

Section 74.1204 - Statement of Compliance
AM Revitalization 250-Mile Window Application
W284BO, Lake Placid, FL to Orlando, FL, Channel 235
FM Translator Facility ID. 148317
July, 2016

The Applicant proposes to modify the above-referenced, non-reserved band, FM translator authorization pursuant to the announced “*Second FM translator application modification window for AM stations to modify and/or relocate FM translator stations (Second Modification Window)*”.¹ The FM translator will relocate, change frequency and rebroadcast Class B AM station WTLN(AM), Orlando, FL (Facility ID 48731). As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached are two maps which demonstrate that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) and first-adjacent channel (See Exhibit 2) assignments, authorizations and applications. With respect to the cochannel W235CJ, Orlando, FL licensed facility (Facility ID 150271; FCC File No. BLFT-20150722ABM) it is noted that W235CJ presently holds an outstanding FCC Construction Permit (Call Sign W270CV; FCC File No. BPFT-20160129AXI) on Channel 270D. The Applicant understands that facility proposed herein cannot be licensed until a license application (FCC Form 350) is filed to cover the outstanding W235CJ construction permit on Channel 270.

The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

The required protection to second-adjacent channel stations WCFB(FM), Daytona Beach, FL (Channel 233C) and WPYO(FM), Maitland, FL (Channel 237C3) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of the second-adjacent channel, full service stations listed above resulting in contour overlap

¹ See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

as defined in Section 74.1204 of the FCC Rules. However, at the translator's proposed transmitter site, WPYO(FM) is predicted to produce an F(50,50) signal strength of 95 dBu while WCFB(FM) is predicted to produce an F(50,50) signal strength of only 78 dBu. Therefore, WCFB(FM) provides for a worst-case interference analysis.

In the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 118 dBu contour relative to WCFB(FM). According to free space calculations, the translator's worst-case predicted 118 dBu contour will not reach ground level and is predicted to occur only at heights above ground level of 290 feet or higher (See the attached Table). Therefore, the proposed minor change will cause no interference to any population served by WPYO(FM) or by WCFB(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been "demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable".

Section 74.1204 CoChannel
Contour Overlap Study

Exhibit 1

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Key to Stations on Map

- APP.245D.FAC.ID.148317
- WWRM.235C.FAC.ID.74200

APP.245D.FAC.ID.148317
Orlando, FL
Latitude: 28-36-20 N
Longitude: 081-25-05 W
ERP: 0.25 kW
Channel: 235
Frequency: 94.9 MHz
AMSL Height: 160.0 m
Horiz. Pattern: Directional

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):
40 dBu F(50,10) to Class A & FX & LPFM
37 dBu F(50,10) to Class B1 FM Station
34 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):
Class A & FX & LPFM = 60 dBu F(50,50)
Class B1 FM Station = 57 dBu F(50,50)
Class B FM Station = 54 dBu F(50,50)

Section 74.1204 First-Adjacent Channel Contour Overlap Study

Exhibit 2

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APP.235D.FAC.ID.148317

Orlando, FL
Latitude: 28-36-20 N
Longitude: 081-25-05 W
ERP: 0.25 kW
Channel: 235
Frequency: 94.9 MHz
AMSL Height: 160.0 m
Horiz. Pattern: Directional

Key to Stations on Map

- APP.235D.FAC.ID.148317
- W234BI.234D.FAC.ID.156428
- WFKS.236A.FAC.ID.11409

APP.235D.FAC.ID.148317

W234BI.234D.FAC.ID.156428

WFKS.236A.FAC.ID.11409

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):

54 dBu F(50,10) to Class A & FX & LPFM
51 dBu F(50,10) to Class B1 FM Station
48 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):

Class A & FX & LPFM = 60 dBu F(50,50)
Class B1 FM Station = 57 dBu F(50,50)
Class B FM Station = 54 dBu F(50,50)

Scale 1:650,000

0 9 18 27 km

CH235nn Orlando FL
Proposed 250 Watts ERP

Maximum ERP *Interfering contour value ----->* 118.1 dBu
 0.25 kW *RCAGL (m)----->* 131 meters
 Antenna Type -----> 3

Antenna Type 3 = **ERI, 2-bay, half-wave spaced**

Angle Below Horizontal (degrees)	Vertical Pattern**** (REL. FIELD)	CH235nn ERP (kW)	CH235nn ERP (dBk)	Proposed Free-Space Distance to 118.1 dBu interfering contour (meters)	Slant Distance (meters) *	Height of 118.1 dBu interfering contour above ground (feet)**	Proposed Interference within 30 ' of ground level?	Horizontal Distance (meters) ***	Horizontal Distance (feet) ***
0	1.000	0.2500	-6.021	137.7	N/A	429.8			
5	0.987	0.2435	-6.134	135.9	1,398.6	390.9	No	135.4	444.2
10	0.949	0.2252	-6.475	130.7	702.0	355.3	No	128.7	422.3
15	0.889	0.1976	-7.043	122.4	471.0	325.8	No	118.3	388.0
20	0.810	0.1640	-7.851	111.5	356.4	304.6	No	104.8	343.9
25	0.718	0.1289	-8.898	98.9	288.4	292.7	No	89.6	294.0
30	0.617	0.0952	-10.215	85.0	243.8	290.4	No	73.6	241.4
35	0.514	0.0660	-11.801	70.8	212.5	296.6	No	58.0	190.2
40	0.414	0.0428	-13.681	57.0	189.6	309.6	No	43.7	143.3
45	0.320	0.0256	-15.918	44.1	172.4	327.6	No	31.2	102.2
50	0.237	0.0140	-18.526	32.6	159.1	347.8	No	21.0	68.8
55	0.166	0.0069	-21.618	22.9	148.8	368.4	No	13.1	43.0
60	0.109	0.0030	-25.272	15.0	140.8	387.1	No	7.5	24.6
65	0.066	0.0011	-29.630	9.1	134.5	402.8	No	3.8	12.6
70	0.035	0.0003	-35.139	4.8	129.7	414.9	No	1.6	5.4
75	0.016	0.0001	-41.938	2.2	126.2	422.8	No	0.6	1.9
80	0.005	0.0000	-52.041	0.7	123.8	427.6	No	0.1	0.4
85	0.001	0.0000	-66.021	0.1	122.4	429.3	No	0.0	0.0
90	0.000	0.0000	-106.021	0.0	121.9	429.8	No	0.0	0.0

* Slant distance from antenna center of radiation to location 30 feet (9.1 meters) above ground level at angle below horizontal.

** A negative number indicates that the interfering contour is predicted to reach ground level. If a negative number is present, the interfering contour reaches ground level at the "Horizontal Distance" described below.

*** Horizontal distance from tower base to interfering contour at the indicated height above ground level. If a negative height above ground level is indicated, this horizontal distance is the distance from the tower base to the interfering contour. This horizontal distance is only relevant if the proposed interference is predicted to occur within 30 feet of ground level.