

Engineering Statement Regarding BPFT-20180807ADC Condition 3

Construction permit BPFT-20180807ADC, which authorizes an FM translator to serve Sarasota, Florida with the programming of AM radio station WSRQ on 106.9 MHz, includes special condition 3 requiring a study of the potential impact of the translator antenna on nearby AM radio station WWPR. The special condition appears on the construction permit because of the height of the translator antenna support tower and the distance between the translator site and the licensed WWPR transmitter site.

The FCC rule that governs such situations, 47 CFR 1.30002(a), requires notification before construction, and an analysis of potential impact, when a new antenna is to be installed on a structure within one wavelength of an AM station's nondirectional antenna system, the structure height is taller than 60 electrical degrees at the AM station's frequency, and the installation of the new antenna will be a significant modification of the structure. Although the FM translator antenna will be installed on a tower that is taller than 60 electrical degrees, and is closer than one wavelength to WWPR on 1490 kilohertz, it is exempted from those requirements because installation of the antenna on the existing tower will not be a significant modification as defined in 47 CFR 1.30002(d). There will be no increase in the height of the tower, it is grounded, rather than insulated, at its base, and it is not detuned.

I have personally inspected the tower, from ground level, and can confirm that it is not base-insulated or detuned. I can, therefore, certify that the installation of the FM translator antenna will not be a significant modification of the existing tower to satisfy the last sentence of Special condition 3 of the construction permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald D. Rackley". The signature is fluid and cursive, with the first name "Ronald" being the most prominent part.

Ronald D. Rackley, P.E.

November 5, 2018