

**Amended Section 74.1204 - Statement of Compliance**  
**AM Revitalization 250-Mile Window Application**  
**W279BK, Carbondale, PA to Pittsburgh, PA, Channel 223**  
**FM Translator Facility ID. 145973**  
**August, 2017**

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 WPGP(AM), Pittsburgh, PA (Facility ID 65691). As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules. This technical amendment reduces, slightly, the antenna height and proposed ERP.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent co-channel (See Exhibit 13) 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 stations 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 stations shown in Exhibit 13A which results in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, WLTJ Pittsburgh, PA BLH20060707AAC Channel: 225B is predicted to produce an F(50,50) signal strength of 93.2 dBu while WPTS-FM Pittsburgh, PA BLED20060705AAC Channel: 221D is predicted to produce an F(50,50) signal strength of only 65.3 dBu. Therefore, WPTS-FM provides for a worst-case interference analysis.

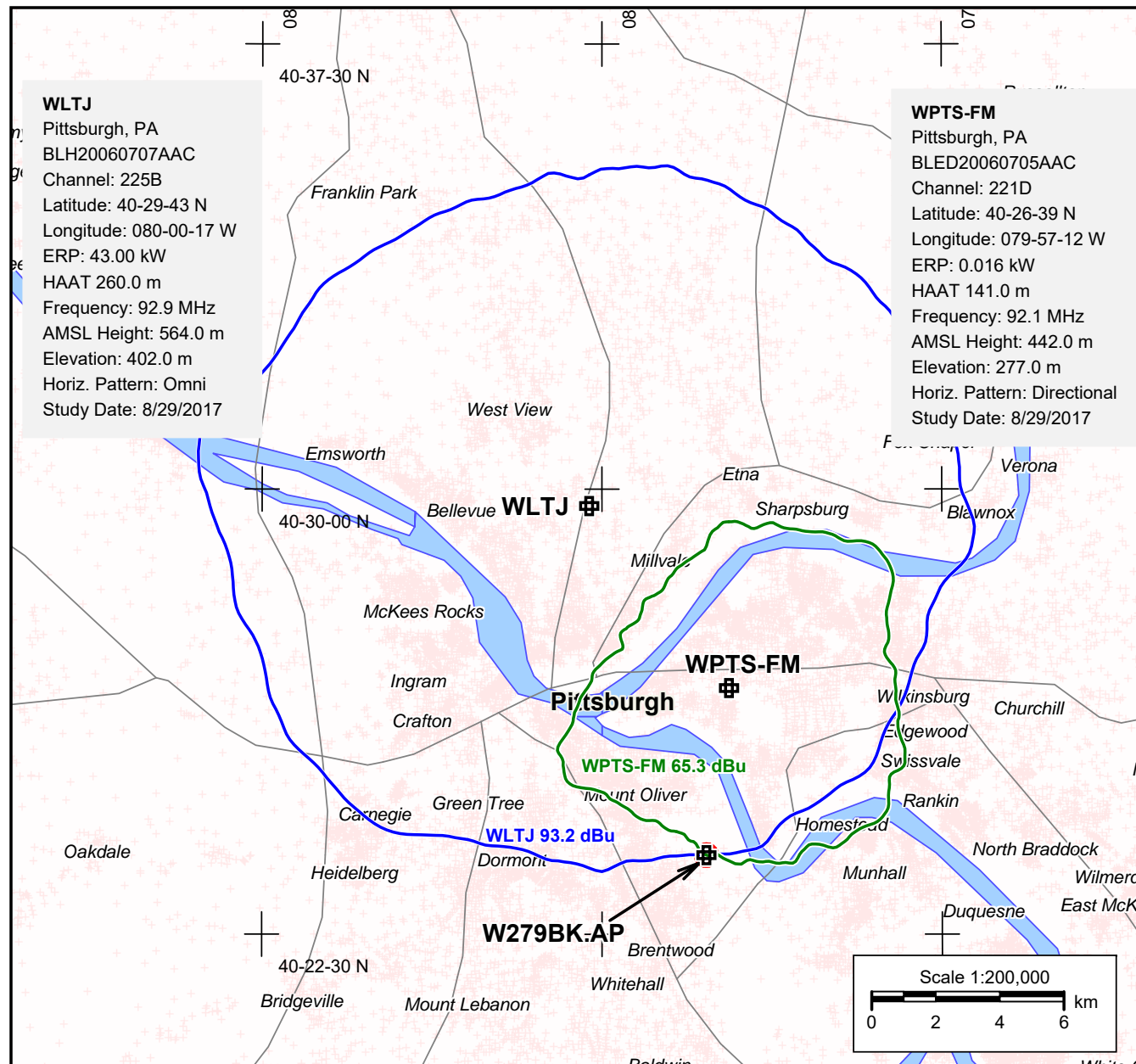
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<sup>1</sup> See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

In the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 105.3 dBu contour relative to WPTS-FM. According to free space calculations the translator's worst-case predicted 105.3 dBu contour will not reach within 30 feet of the ground. (See the attached Table). As shown on the attached aerial view map, there are no roadways, low clearance buildings or residences located near the proposed transmitter site. Therefore, the translator's worst-case interfering contour relative to WPTS-FM does not reach any buildings or major roads where there may be an affected population. Therefore, the proposed minor change will cause no interference to any population served by WPTS-FM or by WLTJ(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".

## Exhibit 13 A - 47 CFR 74.1204 Compliance to Adjacents - D/U Analysis



### 47 C.F.R. 74.1204 Compliance

A desired to undesired (D/U) Analysis of the protected 2nd adjacent signals to the proposed translator shows that WLTJ 225B places a signal strength of 93.2 dBu at the translator tower site. WPTS-FM 221D places a signal strength of 65.3 dBu at the translator site. The more restrictive of these defines the translator interfering signal level as 105.3 dBu. The following sheet contains a table that shows the 105.3 dBu translator signal will not extend within 30 feet of the ground.

There are no tall occupied structures within 440 meters of the translator tower site.

**W279BK App**  
**Pittsburgh PA FACID 145973**

**ERP 110.00 WATTS**

**Maximum ERP** *Interfering contour value ----->* **105** dBu  
0.11 kW *RCAGL (m)----->* **75** meters  
*Antenna Type ----->* **3**

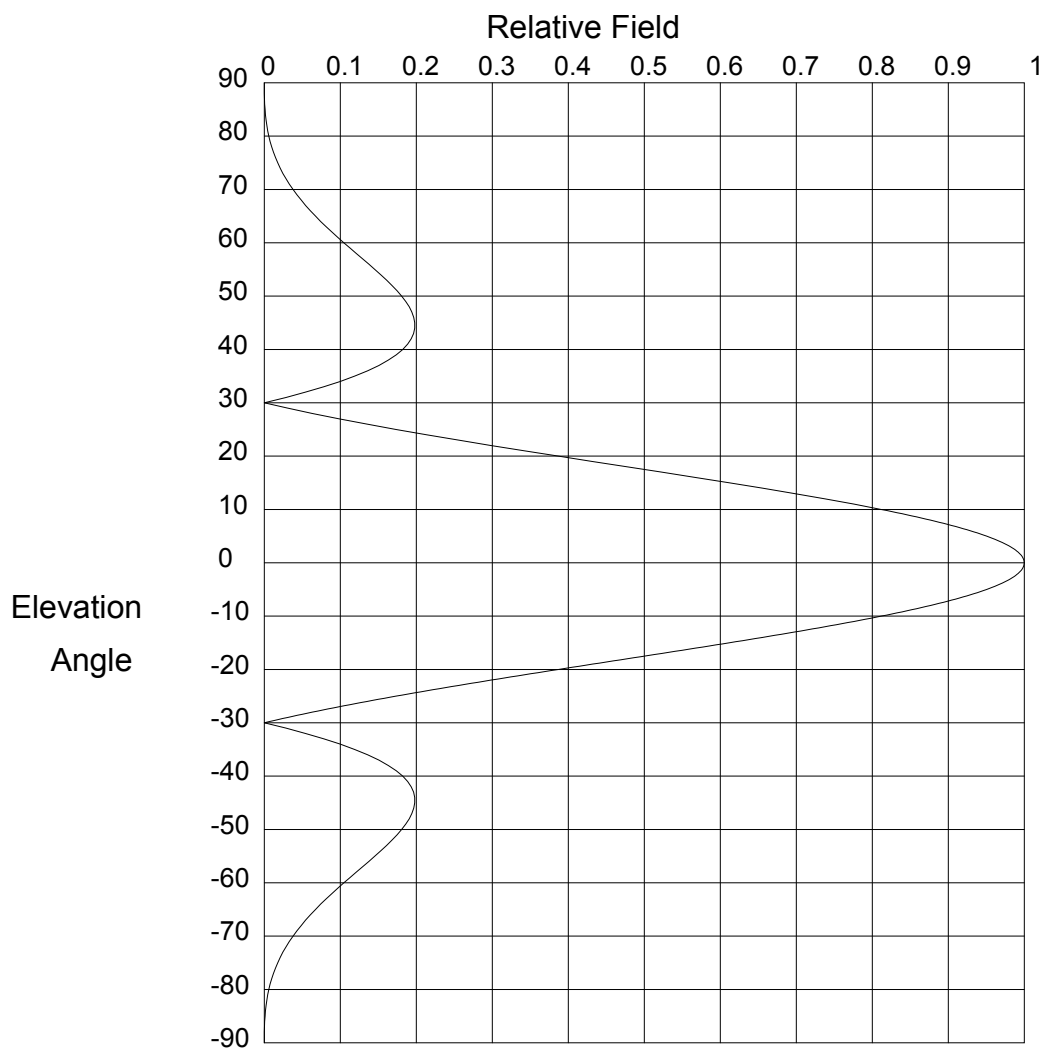
Antenna Type 3 = **SWR FMEE 4-bay 1/2 wave**

Angle Below Horizontal (degrees)	Vertical Pattern (REL. FIELD)	W279BK App ERP (kW)	W279BK App ERP (dBk)	W279BK App Free-Space Distance to interfering contour (meters)	Slant Distance (meters) *	Height of interfering contour above ground (feet)**	Proposed Interference within 30 ' of ground level?	Horizontal Distance (meters) ***	Horizontal Distance (feet) ***
0	1.000	0.1100	-9.586	412.8	N/A	246.1			1354.2
5	0.950	0.0993	-10.032	392.1	756.1	133.9	No	390.6	1281.6
10	0.812	0.0725	-11.395	335.2	379.5	55.1	No	330.1	1082.9
15	0.612	0.0412	-13.851	252.6	254.6	31.6	No	244.0	800.5
20	0.387	0.0165	-17.832	159.7	192.7	66.8	No	150.1	492.5
25	0.174	0.0033	-24.775	71.8	155.9	146.5	No	65.1	213.6
30	0.001	0.0000	-69.586	0.4	131.8	245.4	No	0.4	1.2
35	0.119	0.0016	-28.075	49.1	114.9	153.6	No	40.2	132.0
40	0.182	0.0036	-24.385	75.1	102.5	87.6	No	57.5	188.8
45	0.198	0.0043	-23.653	81.7	93.2	56.5	No	57.8	189.6
50	0.181	0.0036	-24.433	74.7	86.0	58.3	No	48.0	157.6
55	0.146	0.0023	-26.299	60.3	80.4	84.1	No	34.6	113.4
60	0.105	0.0012	-29.162	43.3	76.1	122.9	No	21.7	71.1
65	0.067	0.0005	-33.065	27.7	72.7	163.8	No	11.7	38.3
70	0.038	0.0002	-37.990	15.7	70.1	197.7	No	5.4	17.6
75	0.018	0.0000	-44.481	7.4	68.2	222.5	No	1.9	6.3
80	0.006	0.0000	-54.023	2.5	66.9	238.1	No	0.4	1.4
85	0.001	0.0000	-69.586	0.4	66.2	244.7	No	0.0	0.1
90	0.001	0.0000	-69.586	0.4	65.9	244.7	No	0.0	0.0

\* Slant distance from antenna center of radiation to location 30 feet (9.1 meters) above ground level at angle below horizontal.

\*\* A negative number indicates that the interfering contour is predicted to reach ground level. If a negative number is present, the interfering contour reaches ground level at the "Horizontal Distance" described below.

\*\*\* Horizontal distance from tower base to interfering contour at the indicated height above ground level. If a negative height above ground level is indicated, this horizontal distance is the distance from the tower base to the interfering contour. This horizontal distance is only relevant if the proposed interference is predicted to occur within 30 feet of ground level.



Elevation Pattern

Scale: Linear

Units: Field, Relative

## Systems With Reliability

CLIENT: W279BK\_223

Date: 4/11/2017

ANTENNA TYPE: FMEE/4-HWS-TA

FREQUENCY: 92.5 MHz

PATTERN POL.: Elliptical

DIRECTIVITY(Peak): 2.627/4.195 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 2.627/4.195 dBd

Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
90.0	.00 (-50)	52.0	.168 (-15.488)	14.0	.655 (-3.674 )
89.0	.00 (-91.156)	51.0	.175 (-15.15)	13.0	.697 (-3.135 )
88.0	.00 (-78.01)	50.0	.181 (-14.854)	12.0	.737 (-2.646 )
87.0	.00 (-69.988)	49.0	.186 (-14.601)	11.0	.776 (-2.205 )
86.0	.001 (-64.112)	48.0	.191 (-14.393)	10.0	.812 (-1.809 )
85.0	.001 (-59.441)	47.0	.194 (-14.232)	9.8	.819 (-1.735 )
84.0	.002 (-55.547)	46.0	.197 (-14.121)	9.6	.826 (-1.663 )
83.0	.002 (-52.201)	45.0	.198 (-14.065)	9.4	.833 (-1.592 )
82.0	.003 (-49.264)	44.0	.198 (-14.066)	9.2	.839 (-1.523 )
81.0	.005 (-46.646)	43.0	.197 (-14.132)	9.0	.846 (-1.456 )
80.0	.006 (-44.281)	42.0	.193 (-14.268)	8.8	.852 (-1.39 )
79.0	.008 (-42.127)	41.0	.189 (-14.483)	8.6	.858 (-1.326 )
78.0	.01 (-40.149)	40.0	.182 (-14.79)	8.4	.865 (-1.264 )
77.0	.012 (-38.32)	39.0	.174 (-15.202)	8.2	.871 (-1.203 )
76.0	.015 (-36.621)	38.0	.163 (-15.742)	8.0	.877 (-1.144 )
75.0	.018 (-35.036)	37.0	.151 (-16.436)	7.8	.882 (-1.086 )
74.0	.021 (-33.551)	36.0	.136 (-17.328)	7.6	.888 (-1.03 )
73.0	.025 (-32.156)	35.0	.119 (-18.483)	7.4	.894 (-0.976 )
72.0	.029 (-30.843)	34.0	.10 (-20.011)	7.2	.899 (-0.923 )
71.0	.033 (-29.603)	33.0	.078 (-22.118)	7.0	.905 (-0.871 )
70.0	.038 (-28.431)	32.0	.055 (-25.266)	6.8	.91 (-0.822 )
69.0	.043 (-27.321)	31.0	.028 (-30.932)	6.6	.915 (-0.773 )
68.0	.049 (-26.269)	30.0	.00 (-50)	6.4	.92 (-0.727 )
67.0	.055 (-25.271)	29.0	.031 (-30.277)	6.2	.925 (-0.681 )
66.0	.061 (-24.324)	28.0	.063 (-23.956)	6.0	.929 (-0.638 )
65.0	.067 (-23.425)	27.0	.098 (-20.153)	5.8	.934 (-0.595 )
64.0	.074 (-22.573)	26.0	.135 (-17.391)	5.6	.938 (-0.555 )
63.0	.082 (-21.764)	25.0	.174 (-15.209)	5.4	.942 (-0.515 )
62.0	.089 (-20.998)	24.0	.214 (-13.399)	5.2	.947 (-0.478 )
61.0	.097 (-20.273)	23.0	.255 (-11.853)	5.0	.95 (-0.441 )
60.0	.105 (-19.587)	22.0	.298 (-10.506)	4.8	.954 (-0.406 )
59.0	.113 (-18.941)	21.0	.342 (-9.313)	4.6	.958 (-0.373 )
58.0	.121 (-18.333)	20.0	.387 (-8.248)	4.4	.961 (-0.341 )
57.0	.129 (-17.764)	19.0	.432 (-7.289)	4.2	.965 (-0.311 )
56.0	.138 (-17.232)	18.0	.477 (-6.422)	4.0	.968 (-0.282 )
55.0	.146 (-16.738)	17.0	.523 (-5.635)	3.8	.971 (-0.254 )
54.0	.153 (-16.283)	16.0	.568 (-4.919)	3.6	.974 (-0.228 )
53.0	.161 (-15.866)	15.0	.612 (-4.267)	3.4	.977 (-0.203 )

## Systems With Reliability

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CLIENT: W279BK\_223

Date: 4/11/2017

ANTENNA TYPE: FMEE/4-HWS-TA

FREQUENCY: 92.5 MHz

PATTERN POL.: Elliptical

DIRECTIVITY(Peak): 2.627/4.195 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 2.627/4.195 dBd

Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
3.2	.98 (-0.18)	-4.4	.961 (-0.341)	-12.0	.737 (-2.646 )
3.0	.982 (-0.158)	-4.6	.958 (-0.373)	-12.2	.729 (-2.74 )
2.8	.984 (-0.138)	-4.8	.954 (-0.406)	-12.4	.721 (-2.836 )
2.6	.986 (-0.119)	-5.0	.95 (-0.441)	-12.6	.713 (-2.933 )
2.4	.988 (-0.101)	-5.2	.947 (-0.478)	-12.8	.705 (-3.033 )
2.2	.99 (-0.085)	-5.4	.942 (-0.515)	-13.0	.697 (-3.135 )
2.0	.992 (-0.07)	-5.6	.938 (-0.555)	-13.2	.689 (-3.238 )
1.8	.993 (-0.057)	-5.8	.934 (-0.595)	-13.4	.68 (-3.344 )
1.6	.995 (-0.045)	-6.0	.929 (-0.638)	-13.6	.672 (-3.452 )
1.4	.996 (-0.034)	-6.2	.925 (-0.681)	-13.8	.664 (-3.562 )
1.2	.997 (-0.025)	-6.4	.92 (-0.727)	-14.0	.655 (-3.674 )
1.0	.998 (-0.018)	-6.6	.915 (-0.773)	-14.2	.647 (-3.788 )
.8	.999 (-0.011)	-6.8	.91 (-0.822)	-14.4	.638 (-3.904 )
.6	.999 (-0.006)	-7.0	.905 (-0.871)	-14.6	.629 (-4.023 )
.4	1.00 (-0.003)	-7.2	.899 (-0.923)	-14.8	.621 (-4.144 )
.2	1.00 (-0.001)	-7.4	.894 (-0.976)	-15.0	.612 (-4.267 )
.0	1.00 (0)	-7.6	.888 (-1.03)	-15.2	.603 (-4.392 )
-.2	1.00 (-0.001)	-7.8	.882 (-1.086)	-15.4	.594 (-4.52 )
-.4	1.00 (-0.003)	-8.0	.877 (-1.144)	-15.6	.585 (-4.651 )
-.6	.999 (-0.006)	-8.2	.871 (-1.203)	-15.8	.577 (-4.783 )
-.8	.999 (-0.011)	-8.4	.865 (-1.264)	-16.0	.568 (-4.919 )
-1.0	.998 (-0.018)	-8.6	.858 (-1.326)	-16.2	.559 (-5.057 )
-1.2	.997 (-0.025)	-8.8	.852 (-1.39)	-16.4	.55 (-5.197 )
-1.4	.996 (-0.034)	-9.0	.846 (-1.456)	-16.6	.541 (-5.34 )
-1.6	.995 (-0.045)	-9.2	.839 (-1.523)	-16.8	.532 (-5.486 )
-1.8	.993 (-0.057)	-9.4	.833 (-1.592)	-17.0	.523 (-5.635 )
-2.0	.992 (-0.07)	-9.6	.826 (-1.663)	-17.2	.514 (-5.786 )
-2.2	.99 (-0.085)	-9.8	.819 (-1.735)	-17.4	.505 (-5.941 )
-2.4	.988 (-0.101)	-10.0	.812 (-1.809)	-17.6	.496 (-6.098 )
-2.6	.986 (-0.119)	-10.2	.805 (-1.885)	-17.8	.486 (-6.259 )
-2.8	.984 (-0.138)	-10.4	.798 (-1.962)	-18.0	.477 (-6.422 )
-3.0	.982 (-0.158)	-10.6	.791 (-2.041)	-18.2	.468 (-6.589 )
-3.2	.98 (-0.18)	-10.8	.783 (-2.122)	-18.4	.459 (-6.759 )
-3.4	.977 (-0.203)	-11.0	.776 (-2.205)	-18.6	.45 (-6.932 )
-3.6	.974 (-0.228)	-11.2	.768 (-2.29)	-18.8	.441 (-7.109 )
-3.8	.971 (-0.254)	-11.4	.761 (-2.376)	-19.0	.432 (-7.289 )
-4.0	.968 (-0.282)	-11.6	.753 (-2.464)	-19.2	.423 (-7.473 )
-4.2	.965 (-0.311)	-11.8	.745 (-2.554)	-19.4	.414 (-7.661 )

## Systems With Reliability

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CLIENT: W279BK\_223

Date: 4/11/2017

ANTENNA TYPE: FMEE/4-HWS-TA

FREQUENCY: 92.5 MHz

PATTERN POL.: Elliptical

DIRECTIVITY(Peak): 2.627/4.195 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 2.627/4.195 dBd

Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
-19.6	.405 (-7.853)	-27.2	.091 (-20.807)	-54.0	.153 (-16.283 )
-19.8	.396 (-8.048)	-27.4	.084 (-21.506)	-55.0	.146 (-16.738 )
-20.0	.387 (-8.248)	-27.6	.077 (-22.258)	-56.0	.138 (-17.232 )
-20.2	.378 (-8.452)	-27.8	.07 (-23.071)	-57.0	.129 (-17.764 )
-20.4	.369 (-8.66)	-28.0	.063 (-23.956)	-58.0	.121 (-18.333 )
-20.6	.36 (-8.873)	-28.2	.057 (-24.93)	-59.0	.113 (-18.941 )
-20.8	.351 (-9.091)	-28.4	.05 (-26.012)	-60.0	.105 (-19.587 )
-21.0	.342 (-9.313)	-28.6	.043 (-27.232)	-61.0	.097 (-20.273 )
-21.2	.333 (-9.541)	-28.8	.037 (-28.632)	-62.0	.089 (-20.998 )
-21.4	.325 (-9.774)	-29.0	.031 (-30.277)	-63.0	.082 (-21.764 )
-21.6	.316 (-10.012)	-29.2	.024 (-32.277)	-64.0	.074 (-22.573 )
-21.8	.307 (-10.256)	-29.4	.018 (-34.839)	-65.0	.067 (-23.425 )
-22.0	.298 (-10.506)	-29.6	.012 (-38.424)	-66.0	.061 (-24.324 )
-22.2	.29 (-10.762)	-29.8	.006 (-44.509)	-67.0	.055 (-25.271 )
-22.4	.281 (-11.024)	-30.0	.00 (-50)	-68.0	.049 (-26.269 )
-22.6	.272 (-11.293)	-31.0	.028 (-30.932)	-69.0	.043 (-27.321 )
-22.8	.264 (-11.57)	-32.0	.055 (-25.266)	-70.0	.038 (-28.431 )
-23.0	.255 (-11.853)	-33.0	.078 (-22.118)	-71.0	.033 (-29.603 )
-23.2	.247 (-12.145)	-34.0	.10 (-20.011)	-72.0	.029 (-30.843 )
-23.4	.239 (-12.445)	-35.0	.119 (-18.483)	-73.0	.025 (-32.156 )
-23.6	.23 (-12.754)	-36.0	.136 (-17.328)	-74.0	.021 (-33.551 )
-23.8	.222 (-13.072)	-37.0	.151 (-16.436)	-75.0	.018 (-35.036 )
-24.0	.214 (-13.399)	-38.0	.163 (-15.742)	-76.0	.015 (-36.621 )
-24.2	.206 (-13.737)	-39.0	.174 (-15.202)	-77.0	.012 (-38.32 )
-24.4	.198 (-14.087)	-40.0	.182 (-14.79)	-78.0	.01 (-40.149 )
-24.6	.19 (-14.448)	-41.0	.189 (-14.483)	-79.0	.008 (-42.127 )
-24.8	.182 (-14.821)	-42.0	.193 (-14.268)	-80.0	.006 (-44.281 )
-25.0	.174 (-15.209)	-43.0	.197 (-14.132)	-81.0	.005 (-46.646 )
-25.2	.166 (-15.611)	-44.0	.198 (-14.066)	-82.0	.003 (-49.264 )
-25.4	.158 (-16.028)	-45.0	.198 (-14.065)	-83.0	.002 (-52.201 )
-25.6	.15 (-16.463)	-46.0	.197 (-14.121)	-84.0	.002 (-55.547 )
-25.8	.143 (-16.917)	-47.0	.194 (-14.232)	-85.0	.001 (-59.441 )
-26.0	.135 (-17.391)	-48.0	.191 (-14.393)	-86.0	.001 (-64.112 )
-26.2	.128 (-17.888)	-49.0	.186 (-14.601)	-87.0	.00 (-69.988 )
-26.4	.12 (-18.409)	-50.0	.181 (-14.854)	-88.0	.00 (-78.01 )
-26.6	.113 (-18.958)	-51.0	.175 (-15.15)	-89.0	.00 (-91.156 )
-26.8	.105 (-19.538)	-52.0	.168 (-15.488)	-90.0	.00 (-50 )
-27.0	.098 (-20.153)	-53.0	.161 (-15.866)	90.0	.00 (-50 )

## Systems With Reliability

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CLIENT: W279BK\_223

Date: 4/11/2017

ANTENNA TYPE: FMEE/4-HWS-TA

FREQUENCY: 92.5 MHz

PATTERN POL.: Elliptical

DIRECTIVITY(Peak): 2.627/4.195 dBd

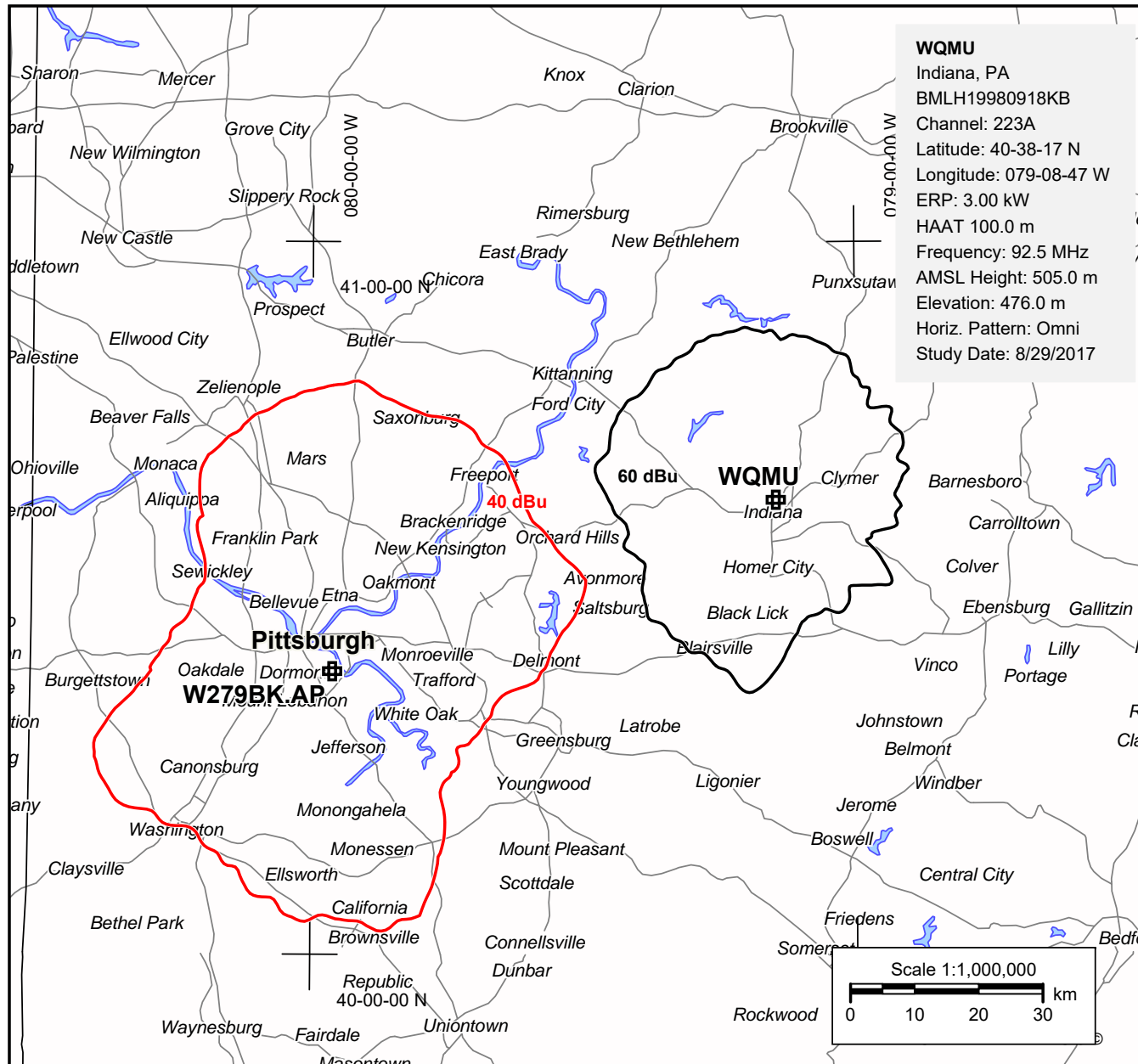
Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 2.627/4.195 dBd

Null Fill(s)(%) : 0, 0, 0

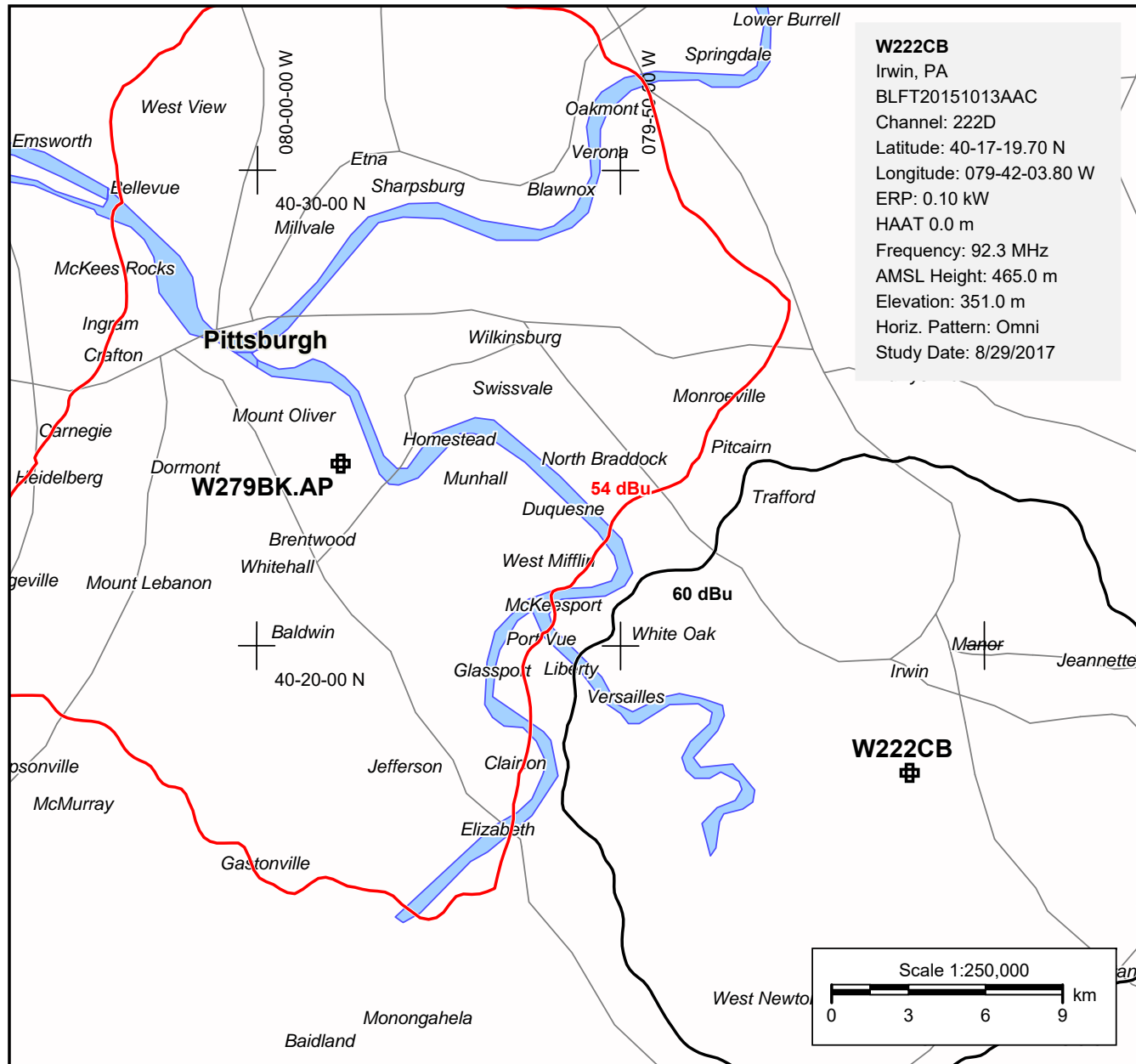


# Exhibit 13 C - 47 CFR 74.1204 Compliance to WQMU 223A Indiana PA



**There is no prohibited overlap** of the interfering and protected contours for the station shown. Thus the proposal satisfies 47 C.F.R. 74.1204 with regard to this station.

# Exhibit 13 D - 47 CFR 74.1204 Compliance to W222CB 222D Irin PA



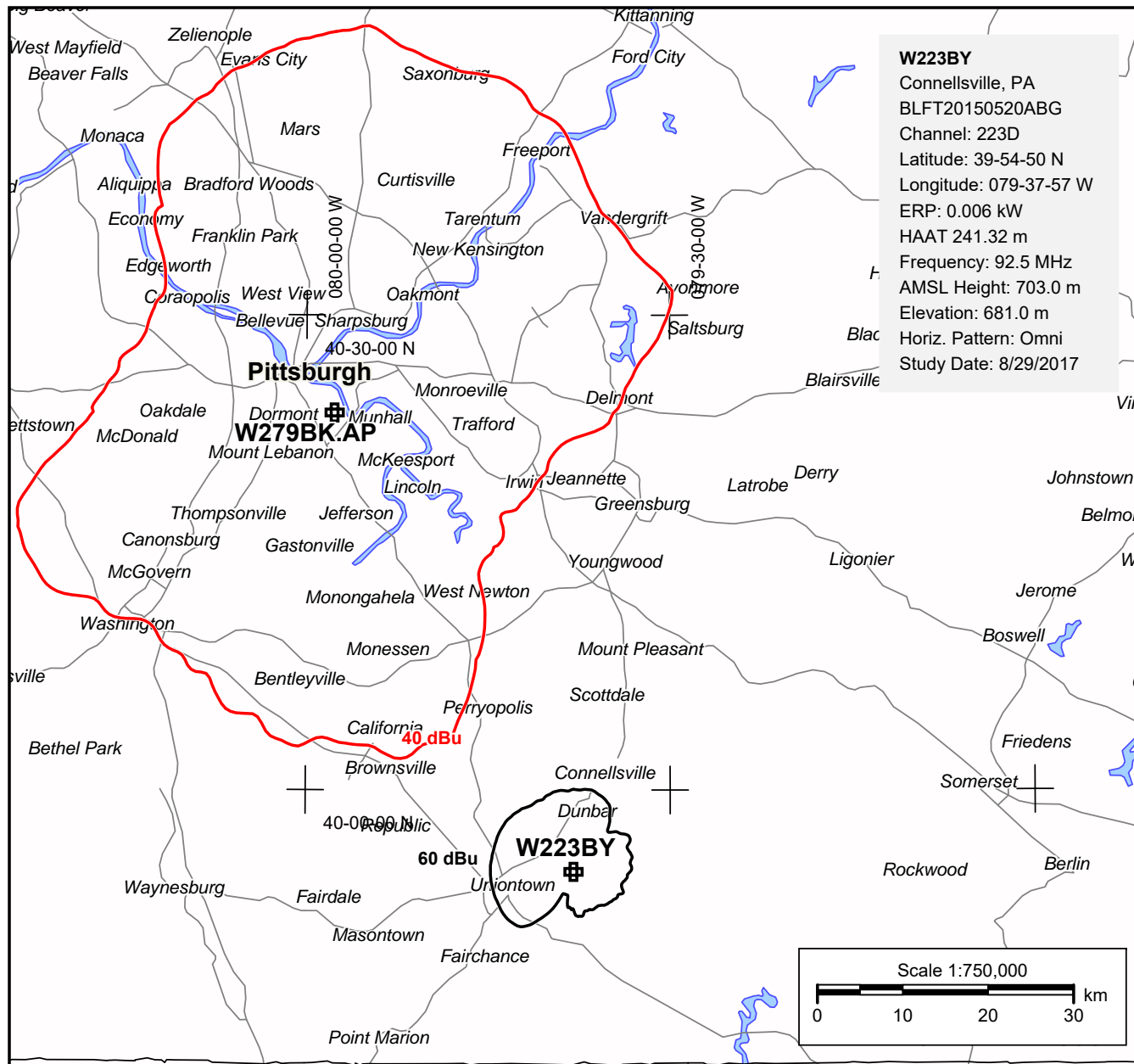
**W222CB**  
Irwin, PA  
BLFT20151013AAC  
Channel: 222D  
Latitude: 40-17-19.70 N  
Longitude: 079-42-03.80 W  
ERP: 0.10 kW  
HAAT 0.0 m  
Frequency: 92.3 MHz  
AMSL Height: 465.0 m  
Elevation: 351.0 m  
Horiz. Pattern: Omni  
Study Date: 8/29/2017

**There is no prohibited overlap**  
of the interfering and protected  
contours for the station shown.  
Thus the proposal satisfies  
47 C.F.R. 74.1204 with regard  
to this station.

**W279BK.AP**  
Pittsburgh, PA

Channel: 223D  
Latitude: 40-23-50 N  
Longitude: 079-57-42 W  
ERP: 0.11 kW  
HAAT 137.45 m  
Frequency: 92.5 MHz  
AMSL Height: 442.0 m  
Elevation: 320.87 m  
Horiz. Pattern: Directional  
Study Date: 8/29/2017

## Exhibit 13 E - 47 CFR 74.1204 Compliance to W223BY Connellsville, PA



**There is no prohibited overlap**  
 of the interfering and protected  
 contours for the station shown.  
 Thus the proposal satisfies  
 47 C.F.R. 74.1204 with regard  
 to this station.

**W279BK.AP**  
 Pittsburgh, PA

Channel: 223D  
 Latitude: 40-23-50 N  
 Longitude: 079-57-42 W  
 ERP: 0.11 kW  
 HAAT 137.45 m  
 Frequency: 92.5 MHz  
 AMSL Height: 442.0 m  
 Elevation: 320.87 m  
 Horiz. Pattern: Directional  
 Study Date: 8/29/2017