

Comprehensive Technical Statement

Bravo Mic Communications, LLC, Proposed Assignee
Minor Modification to Construction Permit BNPFT-20130311ACN
K244FF, FCC Facility ID # 157004, Las Cruces, MN

Introduction

The following changes are proposed:

- Transmitter location
- Effective radiated power
- Directional antenna pattern
- Antenna height

Data Sources

Distances were calculated using the FCC method defined in 73.208 of the Commission's Rules.

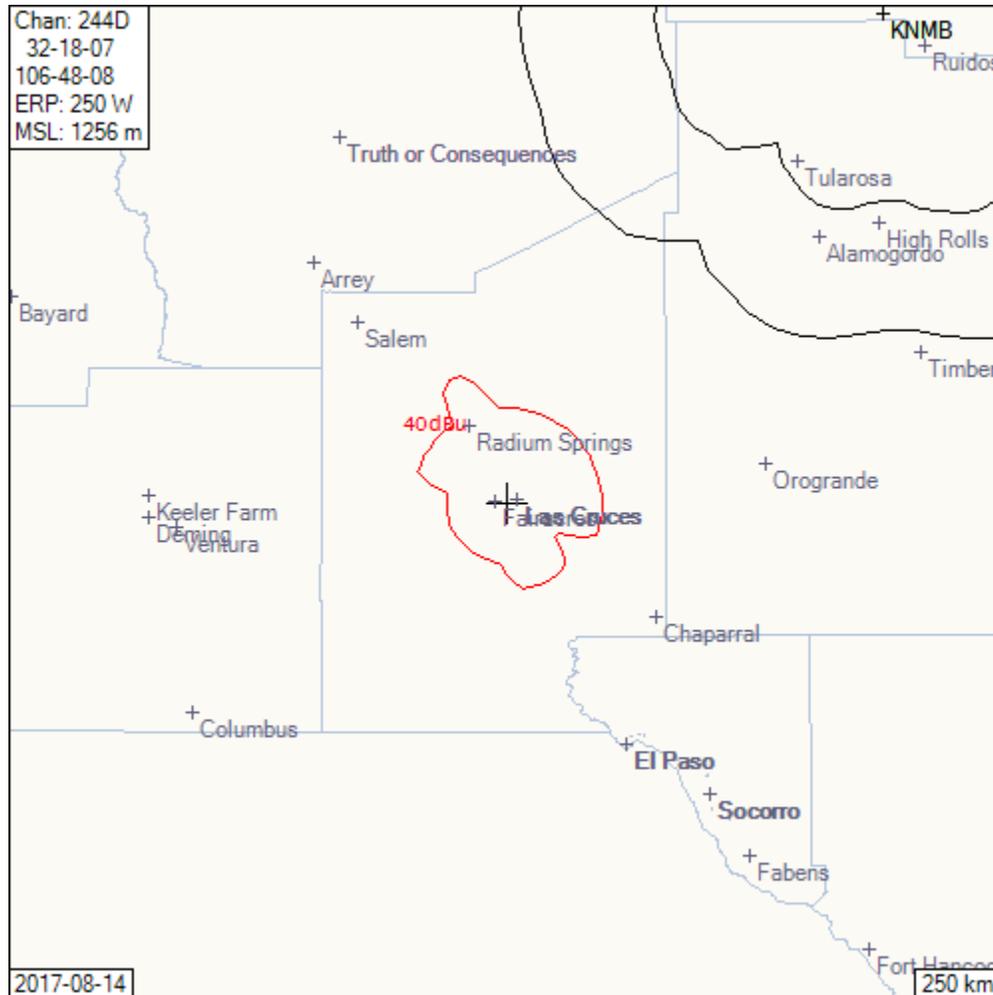
All contours shown in this report were generated using antenna center above mean sea level, NAD-27 coordinates, and the FCC online HAAT calculator, which uses 30-second terrain data.

Dates shown on the maps represent the last change date in the CDBS downloads in use at the time this statement was prepared.

Detailed Interference Study

The following collection of maps and the narrative accompanying each show that no prohibited overlap will occur between the proposed facility and any potentially conflicting facility or proposal. Interfering f(50,10) contours are shown as red polygons, and protected f(50,50) contours are shown as black polygons.

Map 1 – Co-channel Outbound Interference



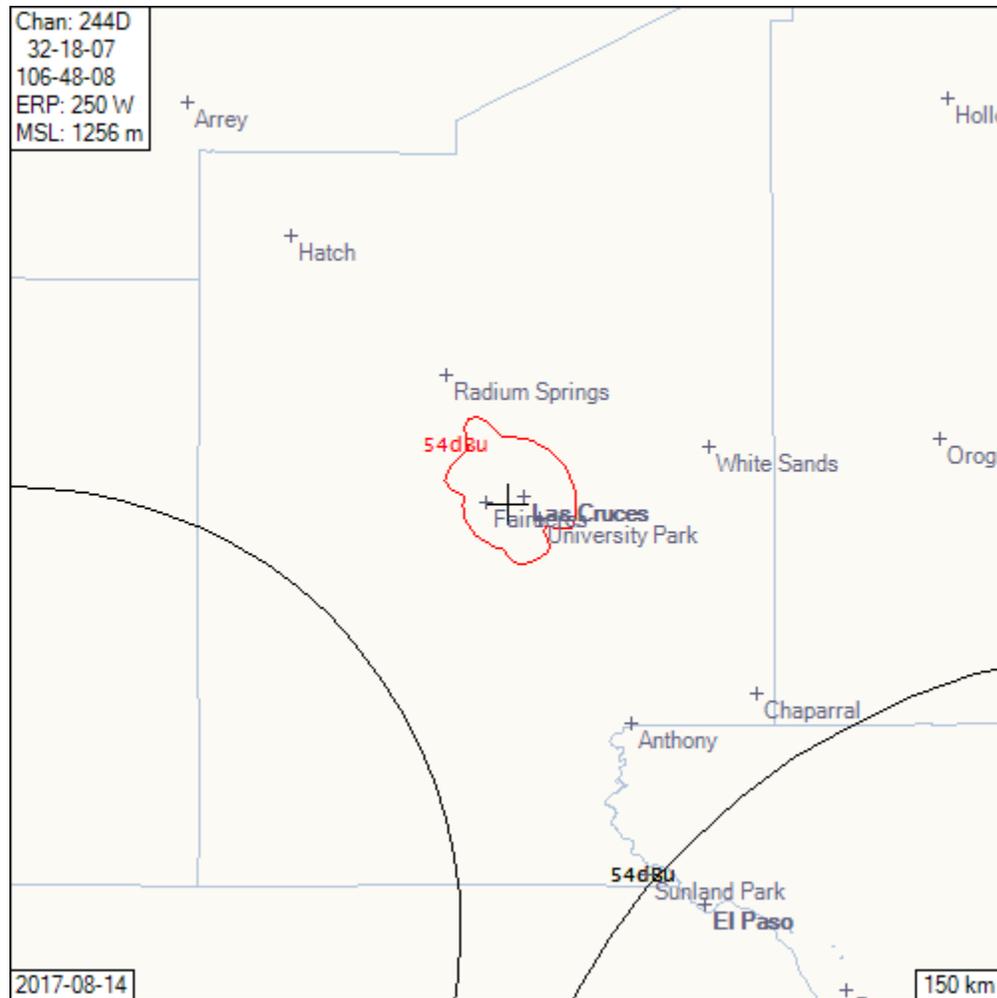
There is no overlap of the interfering contour with the protected contour of any co-channel station or proposal.

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Map 2 – First Adjacent Outbound Interference



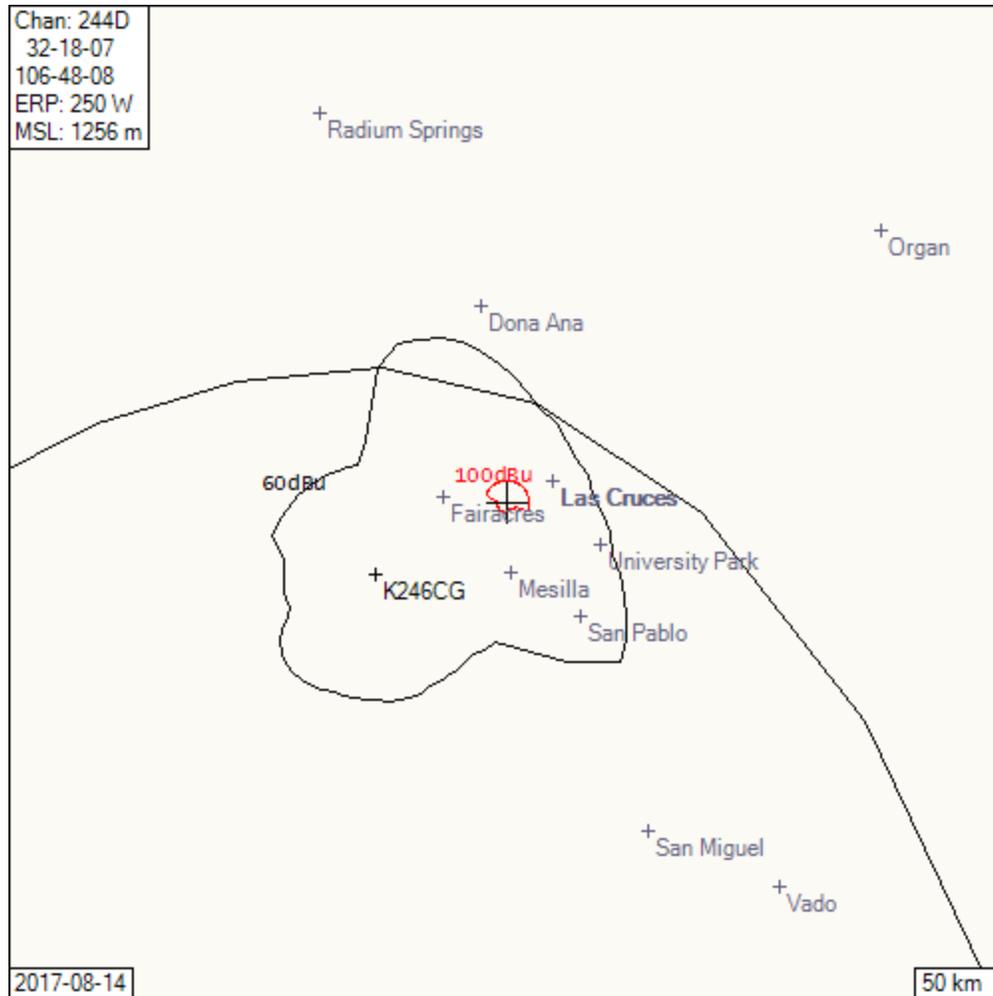
There is no overlap of the interfering contour with the protected contour of any first-adjacent station or proposal.

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Map 3 – Second/Third Adjacent Outbound Interference Detail



The proposed transmitter site is within the protected contours of K246CG and KHEY.

At the proposed site, the field strength of K246CG is 68.0 dBu, and the field strength of KHEY is 64.0 dBu. KHEY is the more limiting, and the allowable interfering signal from the proposal is 104.0 dBu.

The second-adjacent interference showing on the following page shows that the proposal comports with 74.1204(d), which permits interference in unpopulated areas.

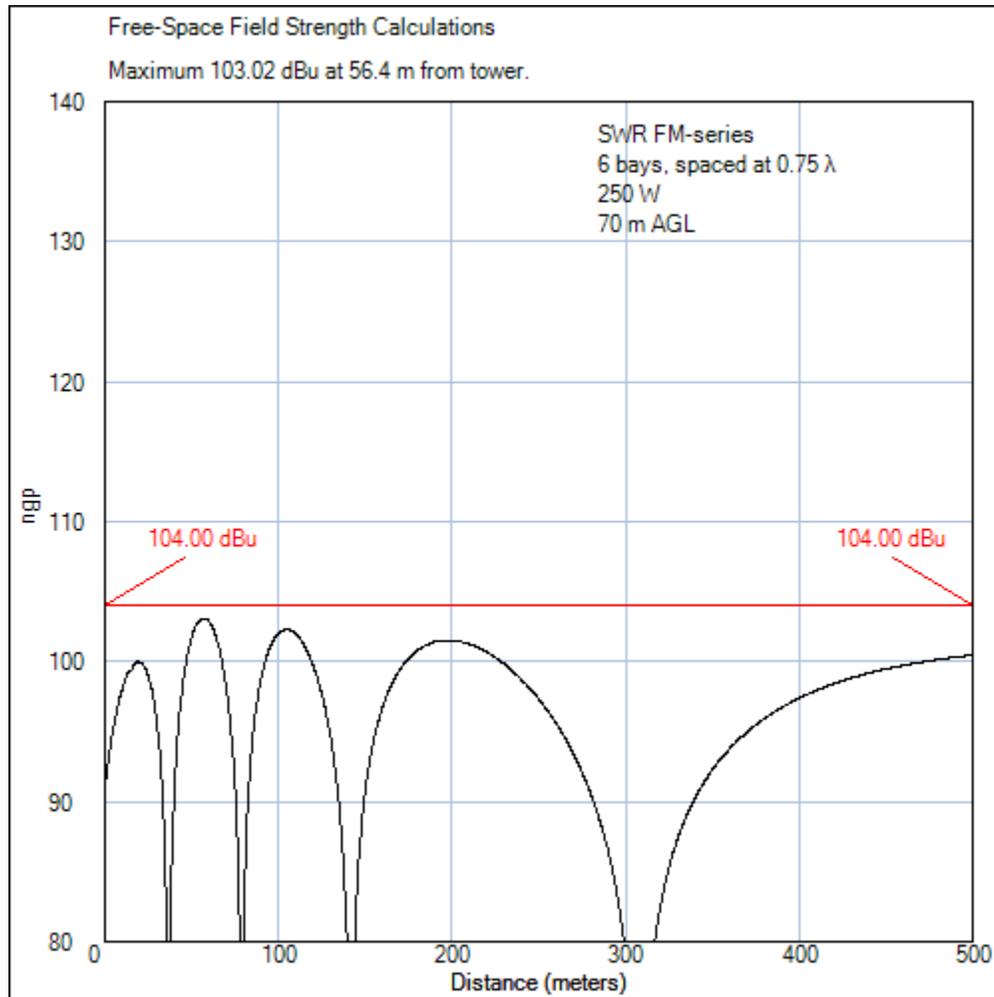
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Second-Adjacent Interference Showing

The proposed antenna is an SWR FMEC-6-SS with a bay spacing of 0.75λ . It will be centered 70 m above the ground.



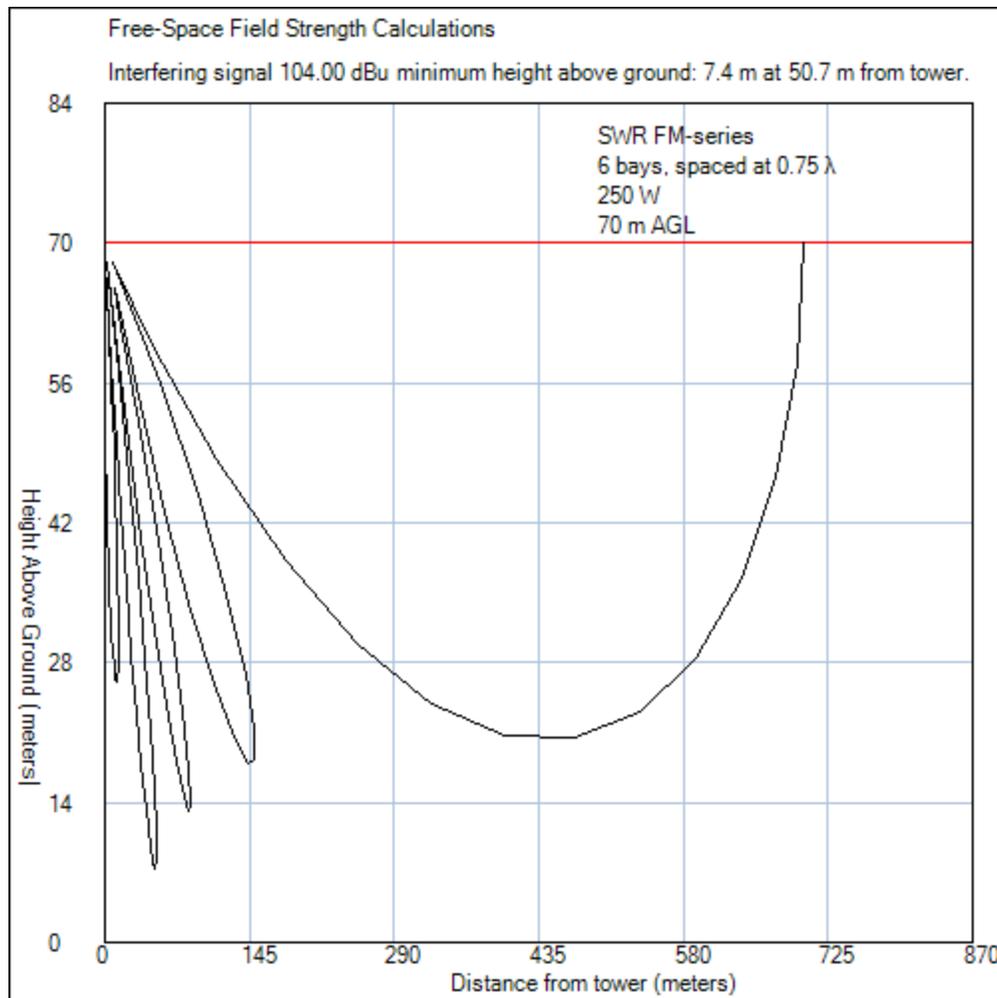
The above plot shows that the interfering signal on the ground will never reach the 104.0 dBu limit.

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This plot shows the height above ground of the 104.0 dBu signal:



The signal will be no less than 7.4 m above the ground. No tall buildings exist in the immediate area.

Since the interfering signal will never reach into any habitable place, the proposal meets the requirements of 74.1204(d).

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IF Separation requirements

There are no IF-separated facilities or proposals within 50 km of the proposal.

Channel 6 Interference

The proposed facility is not on a channel that is implicated in channel 6 interference.

Quiet Zones

The proposed site is outside the National Radio Quiet Zone (National Radio Astronomy Observatory Notification Area) in West Virginia.

The proposed site is outside the Arecibo Observatory notification area in Puerto Rico.

The proposed site is not within a 100 km extension of the Table Mountain Radio Receiving Zone in Colorado.

Protected Monitoring Stations

The nearest Protected Monitoring Station is 283 km distant, in Douglas, AZ. This is well beyond any potential 80 dBu contour.

Minor Change

International

The FM Agreements with Canada and Mexico require evaluation and potential coordination of any proposal within 320 km of the border.

The distance to the nearest point along the US/Canada border is 1,855 km. Coordination with Canada is not required.

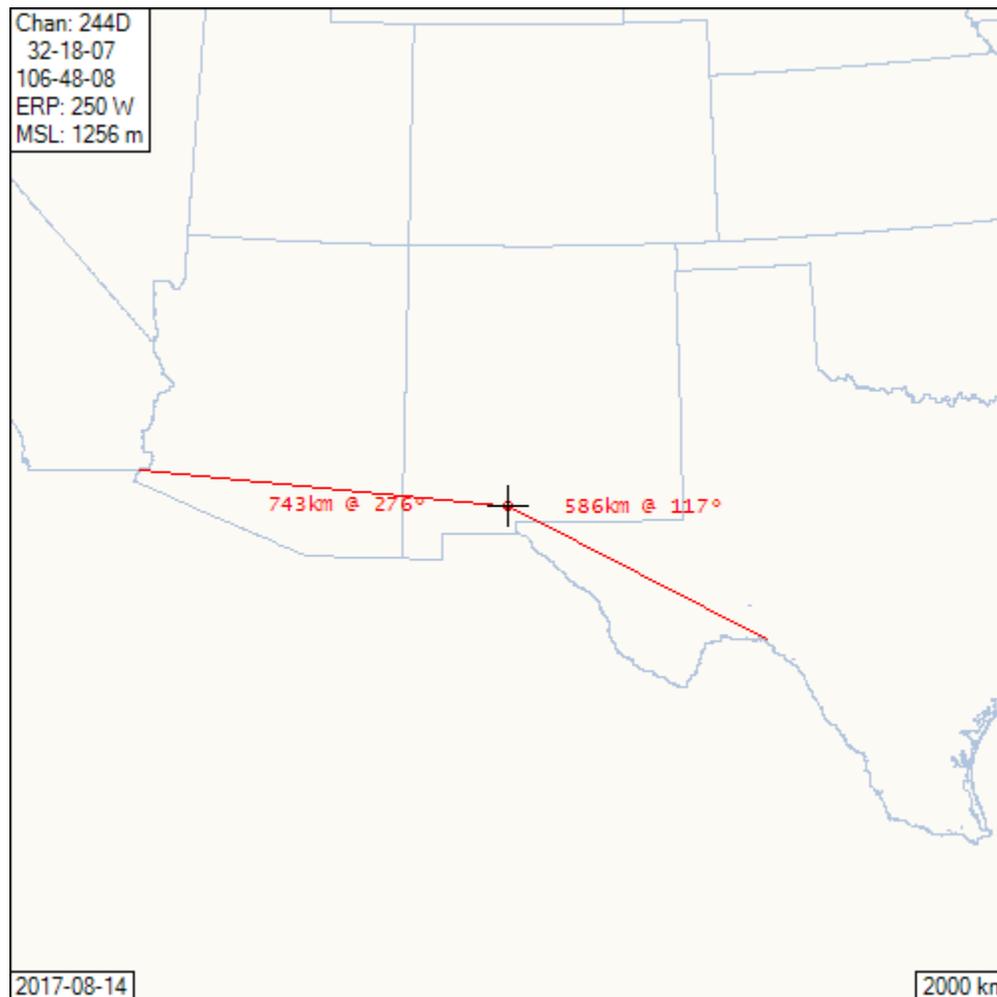
The distance to the nearest point along the US/Mexico border is 57.6 km from the proposed site. Evaluation with respect to Mexican facilities and proposals is required.

International Considerations with Respect to Mexico

In the US-Mexico FM Agreement of 1995, Section 2 deals with “Low Power FM Stations” including translators. It provides the following limits “in the direction of the other country” to proposals within 125 km of the border:

- 50 Watts maximum effective radiated power (ERP)
- 32 km maximum distance to the interfering contour
- 8.7 km to the protected contour

The following map shows the direction and distance to the most limiting points in the direction of Mexico from the proposed site:



On this conservative basis, “the direction of Mexico” spans from 117° clockwise to 276°.

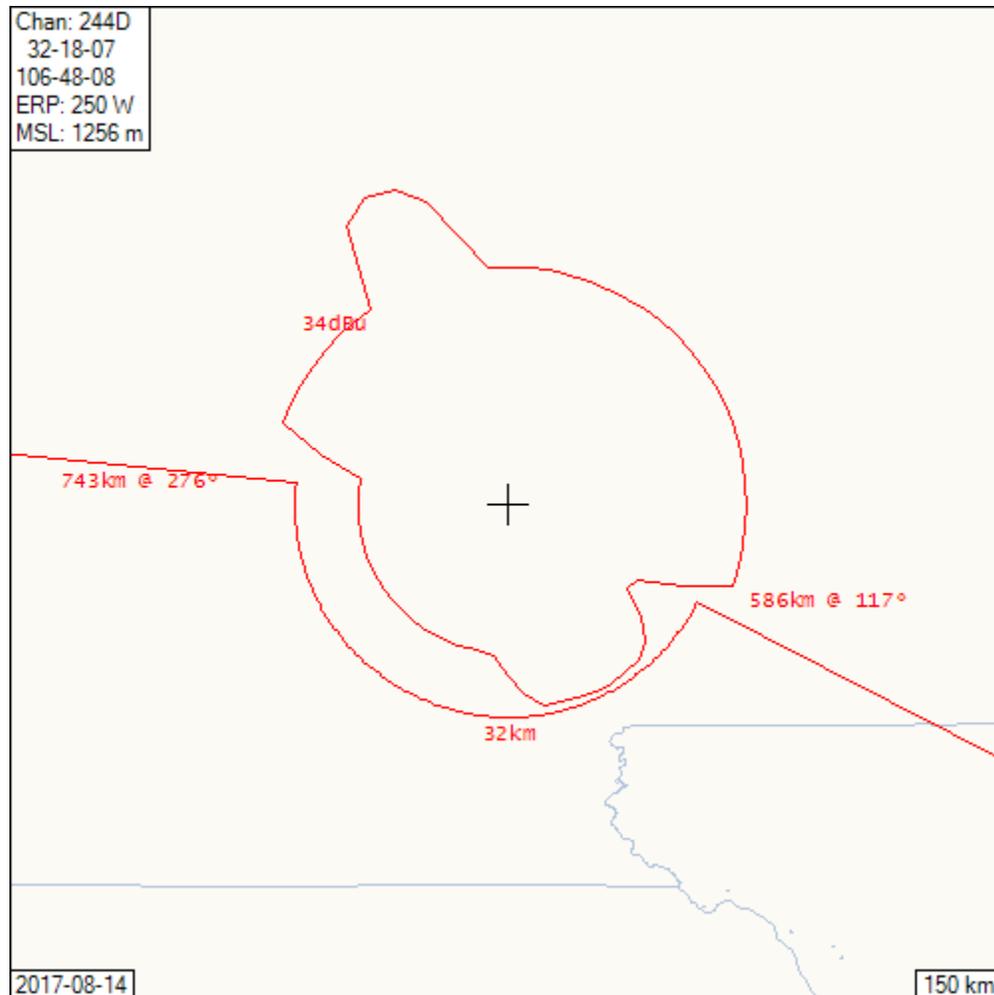
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The maximum ERP is 250 W. The maximum relative field in the directional pattern from 110° to 280° is 0.447. The relative field of 0.447 corresponds to a power of 50 Watts.

The following plot shows the worst-case 34 dBu f(50,10) interfering contour (red polygon) plotted against the 32 km limit (red arc):



The interfering contour does not exceed 32 km from 117° clockwise to 276°.

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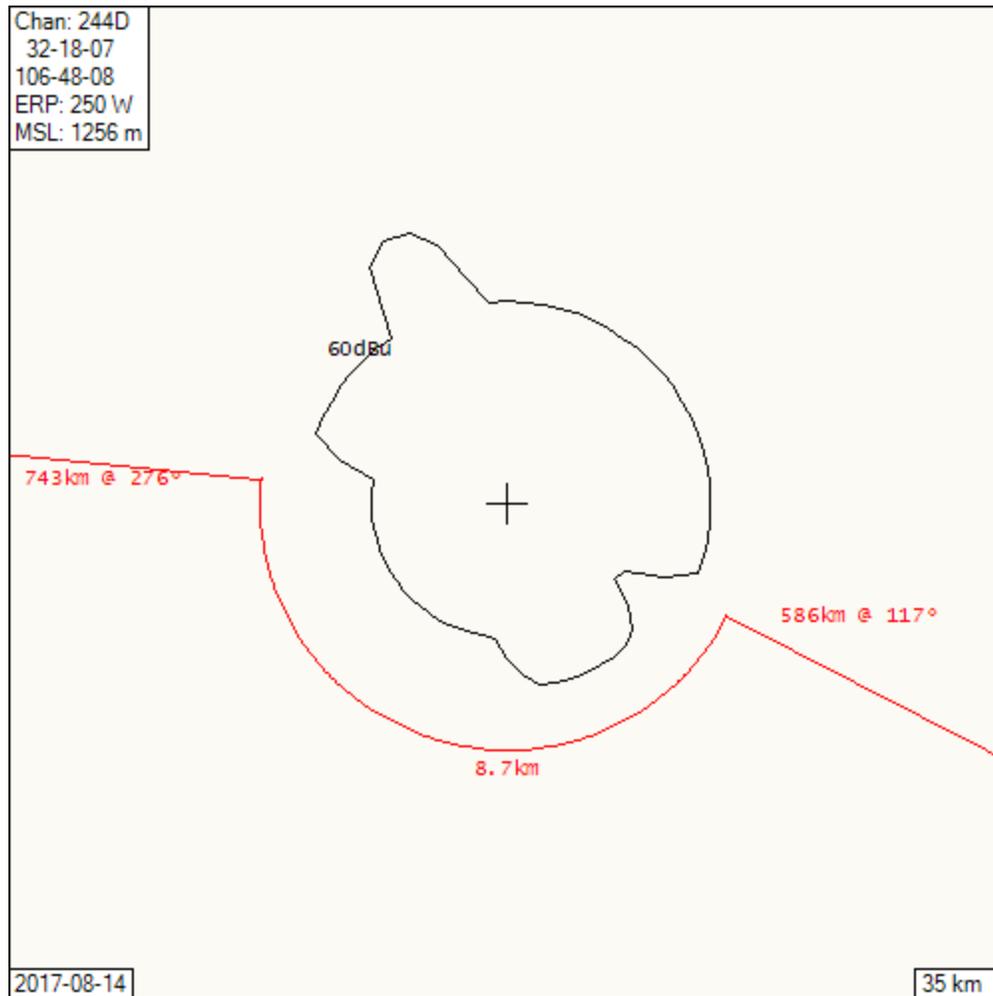
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The following plot shows the proposed 60 dBu f(50,50) protected contour (black polygon) plotted against the 8.7 km protected contour limit (red arc):



The protected contour does not exceed 8.7 km from 117° clockwise to 276°.

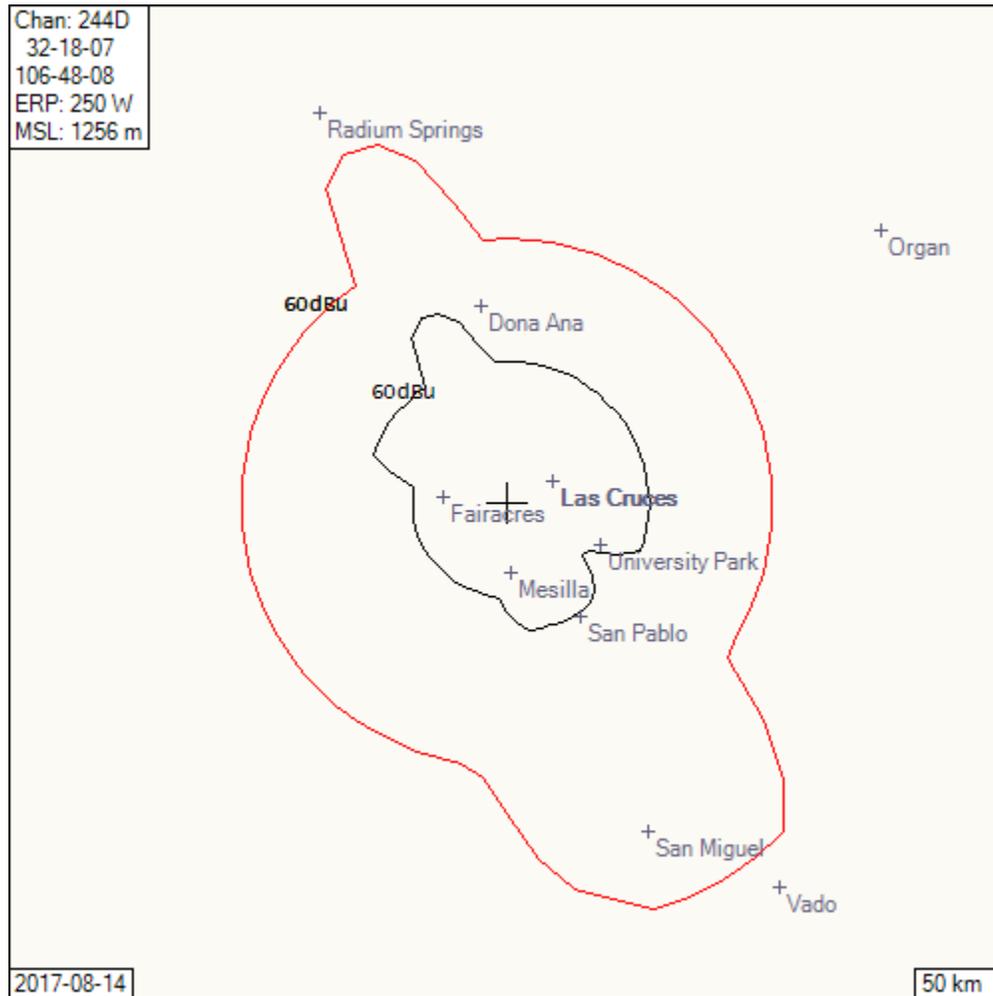
Conclusion:

Using the most conservative assumptions, the proposal comports with all aspects of the US-Mexico FM Agreement of 1995.

Fill-In Translator

The proposed primary station is KMVR HD-2, Mesilla Park, NM, FCC Facility ID # 54946.

The following plot shows the protected 60 dBu f(50,50) contours of the proposal (black polygon) and the primary station (red polygon):



The proposed 60 dBu f(50,50) contour falls entirely within the primary 60 dBu f(50,50).

Assignment application BAPFT-20170814AAU proposes to assign ownership of the CP to the licensee of KMVR.

The proposal therefore qualifies as fill-in service.

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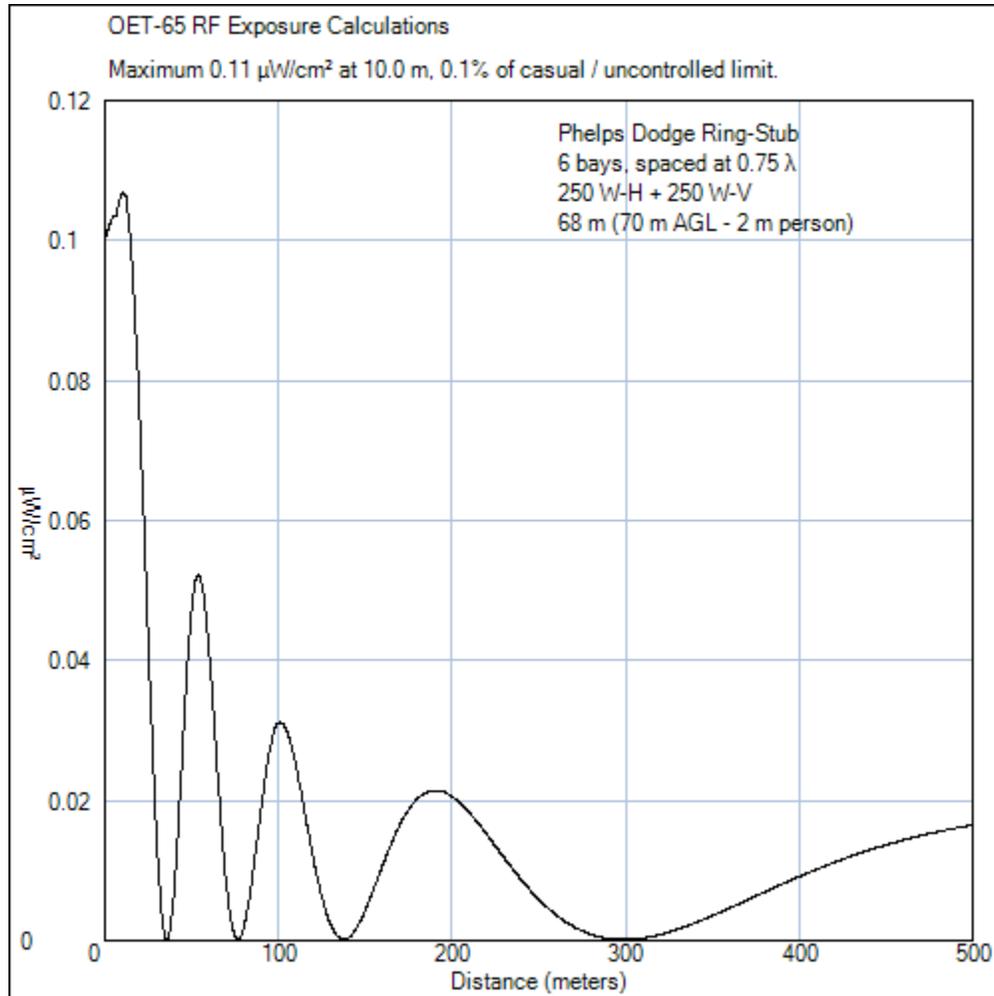
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Environmental

The proposed site is an existing tower, ASR # 1002503. No construction, excavation, or increase to the height of the tower is proposed.

The proposed effective radiated power is 250 W-H + 250 W-V. The six-bay 0.75λ spaced antenna will be centered 70 m above ground level. Assuming the worst-case OET Type 1 antenna model, the OET-65 algorithm returns a maximum exposure of 0.11% of the limit for casual / uncontrolled exposure:



The online FM Model page agrees.

Appropriate access controls and safety signage are provided. The applicant agrees to coordinate with other users of the site to reduce power or shut down in order to protect workers on the tower.

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Form 349 Tech Box Data

Channel 244

Primary Station Facility ID 54946
KMVR HD2
Mesilla Park, NM

Delivery Method Other (Terrestrial)

Coordinates (NAD-27) 32 18 07 N Lat
106 48 08 W Lon

Coordinates (NAD-83) 32 18 07.0 N Lat
106 48 10.0 W Lon

ASR 1002503

Site Elevation AMSL 1186 m

Overall Tower Height AGL 78 m

Radiation Center AGL 70 m

Effective Radiated Power 250 W-H + 250 W-V

Antenna type Directional

Manufacturer / Model SWR FMEC-6-SS (0.75λ)

Directional Pattern:

az	eRel										
0	1.000	10	1.000	20	1.000	30	1.000	40	1.000	50	1.000
60	1.000	70	1.000	80	1.000	90	1.000	100	1.000	110	1.000
120	0.447	130	0.400	140	0.330	150	0.330	160	0.330	170	0.400
180	0.447	190	0.447	200	0.447	210	0.447	220	0.447	230	0.447
240	0.447	250	0.447	260	0.447	270	0.447	280	0.447	290	1.000
300	1.000	310	1.000	320	1.000	330	1.000	340	1.000	350	1.000

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