

**Comprehensive Technical Statement
In Support of
Pride Productions, Inc.
Application for New LPFM Station
102.9 MHz, Channel 275L1
Worcester, MA
Second adjacent waiver requested**

Introduction

Pride Productions, Inc. proposes a new LPFM station to serve **Worcester, MA** on 102.5 MHz, Channel 275L1.

The proposed site meets all spacing requirements with respect to all other operating facilities, construction permits, allocations, and applications, with the exceptions of WKLB-FM, FCC Facility ID # 10542 and WODS, FCC Facility ID # 9639. A second adjacent waiver is requested. Full details supporting the waiver request are included.

The following table lists all potential conflicts whose distance falls within 25 km of the required separation:

facid	adj	chan	lpclass	rrs	status	call	st	city	kW	da	haat	brg	km	req	Δ
10542	2	273B	B		LIC	WKLB-FM	MA	WALTHAM	14	N	276	89	54.31	67	-12.69
9639	2	277B	B		LIC	WODS	MA	BOSTON	8.7	N	351	89	55.39	67	-11.61
9639	2	277B	B		APP	WODS	MA	BOSTON	21	N	235	86	67.18	67	0.18
7718	0	275B	B		LIC	WDRC-FM	CT	HARTFORD	20	N	247	224	113.85	112	1.85

Data Sources

Distances were calculated using the FCC method defined in 73.208 of the Commission's Rules.

The facility data used in preparing the application was current as of June 17, 2013.

Compliance was confirmed in all respects as of October 18, 2013. The only change to the table above is that the WODS application has been granted, and it is now a Construction Permit.

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Second Adjacent Channel Waiver Request

The proposed site is second adjacent to the WODS license and to WKLB-FM. It is fully spaced to the WODS application (as of June 17, 2013) and CP (as of October 1, 2013).

The following discussion is based on use of the USGS03 terrain data set and standard FCC contour calculation methodology. Because of the extreme height of the proposed site, the PTP and Longley-Rice methods produce signal strengths for WODS and WKLB-FM that are more than 10 dB higher than the contour methodology. Therefore, the contour methodology is the most conservative approach.

At the proposed site, the WKLB-FM signal is 58.45 dBu. 150 m past the proposed site, the WKLB-FM signal is 58.21 dBu. Therefore, the maximum allowable interfering signal within 150 m of the proposed site is 98.21 dBu.

At the proposed site, the WODS (LIC) signal is 58.13 dBu. 150 m past the proposed site, the WODS signal is 58.06 dBu. Therefore, the maximum allowable interfering signal within 150 m of the proposed site is 98.06 dBu.

The present WODS license presents the worst-case scenario, with a maximum allowable signal within 150 m of 98.06 dBu.

Using the FCC online Height Above Average Terrain (HAAT) calculator and 360 radials, the proposed HAAT is 184 m. The calculated ERP is 2.7 W.

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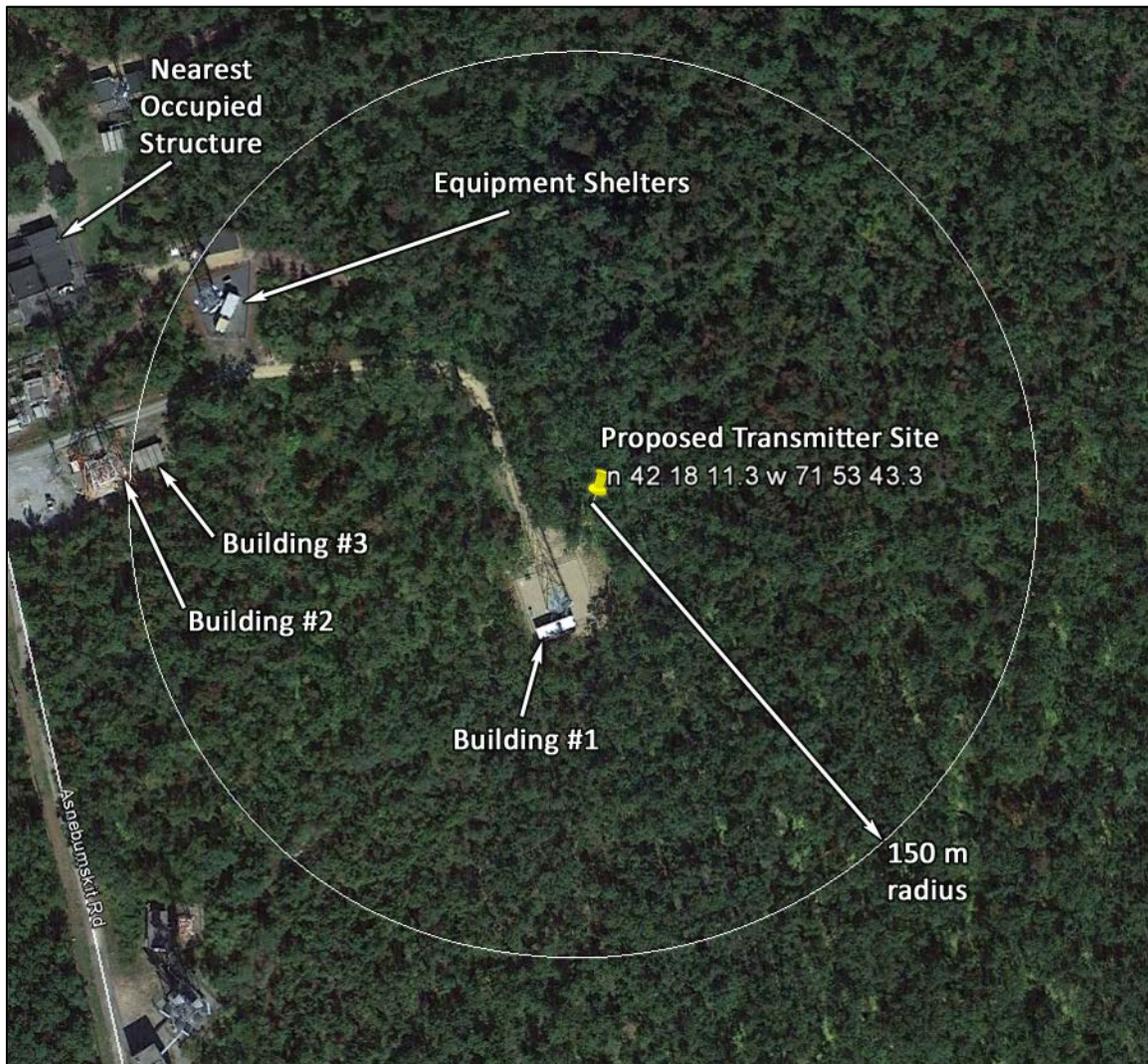
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The free-space distance to 98.06 dBu with an ERP of 2.7 W is 144 m. The nearest residence is more than 180 m from the proposed site. Three buildings and a cluster of equipment shelters exist within 150 m, but all are unattended communications facilities. No generally used roads exist within 150 m of the proposed site.

The following Google Earth image is offered in support of the above statements:



On the following pages, photos of these structures are provided to support the statement that they are unoccupied.

It is respectfully submitted that the proposed facility will comply with the requirements of a second-adjacent interference waiver.

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Building #1:



Building #2:



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Building #3:



Equipment Shelters:



Translator/ Booster Input Interference

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Four translator records exist within 10 km of the proposed site.

NEW, FCC Facility ID # 141380, proposes direct off-reception of WFCR, FCC Facility ID # 69304. WFCR operates on channel 203, which is not adjacent to the proposed channel 275.

W235AV, FCC Facility ID # 138657, rebroadcasts AM station WTAG, FCC Facility ID # 35230. The delivery method specified is "Direct Off-Air." The proposed facility will not interfere with direct off-air reception of an AM station.

W235AV also has an application to rebroadcast WJMN, FCC Facility ID # 53972 with a delivery method of "Other." This delivery method does not implicate direct off-air reception of the primary station. In any event, WJMN operates on channel 235, which is not adjacent to the proposed channel 275.

NEW, FCC Facility ID # 138663, proposes to rebroadcast WSRS, with a delivery method of "Other." This delivery method does not implicate direct off-air reception of the primary station. In any event, WSRS operates on channel 241, which is not adjacent to the proposed channel 275.

There are no boosters within 50 km of the proposed site.

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Form 318 Tech Box Data

Class	LP100
Channel	275
Coordinates (NAD-27)	42 18 11 N Lat 71 53 45 W Lon
ASR	FAA Aeronautical Study requested Aeronautical Study 2013-ANE-1898-OE assigned
Site Elevation AMSL	408 m
Overall Tower Height AGL	15 m
Radiation Center AGL	15 m
Power/height certification	YES
Environmental	YES - Exhibit 11 (This document)

Additional Information

Coordinates (NAD-83)	42 18 11.3 N Lat 71 53 43.3 W Lon
Height above average terrain	184 m (<i>FCC online HAAT calculator, 360 radials</i>)
Estimated ERP	2.7 W-H + 2.7 W-V
Antenna type	Omnidirectional

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International

The FM Agreements with Canada and Mexico require evaluation and potential coordination of any proposal within 320 km of the border.

The distance to the nearest point along the US/Canada border is 300.5 km from the proposed site. Evaluation with respect to Canadian facilities and proposals is required.

Paragraph 4.4 of the February 1991 Working Agreement with Canada, as amended in 2007, provides that LPFM coordination is required only for proposals in which the 34 dBu f(50,10) contour would cross the border.

The maximum extent of the proposed 34 dBu f(50,10) contour is 31.8 km, which is 268.7 km short of the border.

Coordination with Canada should not be required.

The distance to the nearest point along the US/Mexico border is 2,928 km. Coordination with Mexico is not required.

Quiet Zones

The proposed site is outside the National Radio Quiet Zone (National Radio Astronomy Observatory Notification Area) in West Virginia.

The proposed site is outside the Arecibo Observatory notification area in Puerto Rico.

The proposed site is not within a 100 km extension of the Table Mountain Radio Receiving Zone in Colorado.

Protected Monitoring Stations

The nearest Protected Monitoring Station is 329 km distant, in Belfast, ME. This is well beyond any potential 80 dBu contour.

Environmental

The antenna will be mounted 15 m above ground on a 15 m pole. No construction or significant excavation will be performed.

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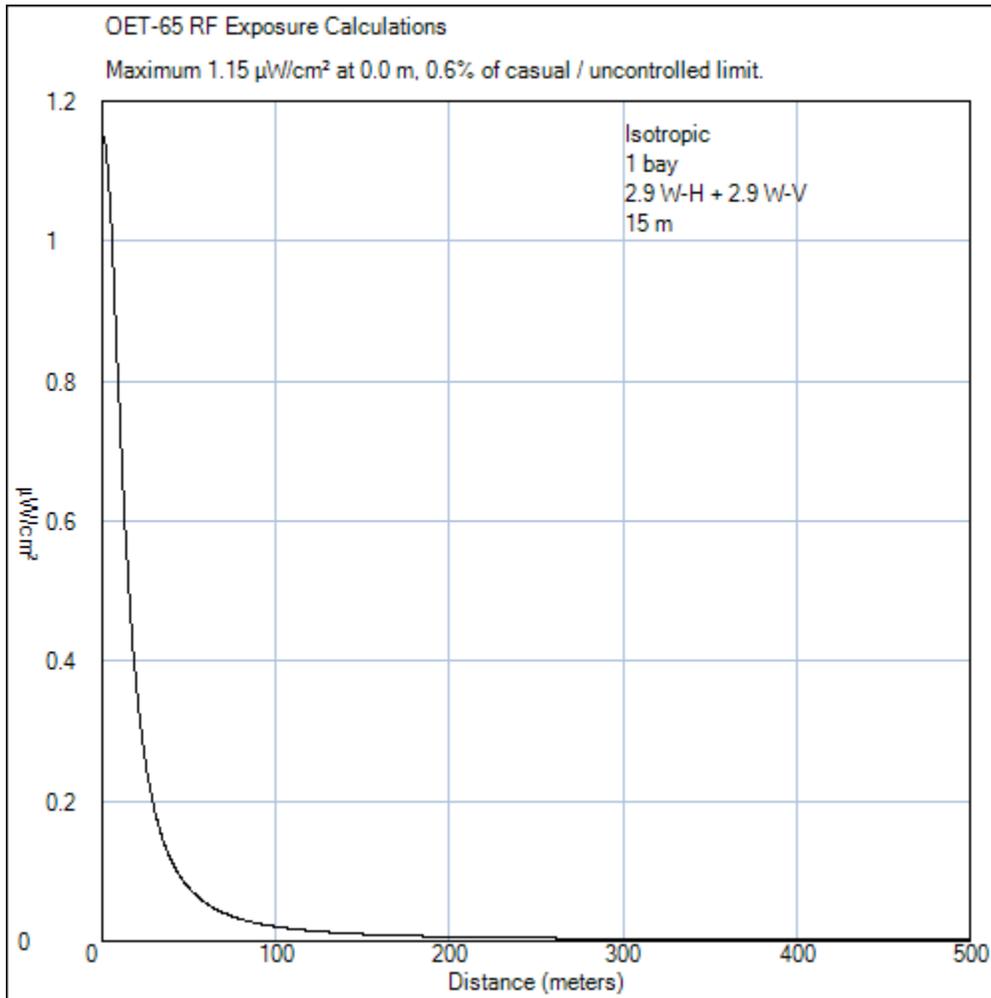
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RF Exposure

The antenna will be mounted 15 m above ground.

Based on the estimated 2.9 W ERP, the distance to the 200 $\mu\text{W}/\text{cm}^2$ limit for casual / uncontrolled exposure in the horizontal lobe of the antenna will be 1 m.

Assuming an isotropic antenna, the maximum exposure on the ground will be less than 1% of the limit for casual / uncontrolled exposure:



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