

# Comprehensive Engineering Exhibit

## Minor Modification to BPFT-20130307ABO

### Facility ID No. 140551, W248AW

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This exhibit is for the minor change modification application of translator W248AW seeking to relocate onto an existing tower via use of a Mattoon waiver, to become fill-in for AM station WNDE, Facility ID No.: 59591, Indianapolis, Indiana.

### Antenna Location

The proposed antenna is to be mounted on the existing tower identified by Antenna Registration No.: 1026780, with a radiation center at 218 meters above ground, using a directional antenna having the emissivity pattern of Figure 1, with a maximum effective radiated power of 250 watts.

Below as Figure 2 is an overlap and spacing study, incorporating the antenna pattern, from which it can be determined that this proposal is within the protected contour of second adjacent channel stations WLHK and WGNR-FM. Section 74.1204(d) states that *“The provisions of this section concerning prohibited overlap will not apply where the area of such overlap lies entirely over water. In addition, an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such other factors as may be applicable.”*

We will demonstrate that a lack of population and/or other factors allow this proposal to be compliant with 74.1204. The process commonly called “Living Way”<sup>1</sup>, allows for the use of U/D Analysis, also known as “signal strength ratio methodology” to be utilized. In this instant case the facilities to be protected are second adjacent and are to be afforded protection from signals 40 dB stronger than they present in the location of the proposed antenna location.

Figure 3 is a map showing the predicted signal contours of WLHK and WGNR-FM more than 500 meters beyond the proposed antenna location utilizing the FCC F50:50 curve. WLHK has a much stronger signal in the area of this proposed location than WGNR-FM. Thus, protection of the WGNR-FM 62.0 dBu contour from a signal produced by this proposal exceeding 102.0 is required, and by protecting this “weaker” signal compared to WGNR-FM, the protection requirements are demonstrated.

The proposed antenna location is 218 meters above ground level upon the tower shown in the Google Earth picture of Figure 4. Utilizing the line of sight equation<sup>2</sup> it has been determined that a 102.0 dBu signal developed by 250 watts, emitted by the proposed antenna, does not reach any habitable area in Figure 5. The provisions of the rules section concerning prohibited overlap will not apply as it

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<sup>1</sup> As recently described in FCC 08-242 in connection with BPFT-19981001TA

<sup>2</sup>  $\text{ReachDistMeters} = 106.92 - (20 * (\text{LOG}_{10}[\text{DistMeters}/1000])) + [\text{ERPin dBk}]$

has been demonstrated that no actual interference will occur due to a lack of population and other factors as applied in this instant proposal.

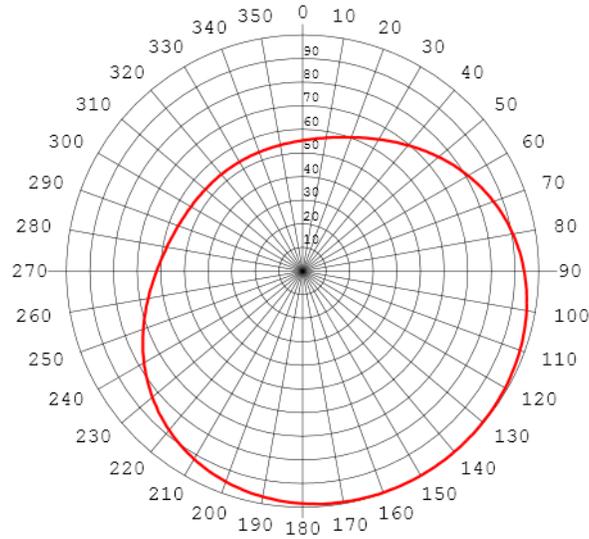
## **RF Fields Statement**

The proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation."

The proposed antenna system is a Scala "FMVMP-2", 2- element; full-wave spaced antenna mounted 218 meters above ground. As this element type is modeled in the FM Model program has been set to calculate values for a "Rototiller" type of antenna element array, operated with an effective radiated power of 0.250 Kilowatts in both the vertical plane. At 2 meters above the surface, at 50 meters from the base of the tower, this proposal will contribute worst case, 0.17 microwatts per square centimeter, or 0.2 percent of the allowable ANSI limit for controlled exposure, and 1.0 percent of the allowable limit for uncontrolled exposure. This figure is less than 5% of the applicable FCC exposure limit at all locations extending out from the base of the tower. Section 1.1307(b)(3) excludes applications when the calculated level is predicted to be less than 5% of the applicable exposure limit. It is therefore believed that this proposal is in compliance with OET Bulletin Number 65 as required by the Federal Communications Commission.

Further, the applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The site itself is restricted from public access. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

**Figure 1. Antenna Pattern**



Azi	Rel	dBk	kW	dB	Azi	Rel	dBk	kW	dB
0	0.553	-11.17	0.076	-5.15	180	0.984	-6.16	0.242	-0.14
10	0.573	-10.86	0.082	-4.84	190	0.970	-6.29	0.235	-0.26
20	0.603	-10.41	0.091	-4.39	200	0.949	-6.48	0.225	-0.45
30	0.644	-9.84	0.104	-3.82	210	0.919	-6.75	0.211	-0.73
40	0.695	-9.18	0.121	-3.16	220	0.879	-7.14	0.193	-1.12
50	0.752	-8.50	0.141	-2.48	230	0.830	-7.64	0.172	-1.62
60	0.808	-7.87	0.163	-1.85	240	0.775	-8.23	0.150	-2.21
70	0.860	-7.33	0.185	-1.31	250	0.717	-8.91	0.129	-2.89
80	0.904	-6.90	0.204	-0.88	260	0.663	-9.59	0.110	-3.57
90	0.938	-6.58	0.220	-0.56	270	0.618	-10.20	0.095	-4.18
100	0.963	-6.35	0.232	-0.33	280	0.584	-10.69	0.085	-4.67
110	0.979	-6.20	0.240	-0.18	290	0.560	-11.06	0.078	-5.04
120	0.990	-6.11	0.245	-0.09	300	0.545	-11.29	0.074	-5.27
130	0.996	-6.06	0.248	-0.03	310	0.538	-11.40	0.072	-5.38
140	0.999	-6.03	0.250	-0.01	320	0.534	-11.47	0.071	-5.45
150	1.000	-6.02	0.250	0.00	330	0.534	-11.47	0.071	-5.45
160	0.998	-6.04	0.249	-0.02	340	0.536	-11.44	0.072	-5.42
170	0.993	-6.08	0.247	-0.06	350	0.542	-11.34	0.073	-5.32

Rotation Angle = 0

## Figure 2. Spacing Study

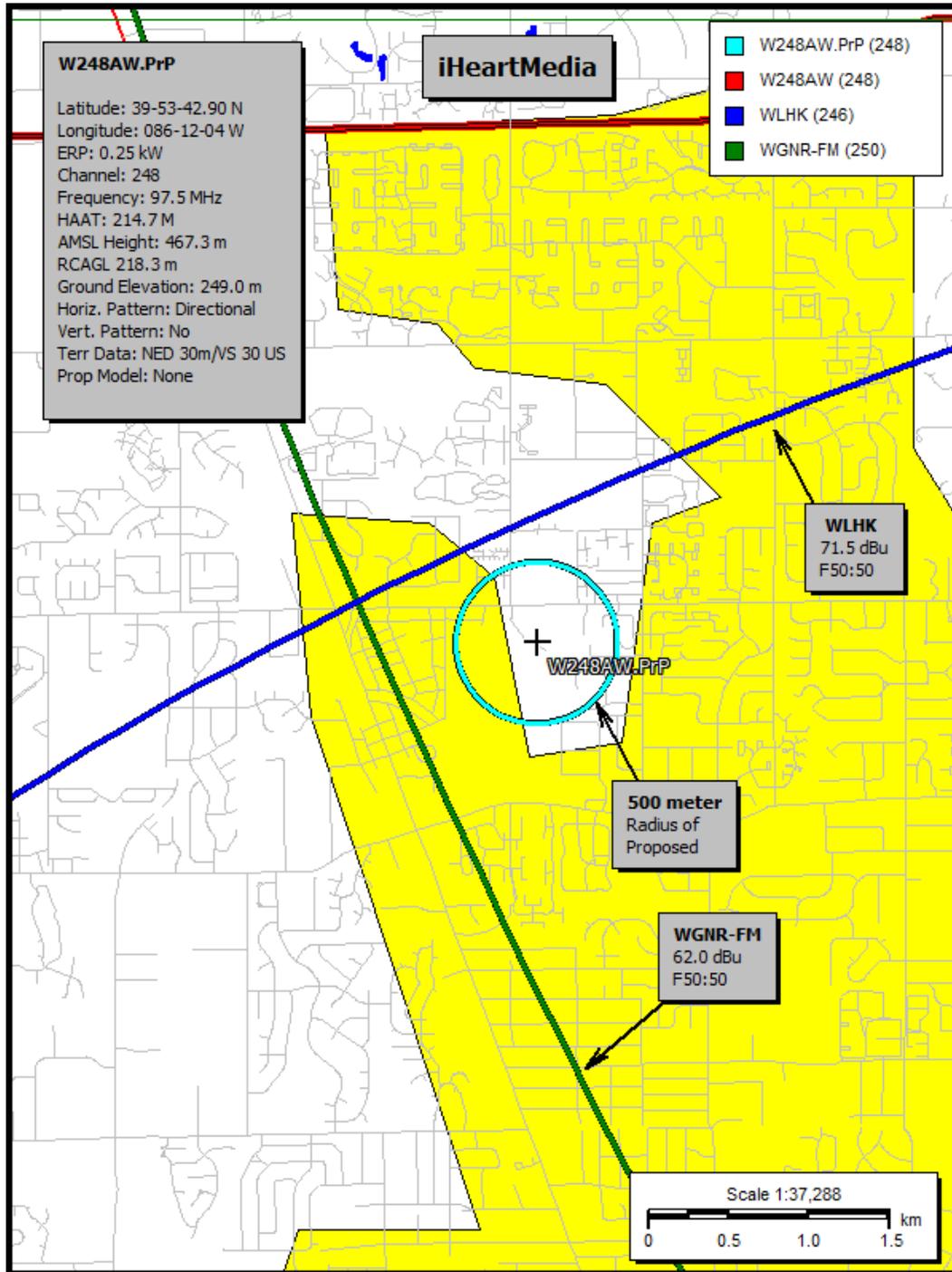
W248AW to ASR 1026780  
Educational Media Foundation

REFERENCE CH# 248D - 97.5 MHz, Pwr= 0.25 kW DA, HAAT= 214.7 M, COR= 467.3 M DISPLAY DATES  
39 53 42.9 N. Average Protected F(50-50)= 19.2 km DATA 02-13-15  
86 12 04.0 W. Standard Directional SEARCH 02-13-15

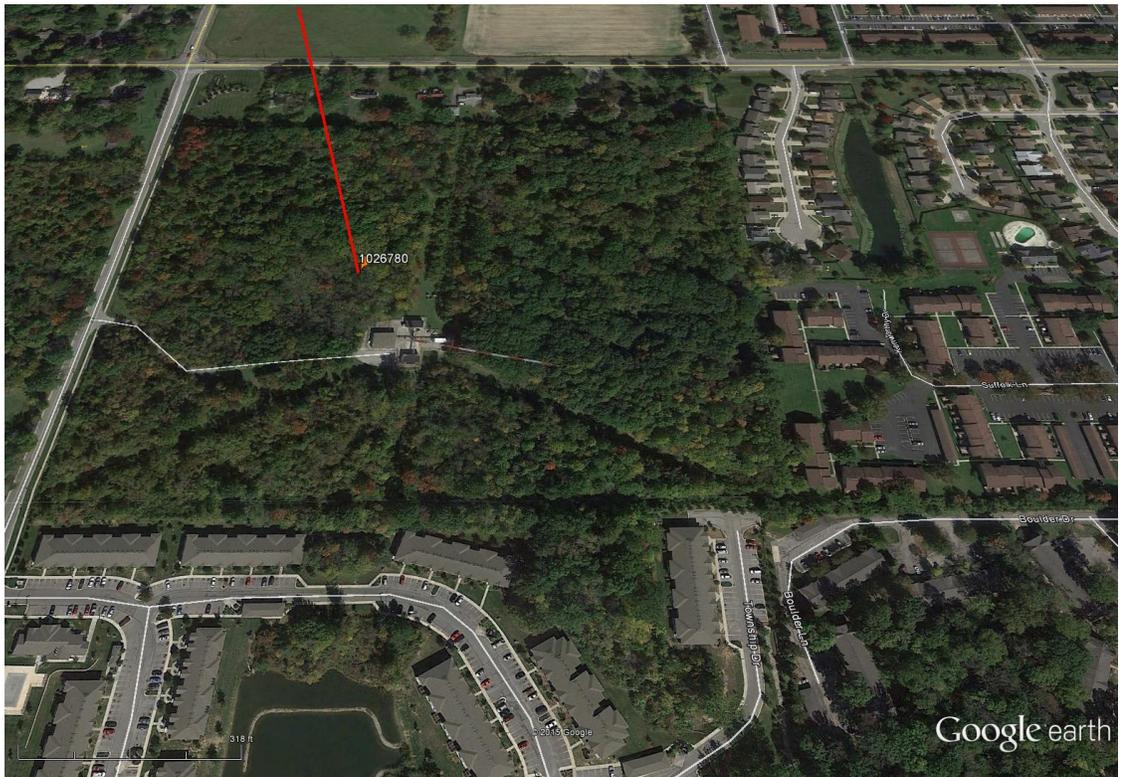
CH CITY	CALL	TYPE	ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr (kW) HAAT (M)	INT (km) COR (M)	PRO (km) LICENSEE	*IN* (Overlap in km)	*OUT*
246B Shelbyville	WLHK	LIC	CX IN	149.7 329.8	29.19 BMLH20070501AGZ	39 40 06.0 86 01 44.0	23.000 223	5.7 463	64.1 Emmis Radio License, Llc	23.5	-34.9*
248D Indianapolis	W248AW!	CP	C IN	149.7 329.8	29.19 BFFT20130307ABO	39 40 06.0 86 01 44.0	0.240 215	58.0 455	18.5 Educational Media Foundati	-28.8	10.7
250B Anderson	WGNR-FM	LIC	C IN	66.0 246.3	45.89 BMLED20030908ADX	40 03 43.0 85 42 34.0	50.000 149	5.7 405	63.5 The Moody Bible Institute	40.2	-17.6*
248D Franklin	W248AW!	LIC	C IN	165.0 345.1	43.97 BLFT20070919ABX	39 30 46.0 86 04 05.0	0.035 40	13.7 274	4.3 Educational Media Foundati	30.2	39.7
248D Frankfort	W248BX	CP	C IN	327.5 147.3	51.51 BNPFT20130822AEF	40 17 09.0 86 31 38.0	0.140 27	20.4 283	6.1 Kaspar Broadcasting Co, In	31.1	45.4
249A Spencer	WCLS	LIC	CX IN	207.1 26.8	83.82 BLH20051110ADE	39 13 22.0 86 38 40.0	6.000 100	45.2 321	29.3 Mid-america Radio Of India	38.6	54.5
248A Union City Proposed to Canada as	WTGR	LIC	ZCN OH	74.1 255.0	124.08 BLH19941118KA	40 11 32.0 84 47 58.0	6.000 99	84.1 426	26.2 Positive Radio Group, Inc.	40.0	97.8
920917-Accepted by Canada 921102											
248C1 Louisville	WAMZ	LIC	CX KY	168.6 348.9	207.34 BMLH20080402AAP	38 03 50.0 85 43 52.0	100.000 205	166.0 372	67.2 Cc Licenses, Llc	41.3	140.1
248C1 Louisville	WAMZ	CP	CX KY	162.6 343.0	198.01 BPH20120419AAB	38 11 30.8 85 31 21.2	100.000 169	156.6 367	59.8 Cc Licenses, Llc	41.4	138.2
248B Champaign	WHMS-FM	LIC	CN IL	277.5 96.2	176.08 BLH19911022KB	40 05 04.0 88 14 53.0	50.000 109	133.4 328	60.4 D.w.s., Inc.	42.7	115.7
249D Cofax	W249CQ	CP	C IN	312.1 131.8	49.64 BNPFT20130829ACF	40 11 36.0 86 38 05.0	0.007 71	5.8 326	4.1 Friends Of Christian Radio	43.9	45.6
248D Crawfordsville	W248BR	CP	C IN	288.5 108.0	70.14 BNPFT20130326AAY	40 05 31.0 86 58 54.0	0.038 66	22.6 302	6.8 Friends Of Christian Radio	47.6	63.4
245D Lafayette	W245CD	CP	C IN	314.5 134.1	78.84 BNPFT20130823AAT	40 23 24.0 86 51 53.0	0.250 77	1.1 276	10.4 Kaspar Broadcasting Co, In	77.7	68.4
249L1 Lafayette	WTGO-LP	LIC	C IN	314.5 134.1	78.86 BLL20041008ACE	40 23 26.0 86 51 52.0	0.100 28			70.9	73.2
228 Harvest Chapel, Inc.											
248D Delphi	W248BZ	CP	C IN	320.1 139.6	93.85 BNPFT20130829ACC	40 32 25.0 86 54 49.0	0.027 60	22.2 263	6.7 Friends Of Christian Radio	71.6	87.2
247L1 West Lafayette	WWCC-LP	LIC	C IN	314.5 134.1	78.86 BLL20050705AAY	40 23 26.0 86 51 52.0	0.014 79			71.7	73.7
279 Triangle Foundation, Inc.											

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM  
Contour distances are on direct line to and from reference station. Reference Zone= , Co to 3rd adjacent.  
All separation margins (if shown) include rounding. Call signs with exclamation marks need not be protected.  
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)  
\*\*\*affixed to 'IN' or 'OUT' values = site inside restricted contour.

**Figure 3. Contour Map**



**Figure 4. View of Antenna Location.**



**Figure 5. Distance to Signal Level Table.**

<p>Proposed Antenna: Scala FMVMP-2</p> <p>Proposed Power: 0.25 kW</p> <p>Antenna Height AGL: 218 meters</p> <p>Interference Contour: 102 dBu f(50:10)</p> <p>Artificial Rcv Antenna Height: 2 meters</p> <p>Distance (Free Space) Equation: <math>= (10^{((106.92 - [\text{desired dBu}] + [\text{ERP in dBk}]) / 20)) * 1000}</math></p> <p>Field Strength (dBu) Equation: <math>= 106.92 - (20 * (\text{LOG}_{10}[\text{DistMeters} / 1000])) + [\text{ERP in dBk}]</math></p>								
Depression			Distance					
Angle	Antenna			from Ant.	Distance	Field Strength	Distance	Field Strength
Below	Relative	ERP	ERP	to Interf	from Ant. to	in dBu @	from Ant.	in dBu @
Horizon	Field	in kW	in dBk	Contour	Artificial Plane	Artificial Plane	to Ground Level	Ground Level
0°	1.000	0.250	-6.02	880.99 m	infinite	---	infinite	---
-5°	0.967	0.234	-6.31	851.92 m	2478.32 m	92.72 dBu	#####	92.64 dBu
-10°	0.873	0.191	-7.20	769.10 m	1243.89 m	97.82 dBu	#####	97.74 dBu
-15°	0.726	0.132	-8.80	639.60 m	834.56 m	99.69 dBu	842.29 m	99.61 dBu
-20°	0.545	0.074	-11.29	480.14 m	631.54 m	99.62 dBu	637.39 m	99.54 dBu
-25°	0.350	0.031	-15.14	308.35 m	511.10 m	97.61 dBu	515.83 m	97.53 dBu
-30°	0.163	0.007	-21.78	143.60 m	432.00 m	92.43 dBu	436.00 m	92.35 dBu
-35°	0.010	0.000	-46.02	8.81 m	376.58 m	69.38 dBu	380.07 m	69.30 dBu
-40°	0.119	0.004	-24.51	104.84 m	336.04 m	91.88 dBu	339.15 m	91.80 dBu
-45°	0.198	0.010	-20.09	174.44 m	305.47 m	97.13 dBu	308.30 m	97.05 dBu
-50°	0.235	0.014	-18.60	207.03 m	281.97 m	99.32 dBu	284.58 m	99.24 dBu
-55°	0.240	0.014	-18.42	211.44 m	263.69 m	100.08 dBu	266.13 m	100.00 dBu
-60°	0.222	0.012	-19.09	195.58 m	249.42 m	99.89 dBu	251.72 m	99.81 dBu
-65°	0.189	0.009	-20.49	166.51 m	238.33 m	98.89 dBu	240.54 m	98.81 dBu
-70°	0.148	0.005	-22.62	130.39 m	229.86 m	97.08 dBu	231.99 m	97.00 dBu
-75°	0.105	0.003	-25.64	92.06 m	223.62 m	94.29 dBu	225.69 m	94.21 dBu
-80°	0.060	0.001	-30.46	52.86 m	219.33 m	89.64 dBu	221.36 m	89.56 dBu
-85°	0.018	0.000	-40.92	15.86 m	216.83 m	79.28 dBu	218.83 m	79.20 dBu
-90°	0.023	0.000	-38.79	20.26 m	216.00 m	81.44 dBu	218.00 m	81.36 dBu