

Compliance with International Requirements

The proposed FM translator is located approximately 50.2km from the Canadian border. As seen in the attached map, Exhibit 12B, the 34dBu interfering contour of the proposed translator extends beyond the international border but does not extend to Canadian Soil. Therefore, no interference will occur with any Canadian facilities.

The distance to the nearest Canadian Soil is approximately 60km at an azimuth of 42 degrees. As seen in Exhibit 12A, the distance to the 34dbu(F50-10) is less than 60km at all azimuths except for the 70 and 80 degree radials where the distance slightly exceeds 60km over water. Exhibit 12B demonstrates that at no point does the 34dbu(F50-10) contour extend to any Canadian Soil.

EMF respectfully requests a waiver of the 34dbu(F50-10) 60km distance rule based on the fact that the contour does not reach Canadian Soil.

Therefore, the proposed translator fully complies with the requirement of 47 C.F.R. 74.1235(d) of the Commission's rules.

Compliance with International Requirements

Distance to 34dbu(F50-10)Contour Report

Type of contour: FCC
Location Variability: 50.0 %
Time Variability: 10.0 %
of Radials Calculated: 72
FCC Matching HAAT Calculation Used
Field Strength: 34.00dBuV/m

Primary Terrain: GLOBE 30 Second World Database
Secondary Terrain: FCC 30 Second US Database

Transmitter Information:

Call Letters: W225AM
File Number: BLFT20151021AEZ
Latitude: 41-38-49 N
Longitude: 083-36-18 W
ERP: 0.16 kW
Channel: 225
Frequency: 92.9 MHz
AMSL Height: 313.0 m
Elevation: 187.0 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Azimuth (deg)	Distance (km)	HAAT (m)
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0.0	57.92	118.1
10.0	58.34	120.9
20.0	58.84	124.3
30.0	59.48	128.6
40.0	59.80	130.7
50.0	59.92	131.5
60.0	60.00	132.1
70.0	60.09	132.6
80.0	60.09	132.6
90.0	60.05	132.4
100.0	59.94	131.7
110.0	59.64	129.7
120.0	59.44	128.4
130.0	58.89	124.7
140.0	58.95	125.1
150.0	58.75	123.8

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Exhibit 12A
Toledo, OH

160.0	58.84	124.3
170.0	58.83	124.3
180.0	58.52	122.2
190.0	58.37	121.1
200.0	58.62	122.9
210.0	58.97	125.2
220.0	58.37	121.1
230.0	58.39	121.3
240.0	58.09	119.3
250.0	57.73	116.9
260.0	57.06	112.6
270.0	57.04	112.6
280.0	57.08	112.8
290.0	56.92	111.8
300.0	57.12	113.0
310.0	57.20	113.5
320.0	57.00	112.3
330.0	57.00	112.3
340.0	57.34	114.4
350.0	57.59	116.0

Average HAAT for radials shown: 122.1 m

Exhibit 12B US-Canadian Compliance

W225AM
BLFT20151021AEZ
Latitude: 41-38-49 N
Longitude: 083-36-18 W
ERP: 0.16 kW
Channel: 225
Frequency: 92.9 MHz
AMSL Height: 313.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

