

This report is prepared to support a long form application for a Auction Window 83 translator, BNPFT20030310BMT. This application is a singleton application which is not subject to competitive bidding, and it is inside the New York, NY market. This application is filed to locate the translator at 101 Harbor, Jersey City, NJ.

Minor Change

This is a minor change application to change the transmitter location, antenna height, power and primary station. The 60 db μ V contour of this proposal overlaps the 60 db μ V contour of the tech box application as shown in Exhibit 10.

LPFM Preclusion

Exhibit 1 is a report showing that the proposed facility precludes no LPFM stations in the New York City market grid, Exhibit 1 shows non-preclusion clearance with in New York and adjacent grids. Exhibit 1 has been supplemented to show that there is no conflict with any LPFM application filed in the November 2013 LPFM window.

Channel Allocations

Exhibit 13 Figure 1 is a co-channel and first adjacent channel allocations map showing that there is no overlap of protected contours of other stations' and applications' protected contours and the interference contours specified in § 74.1204 of the FCC rules. Figure 2 is a map showing the allocations contours for second and third adjacent channels. There is no overlap with any station except class B, Second Adjacent channel stations WQHT(FM) and WSKQ-FM, both licensed to New York City. Figure 3 is a showing that protection is established with respect to these stations by the radio method..

In a letter granting Jersey Shore Broadcasting Corporation's application BPFT-950830TD (September 26, 1996 1800B3-JDB) the FCC stated that the Ratio method is suitable for translator applicants to demonstrate lack of interference for application purposes.

The 54 db μ V F(50,50) contour of WQHT and WSKQ-FM (dark blue) are shown extending

well beyond the proposed facility. The WQHT and WSKQ-FM 95 dB μ V F(50,50) contour is shown in purple, extending well beyond the proposed transmitter site. The second and third adjacent channel protection ratio is 40 db, so it is required that the 95 dB μ V (thin blue) contour of WAYV be protected from the proposed 135 dB μ V (not shown) contour of the translator.

Since the distance to this contour is below the minimum distances for the F(50,10) and F(50,50) curves the signal level existing on the ground in the vicinity of the translator was calculated using inverse distance, with an adjustment for ground reflections, as has been accepted by the FCC in recent applications. Exhibit 13 Figure 3 is a tabulation and chart of these calculations showing the location above ground at which the proposed translator will produce an interfering contour. This table and chart shows that the 108 dB μ V signal is more than 25 meters from the ground at its closest approach.

The area in the roof of the building is restricted from the general public, and the area of potential interference only extends 13 meters from the antenna, less than the distance to any other building, and does not reach to within 2 meters of the floor below.

In conclusion, the proposed translator meets all the overlap requirements of § 74.1204 of the FCC rules and regulations.

Compliance with 74.1204(f)

A petition to deny this application was filed by Greater Philadelphia Radio, licensee of WPEN(FM), Burlington, NJ alleging that the proposed FM Translator would interfere with a single listener to WPEN(FM) residing in Manhattan, New York City residing within the originally proposed 1 mV/m contour. An opposition to this petition demonstrating that it is impossible to receive WPEN(FM) in lower Manhattan, absent the translator operation is being filed. This amendment adjusts the proposed contours so as to exclude the residence of the alleged listener from the proposed 1 mV/m contour. This renders the application compliant, irrespective of the whether Greater Philadelphia Radio's claims that WPEN(FM) actually has an over the air listener in lower Manhattan, and renders its objection moot.

Environment

Exhibit 17 is a study showing that the proposed translator is excluded from environmental processing according to § 1.1306 of the FCC rules. The RF exposure worksheet is included to show that there is no location where the radiation from the translator exceeds exposure standards for general public, nor presents a hazard to workers on the roof.

Engineer's Statement

This is to certify that this report has been prepared by myself. It is correct and accurate of my own knowledge, except where stated otherwise, and where that is so, the information is correct to the best of my knowledge and belief.

I further certify that I am a Licensed Professional Engineer in the State of New Jersey, and the Commonwealth of Pennsylvania with a BSEE degree from the Newark College of Engineering of NJIT, and that I am, and have been for over thirty years, regularly engaged in the practice of radio engineering with the firm of Radiotechniques Engineering, LLC, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, Life Senior member of the IEEE and SBE and hold a FCC General Radiotelephone Operator License. My qualifications are a matter of record with the FCC.



5 December 2013

Edward A. Schober, PE