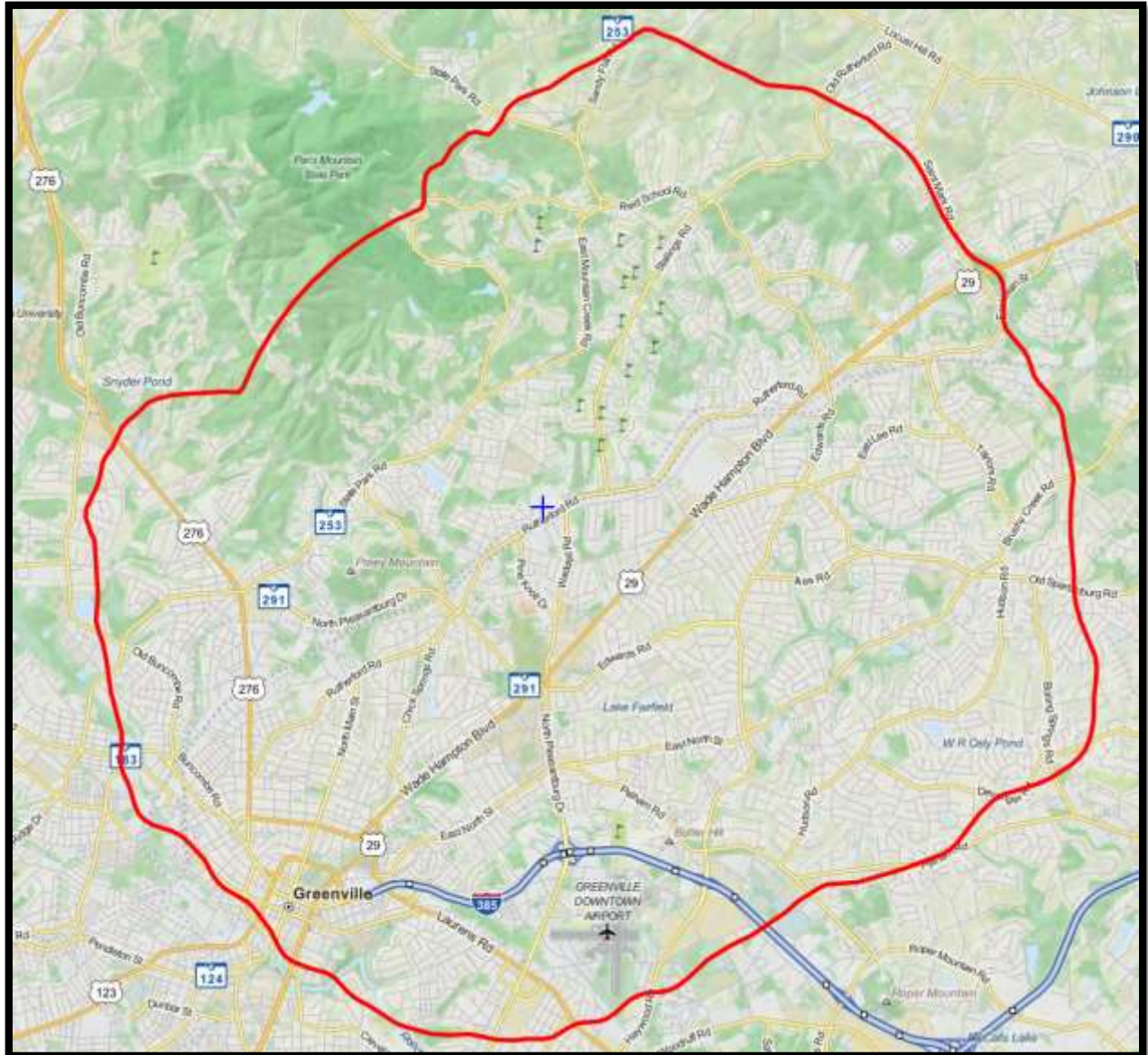




REC Broadcast Services, LLC
11541 Riverton Wharf Rd.
Mardela Springs, MD 21837
844.REC.LPFM/202.621.2355
recnet.com

Minor change for WEZG-LP
GREENVILLE, SC
QUALITY RADIO PARTNERS, INC.
BMLL-20150401AAB

PROPOSED 60dBu F(50,50) SERVICE CONTOUR



GREENVILLE, SC – Channel 268L1 (101.5 MHz) ~ ERP 0.041 kW
Elev: 318 meters ~ RCAGL: 35.2 meters ~ RCAMSL: 353.2 meters ~ HAAT: 47m (GLOBE)
Overall tower height: 35.7 meters – ASR: None required (pass glide slope)
NAD83 Latitude: 34° 54' 03.5" NL – Longitude: 82° 21' 35.8" WL
NAD27 Latitude: 34° 54' 03.1" NL – Longitude: 82° 21' 36.4" WL

NAD27 LATITUDE: 34 - 54' 03.1" - LONGITUDE: 82 - 21' 36.4"
CHANNEL: 268 - CLASS: LPFM(LP-100)

* Does not meet third adjacent channel spacing under LCRA Sect 7.

Azimuth	Field	ERP	HAAT	Contour	Latitude	Longitude
0	1.000	0.041	49.1	5.777	34.9530	82.3599
5	1.000	0.041	54.9	6.107	34.9557	82.3541
10	1.000	0.041	63.2	6.520	34.9588	82.3475
15	1.000	0.041	67.8	6.745	34.9596	82.3408
20	1.000	0.041	65.8	6.649	34.9572	82.3350
25	1.000	0.041	65.1	6.614	34.9549	82.3293
30	1.000	0.041	67.3	6.721	34.9534	82.3231
35	1.000	0.041	70.9	6.892	34.9518	82.3166
40	1.000	0.041	73.5	7.012	34.9493	82.3105
45	1.000	0.041	74.2	7.047	34.9458	82.3053
50	1.000	0.041	72.5	6.966	34.9413	82.3014
55	1.000	0.041	69.9	6.845	34.9363	82.2984
60	1.000	0.041	70.9	6.892	34.9320	82.2945
65	1.000	0.041	74.1	7.042	34.9278	82.2899
70	1.000	0.041	71.3	6.910	34.9223	82.2887
75	1.000	0.041	74.1	7.042	34.9174	82.2853
80	1.000	0.041	79.6	7.304	34.9124	82.2810
85	1.000	0.041	80.2	7.332	34.9067	82.2798
90	1.000	0.041	79.7	7.309	34.9010	82.2798
95	1.000	0.041	80.7	7.355	34.8952	82.2796
100	1.000	0.041	83.6	7.485	34.8893	82.2791
105	1.000	0.041	92.7	7.915	34.8826	82.2761
110	1.000	0.041	97.1	8.118	34.8760	82.2763
115	1.000	0.041	98.7	8.192	34.8699	82.2785
120	1.000	0.041	89.0	7.746	34.8662	82.2863
125	1.000	0.041	81.3	7.382	34.8629	82.2936
130	1.000	0.041	80.8	7.360	34.8584	82.2981
135	1.000	0.041	74.6	7.066	34.8560	82.3051
140	1.000	0.041	68.3	6.769	34.8543	82.3122
145	1.000	0.041	62.7	6.496	34.8531	82.3190
150	1.000	0.041	63.6	6.540	34.8500	82.3240
155	1.000	0.041	64.6	6.590	34.8473	82.3293
160	1.000	0.041	66.0	6.658	34.8447	82.3349
165	1.000	0.041	71.0	6.896	34.8410	82.3403
170	1.000	0.041	71.4	6.915	34.8397	82.3467
175	1.000	0.041	76.1	7.139	34.8370	82.3530

Azimuth	Field	ERP	HAAT	Contour	Latitude	Longitude
180	1.000	0.041	80.6	7.350	34.8348	82.3598
185	1.000	0.041	81.4	7.387	34.8347	82.3669
190	1.000	0.041	81.8	7.405	34.8353	82.3739
195	1.000	0.041	82.3	7.427	34.8364	82.3809
200	1.000	0.041	79.2	7.286	34.8393	82.3871
205	1.000	0.041	75.2	7.096	34.8430	82.3927
210	1.000	0.041	76.4	7.154	34.8452	82.3990
215	1.000	0.041	70.3	6.864	34.8503	82.4030
220	1.000	0.041	70.3	6.864	34.8536	82.4082
225	1.000	0.041	67.7	6.740	34.8580	82.4121
230	1.000	0.041	70.6	6.878	34.8611	82.4176
235	1.000	0.041	72.0	6.943	34.8650	82.4222
240	1.000	0.041	67.9	6.750	34.8705	82.4240
245	1.000	0.041	63.5	6.535	34.8760	82.4248
250	1.000	0.041	60.9	6.413	34.8811	82.4260
255	1.000	0.041	60.1	6.376	34.8860	82.4275
260	1.000	0.041	57.6	6.252	34.8911	82.4275
265	1.000	0.041	56.8	6.211	34.8960	82.4278
270	1.000	0.041	58.8	6.313	34.9008	82.4292
275	1.000	0.041	55.4	6.135	34.9056	82.4270
280	1.000	0.041	52.2	5.954	34.9101	82.4243
285	1.000	0.041	47.1	5.655	34.9140	82.4199
290	1.000	0.041	33.5	4.723	34.9154	82.4087
295	1.000	0.041	16.3	4.464	34.9178	82.4044
300	1.000	0.041	2.9	4.464	34.9210	82.4024
305	1.000	0.041	-8.3	4.464	34.9239	82.4001
310	1.000	0.041	-19.8	4.464	34.9267	82.3976
315	1.000	0.041	-25.2	4.464	34.9293	82.3947
320	1.000	0.041	-6.7	4.464	34.9317	82.3915
325	1.000	0.041	3.8	4.464	34.9338	82.3882
330	1.000	0.041	10.3	4.464	34.9357	82.3846
335	1.000	0.041	24.3	4.464	34.9373	82.3808
340	1.000	0.041	33.9	4.752	34.9411	82.3779
345	1.000	0.041	37.9	5.040	34.9447	82.3744
350	1.000	0.041	41.3	5.279	34.9477	82.3702
355	1.000	0.041	45.0	5.521	34.9505	82.3654

WAIVER OF §73.807(a) REQUEST
SHORT-SPACED SECOND ADJACENT CHANNEL

WEZG-LP
Greenville, SC
Channel 268L1 (101.5 MHz)

The proposed modification will keep the proposed station to be second-adjacent channel short-spaced station WROQ(FM), Anderson, South Carolina (Facility ID #318).

WROQ operates on Channel 266C1 with 100 kW at 296 meters above average terrain. WROQ places a 77.5 dBu service contour at the proposed LPFM site.

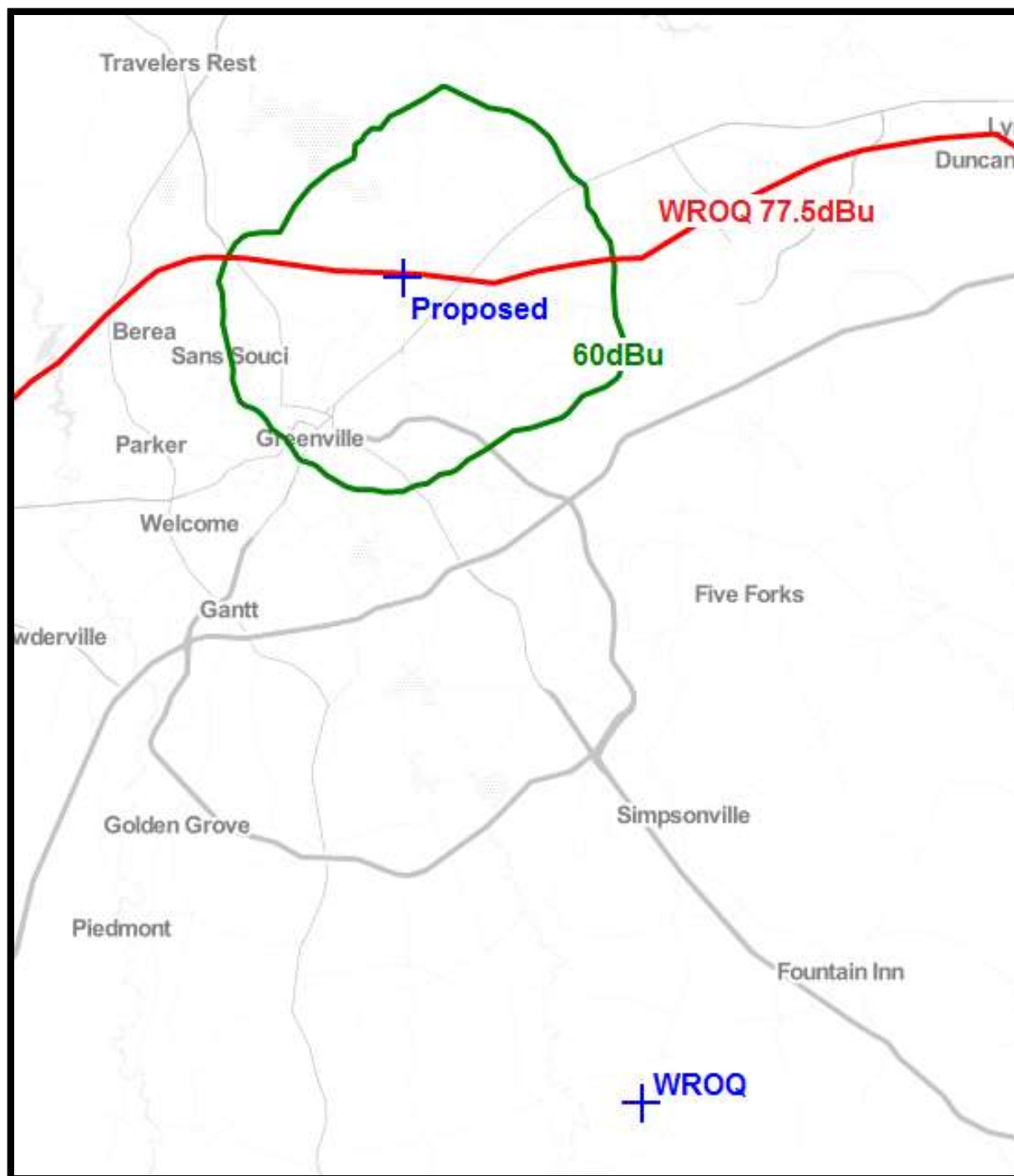
Using the U/D method¹, the proposed LPFM station is predicted to produce an undesired interference overlap in respect to WROQ to the proposed LPFM station's 117.5 dBu interference contour ("overlap zone"). At 41 watts ERP, the overlap zone extends to 50 meters from the radiation center. This interference would reach the ground and extend 35.5 meters from the base of the antenna structure.

The proposed supporting structure is a water tower located at an industrial facility. The tower is surrounded by single and two story structures. To address the predicted overlap, the applicant is proposing to operate using a Nicom BKG-77 single bay circularly polarized antenna. Based on an inflated artificial floor of 8 meters above ground level, the interference extends along the 40 degree depression angle and produce a field strength not exceeding 117.15 dBu at the 8 meter artificial floor.

Based on these findings, the proposed modified LPFM station will not create any interference with WROQ. Quality Radio Partners, Inc. is requesting a waiver of §73.807(a) in respect to second-adjacent channel short-spaced station WROQ(FM), Anderson, South Carolina.

Prepared by
Michelle Bradley
REC Broadcast Services
December 14, 2015

¹ - See *Living Way Ministries, Inc.* Memorandum Opinion and Order, 17 FCC Rcd 17054, 17056 (2002) at 5. *Recon denied* 23 FCC Rcd 15070 (2008).



Proposed Power:				0.041 kW				
Antenna Height AGL:				35.7 m				
Interference Contour:				117.5 dBu				
Artificial RX Antenna Height:				8 m				
Antenna Type:				Nicom BKG77 - 1 bay				
Angle Below Horizon	Antenna Relative Field	ERP in kW	ERP in dBk	Distance from Ant to Interference Contour	Distance from Ant to Artificial Plane	Field Strength in dBu @ Artificial Plane	Distance from Ant to Ground Level	Field Strength in dBu @ Ground Level
5	0.999	0.041	-13.88	59.84	317.82	103.00	409.61	100.79
10	0.982	0.040	-14.03	58.82	159.52	108.83	205.59	106.63
15	0.954	0.037	-14.28	57.14	107.02	112.05	137.93	109.85
20	0.918	0.035	-14.62	54.98	80.99	114.14	104.38	111.93
25	0.872	0.031	-15.06	52.23	65.54	115.53	84.47	113.32
30	0.818	0.027	-15.62	48.99	55.40	116.43	71.40	114.23
35	0.758	0.024	-16.28	45.40	48.29	116.96	62.24	114.76
40	0.691	0.020	-17.08	41.39	43.09	117.15	55.54	114.95
45	0.616	0.016	-18.08	36.90	39.17	116.98	50.49	114.78
50	0.538	0.012	-19.26	32.22	36.16	116.50	46.60	114.30
55	0.465	0.009	-20.52	27.85	33.82	115.81	43.58	113.61
60	0.391	0.006	-22.03	23.42	31.99	114.79	41.22	112.59
65	0.313	0.004	-23.96	18.75	30.56	113.25	39.39	111.05
70	0.239	0.002	-26.30	14.31	29.48	111.23	37.99	109.02
75	0.176	0.001	-28.96	10.54	28.68	108.81	36.96	106.60
80	0.129	0.001	-31.66	7.73	28.13	106.28	36.25	104.07
85	0.103	0.000	-33.62	6.17	27.81	104.42	35.84	102.22
90	0.105	0.000	-33.45	6.29	27.70	104.62	35.70	102.42



Interference is addressed with an antenna with a pattern that limits downward radiation to points no less than 8 meters above ground level.



WAIVER OF §73.870(a) REQUESTED

WEZG-LP
Greenville, SC
Channel 268L1 (101.5 MHz)

The move proposed in this application is 6.9 km from the currently authorized site. Section §73.870(a) of the Commission's Rules states that an LPFM station can move up to 5.6 kilometers as a minor change².

In the instant case, the applicant was unable to find an alternate site that was within 5.6 km of the currently authorized site. In addition, WEZG-LP is authorized to serve the Greenville, South Carolina area. The proposed move would also place the station in a better position to serve Greenville.

In *SRN Communications*, the Commission permitted a move of 8.5 kilometers due to not being able to find an alternate site that is closer.³ SRN further states that the 5.6 km restriction is the strictest in the FM band where full power stations need only be mutually exclusive with the original and translators only require contour overlap.⁴

Furthermore, in *Sloan Canyon Communications*, the Commission permitted a move of 12.3 km citing a lack of available sites as well as moving the station to better serve its community of license.⁵

By allowing WEZG-LP to move to this proposed location, we are not jeopardizing localism. If anything, it is being improved as the station is being moved into the community of license that the station was originally authorized to serve.

Due to these extenuating circumstances and past precedence, Quality Radio Partners, Inc. feels that it would be in the public interest to allow this site move of 6.9 km so WEZG-LP can better serve the people of Greenville, South Carolina.

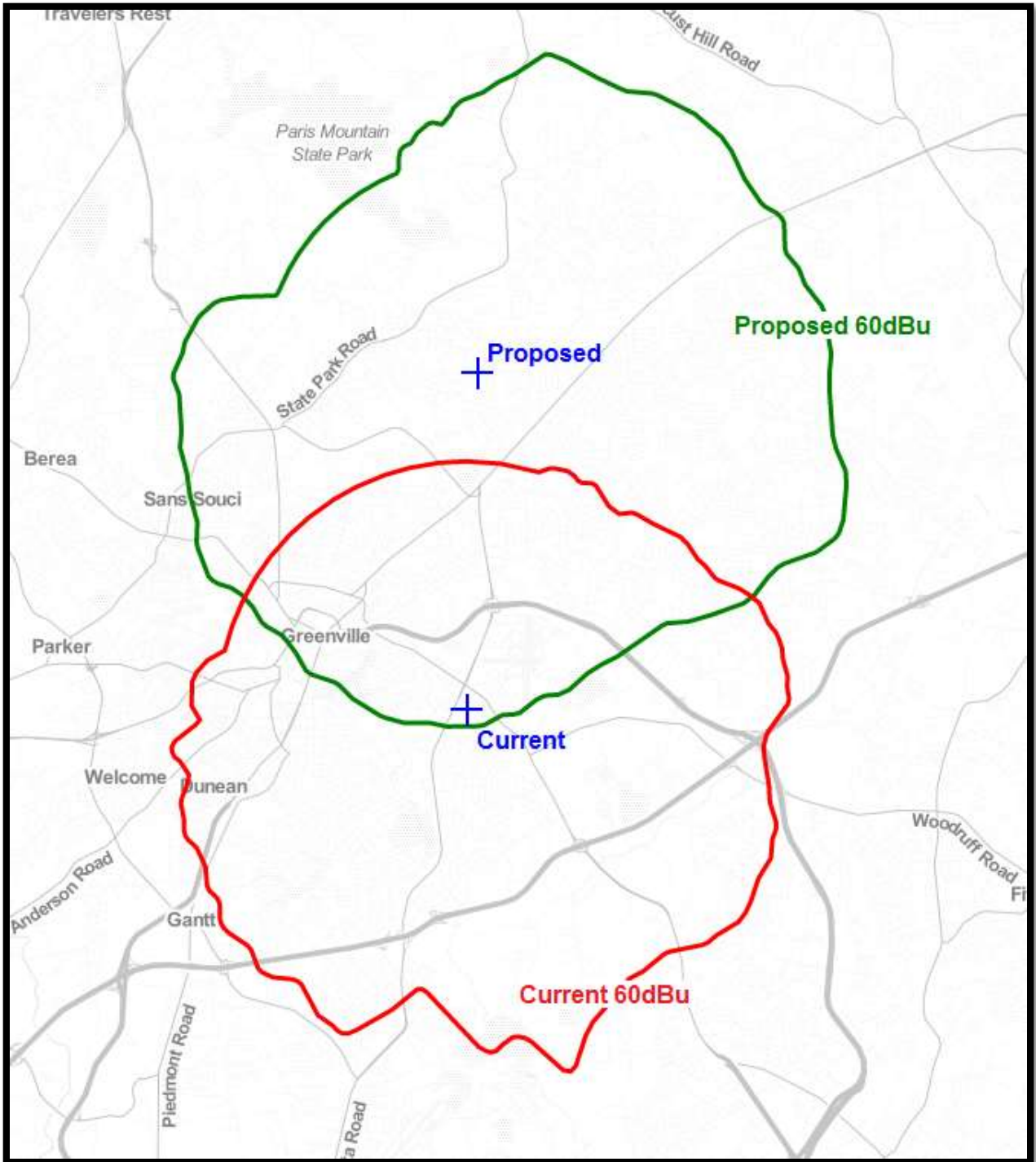
With that, Quality Radio Partners, Inc. is requesting a waiver of §73.870(a) of the Commission's Rules in respect to the instant application.

² - See 47 C.F.R. §73.870(a).

³ - See *SRN Communications, Inc.*, BMPL-20140902ACG, Granted September 15, 2014 at Exhibit 1.

⁴ - Id.

⁵ - See *Sloan Canyon Communications*, BMPL-20140623AAG, Granted December 22, 2014 at Exhibit 11.



NEARBY AM STATIONS

Call	Freq (m)	Type	Distance Required	Distance Actual	Elec Deg Required	Elec Deg Actual
WMUU	1260 (238)	ND	238	1593	60.00	53.98
WPCI	1490 (201)	ND	201	7385	60.00	63.83
WYRD	1330 (226)	DA	2256	7745	36.00	56.98

No notification to AM stations is required under Part 1, Subpart BB of the Commission's Rules.

REQUEST TO USE GLOBE DATA

Height Above Average Terrain (HAAT) was calculated using the Commission approved GLOBE terrain data. The applicant is requesting that the GLOBE calculated HAAT is used when assigning the authorized effective radiated power.

Antenna Height Above Average Terrain Calculations -- Results

Input Data

Latitude 34° 54' 3.5" North

Longitude 82° 21' 35.8" West (NAD 83)

Height of antenna radiation center above mean sea level: 353.2 meters AMSL

Number of Evenly Spaced Radials = 8 0° is referenced to True North

Results

Calculated HAAT = 47 meters

Antenna Height Above Average Terrain calculated
using 1 km GLOBE terrain data

Individual "Radial HAAT" Values, in meters

0°	43.0 m
45°	63.7 m
90°	69.9 m
135°	64.2 m
180°	69.6 m
225°	56.9 m
270°	40.3 m
315°	-31.2 m

Print Results?

New Calculation?