

B. W. St. Clair

COMPREHENSIVE TECHNICAL EXHIBIT

**AMENDMENT TO MAJOR CHANGE IN LICENSED FACILITY
W295AP, FCC ID 150909
FCC FILE NUMBER BPFT-20120509AEZ
MEDIA ONE COMMUNICATIONS, INC.**

Introduction; explanation of the within amendment as a "major" amendment. BPFT-20120509AEZ was first filed as a *Minor Change* to licensed facility BLFT-20111207AEO with a request for a *Mattoon Waiver* of the rules. As a practical matter, that filing was a *Major Change* which requested a move of transmitter location which did not show overlap of coverage areas as defined within the 60 dBu F,50,50 contours of the licensed facility and the subject application. Without encumbering the instant amendment with excessive detail, the applicant notes that Commission staff has already telegraphed the unacceptability of BPFT-20120509AEZ as filed by regarding the *Mattoon Waiver* request as inapplicable in this instance.

Thus, the instant amendment attempts to change BPFT-20120509AEZ from a *Major Change* from its underlying license into a *Minor Change* of the same by requesting that the TL not be changed from the licensed site, thus preserving overlap of coverage areas and 60 dBu F50,50 contours. In so doing, the amendment becomes a *Major Amendment* in order to accomplish what should have occurred initially: BPFT-20120509AEZ will now become an amended application for *Minor Change* of BLFT-20111207AEO.

Contents of Comprehensive Technical Exhibit, following pages:

Allocation summary, 53, 54 Channel separation

Allocation summary, Cochannels, Adjacencies

Waiver Request, §74.1204(a)(3) re WRGV, Pensacola, FL

NIER analysis, application as amended

Antenna structure, TOWAIR study

Allotment Detail, 53/54 Channel Separation

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FM Query results:

Call	Channel	Class	Service	Frequency	Status	City	State	Country	File Number	Docket	Dist(km)
FacilityID	ERP	DA?	HAAT	RCAMSL	RCAGL	Latitude	Longitude	ASRN			
Dist(mi)	Azimuth	Licensee/Permittee									
WRKH	241 C	FA	96.1 MHz	USE	MOBILE		AL US	---		-	53142
- kW	- m	- m	- m	- m	N 30 41 20.00	W 87 49 49.00	-	29.39 km	18.26 mi	260.69°	-
WRKH	241 C	FM	96.1 MHz	LIC	MOBILE		AL US	BLH-20050615ACP	-	53142	
77. kW	535. m	569. m	517. m	N 30 41 20.00	W 87 49 49.00	1035771	29.39 km	18.26 mi	260.69°		
CC LICENSES, LLC											

*** 2 FM Records within 40.00 km distance of 30° 43' 55.00" N, 87° 31' 39.00" W ***

Per §74.1204(g) and 73.207(b)(1), the facility may not be filed within 29 km of any authorized $\pm 10.6/10.7$ MHz (53/54 channel) frequency separated FM facility. The within proposal is 29.39 km separated from WRKH, the only such facility in the the area and thus is compliant with that rulepart.

-/-

Allotment Detail, Co-/Adjacent Channel Separation

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FM Query results:

Call FacilityID	Channel ERP	Class Service	Frequency DA?	Status HAAT	City RCAMSL	State RCAGL	Country	File Number	Docket ASRN	Dist (km)
WKNW - kW	292 A - m	FA 106.3 MHz	USE	- m	BREWTON N 31 6	AL US	---	---	-	19430
3.8 kW	127. m	186. m	117. m	39. m	45.00 W 87 1	19.00 -	64.15 km	39.86 mi	48.60° -	
WKNW RADIO INC.										
WAVH 50. kW	293 C2 137. m	FM 106.5 MHz	LIC	143. m	DAPHNE N 30 44	AL US	BMLH-19960111BN	-	3636	
BIGLER BROADCASTING, LLC										
WAVH - kW	293 C2 - m	FA 106.5 MHz	USE	- m	DAPHNE N 30 46	AL US	---	---	-	3636
W293BA 0.027 kW	293 D 56.4 m	FX 106.5 MHz	LIC	83. m	MILTON N 30 39	FL US	BLFT-20070928AAF	-	142989	
99.91° ADX COMMUNICATIONS OF PENSACOLA										
W295BB 0.01 kW	295 D 28.3 m	FX 106.9 MHz	LIC	38. m	FAIRHOPE N 30 30	AL US	BLFT-20071119AFL	-	151023	
234.61° FAITH BROADCASTING, INC.										
W295AP 0.25 kW	295 D 0. m	FX 106.9 MHz	LIC	37. m	BAY MINETTE N 30 43	AL US	BLFT-20111207AEO	-	150909	
0.00° MEDIA ONE COMMUNICATIONS, INC.										
W295AP 0.13 kW	295 D 0. m	FX 106.9 MHz	APP	78. m	PENSACOLA N 30 30	FL US	BPFT-20120509AEZ	-	150909	
130.21° MEDIA ONE COMMUNICATIONS, INC.										
WRGV - kW	297 C0 - m	FA 107.3 MHz	USE	- m	PENSACOLA N 30 42	FL US	---	---	-	63931
WRGV 50. kW	297 C0 488. m	FM 107.3 MHz	LIC	488. m	PENSACOLA N 30 36	FL US	BLH-20080402AAB	-	63931	
CLEAR CHANNEL BROADCASTING LICENSES, INC.										
WRGV 8.5 kW	297 C 429. m	FS 107.3 MHz	LIC	420. m	PENSACOLA N 30 42	FL US	BXMLH-20080521ACB	-	63931	
CLEAR CHANNEL BROADCASTING LICENSES, INC.										

*** 11 FM Records within 70.00 km distance of 30° 43' 55.00" N, 87° 31' 39.00" W ***

With reference to the within application: Among all facilities listed, prohibited overlaps are as follows: W295AP 100 dBu F50,10 contour within WRGV 60 dBu F50,50 contour. W295AP 60 dBu F50,50 contour overlaps WRGV 100 dBu F50,10 contour. See maps attached following for clarity. Waiver request will discuss WRGV overlaps.

WAVH 60 dBu contour close to W295AP 100 dBu contour but is clear.

All others well clear.

-/-

W295AP amdt

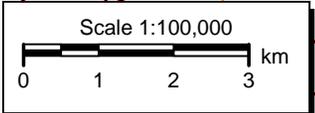
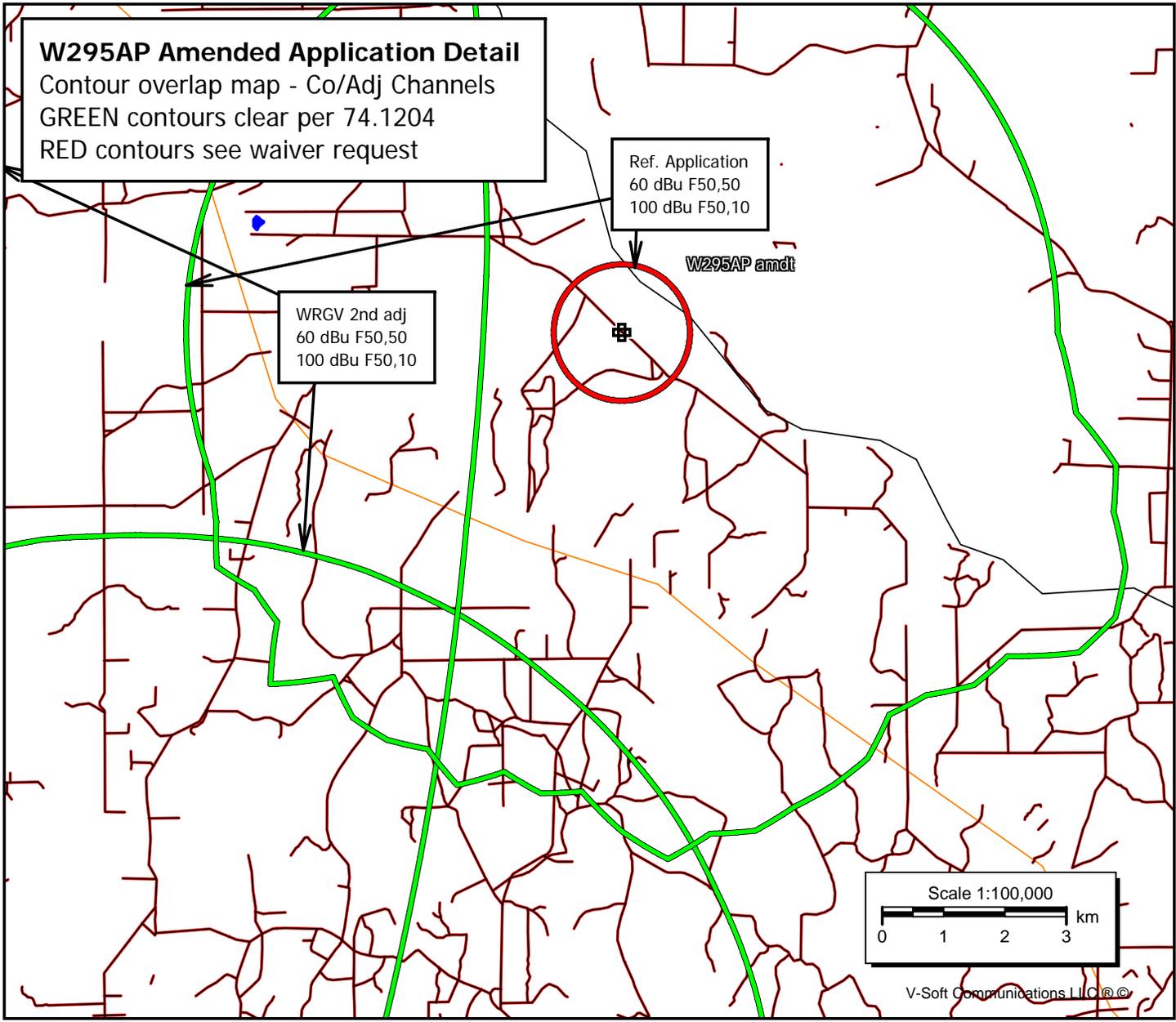
Latitude: 30-43-55.10 N
Longitude: 087-31-39.20 W
ERP: 0.25 kW
Channel: 295
Frequency: 106.9 MHz
AMSL Height: 76.0 m
Elevation: 28.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 3.0 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

W295AP Amended Application Detail
Contour overlap map - Co/Adj Channels
GREEN contours clear per 74.1204
RED contours see waiver request

Ref. Application
60 dBu F50,50
100 dBu F50,10

WRGV 2nd adj
60 dBu F50,50
100 dBu F50,10

W295AP amdt



Prohibited Overlap Waiver Request - Second Adjacent Facility Discussion

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Introduction. Allocation study reveals a single prohibited contour overlap per §74.1204(a)(3). The 100 dBu F50,10 contour of the instant application is contained within the protected 60 dBu F50,50 contour of WRGV, FCC ID 63931, FCC file number BLH-20080402AAB. In accordance with §74.1204(d), the prohibition is inapplicable when actual interference can be shown not to exist due to factors which include lack of population.

Interference Discussion. The tables, which prohibit an applicant's 100 dBu interfering contour within a second adjacent's 60 dBu protected contour contemplate an actual D/U ratio of 40 dB. Using Probe 4 software as provided by V-soft, Inc., the predicted minimum F50,50 signal level of WRGV at any point near the within application's transmitter location is 94.4 dBu. Thus, the 40 dB D/U ratio would yield a prohibited signal level from the within application of 134.4 dBu F50,10. Using the same software, a 134.4 dBu F50,10 contour was placed around the applicant transmitter. The radius of the contour is 20 meters.

Site Discussion. The area contained within the 20 meter radius is itself contained entirely within private property owned by Verren Wilson and Dorothy Lee. The area is heavily forested and would be considered wildland; in this area are no residences, no businesses and no areas where the public will gather or travel.

Conclusion. The only area in which there is a possible prohibited 40 dBu overlap between the within application and existing FM facility WRGV contains no population and is thus excluded by §74.1204(d) from the provisions of §74.1204(a)(3). Thus, waiver of §74.1204(a)(3) during processing is respectfully requested.

NIER Exhibit

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Introduction; calculations. Non-Ionizing Electromagnetic Radiation (NIER) from the within proposal is in compliance with OET Bulletin 65. The proposal was subjected to the checklist with the FCC form 349.

Values Given and Calculated as follows:

Height of antenna C/R above Ground: 40 m; with 2 m head height, operative = 38 m.
ERP is in vertical plane only: 0.25 kW, so total is 0.25 kW.

Calculations:

$$0.25 \times 33.41 = 8.35$$

$$38^2 = 1444$$

$$8.35/1444 \times 100 = \mathbf{0.578\% \text{ of the occupational limit; 2.89\% of the public limit.}$$

-/-

Antenna Structure Exhibit

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Summary:

Antenna structure will be licensee or property owner-provided pole/tower 41 meters in overall height when the antenna is included. The site is subjected to the FCC's TOWAIR study attached following, and shows no requirement for registration.

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Antenna Structure Registration

[FCC](#) > [WTB](#) > [ASR](#) > [Online Systems](#) > TOWAIR

[FCC Site Map](#)

TOWAIR Determination Results

[? HELP](#)

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A routine check of the coordinates, heights, and structure type you provided indicates that this structure does not require registration.

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

PASS SLOPE(100:1)NO FAA REQ - 5741.0 Meters (18835.0 Feet)away & below slope by 37.0 Meters (121.39 Feet)

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	30-41-41.00N	087-01-10.00W	WHITING FIELD NAS SOUTH	SANTA ROSA MILTON, FL	49.1	1829.0999999999999

PASS SLOPE(100:1)NO FAA REQ - 4850.0 Meters (15911.8 Feet)away & below slope by 28.0 Meters (91.8599 Feet)

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	30-42-11.00N	087-01-23.00W	WHITING FIELD NAS SOUTH	SANTA ROSA MILTON, FL	49.1	1829.0999999999999

PASS SLOPE(100:1)NO FAA REQ - 3255.0 Meters (10679.0 Feet)away & below slope by 12.0 Meters (39.3699 Feet)

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	30-42-55.00N	087-01-59.00W	WHITING FIELD	SANTA ROSA	48.5	1829.4000000000001

NAS MILTON,
NORTH FL

**PASS SLOPE(100:1)NO FAA REQ - 3122.0 Meters (10242.6 Feet)away & below
slope by 10.0 Meters (32.8100 Feet)**

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	30-43- 49.00N	087-01- 42.00W	WHITING FIELD NAS NORTH	SANTA ROSA MILTON, FL	48.5	1829.4000000000001

Your Specifications

NAD83 Coordinates

Latitude 30-43-55.8 north
Longitude 087-03-39.1 west

Measurements (Meters)

Overall Structure Height (AGL) 41
Support Structure Height (AGL) 40
Site Elevation (AMSL) 28

Structure Type

POLE - Any type of Pole

[Tower Construction Notifications](#)

Notify Tribes and Historic Preservation Officers of your plans to build a tower.

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Declaration

I declare under penalty of perjury that the facts, findings and claims made in the within FCC 349 form and the attached Comprehensive Technical Exhibit are accurate, true and correct to the best of my knowledge and belief.



Jim McDonald
July 27, 2012