

**Goldman Engineering Management
Auburn, CA**

**MINOR MODIFICATION APPLICATION
W233BZ (BNPFT-20130826AGW)**

January, 2016

TECHNICAL STATEMENT

This technical statement and attached exhibits have been prepared on behalf of WCLT Radio, Inc. (“WCLT”), proposed Assignee of translator station W233BZ, Facility identifier 14259. The applicant proposes to modify Construction Permit BNPFT-20130826AGW to change tower location and license for W233BZ and license as a fill-in translator for AM station WCLT (1430kHz, Class D). Facility ID #71284 in compliance with 47CFR 74.1201(g). The translator community of license will change to Newark, OH. The proposed operation is compliant with the “AM Revitalization Act” (AMR Order) pursuant to DA 15-1215 Released 10/16/2015. As a class C or D station, WCLT is eligible to apply in the first modification window opening January 29, 2016. Pursuant to the AMR Order, translator station W233BZ will change frequency from channel 233D (94.5MHz) to 254D (98.7MHz) and will be relocated 41 miles from the currently permitted site to the proposed tower site which is well within the maximum allowable 250 miles.

Facilities Proposed

Location (NAD27)	40° 02' 02" N Latitude, 82° 24' 08" W Longitude
Channel	254D (98.7MHz)
Tower Overall AGL Height-	107m
Tower ASR	1014504 (Exhibit C)
Proposed Antenna	ERI LPX-2E-HW
Antenna AGL Height-	81m
Site AMSL Height-	316m
COR AMSL Height	400m
ERP	250w Non-Directional

1511 Radcliffe Way, Auburn CA 95603
(214) 395-5067

Interference Study

ComStudy 2.2 search of channel 254 (98.7 MHz Class D) at 40-02-02.0 N, 82-24-08.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
WOVK	WHEELING	WV 254 B	139.23	0.00	87.2	0.35 dB See Exhibit A
WTOH	UPPER ARLINGTON	OH 255 A	53.87	0.00	262.7	3.96 dB
WYKL	CRESTLINE	OH 254 A	87.12	0.00	340.0	7.63 dB
WTLL-LP	ZANESVILLE	OH 255 LP100	35.07	13.00	107.0	7.93 dB
WYRO	MCARTHUR	OH 254 A	99.00	0.00	189.8	9.47 dB
WSAX-LP	COLUMBUS	OH 253 LP100	39.29	13.00	275.7	10.91 dB
WMAN-FM	FREDERICKTOWN	OH 252 A	61.25	0.00	354.4	18.92 dB
WKNA	LOGAN	OH 252 A	56.12	0.00	178.5	18.11 dB
WTNS-FM	COSHOCTON	OH 257 A	55.85	0.00	61.1	18.10 dB
WINF-LP	DELAWARE	OH 253 LP100	62.24	13.00	298.5	19.20 dB
W254BJ	SPRINGFIELD	OH 254 D	125.56	0.00	266.4	21.45 dB
W257CU	COLUMBUS	OH 257 D	53.94	0.00	258.7	23.98 dB
WNCX	CLEVELAND	OH 253 B	155.58	0.00	20.8	23.31 dB
WNCX	CLEVELAND	OH 253 B	155.58	0.00	20.8	23.09 dB
WHKO	DAYTON	OH 256 B	161.37	0.00	258.6	24.70 dB
W254BA	DAYTON	OH 254 D	151.17	0.00	261.7	25.01 dB

COMPLIANCE, 74.1201(g), 74.1233(a)(1), and 74.1204(a),(d)

Exhibit A demonstrates compliance with 74.1204(a). There are no impermissible contour overlaps to any other facilities. The only close relationship is to WOVK, 254B.

Exhibit B demonstrates compliance with 74.1201(g) governing the use of a translator as a fill-in for an AM station. The 60dBu contour of the proposed W233BZ will be completely contained within the 2mV/m contour of WCLT(AM) and is within 25 miles of the WCLT transmitter.

Due to the special nature of this AMR Order, 74.1233(a)(1) does not apply.

Environmental Exhibit

The proposed W233BZ facility as proposed on channel 254D will utilize a non-directional antenna located on an existing tower (ASR 1014504) owned by WCLT. The ASR for the tower is attached as Exhibit C. The RF density near the tower was calculated using the proposed ERI LPX-2E-HW antenna at 250 watts horizontal and vertical.

Using the FCC program "FM Model for Windows", it was calculated that the proposed antenna contributes approximately $0.24 \mu\text{W}/\text{cm}^2$ or 0.12% of the total allowable $200 \mu\text{W}/\text{cm}^2$.

Because the RF level is under 5% of the allowable public exposure level the proposed operation is categorically excluded from further environmental review under §1.1306 of the FCC rules and regulations.

Respectfully Submitted



Bert Goldman
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EXHIBIT A- 74.1204(a) Compliance (contour Overlaps)

W233BZ- PROPOSED- 254D (98.7MHz), Newark, OH. 250w, 81m AGL

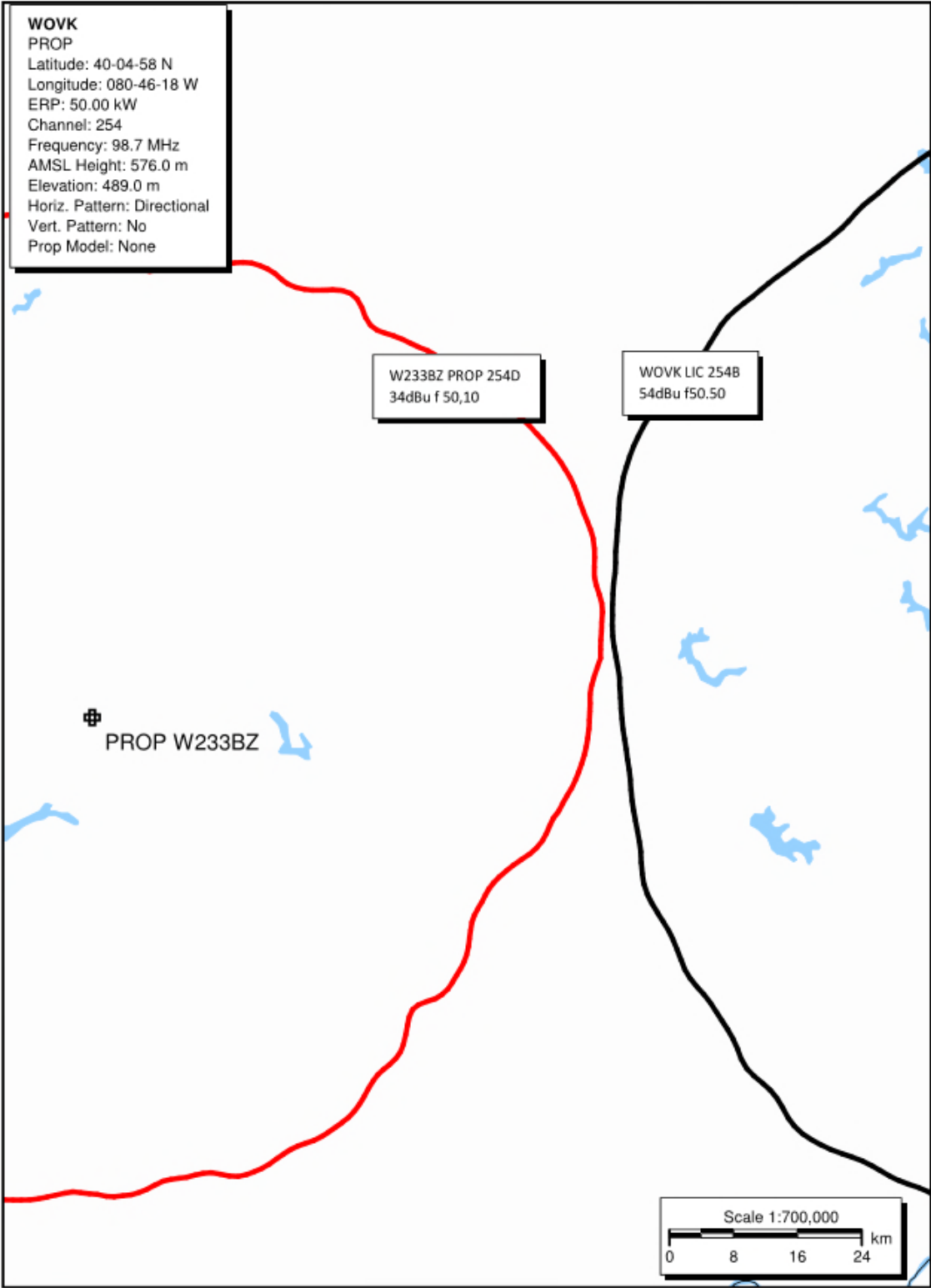


EXHIBIT B- 74.1201(g) Compliance to WCLT (AM Fill-in)

W233BZ- PROPOSED- 98.7MHz, Newark, OH. 250w, 81m AGL

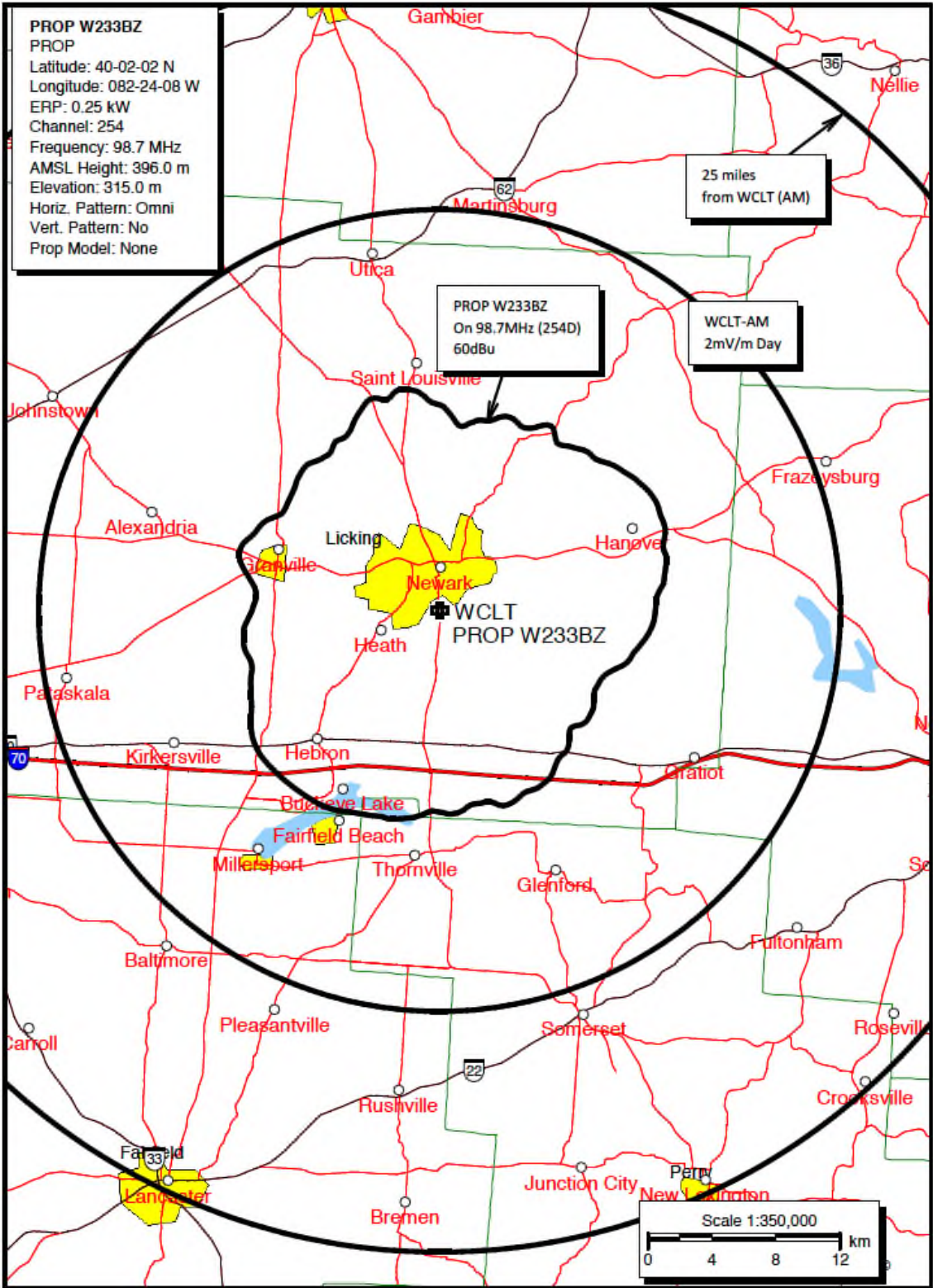


EXHIBIT C- ANTENNA STRUCTURE REGISTRATION

Registration 1014504

 [Map Registration](#)

Registration Detail

Reg Number	1014504	Status	Constructed
File Number	A0079370	Constructed	01/04/1949
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long	40-02-02.0 N 082-24-08.0 W	Address	674 JACKSONTOWN RD SE
City, State	NEWARK , OH		
Zip	43056	County	LICKING
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
315.5	107.3
Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
422.8	106.4

Painting and Lighting Specifications

FCC Paragraphs 1, 3, 12, 21

FAA Notification

FAA Study	FAA Issue Date
"	

Owner & Contact Information

FRN	Owner Entity Type
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Owner

WCLT RADIO INC	P: (614)345-4004
Attention To: JIM FERGUSON	F:
P.O. Box 5150	E: JIMFERG@WCLT.COM
NEWARK , OH 43058-5150	

Contact

P:
F:
E:

" Last Action Status

Status	Constructed	Received	02/26/1997
Purpose	New	Entered	02/26/1997
Mode	Interactive		

(ASR 1014504 Cont'd)

Related Applications

02/26/1997 A0079370 - New (NE)

▮

Comments

Comments

None

▮

History

Date

Event

None

▮

Automated Letters

None

▮