Minor Modification of Facility
W295DE; BLFT-20180827AAW
Facility ID No. 147802

This exhibit is for minor modification of translator permit for W295DE Facility ID No. 147802, BLFT-20180827AAW. This application is to "clear space" of the existing support tower at the request of the tower owner, by moving to a higher location on the same tower. We propose to move the existing directional antenna up from the present 155 meters above ground level ("AGL") to 188 meters AGL with a reduction in power from 195 to 146 watts to keep the interference contours within those of the present facility. There is no change in directional patter, antenna type or make, nor of channel, being requested.

Antenna Location

The antenna is to be mounted 33 meters above its present postion on an existing tower identified by registration number 1012090 at 188 meters above ground. A directional antenna is used, the pattern is given in **Figure 0.** Below as **Figure 1** is an overlap and spacing study from which it can be determined that this proposal is within the protected contour of **second** adjacent channel full-power stations WHLK, and WNWV.

73.1204 Compliance

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", allows for the use of D/U Analysis, also known as "signal strength ratio methodology" to be utilized to demonstrate compliance. In this instant case the facility to be protected is on a second or third adjacent channel and is to be afforded protection from signals 40 dB stronger than the protected facility presents near the proposed translator antenna location.

Concerning WNWV; In **Figure 2** a map showing that the predicted 73.7 dBu signal contour of the protected station falls 500 meters beyond the proposed translator antenna location is given. This proposal can only cause predicted interference to the protected facility by having a signal exceeding 113.7 dBu (73.7 + 40) in a habitable/populated area. Utilizing the line of sight equation considering the proposed antenna vertical pattern as shown in **Figure 3,** it has been determined that a 113.7 dBu signal developed by 195 watts, as proposed, will not reach habitable areas. With examination of the image in **Figure 4** it can be determined that no habitable space extends into the confines of the interference signal level contour area.

Concerning WHLK; In **Figure 1** it can be seen that WHLK and the proposal are co-located. WHLK will have a signal of over 154 dBu in the vicinity of the tower. As this is a signal of greater value than that of WNWV, protection of the stronger WHLK signal is assured by the protection of the weaker WNWV signal.

Thus the provisions of the rules section concerning prohibited overlap will not apply as it has been demonstrated that no actual interference will occur due to a lack of population and other factors as applied in this instant proposal.

Request for Waiver of 47 CFR § 74.1235(d)(3)

The proposed 34 dBu F(50,10) interfering contour extends north of the US-Canada border within Lake Ontario, and exceeds the 60 km distance limit specified in 47 CFR § 74.1235(d)(3), but it clears all Canadian soil by at least 8 kilometers; therefore, the proposed operation would have no impact on any present or future Canadian FM broadcast facilities. The closest point of Canadian land to the contour is Pelee Island, Ontario. Please see **Figure 5**.

Fill-in and Minor Change Status

This proposal is to serve as a fill-in translator for station WTAM Facility ID 59595, Cleveland, Ohio. The map of **Figure 6** demonstrates that the proposed 60 dBu contour is contained within the 2 mV/M signal and a 25 mile radius of the WTAM facility. It can also be seen that the proposed and permitted facilities are within the allowed 250 mile distance.

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 antenna system is a horizontal array of 2 Scala "CLFM" antenna mounted 188 meters above ground. For purposes of this analysis the FM Model program has been set to calculate values for a type=1 of antenna element, operated with an effective radiated power of 0.146 Kilowatts in vertical. At 2 meters above the surface, at 35 meters from the base of the tower, this proposal will contribute worst case, 0.3 microwatts per square centimeter, or 0.03 percent of the allowable ANSI limit for controlled exposure, and 0.15 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 0. Antenna Pattern

W295DE 11-09-2018 RMS(V)= .69

Azi	Field	dBk	kW
000	0.854	-09.727	0.106
010	0.842	-09.850	0.104
020	0.919	-09.090	0.123
030	0.981	-08.523	0.141
040	1.000	-08.356	0.146
050	0.981	-08.523	0.141
060	0.919	-09.090	0.123
070	0.823	-10.048	0.099
080	0.699	-11.467	0.071
090	0.557	-13.439	0.045
100	0.408	-16.143	0.024
110	0.214	-21.748	0.007
120	0.078	-30.515	0.001
130	0.058	-33.088	0.000
140	0.058	-33.088	0.000
150	0.058	-33.088	0.000
160	0.058	-33.088	0.000
170	0.058	-33.088	0.000
180	0.058	-33.088	0.000
190	0.058	-33.088	0.000
200	0.058	-33.088	0.000
210	0.078	-30.515	0.001
220	0.214	-21.748	0.007
230	0.408	-16.143	0.024
240	0.557	-13.439	0.045
250	0.699	-11.467	0.071
260	0.823	-10.048	0.099
270	0.919	-09.090	0.123
280	0.981	-08.523	0.141
290	1.000	-08.356	0.146
300	0.981	-08.523	0.141
310	0.919	-09.090	0.123
320	0.842	-09.850	0.104
330	0.854	-09.727	0.106
340	0.906	-09.214	0.120
350	0.906	-09.214	0.120

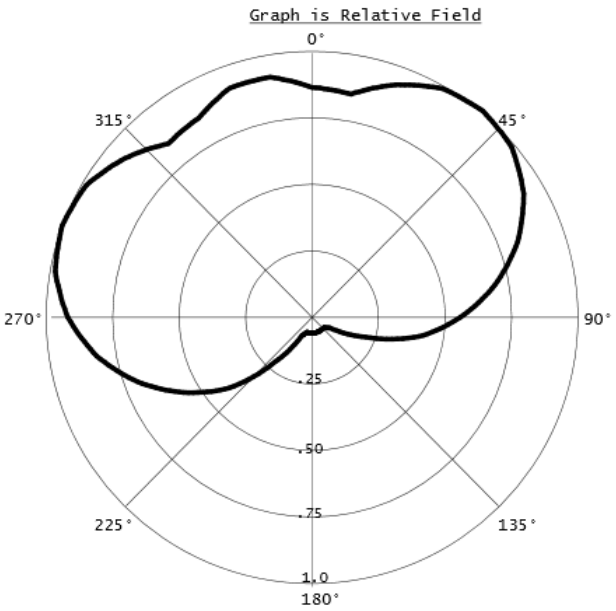
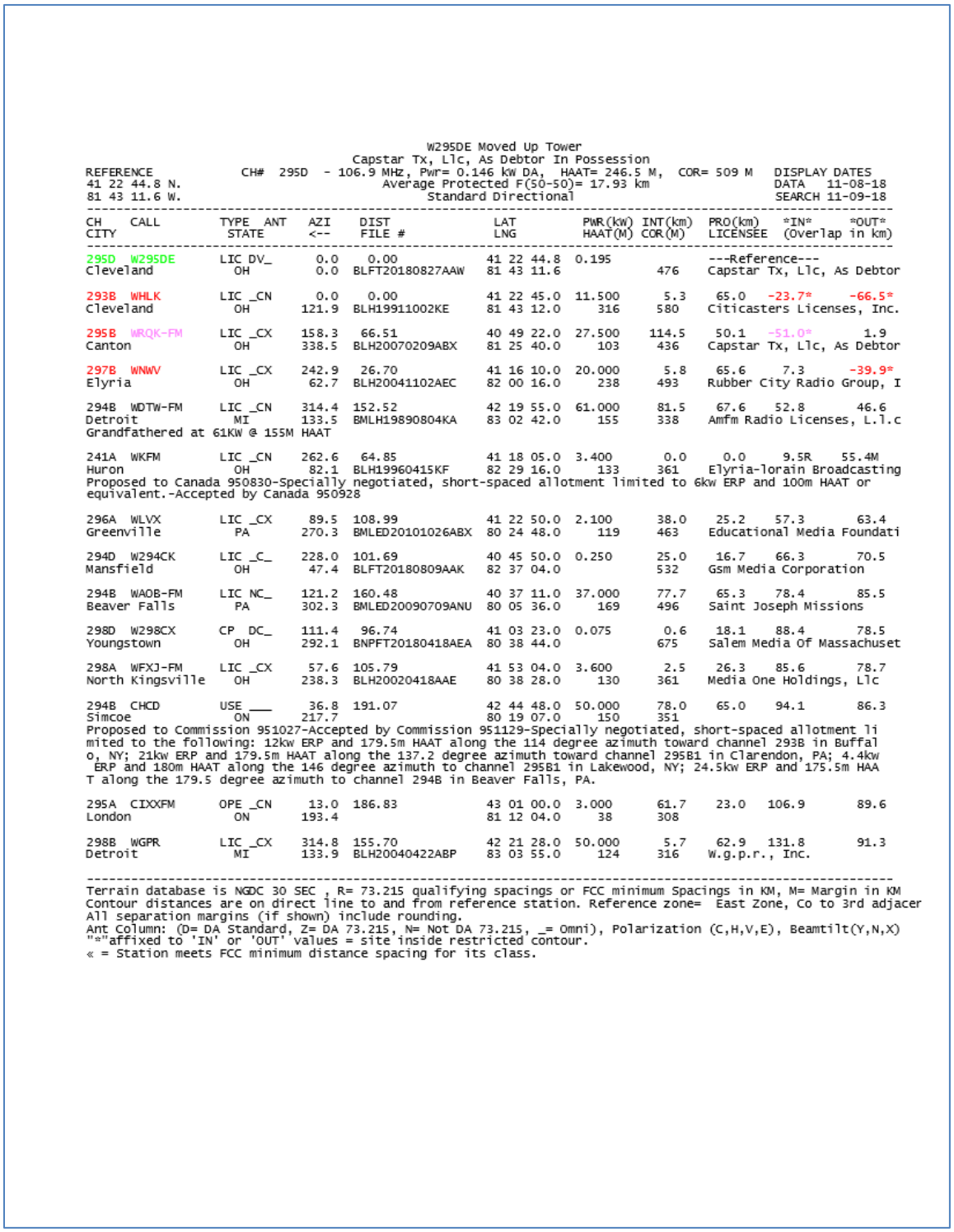


Figure 1. Overlap and Spacing Study



W295DE Moved Up Tower
Capstar Tx, Llc, As Debtor In Possession

REFERENCE CH# 295D - 106.9 MHz, Pwr= 0.146 kW DA, HAAT= 246.5 M, COR= 509 M DISPLAY DATES
41 22 44.8 N. Average Protected F(50-50)= 17.93 km DATA 11-08-18
81 43 11.6 W. Standard Directional SEARCH 11-09-18

CH CITY	CALL STATE	TYPE ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
295D Cleveland	W295DE OH	LIC DV_	0.0 0.0	0.00 BLFT20180827AAW	41 22 44.8 81 43 11.6	0.195	476	---Reference--- Capstar Tx, Llc, As Debtor		
293B Cleveland	WHLK OH	LIC _CN	0.0 121.9	0.00 BLH19911002KE	41 22 45.0 81 43 12.0	11.500 316	5.3 580	65.0 Citicasters Licenses, Inc.	-23.7*	-66.5*
295B Canton	WRQK-FM OH	LIC _CX	158.3 338.5	66.51 BLH20070209ABX	40 49 22.0 81 25 40.0	27.500 103	114.5 436	50.1 Capstar Tx, Llc, As Debtor	-51.0*	1.9
297B Elyria	WNWV OH	LIC _CX	242.9 62.7	26.70 BLH20041102AEC	41 16 10.0 82 00 16.0	20.000 238	5.8 493	65.6 Rubber City Radio Group, I	7.3	-39.9*
294B Detroit	WDTW-FM MI	LIC _CN	314.4 133.5	152.52 BMLH19890804KA	42 19 55.0 83 02 42.0	61.000 155	81.5 338	67.6 Amfm Radio Licenses, L.l.c	52.8	46.6
Grandfathered at 61KW @ 155M HAAT										
241A Huron	WKFM OH	LIC _CN	262.6 82.1	64.85 BLH19960415KF	41 18 05.0 82 29 16.0	3.400 133	0.0 361	0.0 Elyria-lorain Broadcasting	9.5R	55.4M
Proposed to Canada 950830-Specially negotiated, short-spaced allotment limited to 6kw ERP and 100m HAAT or equivalent.-Accepted by Canada 950928										
296A Greenville	WLVX PA	LIC _CX	89.5 270.3	108.99 BMLED20101026ABX	41 22 50.0 80 24 48.0	2.100 119	38.0 463	25.2 Educational Media Foundati	57.3	63.4
294D Mansfield	W294CK OH	LIC _C_	228.0 47.4	101.69 BLFT20180809AAK	40 45 50.0 82 37 04.0	0.250	25.0 532	16.7 Gsm Media Corporation	66.3	70.5
294B Beaver Falls	WAOB-FM PA	LIC NC_	121.2 302.3	160.48 BMLED20090709ANU	40 37 11.0 80 05 36.0	37.000 169	77.7 496	65.3 Saint Joseph Missions	78.4	85.5
298D Youngstown	W298CX OH	CP DC_	111.4 292.1	96.74 BNPFT20180418AEA	41 03 23.0 80 38 44.0	0.075	0.6 675	18.1 Salem Media Of Massachuset	88.4	78.5
298A North Kingsville	WFXJ-FM OH	LIC _CX	57.6 238.3	105.79 BLH20020418AAE	41 53 04.0 80 38 28.0	3.600 130	2.5 361	26.3 Media One Holdings, Llc	85.6	78.7
294B Simcoe	CHCD ON	USE ___	36.8 217.7	191.07	42 44 48.0 80 19 07.0	50.000 150	78.0 351	65.0	94.1	86.3
Proposed to Commission 951027-Accepted by Commission 951129-Specially negotiated, short-spaced allotment limited to the following: 12kw ERP and 179.5m HAAT along the 114 degree azimuth toward channel 293B in Buffalo, NY; 21kw ERP and 179.5m HAAT along the 137.2 degree azimuth toward channel 295B1 in Clarendon, PA; 4.4kw ERP and 180m HAAT along the 146 degree azimuth to channel 295B1 in Lakewood, NY; 24.5kw ERP and 175.5m HAAT along the 179.5 degree azimuth to channel 294B in Beaver Falls, PA.										
295A London	CIXXFM ON	OPE _CN	13.0 193.4	186.83	43 01 00.0 81 12 04.0	3.000 38	61.7 308	23.0	106.9	89.6
298B Detroit	WGPR MI	LIC _CX	314.8 133.9	155.70 BLH20040422ABP	42 21 28.0 83 03 55.0	50.000 124	5.7 316	62.9 W.g.p.r., Inc.	131.8	91.3

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= East Zone, Co to 3rd adjacer
All separation margins (if shown) include rounding.
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.
« = Station meets FCC minimum distance spacing for its class.

Figure 2. Contour Map

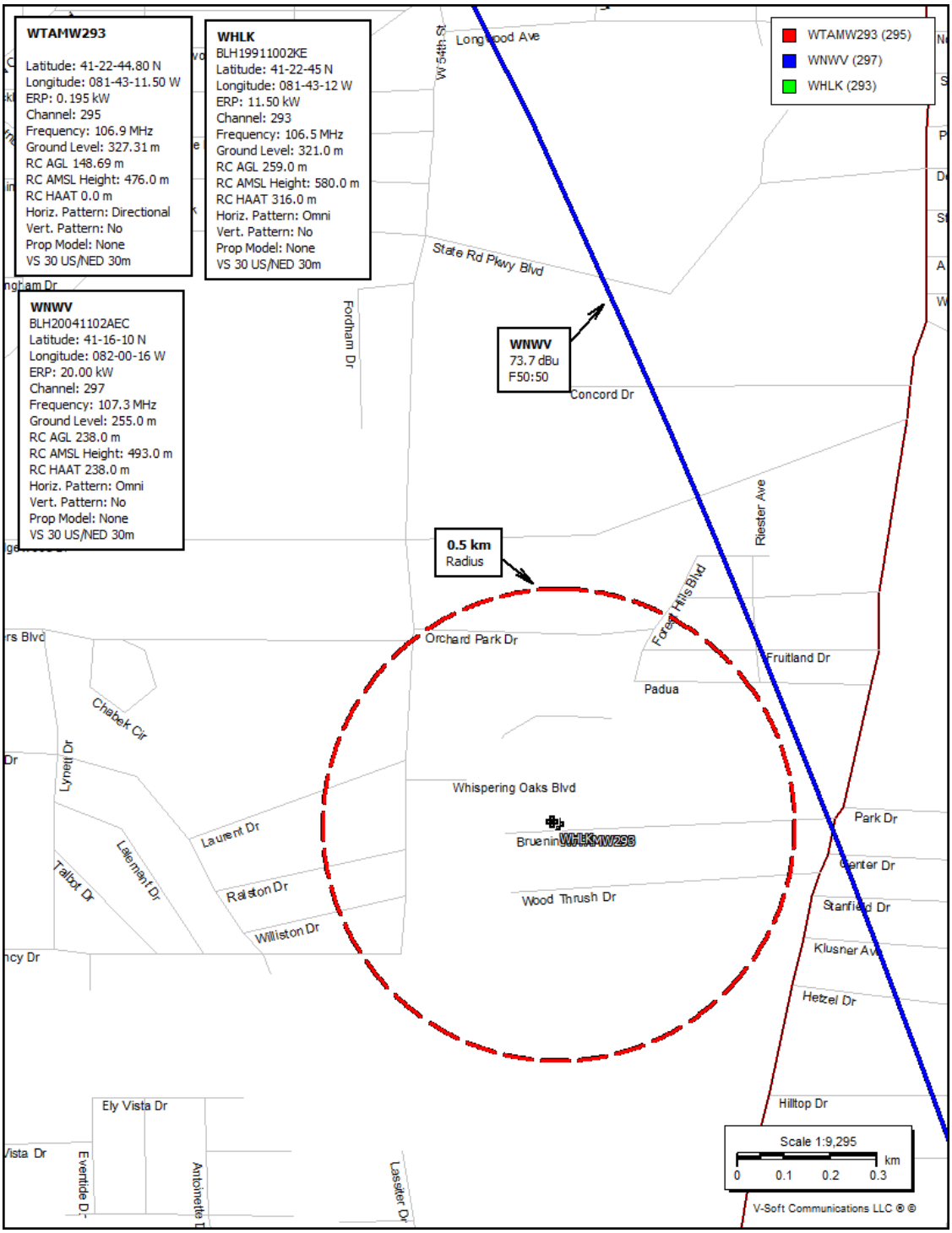


Figure 3. Signal Level at or Near Ground Level

Proposed Antenna:	Scala CL-FMV 2 Stack full w ave	
Proposed Power:	0.146	kW
Antenna Height AGL:	188	meters
Interference Contour:	113.7	dBu f(50:10)
Artificial Rcv Antenna Height:	2	meters
Distance (Free Space) Equation:	=(10^((106.92-[desired dBu]+[ERP in dBk])/20))*1000	
Field Strength (dBu) Equation	"=106.92-(20*(LOG10[DistMeters]/1000)))+[ERPin dBk]	

Depression Angle Below Horizon	Antenna Relative Field	ERP in kW	ERP in dBk	Distance from Ant. to Interf Contour	Distance from Ant. to Artificial Plane	Field Streng in dBu @ Artificial Plane	Distance from Ant. to Ground Level	Field Strength in dBu @ Ground Level
0°	1.000	0.146	-8.36	175.06 m	infinite	---	infinite	---
-5°	0.948	0.131	-8.82	165.95 m	2134.11 m	91.52 dBu	2157.06 m	91.42 dBu
-10°	0.828	0.100	-10.00	144.95 m	1071.13 m	96.33 dBu	1082.65 m	96.23 dBu
-15°	0.646	0.061	-12.15	113.09 m	718.65 m	97.64 dBu	726.38 m	97.54 dBu
-20°	0.436	0.028	-15.57	76.32 m	543.83 m	96.64 dBu	549.68 m	96.55 dBu
-25°	0.233	0.008	-21.01	40.79 m	440.11 m	93.04 dBu	444.85 m	92.95 dBu
-30°	0.061	0.001	-32.65	10.68 m	372.00 m	82.86 dBu	376.00 m	82.77 dBu
-35°	0.069	0.001	-31.58	12.08 m	324.28 m	85.12 dBu	327.77 m	85.03 dBu
-40°	0.151	0.003	-24.78	26.43 m	289.36 m	92.91 dBu	292.48 m	92.82 dBu
-45°	0.178	0.005	-23.35	31.16 m	263.04 m	95.17 dBu	265.87 m	95.08 dBu
-50°	0.159	0.004	-24.33	27.83 m	242.81 m	94.89 dBu	245.42 m	94.79 dBu
-55°	0.116	0.002	-27.07	20.31 m	227.06 m	92.73 dBu	229.51 m	92.64 dBu
-60°	0.071	0.001	-31.33	12.43 m	214.77 m	88.95 dBu	217.08 m	88.86 dBu
-65°	0.040	0.000	-36.32	7.00 m	205.23 m	84.36 dBu	207.44 m	84.27 dBu
-70°	0.019	0.000	-42.78	3.33 m	197.94 m	78.21 dBu	200.07 m	78.12 dBu
-75°	0.010	0.000	-48.36	1.75 m	192.56 m	72.87 dBu	194.63 m	72.78 dBu
-80°	0.010	0.000	-48.36	1.75 m	188.87 m	73.04 dBu	190.90 m	72.95 dBu
-85°	0.010	0.000	-48.36	1.75 m	186.71 m	73.14 dBu	188.72 m	73.05 dBu
-90°	0.010	0.000	-48.36	1.75 m	186.00 m	73.17 dBu	188.00 m	73.08 dBu

Figure 4. Image of Proposed Support Tower

Figure 5. 74.1235(d)(3) Map

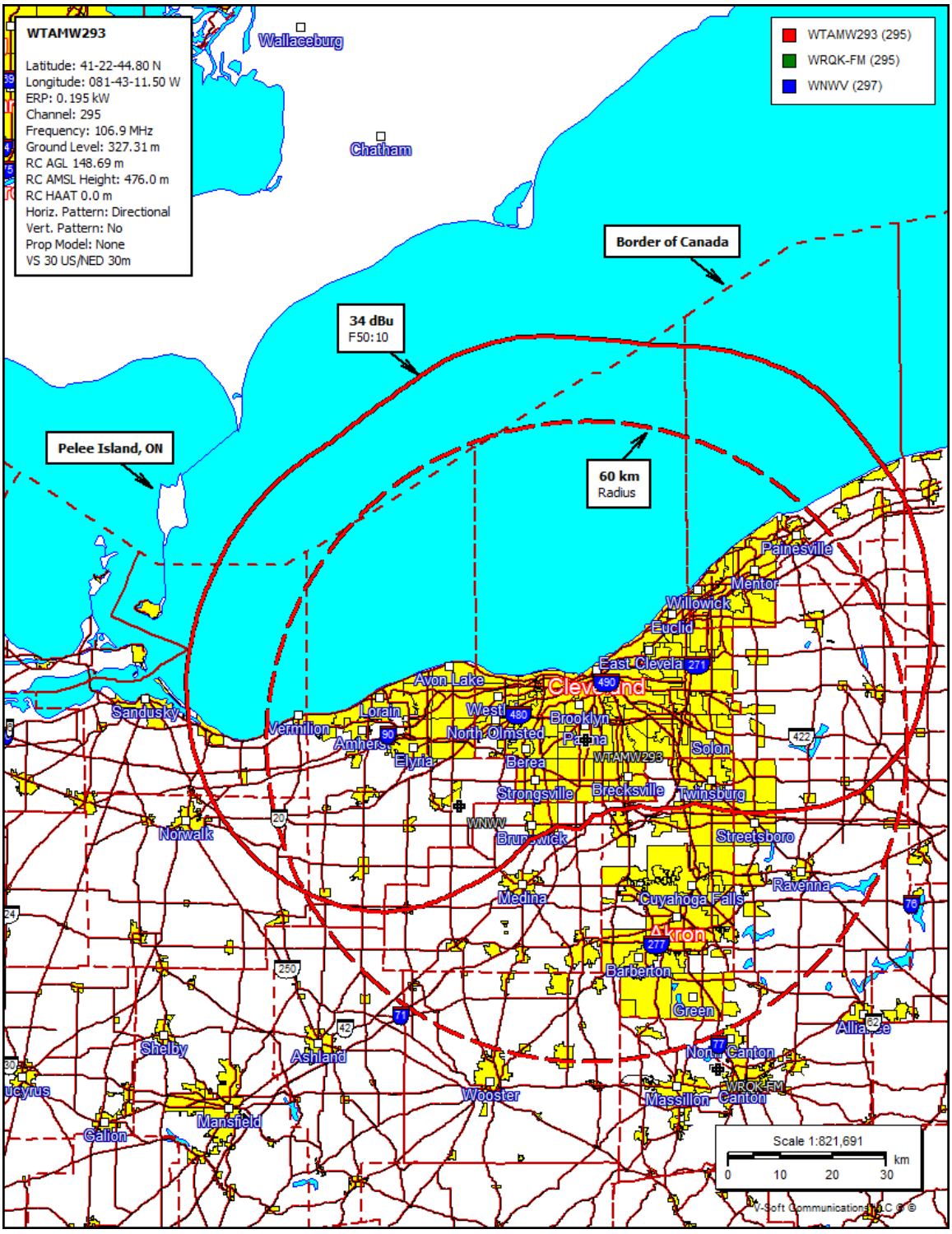


Figure 6. Fill-in and Minor Change Distance Map