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Engineering Statement

This Engineering Statement has been prepared as part of an amendment to BNPFT-20030827APV, an application for a new FM translator on Channel 252D at Depoe Bay, Oregon.

This amendment modifies the proposed omnidirectional ERP from 35 Watts to 28 Watts.

The proposed transmitter site is located along the Pacific coast of Oregon. As is depicted on the attached map, four of the 30-degree-interval radials (210 degrees, 240 degrees, 270 degrees, and 300 degrees) are located entirely over the Pacific Ocean. Based on our consultation with FCC staff, we have been advised that the radial ERP/HAAT limits of §74.1235 can be exceeded where the radials are entirely over water and where the 34 dBu contour does not touch land. That is the case on each of these four radials. (Otter Rock, near the 210 degree radial, is an uninhabited exposed rock.)

On the 330 degree radial, the only portion over land is between 3.0 and 3.8 kilometers. Based on visual inspection of the relevant 7.5 minute topo map, the HAAT for the 3.0 to 3.8 km portion of this radial has been calculated to be 265 meters.

The radial HAAT values are summarized below:

Azimuth (deg True)	Radial HAAT
0	295 meters
30	248 meters
60	186 meters
90	228 meters
120	218 meters
150	225 meters
180	284 meters
210	excluded - 100% over water
240	excluded - 100% over water
270	excluded - 100% over water
300	excluded - 100% over water
330	265 meters (3.0 to 3.8 km sector)

The highest radial HAAT is 295 meters, and the corresponding maximum omnidirectional ERP per §74.1235 is 28 Watts. Since the allocation study map exhibits included with BNPFT-20030827APV were based on an a higher omnidirectional ERP of 34 Watts, no changes have been made to those exhibits.

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Zoom Level: 12-0 Datum: NAD27

Scale 1 : 50,000
1" = 1.27 km

