

**Section 74.1204 - Statement of Compliance  
AM Revitalization Auction 99 FM Translator  
Long-Form Application Filing Window  
NEW FM Translator Station Facility ID. 201335  
Tech Box Proposal FCC File No. BNPFT-20170728AAE  
December, 2017**

The instant “Long Form Application for FM Translator in Auction Window 99” is filed in response to the FCC’s Public Notice, DA 17-1068, Released November 1, 2017, for a new FM translator station to rebroadcast Class D AM station: WRUS, Russellville, KY (Facility ID 73971). The Public Notice announced a window, opening from December 1, 2017, to December 21, 2017, for the filing of FM translator new station construction permit applications for singleton “Tech Box” proposals such as the Tech Box proposal referenced above. As a “singleton” proposal, the instant application is exempt from the Commission’s auction procedures.

This long-form application specifies the identical technical facility as previously submitted in the Tech Box proposal. Accordingly, the instant proposal may be considered a “minor change”. Further, the instant long-form application does not create a new conflict to any pending Auction 99 Tech Box proposal, or to any prior-filed Form 349 application. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules

Section 74.1204 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 protection considerations not represented herein.

Section 74.1204 CoChannel  
Contour Overlap Study

Exhibit 1

December, 2017

Key to Stations on Map

- FX.APP.231D
- WFFH.231A.FAC.ID.68347
- WLYE-FM.231A.FAC.ID.57897

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):  
40 dBu F(50,10) to Class A & FX & LPFM  
40 dBu F(50,10) to Class C, C0, C1, C2, C3  
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, C, Cx, 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 1:975,000



FX.APP.231D

Russellville, KY  
Latitude: 36-50-40.80 N  
Longitude: 086-55-21 W  
ERP: 0.25 kW  
Channel: 231  
Frequency: 94.1 MHz  
AMSL Height: 355.0 m  
Horiz. Pattern: Omni

Section 74.1204 First-Adjacent  
Channel Contour Overlap Study

Exhibit 2 December, 2017

Hardin  
Key to Stations on Map

- FX.APP.231D
- WKTG.230C2.FAC.ID.60877
- W230AD.230D.FAC.ID.67635
- WRND-FM.232A.FAC.ID.14915

**FX.APP.231D**  
Russellville, KY  
Latitude: 36-50-40.80 N  
Longitude: 086-55-21 W  
ERP: 0.25 kW  
Channel: 231  
Frequency: 94.1 MHz  
AMSL Height: 355.0 m  
Horiz. Pattern: Omni

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):  
54 dBu F(50,10) to Class A & FX & LPFM  
54 dBu F(50,10) to Class C, C0, C1, C2 & C3  
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 C, C0, C1, C2 & C3 = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

