

TECHNICAL STATEMENT  
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT  
RADIO STATION WALR-FM  
PALMETTO, GEORGIA  
CH 281C1 50 KW (H&V) 145 M

This Technical Statement was prepared on behalf of Cox Radio, Inc. (“Cox Radio”) in support of an application for construction permit for radio station WALR-FM to relocate transmitter site and change its Class from C1 to C2 on current channel 281 (104.1 MHz) at Palmetto, Georgia.

Response to Paragraph 5 – Tower Registration/FAA Notification

The applicant is proposing a site with a current site registration (ASRN 1293650) and tower structure covered by an FAA Determination of No Hazard to Air Navigation (FAA Study No. 2014-ASO-7004-OE). Cox Radio retained an aviation communications consultant to assist Cox Radio in addressing instances in which aviation instrument landing system (“ILS”) receivers in the Atlanta area could experience an increase in potential interference based on the FAA’s Airspace Analysis Model (AAM) from the implementation of the facilities proposed in this application. From initial contacts with the Federal Aviation Administration (“FAA”), Cox Radio believes there are options available to address the potential impact on ILS receivers.

Response to Paragraph 13 – Allotment

Figure 1 is a separation study from the proposed allotment reference coordinates which are also the proposed transmitter site coordinates. As shown, the proposed allotment reference site/proposed transmitter site complies with the minimum distance separation requirements of Section 73.207 for Class C2 operation on channel 281 towards all existing, authorized and proposed stations and allotments.

Figure 2 is a map which demonstrates that the allotment coordinates/proposed transmitter site complies with the provisions of Sections 73.203(b) and 73.315. Specifically, Figure 2 depicts the 70 dBu contours based on maximum Class C2 facilities (ERP 50 kW/HAAT 150 meters) and presuming uniform terrain (FCC allotment stage requirement), and based on the proposed facilities (ERP

50 kW (H&V)/HAAT 145 meters) and actual terrain (FCC application stage requirement). As shown, operation from the proposed site will provide the requisite city grade signal to all of Palmetto. The Palmetto city limits shown on Figure 2 were obtained from a map contained in the 2010 U.S. Census of Population.

RF Hazard Statement

With respect to the potential for human exposure to radio frequency (RF) radiation, calculations prepared in accordance with FCC Bulletin OET-65 (Edition 97-01) indicate that the proposal will not result in human exposure to RF radiation at ground level in excess of FCC standards.

The proposed facility will employ an ERI 4-bay ½-wave spaced “rototiller” type antenna. An RF exposure analysis conducted using the FCC *FMMModel* (released March 26, 2016, DA 16-340) indicates that the RF exposure at 2 m above ground anywhere in the vicinity of the proposed facility will not exceed 5.6  $\mu\text{W}/\text{cm}^2$ , which is equivalent to 2.8% of the FCC exposure limit for general population / uncontrolled environments of 200  $\mu\text{W}/\text{cm}^2$ .

Therefore, based on these results, the proposal complies with the FCC limits for human exposure to RF radiation and it is categorically excluded from environmental processing. The applicant shall reduce power or cease operation as necessary to protect persons having access to the tower or antenna from radio frequency radiation in excess of the FCC guidelines.<sup>1</sup> In addition, public access to the tower site will be restricted. Furthermore, the site will be appropriately marked with RF radiation warning signs.



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du Treil, Lundin & Rackley, Inc.  
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June 29, 2016

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<sup>1</sup> See Sections 1.1307 and 1.1310 of the FCC Rules.

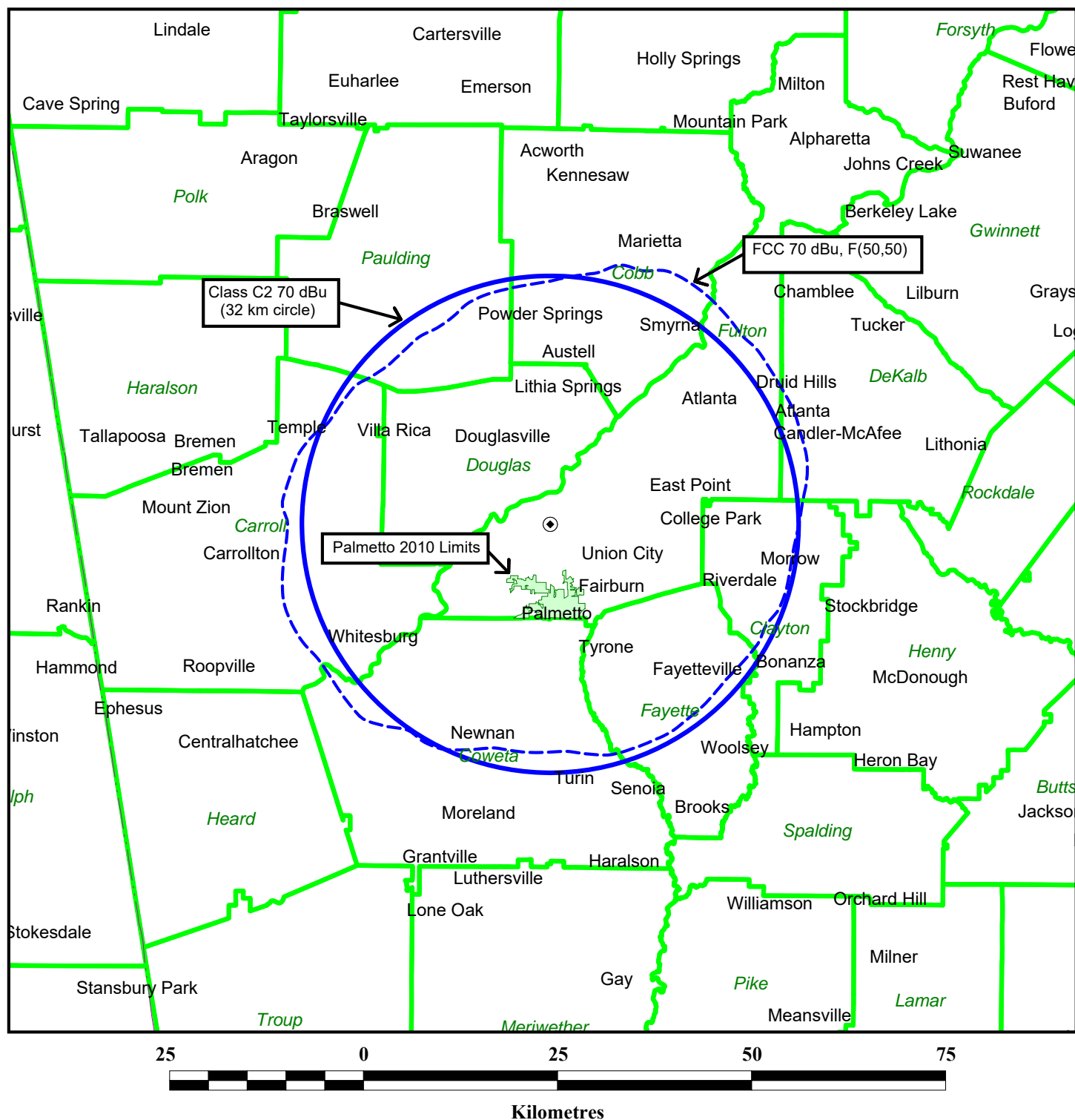
SECTION 73.207 SEPARATION STUDY - PROPOSED WALR CH 281C2 ALLOTMENT COORDINATES/PROPOSED SITE

Channel: 281 Coordinates: 033-37-11 084-40-13 (NAD 27)  
 Class: C2 Buffer Distance: 20 km

Date: 06/22/2016  
 Page: 1 of 1

Callsign	Status	Chan.	Serv.	Freq.	City	State	Latitude	Dist.(km)	Sep.(km)	Spacing(km)		
Fac. ID	ARN			Class	DA	Ant. ID	ERP(kW)	HAAT(m)	Longitude	Bear.(deg)	73.215	Comment
<b>WALR-FM</b>	LIC	281	FM	104.1	GREENVILLE	GA	033-24-43	27.62	239	-211.38		
48728	BLH 20070314ABH			C0	N		100	371	084-50-03	213.38	<b>227 Y</b>	<b>SHORT</b>
<b>WCLE-FM</b>	CP	281	FM	104.1	CALHOUN	TN	035-15-59	183.32	166	17.32		
55099	BPH 20130911ABJ			A	N		2.2	159	084-50-23	355.2	<b>143 Y</b>	<b>CLEAR</b>
<b>WCLE-FM</b>	LIC	281	FM	104.1	CALHOUN	TN	035-15-59	183.32	166	17.32		
55099	BLH 20040709ACQ			A	D 64684		2.3	159	084-50-23	355.2	<b>143 Y</b>	<b>CLEAR</b>
<b>WZTR</b>	LIC	282	FM	104.3	DAHLONEGA	GA	034-29-56	109.02	106	3.02		
34319	BLH 20040709ACR			A	D 64683		3.7	127	084-08-32	26.31	<b>89 Y</b>	<b>CLOSE</b>
<b>WFSH-FM</b>	LIC	284	FM	104.7	ATHENS	GA	033-52-02	82.66	79	3.66		
56390	BMLH 20060726APQ			C1	N		24	505	083-49-44	70.29	<b>73 N</b>	<b>CLOSE</b>

Figure 2



## COMPLIANCE WITH SECTION 73.315

FM STATION WALR-FM  
PALMETTO, GEORGIA  
CH 281C2 50 KW (H&V) 145 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida