

Comprehensive Technical Statement**In Support of****Pride Productions, Inc.****Application for Minor Modification of Construction Permit BNPL-20131112ATE****WUTY-LP, FCC Facility ID # 193860****Worcester, MA****Second Adjacent Interference Waiver Requested – WKLB-FM and WODS****Introduction**

The applicant proposes the following changes to the captioned Construction Permit:

- Transmitter location
- Antenna height
- Add directional antenna

No other changes are proposed.

Data Sources

Distances were calculated using the FCC method defined in 73.208 of the Commission's Rules.

Except where otherwise noted, contours shown in this report were generated using antenna center above mean sea level, NAD-27 coordinates, and the FCC online HAAT calculator, which uses 30-second terrain data.

Dates shown on maps are the latest entries into the earlier of CDBS and VAX databases.

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Allocation Study ¹

| facid | adj | chan | lpclass | status | call | st | city | kW | da | haat | brg | km | req | Δ | eval |
|--------|-----|-------|---------|--------|---------|----|-----------|---------|----|------|-----|--------|-----|--------|-------|
| 193860 | 0 | 275L1 | L1 | CP | WUTY-LP | MA | WORCESTER | 0.003 | N | 185 | 90 | 0.16 | 24 | -23.84 | STUDY |
| 10542 | 2 | 273B | B | LIC | WKLB-FM | MA | WALTHAM | 14 | N | 276 | 89 | 54.47 | 67 | -12.53 | SHORT |
| 9639 | 2 | 277B | B | LIC | WODS | MA | BOSTON | 8.7 | N | 351 | 89 | 55.55 | 67 | -11.45 | SHORT |
| 9639 | 2 | 277B | B | CP | WODS | MA | BOSTON | 21 | N | 235 | 86 | 67.34 | 67 | 0.34 | CLOSE |
| 7718 | 0 | 275B | B | LIC | WDRC-FM | CT | HARTFORD | 19.54 | Y | 247 | 224 | 113.74 | 112 | 1.74 | CLOSE |
| 192162 | 0 | 275L1 | L1 | CP | WVDP-LP | MA | TEMPLETON | 0.05133 | N | 42 | 334 | 37.27 | 24 | 13.27 | CLEAR |
| 194829 | 0 | 275L1 | L1 | CP | WFPR-LP | MA | FRANKLIN | 0.1 | N | 26 | 122 | 47.07 | 24 | 23.07 | CLEAR |

The proposal meets the spacing requirements with respect to all potential conflicts, with the following exceptions:

- The WUTY-LP Construction Permit, which is being superseded by this modification.
- WKLB, a second-adjacent channel station, for which a waiver is requested.
- WODS, a second-adjacent channel station, for which a waiver is requested.

A second adjacent interference showing is provided below.

¹ The columns in the table include "lpclass," which is the class of the record as determined in accordance with the note to paragraphs a, b, and c in 73.807; "req," which is the separation required by 73.807; and "Δ" which is the margin over that required separation (a negative number here indicates a short spacing).

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Second Adjacent Channel Interference Showing

The two short-spaced second adjacent channel stations are:

- WKLB-FM, FCC Facility ID # 10542, Waltham, MA
- WODS, FCC Facility ID # 8639, Boston, MA

Both stations are Class B, protected to the 54 dBu f(50,50) contour. The allowable interfering signal is 94 dBu f(50,10).



The proposed 94 dBu free space contour is shown as a red polygon on the above Google Earth image. There are no highways or residences within the contour. The only structures are communications towers and associated equipment shelters. Therefore, the proposal comports with the requirements for a second-adjacent interference waiver.

Translator/ Booster Input Interference

There are four translator records within 20 km of the proposed site:

- W247CD (CP) input WFCR channel 203, non-adjacent to proposed channel 275
- W235AV (LIC) input WTAG (AM), no conflict
- W293BN (APP) input WVNE (AM), no conflict
- W249CU (CP) input WSRS channel 241, non-adjacent to proposed channel 275

There are no boosters within 20 km of the proposed site.

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Form 318 Tech Box Data

| | |
|----------------------------|----------------------------------|
| Class | LP100 |
| Channel | 275 |
| Coordinates (NAD-27) | 42 18 11 N Lat 71 53 52 W Lon |
| ASR | 1003939 |
| Site Elevation AMSL | 420 m |
| Overall Tower Height AGL | 77 m |
| Radiation Center AGL | 16 m |
| Power/height certification | YES |
| Separations | NO |
| Short Space | WKLB-FM, WODS |
| Environmental | YES - Exhibit 11 (This document) |

Additional Info

| | |
|--------------------------|------------------------------------|
| Coordinates (NAD-83) | 42 18 11 N Lat 71 53 50 W Lon |
| Effective Radiated Power | 3 W |
| Antenna type | Directional |
| Manufacturer / Model | SCA HDCA5-CP oriented at 120° True |

Minor change

There is no change to the proposed frequency. The relocation amounts to less than 200 meters, which is a small fraction of the allowed 5.6 km distance for a minor change.

International

The FM Agreements with Canada and Mexico require evaluation and potential coordination of any proposal within 320 km of the border.

The distance to the nearest point along the US/Canada border is 300.5 km from the proposed site. Evaluation with respect to Canadian facilities and proposals is required.

Paragraph 4.4 of the February 1991 Working Agreement with Canada, as amended in 2007, provides that LPFM coordination is required only for proposals in which the 34 dBu f(50,10) contour would cross the border.

The maximum extent of the proposed 34 dBu f(50,10) contour is 33.7 km. Given the 300.5 km distance to the border, it is self-evident that the 34 dBu f(50,10) contour will not cross the border. Coordination with Canada is not required.

The distance to the nearest point along the US/Mexico border is 2,928 km. Coordination with Mexico is not required.

Quiet Zones

The proposed site is outside the National Radio Quiet Zone (National Radio Astronomy Observatory Notification Area) in West Virginia.

The proposed site is outside the Arecibo Observatory notification area in Puerto Rico.

The proposed site is not within a 100 km extension of the Table Mountain Radio Receiving Zone in Colorado.

Protected Monitoring Stations

The nearest Protected Monitoring Station is 329 km distant, in Belfast, ME. This is well beyond any potential 80 dBu contour.

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