Engineering Report (Amended)
Exhibit 12 – Technical Statement
New FM Translator for WHTX, Warren, OH
June 2018

Abstract

This report supports a curative amendment to the long form application BNPFT-20180327ACG for a new FM Translator at Warren, OH. This amendment changes the directional antenna, and reduces power to eliminate the possibility for interference to the alleged listeners of WONE-FM within the originally proposed 1 mV/m contour. This issue was raised in a Petition to Deny filed by Rubber City Radio Group, Inc., licensee of first adjacent channel WONE-FM, Akron, OH against the application.

Fill In Translator Eligibility

Exhibit 10 shows that this application is eligible to serve as a fill in translator for WHTX(AM), Warren, OH. The transfer to the applicant is subject to review at the state level and before the FCC, and is expected to be approved very shortly.

Interference

Exhibit 10 also has plotted the home and/or work locations of the alleged listeners to First Adjacent Channel WONE-FM detailed in the Rubber City Radio Group, Inc Petition to Deny.

As can be seen in Exhibit 10, none of these locations are within the amended proposed 60 dbu contour. As such, the amended application now complies with §74.1204(f), and Rubber City's assertion that the application is not compliant with this paragraph is now moot.

This report is a narrative showing that the requirements of FCC Rules §74.1204 are met.

Exhibit 13 Figure 1 is a map showing compliance with all contour overlap requirements. This figure utilizes color coded contours with the proposed nuisance contours are shown in the same color as the authorized station protected contour. There is no prohibited with any other authorized or proposed station on Co-channel, or the three adjacent channels. It should be noted that BNPFT-20180322ABE is a window 100 application which must fully protect this

senior application.

Exhibit 13 Figure 2 is a map showing the compliance with §74.1204(a)(1) overlap requirement with respect Class B first adjacent station WONE-FM Akron, OH. This map shows that there is no overlap of contours between these stations.

Exhibit 10 is a map showing the detail of location of alleged listeners to first adjacent WONE-FM identified by Rubber City Radio Group, Inc as residing or working within the 60 dbu F(50,50) contour FM Translator as originally proposed. FCC Rules and Regulations §74.1204(f) requires that, to be accepted for filing if listeners are already receiving a regularly used, off-the-air signal of any authorized Broadcast Station within the 1 mV/m field strength contour of the translator. This amendment modifies the proposed directional antenna and decreases power to eliminate overlap of the translator 60 dbu contour and any alleged listeners identified in the Petition to Deny, rendering the petitioner's claims moot.

IF spacing

There are no IF Spaced FM channels with respect to the proposed frequency.

In conclusion, the proposed translator meets all the overlap requirements of § 74.1204 of the FCC rules and regulations.

Environment

Exhibit 17 is a study showing that the proposed translator is excluded from environmental processing according to § 1.1306 of the FCC rules. The RF exposure worksheet is included to show that there is no location on the ground where the radiation from the translator exceeds exposure standards for general public, and represents less than 0.22% of the allowable level. The worksheet was complete for the originally proposed power of 250 Watts.

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The instant amendment reduces power and does not propose to change the antenna location, so the potential RF exposure will be reduced from that initially proposed. This spreadsheet has not been amended, however the exposure is now 0.03% of the allowable limit.

When work on the tower requires working in the vicinity of the antenna, operations will be suspended or power reduced when workers are on the tower and could be exposed to RF radiation levels above those permitted.

Engineer's Statement

This is to certify that this report has been prepared by myself. It is correct and accurate of my own knowledge, except were stated otherwise, and where that is so, the information is correct to the best of my knowledge and belief.

I further certify that I am a Licensed Professional Engineer in the State of New Jersey, and the Commonwealth of Pennsylvania with a BSEE degree from the Newark College of Engineering of NJIT, and that I am, and have been for over thirty years, regularly engaged in the practice of radio engineering with the firm of Radiotechniques Engineering, LLC, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, Senior member of the IEEE and SBE and hold a FCC General Radiotelephone Operator License. My qualifications are a matter of record with the FCC.

23 June 2018

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Edward A. Schober, PE