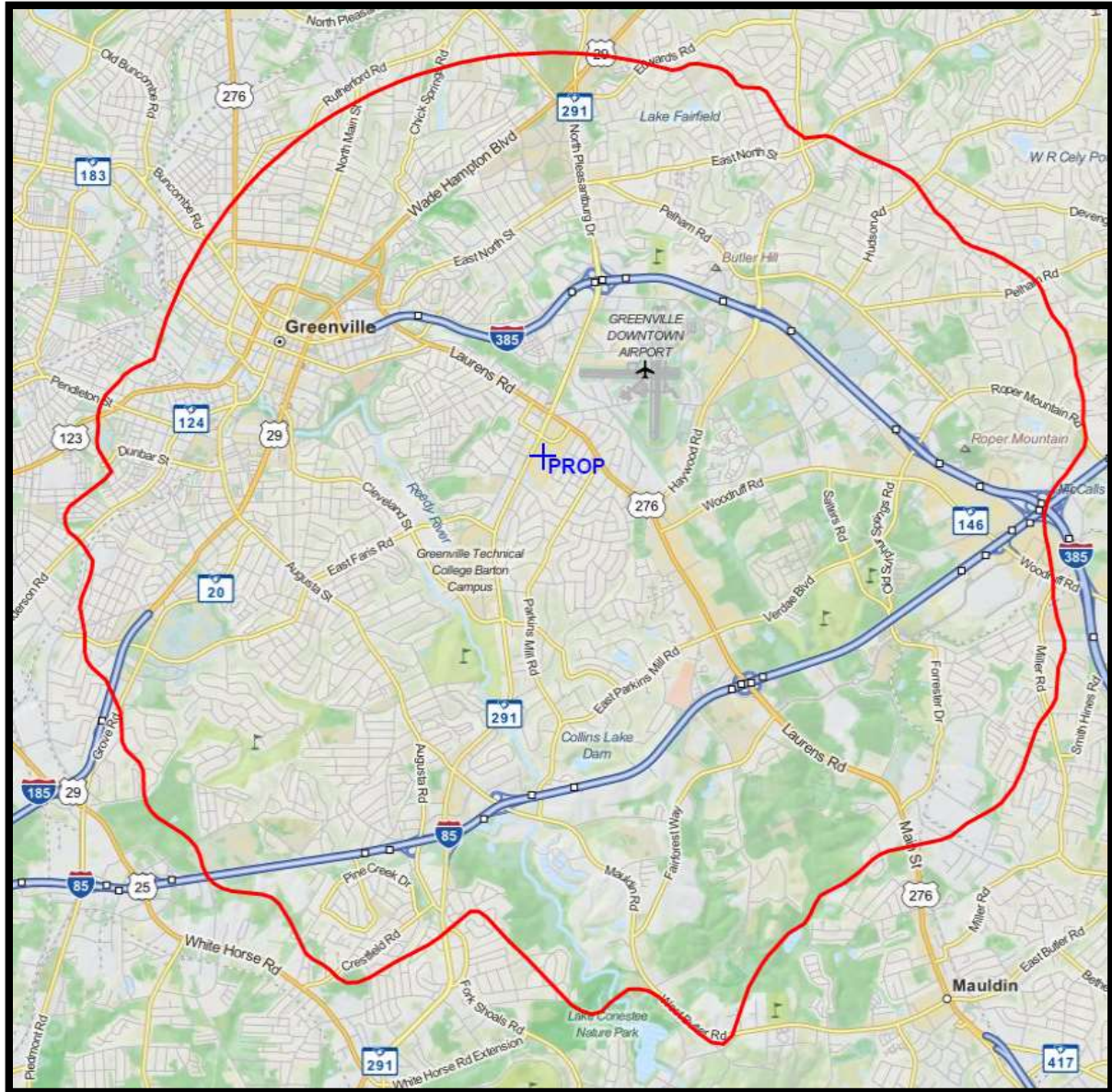




REC Networks
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Mardela Springs, MD 21837
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recnet.com

Modification for **WBWT-LP**
GREENVILLE, SC
QUALITY RADIO PARTNERS, INC.
BLL-20160106AAL

PROPOSED 60dBu F(50,50) SERVICE CONTOUR



GREENVILLE, SC – Chan 268L1 (101.5 MHz) ~ ERP 0.061 kW
Elev: 294 meters ~ RCAGL: 24.4 meters ~ RCAMSL: 318.4 meters ~ HAAT: 39 meters
Overall tower height: 45.7 meters – ASRN: 1224717
NAD27 Latitude: 34° 50' 18.6" NL – Longitude: 82° 21' 45.6" WL
NAD83 Latitude: 34° 50' 19.0" NL – Longitude: 82° 21' 45.0" WL

Site: WBWT-Proposed
 Coordinates: 34-50-18.6 N, 82-21-45.6 W
 Freq: 101.50000 MHz
 ERP: 61.00 W

Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0	61.00	19	360	5.02	34.883688	-82.362667
5	61.00	30	410	5.02	34.883516	-82.357866
10	61.00	33	430	5.26	34.885109	-82.352648
15	61.00	38	100	5.65	34.887551	-82.346643
20	61.00	40	70	5.78	34.887384	-82.340975
25	61.00	39	40	5.71	34.885084	-82.336184
30	61.00	41	40	5.85	34.884079	-82.330584
35	61.00	35	50	5.42	34.878414	-82.328595
40	61.00	40	40	5.78	34.878346	-82.321904
45	61.00	40	60	5.78	34.875278	-82.317827
50	61.00	41	50	5.85	34.872323	-82.313520
55	61.00	44	40	6.06	34.869772	-82.308211
60	61.00	45	30	6.14	34.866121	-82.304329
65	61.00	51	30	6.56	34.863415	-82.297504
70	61.00	56	60	6.87	34.859598	-82.291955
75	61.00	56	60	6.87	34.854460	-82.289985
80	61.00	57	60	6.92	34.849284	-82.287986
85	61.00	56	70	6.87	34.843859	-82.287717
90	61.00	56	60	6.87	34.838477	-82.287436
95	61.00	50	80	6.49	34.833390	-82.291799
100	61.00	52	80	6.63	34.828130	-82.291167
105	61.00	55	90	6.81	34.822626	-82.290596
110	61.00	61	60	7.17	34.816424	-82.288862
115	61.00	65	60	7.40	34.810345	-82.289186
120	61.00	62	80	7.23	34.805966	-82.294078
125	61.00	68	70	7.57	34.799433	-82.294754
130	61.00	64	80	7.34	34.796025	-82.301047
135	61.00	61	50	7.17	34.792892	-82.307146
140	61.00	55	80	6.81	34.791569	-82.314724
145	61.00	55	80	6.81	34.788318	-82.319888
150	61.00	58	90	6.97	34.784179	-82.324485
155	61.00	60	80	7.10	34.780602	-82.329798
160	61.00	68	80	7.57	34.774524	-82.334320
165	61.00	76	50	7.98	34.769133	-82.340041
170	61.00	63	90	7.29	34.773953	-82.348811
175	61.00	63	70	7.29	34.773207	-82.355712
180	61.00	56	60	6.87	34.776753	-82.362667
185	61.00	51	70	6.56	34.779730	-82.368927
190	61.00	48	80	6.36	34.782190	-82.374755
195	61.00	55	40	6.81	34.779334	-82.381968
200	61.00	67	40	7.51	34.774997	-82.390804
205	61.00	65	50	7.40	34.778164	-82.396918
210	61.00	58	50	6.97	34.784179	-82.400849
215	61.00	60	60	7.10	34.786166	-82.407279
220	61.00	61	40	7.17	34.789094	-82.413135
225	61.00	59	70	7.04	34.793745	-82.417150
230	61.00	58	60	6.97	34.798172	-82.421175
235	61.00	57	70	6.92	34.802789	-82.424750
240	61.00	54	30	6.75	34.808105	-82.426751
245	61.00	53	40	6.69	34.813040	-82.429120
250	61.00	53	80	6.69	34.817891	-82.431572
255	61.00	49	60	6.42	34.823526	-82.430653
260	61.00	50	60	6.49	34.828340	-82.432720
265	61.00	50	80	6.49	34.833390	-82.433535
270	61.00	47	80	6.29	34.838481	-82.431585
275	61.00	47	90	6.29	34.843411	-82.431327
280	61.00	44	80	6.06	34.847954	-82.428117
285	61.00	37	130	5.57	34.851455	-82.421646
290	61.00	38	110	5.65	34.855855	-82.420820
295	61.00	35	200	5.42	34.859083	-82.416491
300	61.00	35	470	5.42	34.862855	-82.414101
305	61.00	33	630	5.26	34.865637	-82.409918
310	61.00	31	560	5.10	34.868001	-82.405529
315	61.00	28	610	5.02	34.870447	-82.401612
320	61.00	26	610	5.02	34.873111	-82.398071
325	61.00	23	620	5.02	34.875512	-82.394260
330	61.00	15	550	5.02	34.877631	-82.390208
335	61.00	-24	590	5.02	34.879452	-82.385946
340	61.00	-54	590	5.02	34.880961	-82.381507
345	61.00	-31	540	5.02	34.882147	-82.376924
350	61.00	-5	440	5.02	34.883001	-82.372232
355	61.00	11	380	5.02	34.883516	-82.367468

NAD27 LATITUDE: 34 - 50' 18.6" - LONGITUDE: 82 - 21' 45.6"
CHANNEL: 268 - CLASS: LPFM(LP-100)

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

LPFM SECOND ADJACENT CHANNEL WAIVER STUDY

Greenville, SC
Channel 268L1 (101.5 MHz)

Based on a study performed by Michelle Bradley of REC Networks, it has been determined that this proposed site qualifies for a second adjacent waiver as specified in Section 73.807(e) of the Commission's Rules.

Station WROQ (Facility ID # 318) Anderson, SC operates on Channel 266C1. WROQ operates 100 kW at 296 meters height above average terrain and is located 22.8 km from the proposed LPFM station. WROQ places an 83.0 dBu F(50, 50) service contour at the proposed LPFM transmitter site.

The proposed LPFM station will operate from an antenna height of 24.4 meters above ground level which places the radiation center at 39 meters above average terrain. In order to meet the maximum service requirements of §73.811(a) of the Commission's rules, the applicant is proposing to operate at 0.061 kW ERP.

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 123.0 dBu interference contour ("overlap zone"). The 123.0 dBu contour is 39 meters from the radiation center of the antenna. The applicant is proposing to use a Norwalk Dominator antenna. Based on manufacturer's data using the depression angle method, a 61 watt signal would produce a 122.04 dBu contour at 40 degrees below the horizon at an artificial plane of 7 meters above ground level.

Based on the information presented, REC submits that the proposed station will not create any interference to existing or potential listeners of second adjacent channel station WROQ.

The applicant requests a waiver of §73.807 of the Commission's Rules in respect to WROQ.²

Report completed by
Michelle Eyre Bradley
Founder, REC Networks
January 26, 2016

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).

² - This location was previously authorized for this station under BMLL-20150401AAB. The applicant is returning the station to their prior location.

Proposed Power:	0.061 kW
Antenna Height AGL:	24.4 m
Interference Contour:	123 dBu
Artificial RX Antenna Height:	7 m

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
0	1.000	0.061	-12.15	38.79	Infinite		Infinite	
-5	0.989	0.060	-12.24	38.36	199.64	108.67	279.96	105.74
-10	0.966	0.057	-12.45	37.47	100.20	114.46	140.51	111.52
-15	0.931	0.053	-12.77	36.11	67.23	117.60	94.27	114.66
-20	0.885	0.048	-13.21	34.32	50.87	119.58	71.34	116.65
-25	0.829	0.042	-13.78	32.15	41.17	120.85	57.74	117.92
-30	0.766	0.036	-14.46	29.71	34.80	121.63	48.80	118.69
-35	0.697	0.030	-15.28	27.03	30.34	122.00	42.54	119.06
-40	0.625	0.024	-16.23	24.24	27.07	122.04	37.96	119.10
-45	0.551	0.019	-17.32	21.37	24.61	121.78	34.51	118.84
-50	0.477	0.014	-18.58	18.50	22.71	121.22	31.85	118.28
-55	0.406	0.010	-19.98	15.75	21.24	120.40	29.79	117.46
-60	0.338	0.007	-21.57	13.11	20.09	119.29	28.17	116.35
-65	0.275	0.005	-23.36	10.67	19.20	117.89	26.92	114.96
-70	0.216	0.003	-25.46	8.38	18.52	116.11	25.97	113.17
-75	0.161	0.002	-28.01	6.24	18.01	113.80	25.26	110.86
-80	0.107	0.001	-31.56	4.15	17.67	110.42	24.78	107.48
-85	0.051	0.000	-38.00	1.98	17.47	104.08	24.49	101.14
-90	0.030	0.000	-42.60	1.16	17.40	99.50	24.40	96.57

Antenna type: **Norwalk Dominator NWE-34**

As demonstrated above, the field strength is less than 123 dBu at no location from ground to 7 meters above ground level does the predicted signal of the proposed station exceed that of the protected station(s) by 40 dBu or more therefore demonstrating that there are no listeners or potential listeners in the predicted overlap zone.



Location of tower. As interference does not reach the artificial plane of 7 meters above ground level, the interference will not penetrate any of the adjacent buildings.

WAIVER OF §73.870(a) REQUESTED

WBWT-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 change³.

In this change, the applicant is requesting to move back to their previously authorized location as authorized in BMPL-20140507ACV, covered by BLL-20140707AAA and modified by BMLL-20150401AAB. There is uncertainty on the future availability of this site and as in the previous waiver, there are no viable sites in-between. We still have site assurance at the previously authorized location and therefore in order to maintain our non-commercial broadcast service, we are requesting to resume broadcasting from that previous location.

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.⁴ 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.⁵

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.⁶

By permitting WBWT-LP to move back to their previous location will assure continued service that listeners in the Greenville area have already come to depend on. This type of continuance of service is in the public interest.

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 WBWT-LP can continue 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.

³ - See 47 C.F.R. §73.870(a).

⁴ - See *SRN Communications, Inc.*, BMPL-20140902ACG, Granted September 15, 2014 at Exhibit 1.

⁵ - *Id.*

⁶ - See *Sloan Canyon Communications*, BMPL-20140623AAG, Granted December 22, 2014 at Exhibit 11.