

Waynco Radio, Inc.
April 2019 Application for Minor Modification of CP
W245DI -- Sodus, NY -- Facility ID 202421

Exhibit 12K – Protection of Canadian FM Facilities and
Request for Waiver of 47 CFR § 74.1235(d)(3)

Maximum distance to the W245DI proposed F(50,10) 34 dBu contour is 65.6 kilometers at an azimuth of 35 degrees True, based on FCC 30-second terrain data. Because this contour exceeds the 60 km distance limit specified in 47 CFR § 74.1235(d)(3), applicant respectfully requests a waiver on the basis that the 34 dBu interference contour crosses the international border in Lake Ontario, but does not fall over any Canadian landmass; therefore, no prohibited interference would occur on Canadian soil. This waiver would serve the public interest by allowing the proposed translator to operate at maximum effective radiated power of 250 watts, providing improved service in the northwest portion of the WACK coverage area.

Please note that WACK's day and night directional patterns are still required to protect the now-vacant 1420 kHz allocation to Peterborough, Ontario which was formerly used by CKPT, an AM station that ceased operation over ten years ago. Therefore, WACK's AM facility is unable to provide 2 mV/m service to the Village of Sodus and the Towns of Ontario, Walworth and Williamson in Wayne County. The proposed modification of W245DI will help to remediate this coverage deficiency.

From the proposed translator site, the closest point of Canadian land is Point Petre, Ontario at WGS 84 coordinates 43.8387, -77.1553. Calculated distance from the translator site to this point is 77 kilometers, leaving a margin of at least 11.4 kilometers under a "worst case" assumption that the interference contour extends 65.6 kilometers in all directions, as illustrated in the map below.

Applicant also notes that similar waivers have been granted on the same basis to FM Translators W225AR, W234AZ, W288CS, and W238DE, which are licensed to other communities in the Rochester, NY market.

