

MINOR CHANGE APPLICATION
MILLER COMMUNICATIONS, INC.
W235CH FM TRANSLATOR STATION
CH 235D - 94.9 MHZ - 0.099 KW
SAINT MATTHEWS, SOUTH CAROLINA
July 2015

Technical Statement

This Technical Statement and exhibits were prepared on behalf of Miller Communications, Inc. ("Miller"), licensee of W235CH, Channel 235D, Saint Matthews, South Carolina. This application proposes to relocate the W235CH transmitter site and change the power and antenna height. It is proposed to relocate the W235CH antenna to an existing tower that has been registered with the FCC and assigned Antenna Structure Registration Number 1238927.

The proposed translator on Channel 235 will rebroadcast the signal of AM station WOIC, Columbia, South Carolina. The proposed translator's 60 dBu contour lies entirely within the 2.0 mV/m contour of WOIC, as demonstrated in Exhibit A. As such, the proposed translator on Channel 235 is considered to be a fill-in translator for WOIC (AM).

Exhibit B demonstrates that the proposed facility is mutually exclusive with the outstanding license for W235CH. There is no 60 dBu contour overlap between the outstanding W235CH license and the proposed site; therefore, a waiver of this requirement under a "Mattoon Waiver" is respectfully requested. Miller's qualification for the Mattoon Waiver are: (1) Miller does not have a history of filing serial minor modification applications; (2) the proposed site is mutually exclusive to its licensed facility; (3) the proposed move does not implicate the concerns

raised by the Commission in the recent *Third Further Notice* in the low-power FM (“LPFM”) docket,¹ and, (4) while not alone dispositive, the translator will be rebroadcasting an AM station.

Exhibit C is a study demonstrating that the proposed operation on Channel 235 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 or station.

The worksheets for FM operation could not be used to demonstrate compliance with the Commission’s exposure guidelines for radio frequency radiation exposure. Exhibit D details compliance with the FCC’s guidelines for human exposure to RF radiation. 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.²

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- 1) *Creation of a Low Power Radio Service*, Third Further Notice of Proposed Rulemaking, FCC 11-105, 2011 WL 2722585 (rel. Jul. 12, 2011) (“*Third Further Notice*”).
 - 2) 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.