

MINOR CHANGE APPLICATION
AMENDMENT TO BNPFT-20030317CCV
MILLER COMMUNICATIONS, INC.
NEW FM TRANSLATOR STATION
CH 254D - 98.7 MHZ - 0.25 KW DA
ORANGEBURG, SOUTH CAROLINA
July 2013

TECHNICAL STATEMENT

This Technical Statement was prepared on behalf of Miller Communications, Inc. ("Miller"), applicant for a new FM translator on Channel 254D in Orangeburg, South Carolina (BNPFT-20030317CCV). Miller herein proposes to make minor changes in the proposed facilities by relocating to an existing tower site and using a different directional antenna pattern. The proposed minor change will constitute an engineering resolution of the conflict of BNPFT-20030317CCV with the application filed by Radio Training Network, Inc. (BNPFT-20030317IXT) in MX Group 416.¹ The proposed 60 dBu contour is completely encompassed within the 60 dBu contour of parent station WQKI-FM, Orangeburg, South Carolina; as such, the proposed facility is considered a fill-in translator (Exhibit A).

The proposed facility is located within the Columbia, South Carolina 39.0 kilometer grid buffer, as shown in Exhibit B. The reference distance of the proposed translator, based upon a height above average terrain of 108.95 meters and a maximum power of 0.25 kilowatts, is 13.4166 kilometers. By reference to §73.807(d)(1) of the Commission's rules, the co-channel LPFM protection distance is 39.0 kilometers, which is the distance that is considered most restrictive; adjacent channel distances are 28.0 kilometers and 21.0 kilometers, respectively, with

1) Radio Training Network, Inc., is filing a curative amendment to co-locate with this proposal and demonstrate there will be no interference between the two, based on a ratio of desired to undesired contours.

an I.F. spacing requirement of 5 kilometers. The 39.0 kilometer distance does not impact the Columbia, South Carolina Grid LPFM possible sites, as indicated on Exhibit B1. As shown on Exhibit B2, the first adjacent spacing distance for LPFM does not extend to the Columbia, South Carolina Grid. Similarly as shown on Exhibit B3, the second and third adjacent spacing distance for LPFM does not extend to the Columbia, South Carolina Grid. Therefore, this proposal is not considered as a restriction or preclusion to any LPFM possible channel in the Columbia, South Carolina (spectrum available, 30 minute X 30 minute) Grid. There is 60 dBu contour overlap between this amended facility and the originally filed facility, as shown on Exhibit C.

The proposed new FM translator's antenna system will be located on an existing tower structure that has been registered with the FCC and assigned Antenna Structure Registration Number 1242373. As no change to the tower height is anticipated, the FAA has not been notified of this proposal.

Exhibit D is a study demonstrating that the proposed new FM translator will not cause interference to any full service station, nor will interference be delivered to or received from any existing FM translator station or LPFM application.

It is noted the the proposed facility will be located within the 60 dBu contour of 3rd adjacent channel new translator station on Channel 251D in Orangeburg, South Carolina. This is the amendment to its pending application by Radio Training Network, Inc. (BNPFT-20030317IXT). The amended facility, as specified in BNPFT-20030317IXT, will operate with

0.019 kilowatt at an elevation above ground level of 100.6 meters (330.0 feet). Due to the relationship between these facilities, a 40 db ratio of the protected and interfering contours applies. The facilities will be co-located.

We have, therefore, calculated the level of signal of the amended facility BNPFT-20030317IXT at the proposed new translator's site as over 100 dBu (FCC 50/50). The corresponding interfering contour for the proposed translator is 140+ dBu (50/10). The 140 dBu interfering contour of the proposed extends 0.010 kilometer (32.8 feet), as indicated on Exhibit D2. The predicted interfering contour never reaches ground level. As such, BNPFT-20030317IXT (as amended) will not receive interference from BNPFT-20030317CCV (as amended). Exhibit E is a demonstration that the proposed new FM translator complies with the RF exposure limits.

All supporting data used in the preparation of this application has been forwarded to Miller and is available for submission to the Commission upon request.¹

1) All data regarding broadcast facilities was extracted from the CBDS database on the date of the interference tabulation. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein. Only the radio frequency exposure review of the environmental analysis was undertaken as part of this instant engineering application.