

**MINOR CHANGE APPLICATION**  
**REACH COMMUNICATIONS, INC.**  
**W251AL FM TRANSLATOR STATION**  
**CH 251D - 98.1 MHZ - 0.230 KW**  
**FORT MYERS, FLORIDA**  
**July 2012**

**EXHIBIT C**

As indicated on Exhibit C1, the proposed W251AL operation with an effective radiated power of 0.230 kilowatt at 129.0 meters (426.2 feet) above ground level, will not cause interference to any existing, applied for, or proposed facility. As noted on Exhibit C1, the proposed W251AL is within the predicted 60 dBu contour of second adjacent station WDEO-FM, Channel 253C3, San Carlos Park, Florida and WTLQ-FM, Channel 249C3, Punta Rassa, Florida. Due to the relationship between W2351AL and WDEO-FM and WTLQ-FM, a 40 db ratio of the protected and interfering contours applies.

We have, therefore, calculated the level of signal of WDEO-FM and WTLQ-FM at the proposed W251AL site. A map showing the WDEO-FM and WTLQ-FM contours at the proposed W251AL site is attached as Exhibit C2. The WDEO-FM contour at the W251AL site is 90 dBu (50/50), and the corresponding interfering contour for W251AL is 130 dBu (50/10). The 130 dBu interfering contour of W251AL extends 0.03 kilometer (98.4 feet), as indicated on Exhibit C3. Since the W251AL antenna will be mounted at 127.1 meters (417.0 feet) above ground level, this contour never reaches the ground. As such, WDEO-FM will not receive interference from the proposed translator.

The WTLQ-FM contour at the W251AL site is 77 dBu (50/50), and the corresponding interfering contour for W251AL is 117 dBu (50/10). The 117 dBu contour of the proposed W251AL extends 0.15 kilometer (492.1 feet) from the proposed translator antenna, as indicated on Exhibit C3. As indicated on Exhibit C4, using the elevated pattern of the proposed antenna supplied by the manufacturer, we have calculated the elevation above the ground of the interference from the proposed W251AL translator. The closest point above the ground that the interfering contour reaches is 80.3 meters (263.5 feet). This point occurs at a distance of 81.0 meters (265.7 feet) out from the base of the tower. As the interfering contour does not reach the ground, it will not impact reception of service from WTLQ-FM in the area and the interference is, therefore, considered to be over an unpopulated area.

Based on the foregoing, it is believed that the proposed W251AL is in compliance with §74.1204(d) of the Commission's rules. If a waiver of the rule is needed to address WDEO-FM and WTLQ-FM, one is respectfully requested.

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**EXHIBIT C1**

Interference Study for W251AL, Fort Myers, Florida  
Using Proposed Site as Reference

REFERENCE		CH# 251D - 98.1 MHz, Pwr= 0.23 kW, HAAT= 129.7 M, COR= 130.2 M								DISPLAY DATES	
26 26 54.0 N.		Average Protected F(50-50)= 14.3 km								DATA 07-02-12	
81 48 54.0 W.		Omni-directional								SEARCH 07-02-12	
CH CITY	CALL	TYPE STATE	ANT	AZI. <---	DIST FILE #	LAT. LNG.	Pwr (kW) HAAT (M)	INT (km) COR (M)	PRO (km) LICENSEE	*IN* (Overlap in km)	*OUT*
251D Fort Myers	W251AL	LIC FL	C	335.5	10.56 BLFT20070326ABB	26 32 06.0 81 51 33.0	0.080 51	23.5 52	7.0 Reach Communications, Inc.	-27.2*	-44.6
253C3 San Carlos Park	WDEO-FM	LIC FL	NC	328.4	7.37 BLH19990927ABS	26 30 18.0 81 51 14.0	18.500 113	4.0 114	38.8 Ave Maria University, Inc.	-10.9*<	-32.5*<
249C3 Punta Rassa	WTLQ-FM	LIC FL	ZC	291.1	12.22 BLH20000120ABH	26 29 16.0 81 55 46.0	14.500 131	3.0 131	31.8 Fort Myers Broadcasting Co	-5.2*<	-20.7*<
251D Punta Gorda	W251BF	LIC FL	C	338.3	55.19 BLFT20070322ACR	26 54 39.0 82 01 16.0	0.170 36	23.0 39	6.9 Reach Communications, Inc.	17.9	0.2
251D Everglades City	W251BL	LIC FL	C	168.4	58.16 BLFT20111107AMV	25 56 02.7 81 41 52.4	0.250	23.8 21	7.1 Robert G. Ladd	20.1	2.9
250C Palm Beach	WRMF	LIC FL	CN	84.4	157.42 BLH19850806KQ	26 34 37.0 80 14 32.0	100.000 411	119.7 412	80.6 Palm Beach Broadcasting Li	23.5	55.2
252C Goulds	WRTO-FM	LIC FL	CN	126.6	168.22 BLH19920311KD	25 32 24.0 80 28 07.0	100.000 429	121.6 429	81.9 License Corporation #2	32.3	64.7
252C2 Fort Meade	WWRZ	LIC FL	NCX	358.1	155.70 BLH20080613ABL	27 51 10.0 81 52 02.0	27.000 203	76.7 244	52.0 Hall Communications, Inc.	64.6	82.1
250C Clearwater	WXTB	LIC FL	NCX	334.2	214.04 BLH20090706AFW	28 10 56.0 82 46 06.0	100.000 458	125.1 461	84.2 Citicasters Licenses, Inc.	74.6	108.2

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM  
Contour distances are on direct line to and from reference station. Reference Zone= East Zone, Co to 3rd  
adjacent.  
All separation margins (if shown) include rounding  
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beamtilt (Y,N,X)  
"\*"affixed to 'IN' or 'OUT' values = site inside protected contour.  
< = Contour Overlap

**Graham Brock, Inc. - Broadcast Technical Consultants**

**W251AL - Proposed**  
Latitude: 26-26-54 N  
Longitude: 081-48-54 W  
ERP: 0.235 kW  
Channel: 251D  
Frequency: 98.1 MHz  
AMSL Height: 130.2 m  
Horiz. Pattern: Omni  
Prop Model: FCC

**WDEO-FM**  
BLH-19990927ABS  
Latitude: 26-30-18 N  
Longitude: 081-51-14 W  
ERP: 18.50 kW  
Channel: 253C3  
Frequency: 98.5 MHz  
AMSL Height: 114.0 m  
Horiz. Pattern: Omni  
Prop Model: FCC

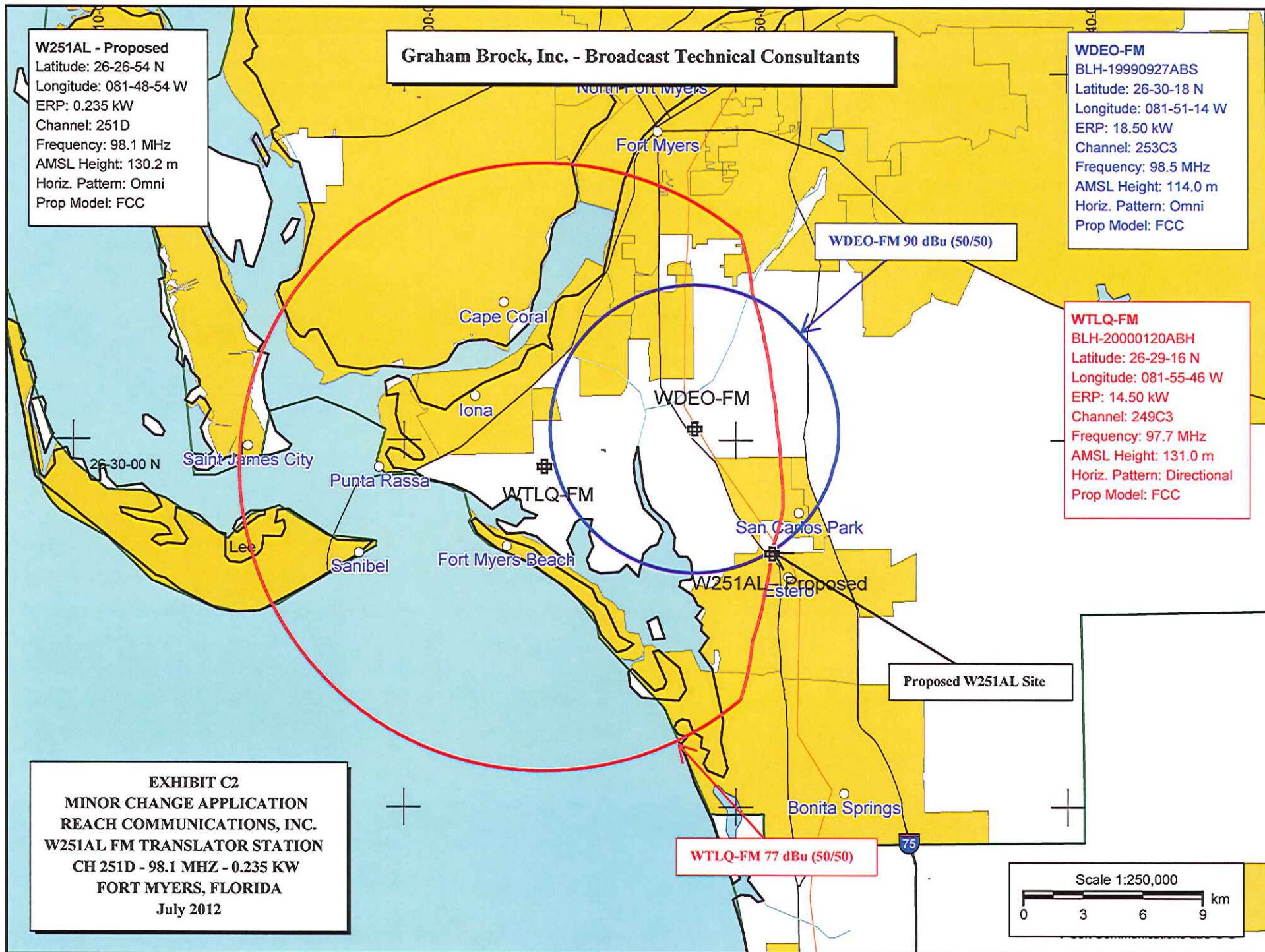
**WTLQ-FM**  
BLH-20000120ABH  
Latitude: 26-29-16 N  
Longitude: 081-55-46 W  
ERP: 14.50 kW  
Channel: 249C3  
Frequency: 97.7 MHz  
AMSL Height: 131.0 m  
Horiz. Pattern: Directional  
Prop Model: FCC

WDEO-FM 90 dBu (50/50)

WTLQ-FM 77 dBu (50/50)

Proposed W251AL Site

**EXHIBIT C2**  
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**EXHIBIT C3**

Predicted contour:

N. Lat. = 26 26 54.0 - Tabulated Protected and Interfering Contour Data  
W. Lng. = 81 48 54.0 - W251AL FM Translator - Fort Myers, Florida

HAAT and Distance to Contour - NGDC 30 Second terrain database

Azi.	HAAT	ERP kW	dBk	Field	60-F5	40-F1	54-F1	100-F1	117-F1	130-F1
Azi.	HAAT	ERP kW	dBk	Field	60-F5	40-F1	54-F1	100-F1	117-F1	130-F1
000	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
010	129.8	0.2300	-6.38	1.000	14.32	48.13	21.62	1.06	0.15	0.03
020	128.7	0.2300	-6.38	1.000	14.25	47.97	21.51	1.06	0.15	0.03
030	128.4	0.2300	-6.38	1.000	14.24	47.94	21.49	1.06	0.15	0.03
040	128.4	0.2300	-6.38	1.000	14.24	47.93	21.49	1.06	0.15	0.03
050	128.8	0.2300	-6.38	1.000	14.26	47.99	21.52	1.06	0.15	0.03
060	128.0	0.2300	-6.38	1.000	14.22	47.88	21.46	1.06	0.15	0.03
070	127.9	0.2300	-6.38	1.000	14.21	47.86	21.44	1.06	0.15	0.03
080	128.3	0.2300	-6.38	1.000	14.23	47.92	21.48	1.06	0.15	0.03
090	128.5	0.2300	-6.38	1.000	14.24	47.94	21.49	1.06	0.15	0.03
100	130.0	0.2300	-6.38	1.000	14.33	48.15	21.63	1.06	0.15	0.03
110	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
120	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
130	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
140	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
150	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
160	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
170	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
180	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
190	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
200	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
210	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
220	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
230	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
240	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
250	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
260	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
270	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
280	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
290	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
300	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
310	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
320	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
330	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
340	130.2	0.2300	-6.38	1.000	14.34	48.18	21.65	1.06	0.15	0.03
350	129.6	0.2300	-6.38	1.000	14.30	48.09	21.59	1.06	0.15	0.03

AMSL= 130.2 M

Interference to: WTLQ-FM  
 Contour at tower: 77 dBu - FCC 50/50  
 Interference Ratio: 40 db

CALL: W251AL  
 POWER (Watts): 230  
 ANTENNA AGL (m): 127.1  
 Desired Contour (dBu - FCC 50/10) 117

Non-Directional Antenna ERI LPX-2E-HW  
 Azimuth: Worst Case  
 Relative field: 1.000  
 ERP (Watts) at Azimuth: 230

DEPRESSION ANGLE	ANTENNA RELATIVE FIELD FROM MFG	ERP (WATTS)	dBk	DISTANCE TO INTERFERING CONTOUR (m)	HORIZONTAL DISTANCE FROM TOWER (m)	VERTICAL DISTANCE FROM GROUND (m)
0	1.000	230.0	-6.38	149.9	149.9	127.1
5	0.987	224.1	-6.50	148.0	147.4	114.2
10	0.950	207.6	-6.83	142.4	140.3	102.4
15	0.891	182.6	-7.39	133.6	129.0	92.5
20	0.814	152.4	-8.17	122.0	114.7	85.4
25	0.423	41.2	-13.86	63.4	57.5	100.3
30	0.624	89.6	-10.48	93.6	81.0	80.3
35	0.523	62.9	-12.01	78.4	64.2	82.1
40	0.423	41.2	-13.86	63.4	48.6	86.3
45	0.330	25.0	-16.01	49.5	35.0	92.1
50	0.247	14.0	-18.53	37.0	23.8	98.7
55	0.176	7.1	-21.47	26.4	15.1	105.5
60	0.118	3.2	-24.95	17.7	8.8	111.8
65	0.073	1.2	-29.12	10.9	4.6	117.2
70	0.040	0.4	-34.34	6.0	2.1	121.5
75	0.019	0.1	-40.81	2.8	0.7	124.3
80	0.007	0.0	-49.48	1.0	0.2	126.1
85	0.001	0.0	-66.38	0.1	0.0	127.0
90	0.000	0.0	-86.38	0.0	0.0	127.1

WORST CASE HEIGHT AGL (m)

80.3

EXHIBIT #C4  
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