

ENGINEERING REPORT
FM Translator
New Station Construction
Permit Application
for
New FM Translator
as an AM Fill-In Translator for
WCVX(AM) – Florence, KY
“Long Form Application for FM
Translator Auction Window 100”

April, 2018

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Table of Contents

Discussion of Report

FM Booster/Fill-in Translator Requirements (See Discussion)

Interference/Overlap Requirements

Exhibit 13.1 - Copy of Existing Antenna Structure Registration (if applicable)

Exhibit 13.2 - Proposed Service and AM Fill-In Contour Map

Exhibit 13.3 - Tabulation of Proposed Allocation

Exhibit 13.4 - §74.1204(d) 2nd/3rd Adjacent Waiver Request (if applicable)

Exhibit 13.5 - Copy of Manufacturer's Vertical Radiation Pattern (if applicable)

TV Channel 6 Protection Requirements (See Discussion)

Multiple Translator Requirements (See Discussion)

RF Radiation Study Requirement

Exhibit 17.1 - RF Compliance Study

(Exhibit numbering is in response to FCC Online Form 349, Section III-A)

Discussion

This firm has been retained to prepare the required engineering report in support of a New Station Construction Permit Application for an FM Translator. This New Translator proposal requests an AMSL of 406 meters and an ERP of 0.125 kW (H&V) operating on CH241D. The Fill-In Translator will rebroadcast Class D Primary Station WCVX(AM) – Florence, KY (1160 kHz); Facility ID No. 35065. This also represents a minor change in from the original short form application. This long form application represents a minor change in frequency, tower location (ASR), antenna COR AMSL, antenna pattern and power. Overlap of the short form and new proposed long form 60 dBu F(50:50) contours is shown in **Exhibit 13.2**.

The Translator as proposed will be mounted on a tower bearing Antenna Structure Registration Number 1019014. A copy of the ASR is included in **Exhibit 13.1**.

The proposed 60 dBu contour of the Fill-In Translator lies wholly inside the greater of the AM primary daytime 2.0 mV/m contour and a 25 mile radius around the AM site. A map of the proposed service area in relation to the primary station service contour has been included in **Exhibit 13.2**.

It has been determined the Translator may be used in the area without interference to any existing FM broadcast station or facility. General allocation details are found in **Exhibit 13.3**. It is believed sufficient clearance exists precluding the need for additional contour protection showings.

The applicant would like to note the existence of a §74.1204(d) Second/Third Adjacent Channel Given Interference Waiver Request toward WFTK(FM) – Lebanon, OH as noted in **Exhibit 13.4**. Protection has been based on the worst case calculated 110.95 dBu F(50:10) Interference Contour, corresponding to the worst case 70.95 dBu F(50:50) Protected Contour. Protection has been demonstrated through a downward vertical radiation study. Full protection will be afforded the facility as the interference will not reach a seven meter artificial plane representing a standard two story home when taking into account the downward radiation characteristics of the antenna as supplied by the antenna manufacturer. The antenna manufacturer's specifications are included in **Exhibit 13.5**.

The applicant certifies the proposed translator 34 dBu F(50:10) Interference contour does not enter Canadian territory on Canadian soil. Documentation of the proposed 34 dBu F(50:10) Interference contour will be supplied upon request.

This translator is not within the affected distance of any TV Channel 6 stations.

The applicant would like to note use of the NGDC 30 second terrain database for terrain based showings contained here-in.

Discussion (continued)

RADIATION PROTECTION: The Commission requires an engineering study regarding compliance with the guidelines for human protection from radiofrequency radiation. This report section is in response to that provision of the Rules. The current Federal Communications Commission guidelines for RF radiation protection are set forth in OET Bulletin No. 65 (Edition 97-01), and the accompanying Supplement A, (Edition 97-01).

The FM Broadcast facility proposed in this application will not produce human exposure to radiofrequency radiation in excess of the applicable safety standards specified in §1.1307 of the Commission's rules concerning RF contributors. **Exhibit 17.1** provides the details of the study that was made to demonstrate compliance. The facility is properly marked with signs, and entry is restricted by means of fencing with locked doors and/or gates. Any other means as may be required to protect employees and the general public will be employed.

In the event work would be required in proximity to the antenna such that the person or persons working in the area would be potentially exposed to fields in excess of the guidelines set forth in OET Bulletin No. 65 (Edition 97-01), the transmitter power will be reduced or the station will cease operation during the critical period.