38 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 276 meters above ground level, the predicted interference area will neither reach ground level nor reach any people. Therefore, the proposed minor change will cause no interference to any population presently served by WDET-FM or by WRIF(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".

Cochannel Class B Station Protected Contours: 54 dBu F(50,50) - Solid Contours  
 Cochannel Class A Station Protected Contours: 60 dBu F(50,50) - Solid Contours  
 Proposed Translator Interfering Contour to Class B Station: 34 dBu F(50,10) - Dashed Outside Contour  
 Proposed Translator Interfering Contour to Class A Station: 40 dBu F(50,10) - Dashed Inside Contour

**EXHIBIT 1**



CO-CHANNEL SECTION 74.1204  
 CONTOUR OVERLAP STUDY  
 TRANSLATOR FACILITY ID 156770  
 LIC: W240CO, CHARLOTTE, MI  
 AMEND: DETROIT, MI, CH. 268D, 99 watts (DA-MAX), 478 m RCAMSL  
 FEBRUARY, 2016