

**Section 74.1204 - Statement of Compliance**  
**AM Revitalization 250-Mile Window Application**  
**W263CS, Battle Creek, MI to Cleveland, OH, Channel 262**  
**FM Translator Facility ID. 145205**  
**July, 2016**

The Applicant proposes to modify the above-referenced, non-reserved band, FM translator authorization pursuant to the announced “*Second FM translator application modification window for AM stations to modify and/or relocate FM translator stations (Second Modification Window)*”.<sup>1</sup> The FM translator will relocate, change frequency and rebroadcast Class B AM station WHKW(AM), Cleveland, OH (Facility ID 10827). As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached are two maps which demonstrate that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) and first-adjacent channel (See Exhibit 2) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

The required protection to second-adjacent channel station WMMS(FM), Cleveland, OH (Channel 264B) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of the second-adjacent channel, full service station, listed above resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, WMMS(FM) is predicted to produce an F(50,50) signal strength of 86 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator’s relevant interfering contour is the 126 dBu contour relative to WMMS(FM).

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<sup>1</sup> See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

According to free space calculations, the translator's predicted interfering contour will extend only 23 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 229 meters above ground level, the predicted interference area will neither reach ground level nor will the predicted interference area reach any buildings within a 23 meter horizontal distance from the proposed antenna location (See attached aerial image). Therefore, the proposed minor change will cause no interference to any population served by WMMS(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been "demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable".

Section 74.1204 CoChannel  
Contour Overlap Study

Exhibit 1

July, 2016

Key to Stations on Map

- APP.262D.FAC.ID.145205
- WGYY.262B.FAC.ID.24940

**APP.262D.FAC.ID.145205**  
Cleveland, OH  
Latitude: 41-29-54.40 N  
Longitude: 081-41-41.30 W  
ERP: 0.04 kW  
Channel: 262  
Frequency: 100.3 MHz  
AMSIL Height: 435.0 m  
Horiz. Pattern: Omni

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):  
40 dBu F(50,10) to Class A & FX & LPFM  
37 dBu F(50,10) to Class B1 FM Station  
34 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
Class A & FX & LPFM = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

**CTJC**  
Consulting Engineers  
CARL T. JONES CORPORATION

Scale 1:1,462,500

0 20 40 60 km

Section 74.1204 First-Adjacent  
Channel Contour Overlap Study

Exhibit 2

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Key to Stations on Map

- APP.262D.FAC.ID.145205
- WNIR.261A.FAC.ID.41077

APP.262D.FAC.ID.145205

Cleveland, OH  
Latitude: 41-29-54.40 N  
Longitude: 081-41-41.30 W  
ERP: 0.04 kW  
Channel: 262  
Frequency: 100.3 MHz  
AMSL Height: 435.0 m  
Horiz. Pattern: Omni

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):

- 54 dBu F(50,10) to Class A & FX & LPFM
- 51 dBu F(50,10) to Class B1 FM Station
- 48 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):

- Class A & FX & LPFM = 60 dBu F(50,50)
- Class B1 FM Station = 57 dBu F(50,50)
- Class B FM Station = 54 dBu F(50,50)

Scale 1:692,656

0 9 18 27 km



Proposed CH262 Translator Cleveland  
Interfering Contour to WMMs 264B  
extends no further than 23 meters,  
and as seen does not affect any nearby  
occupied structures or reach the ground

Proposed Translator Antenna Location

