

**Exhibit 13B Page 1**  
**VCY America, Inc.**  
**Displacement Request**  
**Appleton, WI**

This statement is being prepared by Charles Burkhardt of Sterling Communications, Inc. on behalf of VCY America, Inc. in support of the minor change to the licensed facility of W250CO (Facility ID 140786, Appleton, WI,) to show a reduction in interference under the provisions of §74.1233(a)(1)(A)(2). The instant application is proposing a change in channel from channel 250 to channel 286, with a change in antenna location coordinates.

Currently, W250CO is a co-channel to the licensed primary WSPT (Facility ID 2104, Stevens Point, WI). While the current license for W250CO meets the contour requirements for WSPT, the predicted 60 dbu contour of W250CO sits entirely inside the 40 dbu contour of WSPT. Under §74.1203(a)(3) of the Commission's Rules, *"an authorized FM translator or booster station will not be permitted to continue to operate if it causes any actual interference to the direct reception by the public of the off-the-air signals of any authorized broadcast station."* Therefore, since the 60 dbu contour of W250CO is inside the 40 dbu contour of WSPT, and 108,854 people reside within the 60 dBu contour overlap area, actual interference is present to WSPT.

Figure 1 shows W250CO in relation to WSPT with area of interference highlighted.

Figure 2 is a Longley-Rice map showing WSPT field strength with interference from W250CO.

Figure 3 is a Longley-Rice map showing WSPT field strength without interference from W250CO.

By changing to channel 286 potential interference would be reduced to 77,990 people (WPCK) for a total reduction of 30,864 people.

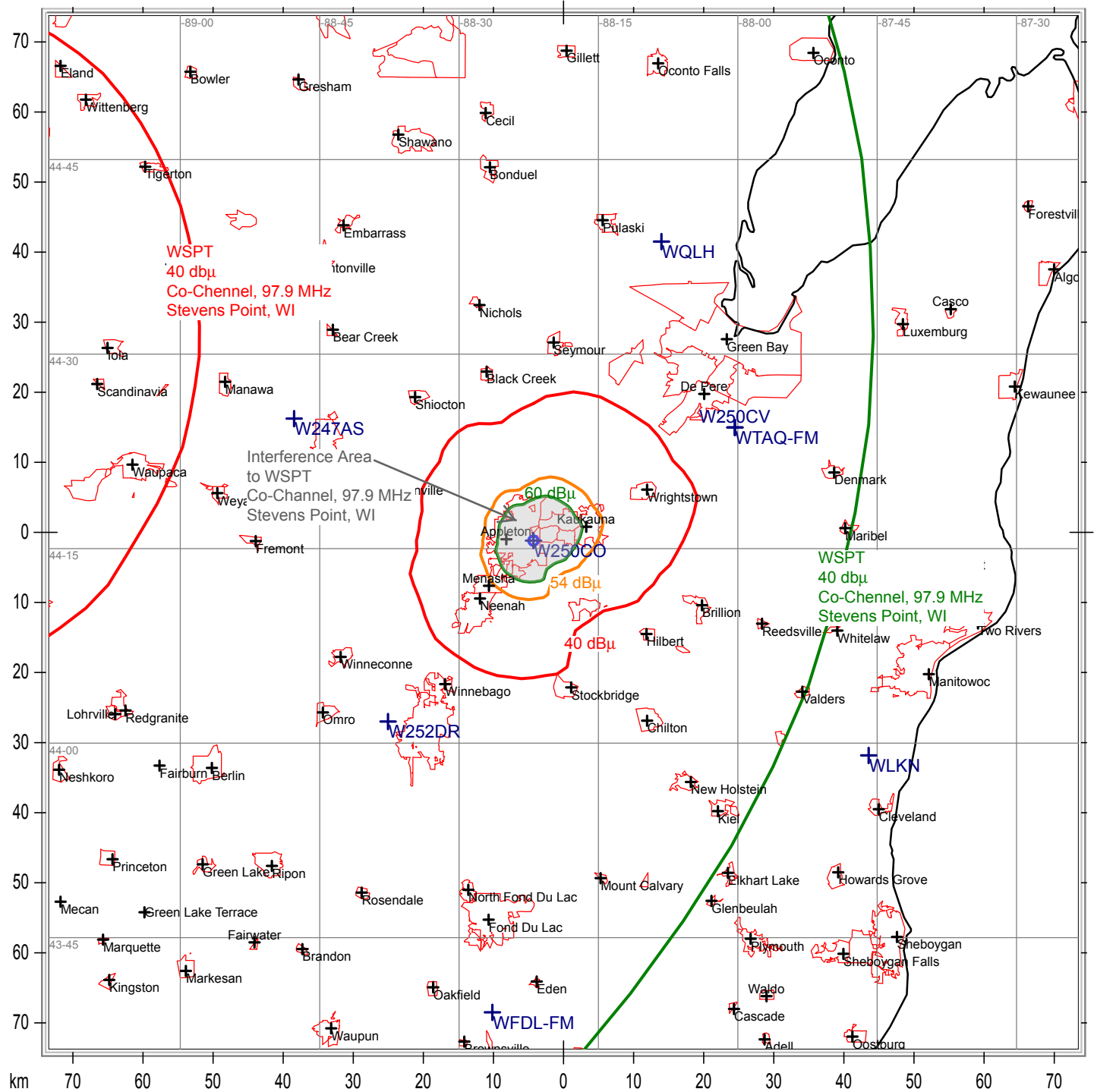
Figure 4 shows W250CO in relation to WPCK with area of interference highlighted.

**Exhibit 13B Page 2**  
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§74.1233(a)(1)(A)(2) of the Commission's Rules state that a FM translator application will be considered minor *"Upon a showing of interference to or from any other broadcast station, remedial changes to any same-band frequency"*. The Proposed channel change to 286 reduces interference caused to WSPT by removing W250CO from the interfering contour of WSPT.

A waiver of Section §74.1233 of the Commission's Rules is requested to permit a minor change application for W250CO to a non-adjacent channel due to the showing of reduction of interference. The FCC has recently ruled in favor of this waiver in the Report and Order MB Docket No. 18-119. Therefore, VCY America, Inc. respectfully requests a change to a non-adjacent channel in the instant application. The public interest will be served by the continuation of service from W250CO that the public has come to rely on and expect.

# W250CO Area of Interference to WSPT

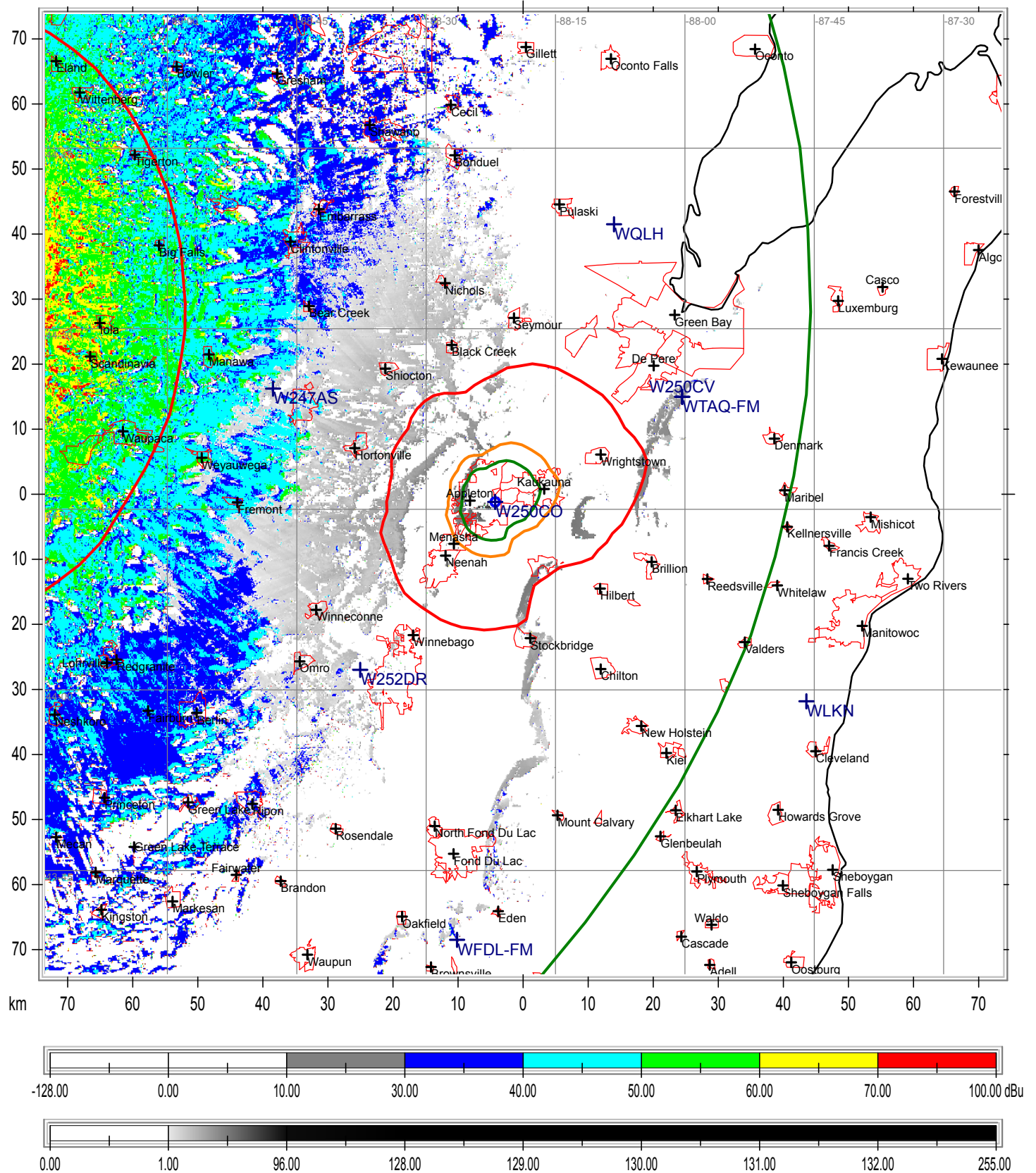


State Borders City Borders Lat/Lon Grid

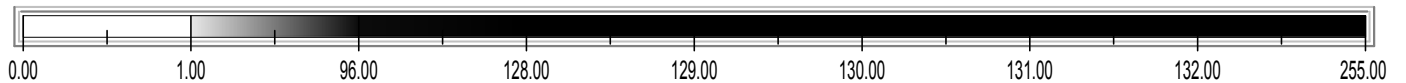
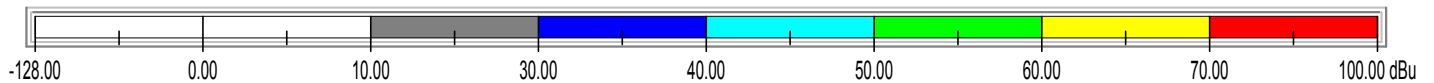
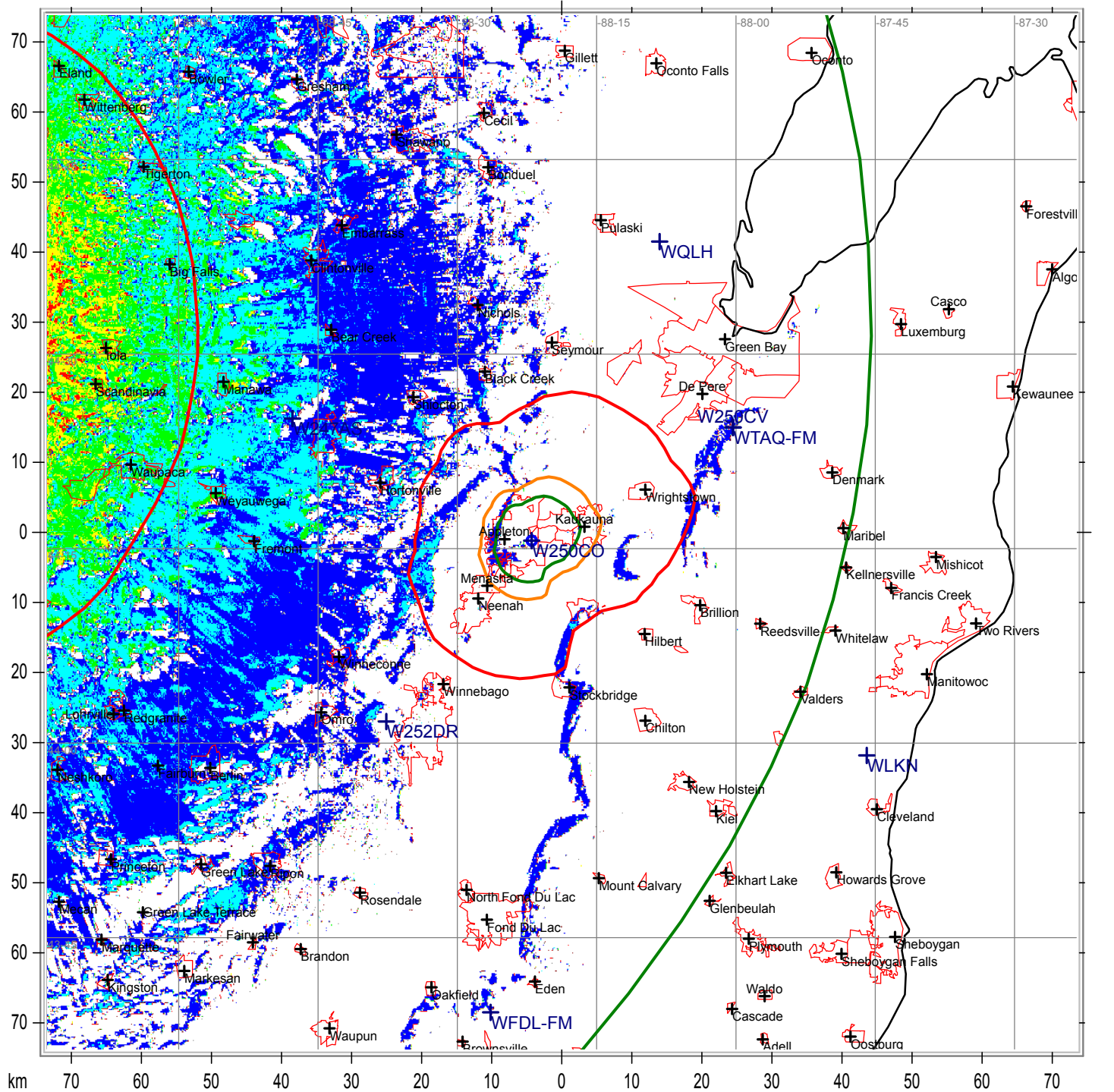
Map Scale: 1:818746 1 cm = 8.19 km VJH Size: 147.51 x 146.88 km

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# WSPT Field Strength with Interference from W250CO - 97.9 MHz (Ch. 250)



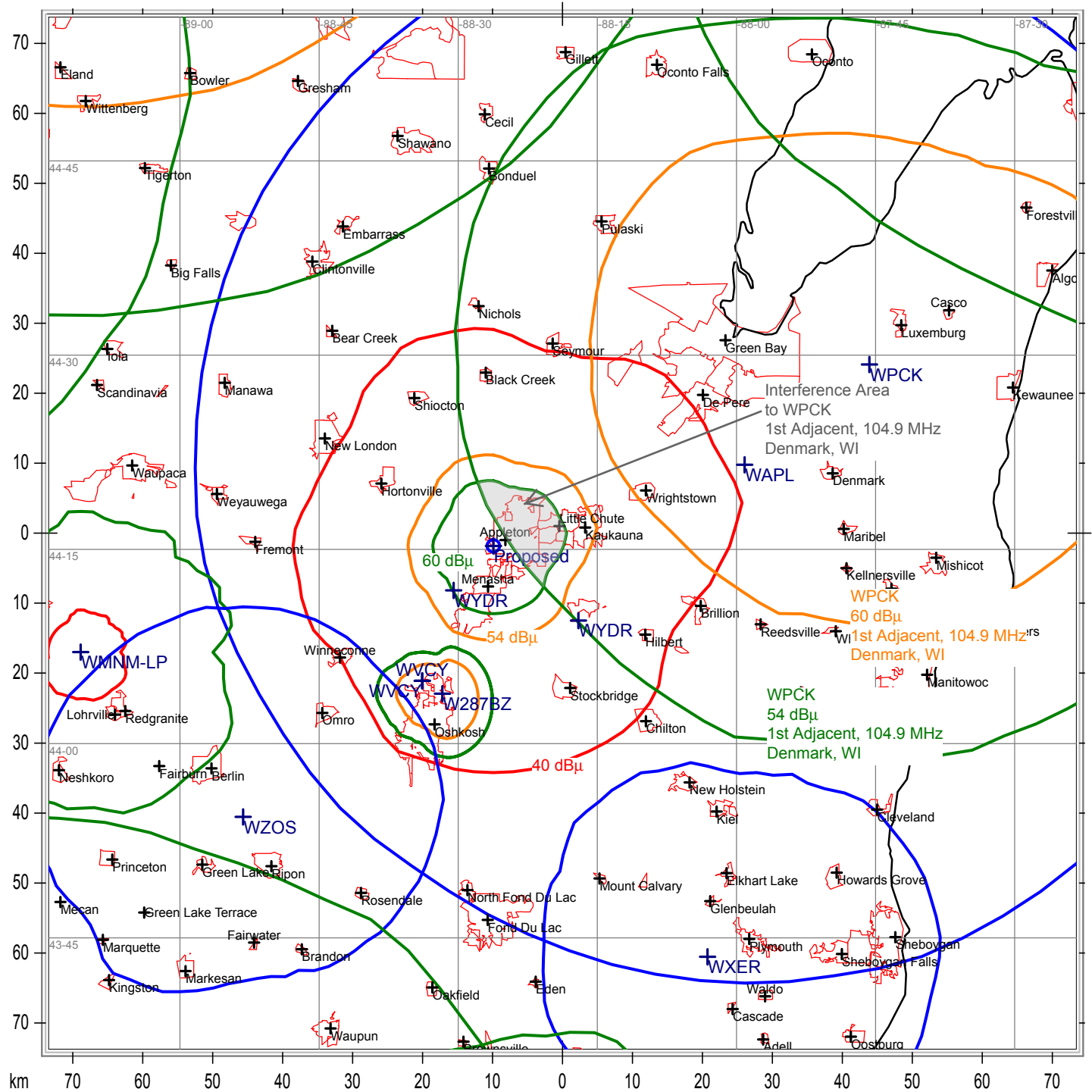
# WSPT Field Strength without Interference from W250CO - 97.9 MHz (Ch. 250)



State Borders City Borders Lat/Lon Grid



Proposed in Relation to Surrounding Stations and WPCK Interference Area -105.1 MHz (Ch. 286)



State Borders City Borders Lat/Lon Grid