

Minor Amendment
To Short Form BNPFT-20030317KAX for Channel 221 Translator
at South Burlington, VT

July 2013

Technical Statement

Nature of Amendment

In order to eliminate mutual exclusivity with another pending translator application, this amendment proposes a change from Channel 275 to Channel 221 (54 channels), a change to a Scala CA-2H H-only directional antenna oriented at 310 degrees True, and an ERP reduction from 5 Watts to 1 Watt, but no change of antenna site.

LPFM Preclusion Study

The proposed translator complies with the Preclusion Showing provisions of FCC Public Notice DA 13-427 dated March 13, 2013. This proposal does not create any new mutually exclusive shortspace. Please see Preclusion Study attached to this application as Exhibit 1.

74.1204 Study

All facilities not meeting the spacing requirements of Section 73.207 with respect to the proposed facility considered as a Class A on proposed Channel 221D were considered.

These are:

<u>Call Sign</u>	<u>Location</u>	<u>Channel No.</u>
WGLY-FM	Bolton, VT	218C3
WCEL	Plattsburgh, NY	220A
WVTK	Port Henry, NY	221C3
WMOO	Derby Center, VT	221C3
WJPL-LP	Barre, VT	LP100

The attached Figures 1A and 1B below illustrate the absence of prohibited overlap between the proposed translator F(50,10) interfering contours and the pertinent service contours of all facilities listed above except WGLY-FM. Also that the proposed translator 60 dBu service contour does not exceed the 60 dBu service contour of co-owned primary station WCLX – both green. (Allocation Study Key: Contours of same color may not overlap.)

The applicant hereby respectfully requests a waiver pursuant to 74.1204(d) with respect to WGLY-FM as described below.

As shown Figure 2, the signal level from WGLY-FM at the proposed translator site is 68.0 dBu. The Commission has generally considered overlap from a proposed translator interfering contour to be acceptable where the ratio of undesired to desired signal (U/D) does not exceed 40 dB, i.e. where in the instant case the proposed translator interfering signal does not exceed 108 dBu.

The proposed translator facility will operate with a maximum ERP of 0.001 kW. The Commission's free space equation indicates that for 0.001 kW, the 108 dBu F(50,10) interfering contour extends 0.028 km (28 meters.)

There are no residences or roads within 28 meters of the proposed site. The applicant therefore believes its application meets the requirements of Section 74.1204(d) with respect to "other factors" insuring no actual interference to WGLY-FM.

Nevertheless, as required by the Commission's Rules, in the event of any complaints that the proposed translator interferes with reception of WGLY-FM, the applicant will take the required steps to eliminate the interference, including, if necessary, reducing power or cessation of translator operation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dennis Jackson", with a stylized flourish at the end.

Dennis Jackson
Westport Broadcasting

July 16, 2013

Figure 1

Section 74.1204 Study

Proposed interfering contours do not overlap any other facilities except WGLY-FM.

(Same color may not overlap)

60 dBu Service Contour lies entirely within that of co-owned primary station WCLX.

(green contours)

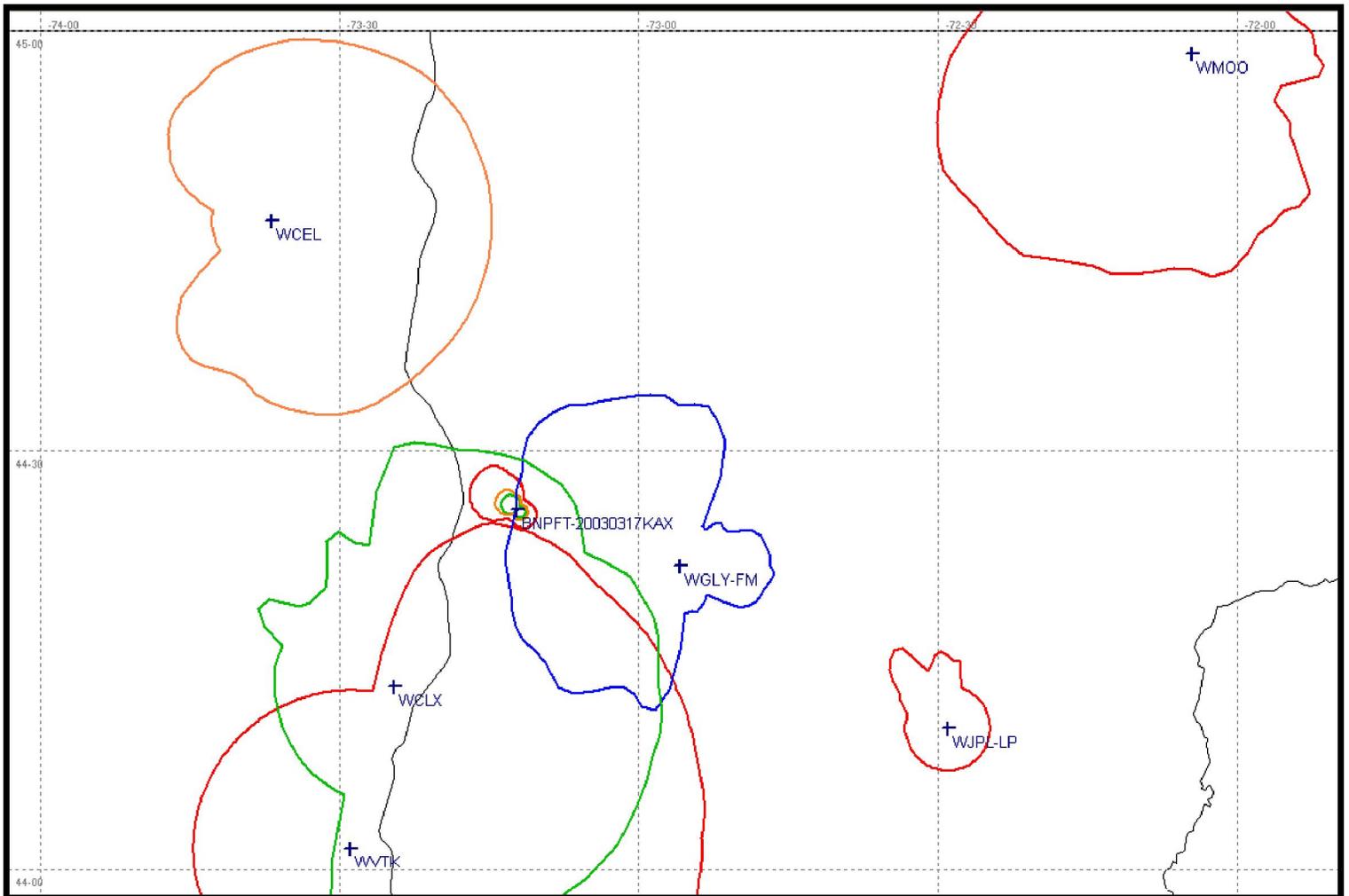


Figure 1B

Section 74.1204 Study (closeup)

(Same color may not overlap.)

WGLY-FM places a 68.0 F(50,50) dBu Service Contour over the proposed site.

Proposed 108 dBu F(50,10) Interfering Contour extends 28 meters max.

