

MUTUAL EXCLUSIVITY ANALYSIS AND RESOLUTION

SUMMIT MEDIA BROADCASTING, LLC

PROPOSED FM TRANSLATORS LISTED IN MX GROUP 87 OF AUCTION 99

NEW CH 221D 250 WATTS DA FAC ID 200358 BNPFT-20170726AJT SUTTON, WV

NEW CH 223D 175 WATTS OMNI FAC ID 200388 BNPFT-20170726APD RICHWOOD, WV

MUTUAL EXCLUSIVITY

The above noted applications are considered mutually exclusive because they propose the same transmitter site and they are second adjacent channels. As such, the applications would be viewed as violating Section 74.1204(a)(3) as the 100 dBu interfering contour of one translator would be expected to overlap the 60 dBu service contour of the other translator.

REMOVAL OF MUTUAL EXCLUSIVITY

The applications are demonstrated to have no mutual exclusivity by requesting a waiver of Section 74.1201(a)(3) utilizing free space methodology and by evaluation of the nature of the site. The co located site is an unregistered 49 meter tower located on a mountain in a rural area of West Virginia where the ground elevation is 917 meters AMSL. Inspection of Google Earth satellite view, Figure 1 attached, shows that there are no structures or possible permanent population within a 2,850 foot radius of the proposed site.

For a violation of 74.1204(a)(3) to exist, the interfering translator signal must be 40 dB greater than the desired signal. The proposed co located second adjacent channel translators propose one bay or two bay elevation patterns and the respective ERP's of 175 watts and 250 watts are 1.5 dB different. Thus, it is not possible that one translator can interfere with the other because the signal levels are so closely matched.

An additional proof of no interference can be seen by employing the FCC Curves for FM available on the Media Bureau web site. The HAAT for both translators is 254 meters. Distance to the 100 dBu interfering contour is:

CH 221 250 watts 100 dBu F(50,10) = 0.862 kilometers

CH 223 175 watts 100 dBu F(50,10) = 0.598 kilometers

In both cases the interfering contour lies inside the rural area on Figure 1 which has no population.

Based on the above analysis, it is believed that a showing of non interference between these two proposed second adjacent co located translators has been adequately demonstrated. However, in an abundance of caution, a waiver of Section 74.1204 of the Rules is respectfully requested.

FIGURE 1

CH 221 & CH 223 FM TRANSLATOR SITE LOCATION IN RELATION TO RURAL AREA.
NO STRUCTURES OR POPULATION WITHIN 2,850 FEET (0.868 KILOMETER)

Legend

- Circle Measure
- NEW(FX) - App

