

**Comprehensive Technical Statement  
In support of  
West Virginia – Virginia Holding Company, LLC**

**Application for Minor Modification**

**W246BE  
Facility ID 143281  
Bluefield, WV**

**Change in Frequency  
(Channel 246D 97.1MHz to Channel 247D 97.3MHz)**

**Expedited Processing Requested**

**Introduction**

West Virginia – Virginia Holding Company, LLC (WVVHC) proposes to make the following changes to its W246BE, Bluefield, WV:

- Channel / Frequency
- Effective Radiated Power

The proposed changes are necessary to resolve a question of interference to co-channel WDBS in Sutton, WV.

WVVHC proposes to move its translator from channel 246 to channel 247 to make it first adjacent to WDBS and eliminate the interference. WVVHC respectfully requests swift action on this proposal due to the desire to resolve this expeditiously.

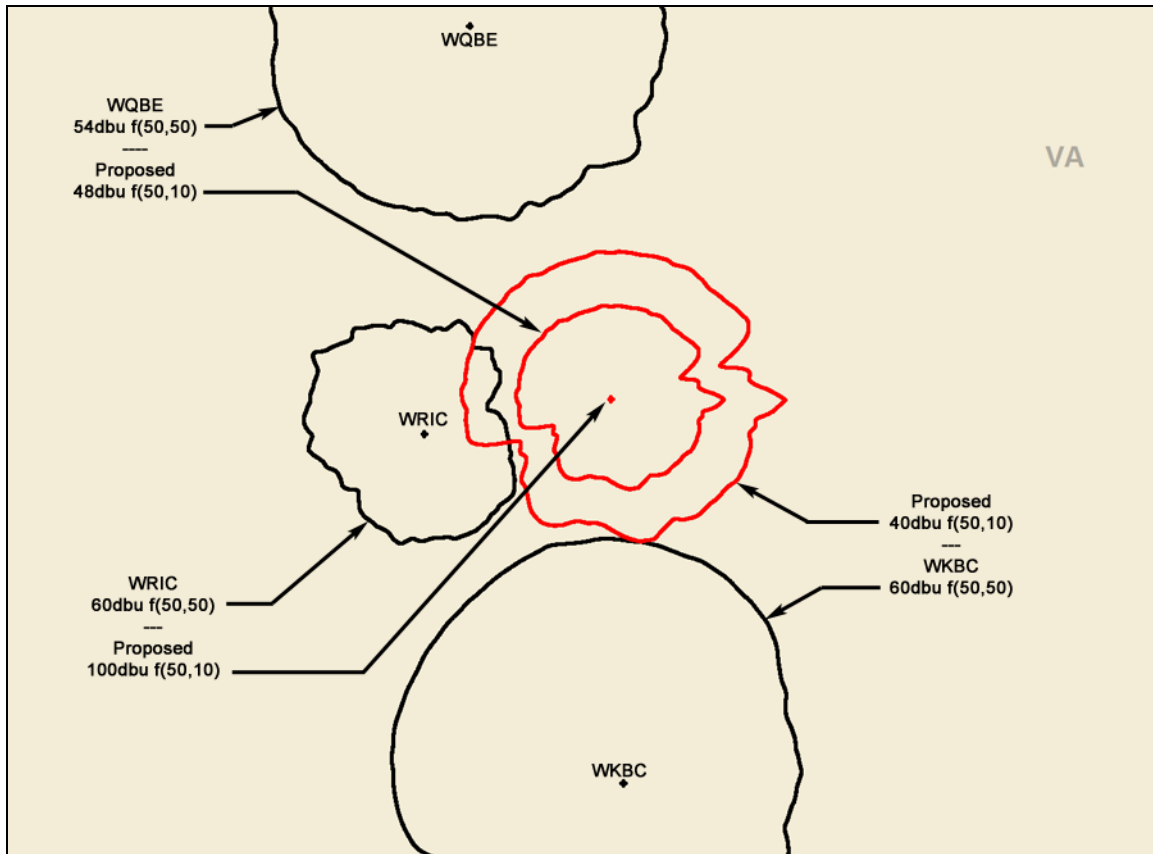
**Allocation Study**

The following table is the output of a study for a full Class A station at the transmitter location. Records exceeding the 73.207 Class A separation requirements by more than 25km were suppressed:

app_id	adj	chan	stts	call	st	city	erp	da	haat	brg	dkm	req	delta
249671	0	247C	LIC	WKBC-FM	NC	N WILKESBORO	100	Y	403	178	131.26	226	-94.74
299919	1	248B	LIC	WQBE-FM	WV	CHARLESTON	50	N	152	340	136.19	113	23.19
1184648	2	249C3	LIC	WRIC-FM	VA	RICHLANDS	3.2	N	229	260	65.19	42	23.19

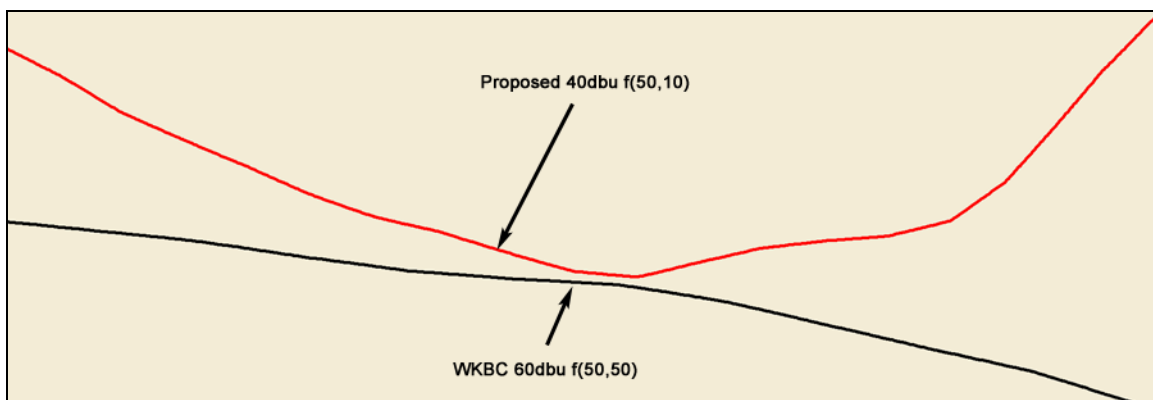
Only WKBC would be a factor for a full Class A station at the translator's location. However, the following section will show the lack of interference to all three records.

## Detailed Interference Study



The above map demonstrates the lack of overlap between the protected contours of WQBE (54dbu) and WRIC (60dbu) and the corresponding interfering contours (48dbu and 100dbu respectively).

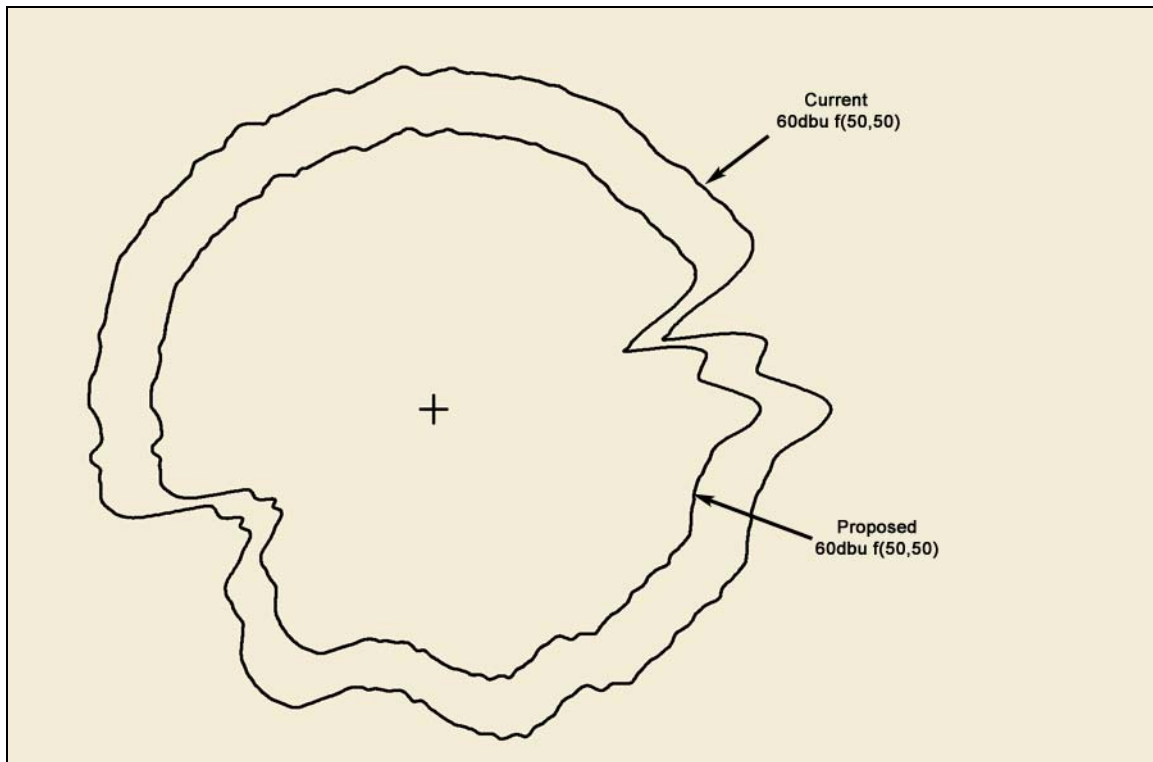
The proposed 40dbu interfering contour is close to the 60dbu protected contour of WKBC. As shown below, the contours clear.



## Analog TV6 Interference

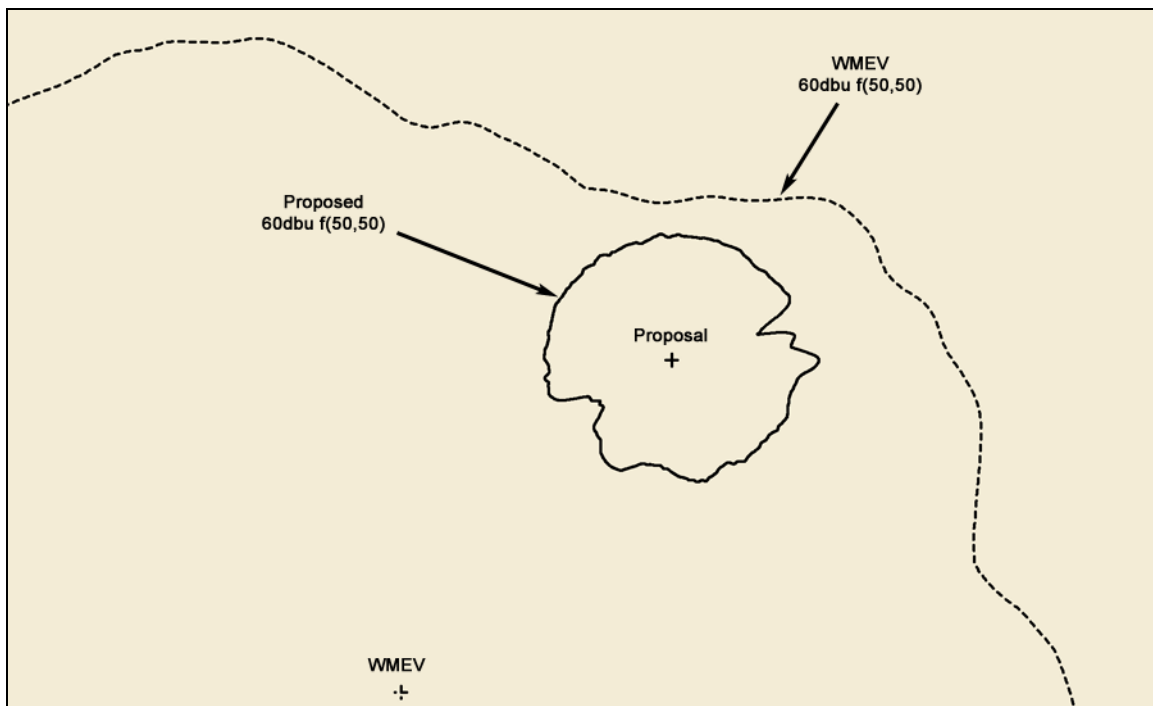
The proposed operating frequency of the translator is 97.3 MHz, channel 247. Channel 6 protection is not required on this frequency.

## Minor Change



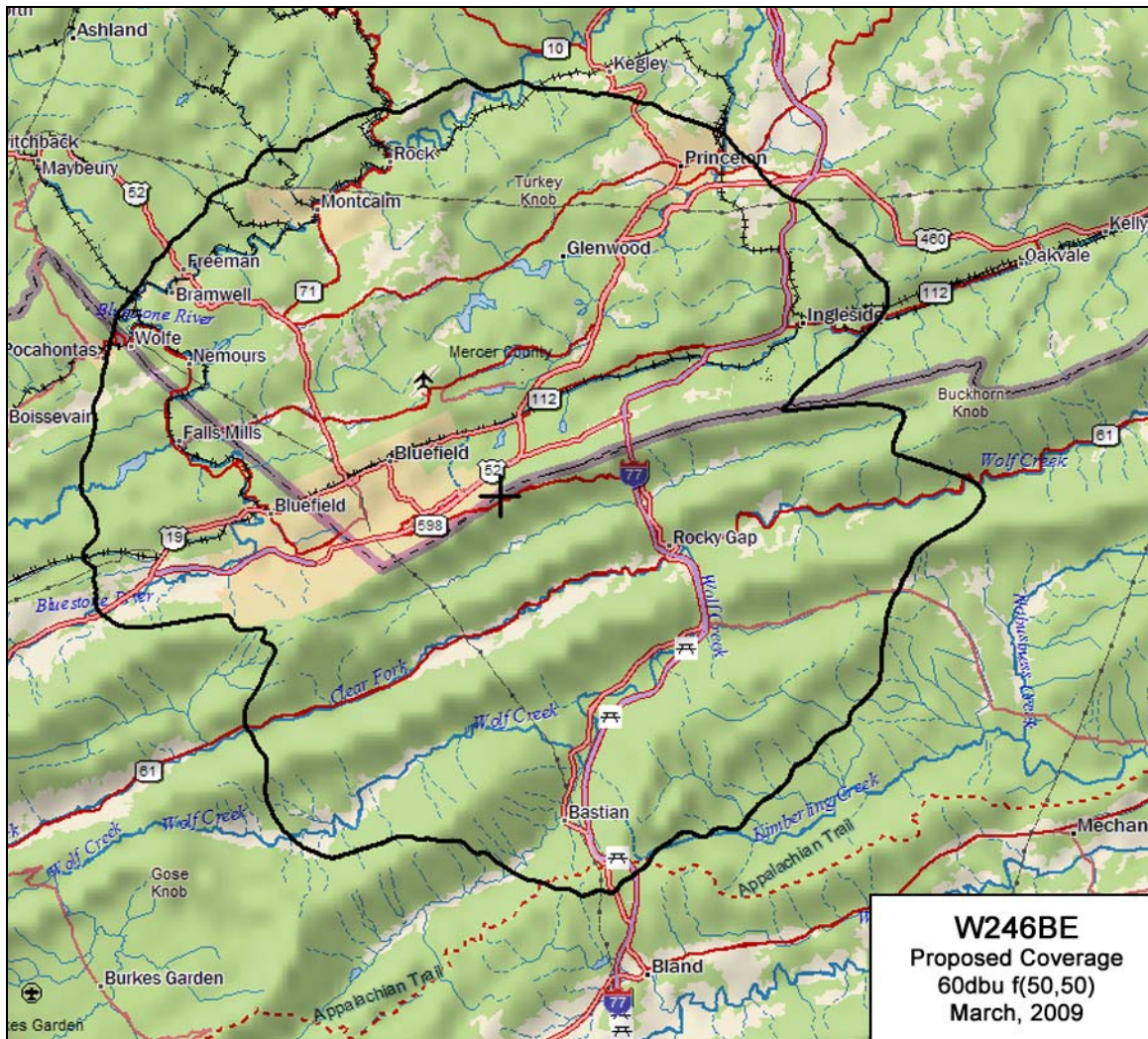
The proposed 60dbu f(50,50) contour falls within the existing 60dbu f(50,50) contour. The frequency change is one channel. Under 74.1233(a), this is a minor change proposal.

## Fill-In Translator



As shown on the map, the proposed 60dbu contour falls completely within the 60dbu contour of the primary station, WMEV-FM, Marion, VA. The translator input is fed directly off-air from WMEV-FM.

## Coverage



### **Antenna Location**

The site elevation fails TOWAIR by about 200m, and any tower with a height greater than 20' (6.1m) requires FAA approval and ASR registration. Any structure less than 6.1m, even though it fails TOWAIR, does not require FAA approval and ASR registration.

The antenna is located on a 6m (19'6") pole. The current antenna and pole will be re-used.

### **Environmental and RF Exposure**

At 37W and 5m AGL, the two-bay Jampro Double-V style antenna with  $0.75\lambda$  bay spacing provides an exposure of  $15.9\mu\text{W}/\text{cm}^2$ , which is 8% of the casual / uncontrolled exposure limit.

Access to the pole itself is controlled, appropriate signage is provided, and the applicant commits to reducing power or shutting down as may be necessary to protect workers on the pole.

There will be no new construction, no excavation will be required, and there will be no change to the overall height of the pole.

### **Conclusion**

The instant application is grantable without any requirement for waiver or special treatment. Expedited processing is requested.