

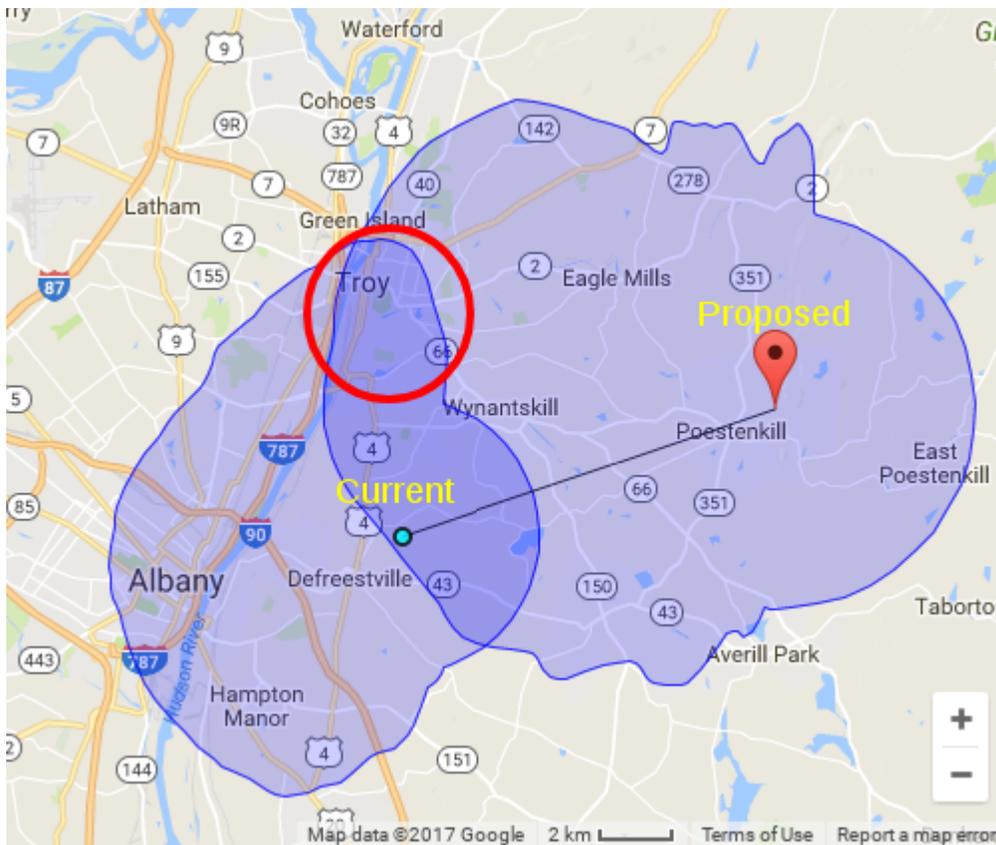
## **Waiver of 73.870(a) Sought**

Oakwood Community Center (OCC) is requesting a relocation of 11 kilometers because the currently-authorized location is not feasible to construct.

Subsequent to the currently-authorized construction permit, translator W226AC entered the area and is short spaced to OCC's construction permit for WOOG-LP. By the U/D method, the second-adjacent interference zone with W226AC is 231 meters, presenting significant challenges for locating qualifying relocation sites. Despite a diligent search for a suitably tall tower, or a large unpopulated land area, no suitable site was located within the 73.870(a) 5.6km minor-modification distance. OCC discovered that the tower rental rates at their presently-permitted location in addition to the installation fees, are significant enough that their future station WOOG-LP would not be viable.

A viable and qualifying location which is 11km from the presently-permitted location was found which can accommodate the large second-adjacent interference zone, hence a waiver of 73.870(a) is sought to permit this move to be considered as a minor modification.

OCC is a community-based organization in Troy, NY; with the mission (BNPL-20131114AAM) of community engagement and improvement. Both the currently-granted and instant locations provide coverage to the target listening area as shown by the service contours below.



OCC believes the public interest is served by enabling their station to be constructed to better serve their community. Conversely, denial of this waiver would doom WOOG-LP, which OCC believes would harm the public interest through the loss of a local radio voice for an organization which is by both statute and mission engaged in serving the public interest. Furthermore denial of this application likely would foreclose the possibility of a local station in the LPFM service being built in the future.

OCC is headquartered in Troy, less than 10 miles from the proposed location, and so is still qualified as a local organization.

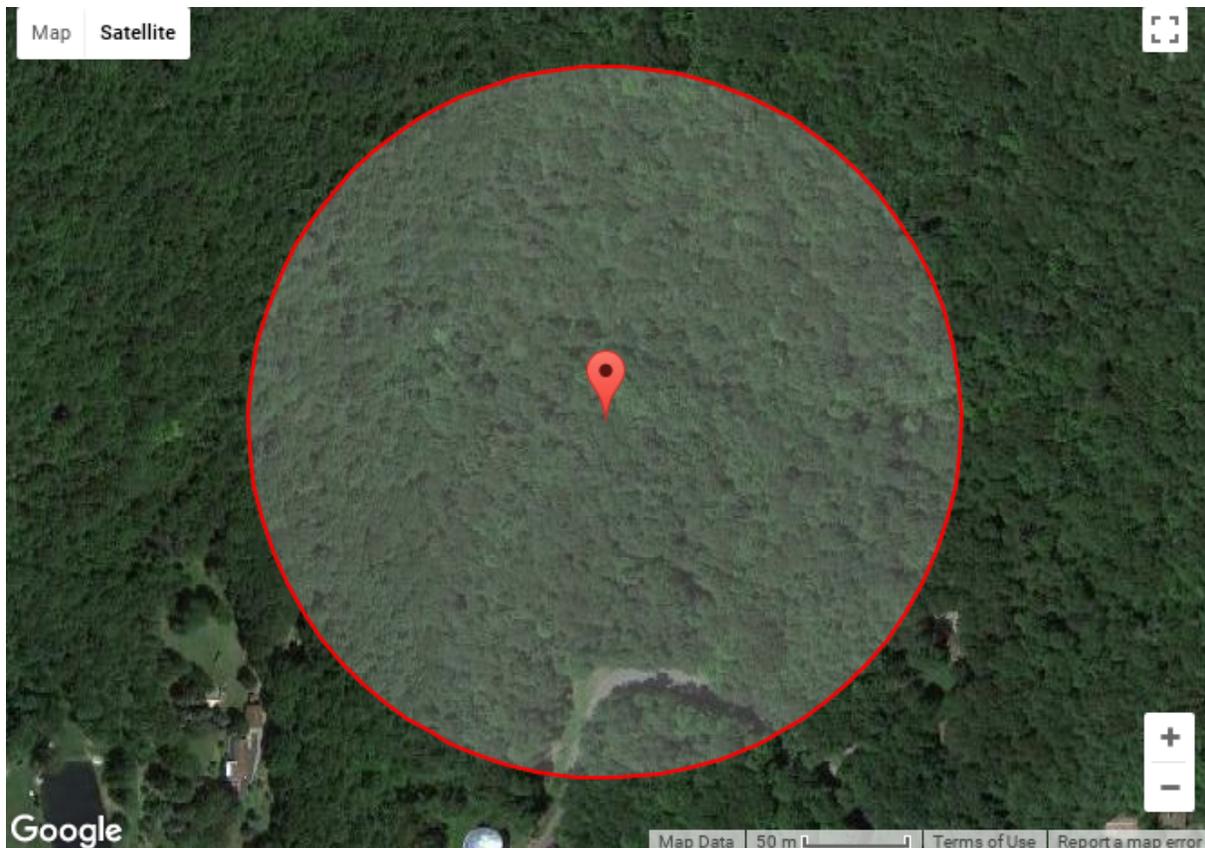
Since the Commission has granted similar waivers, for example in BMPL-20140623AAG, BPL-20171025ABN, and BMPL-20171211AAZ; OCC requests that the Commission grant the instant request.

## Second-adjacent Waiver Exhibit WFLY

Application requests a waiver for a location which is short-spaced on a second-adjacent channel with BLH-19871015KA, callsign WFLY, class B, status LIC, Troy, NY, channel 222, facility ID 832[3]

Undesired-to-Desired Ratio Method	
BLH-19871015KA f(50,50) signal	72.1 dBu [1][2]
Second-adjacent protection	+ 40 dB
Interference-zone boundary	112.1 dBu
Distance to 112.1 dBu	174 m (ERP <= 0.1 kW) [1]

The worst-case interference zone is a sphere of radius 174 meters, shown projected on the ground in the following map. No buildings nor major roadways are present within the interference zone, thus no population will be subject to interference from the proposed station according to the undesired-to-desired ratio method.



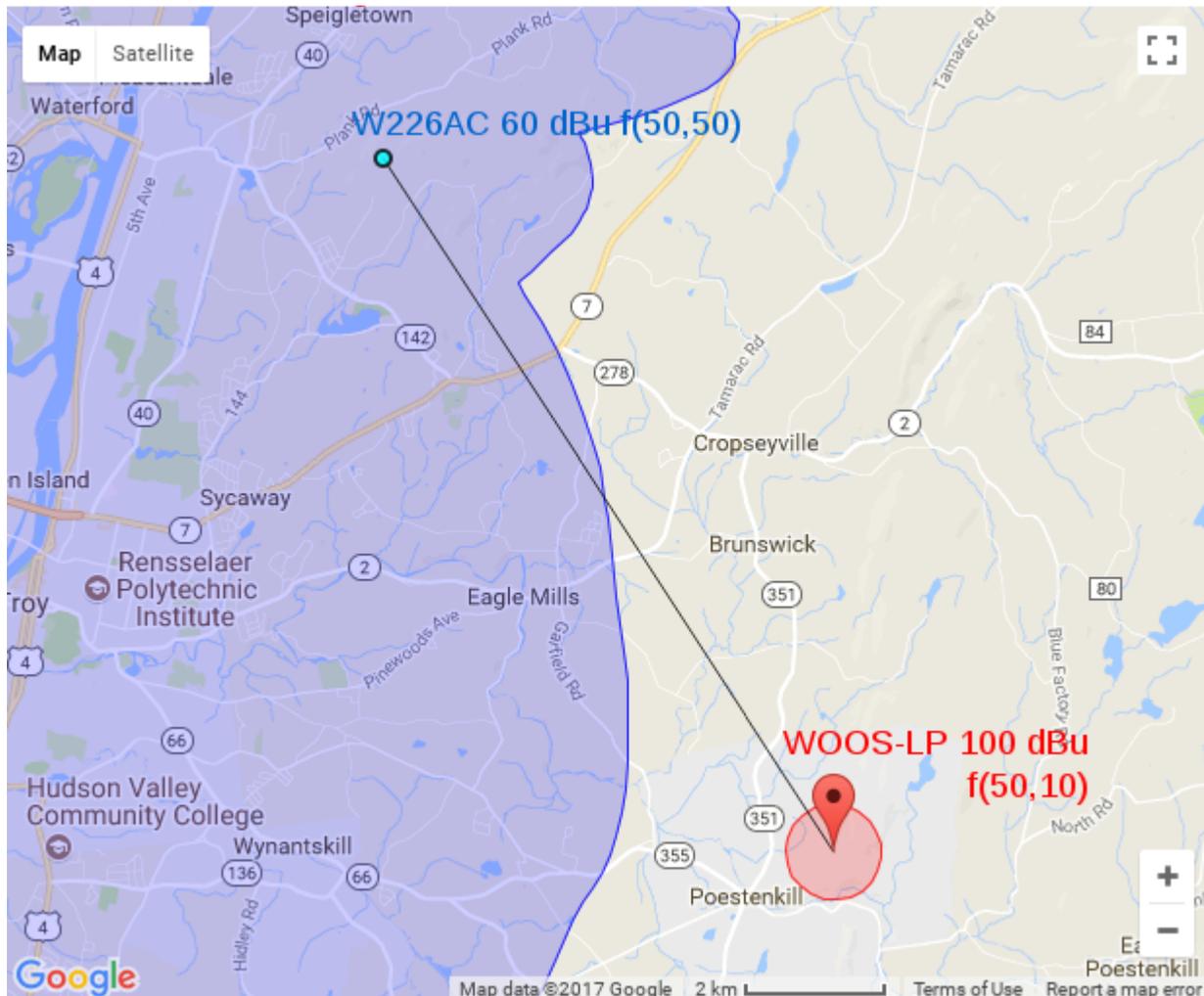
[1] tvfmfs() Fortran subroutine as distributed by the FCC. At distances less than or equal to 1.5 km, tvfmfs() uses the free-space method.

[2] FCC HAAT Calculator web page,  
[http://transition.fcc.gov/mb/audio/bickel/haat\\_calculator.html](http://transition.fcc.gov/mb/audio/bickel/haat_calculator.html)

[3] CDBS database downloaded 2018-01-02 04:00:00

## Second-adjacent Waiver Exhibit W226AC

The location as proposed is short spaced on a second-adjacent channel with W226AC BLFT-20150203AAB. Utilizing methods of 73.313 and the FCC 30-second terrain database, the protected contour of W226AC does not overlap the interfering contour of WOOG-LP. This is shown graphically on the following map. The highest  $f(50,10)$  field from WOOG-LP along the W226AC protected contour is 16dB lower than the 100 dBu allowed.



## FAA Information

The antenna is to be mounted 20' beneath the top of a 90'-tall pine tree on a side-mounted pole as diagrammed below. Since it is below the structure height, no FAA processing is required.

