

FCC Form 349 - Exhibit No. 12B
Relocation Within LPFM Spectrum-Limited Market

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This instant application proposes to relocate W259AO from its currently licensed site within the Milwaukee-Racine Arbitron Market to a new site also within the same Arbitron market. An attached 73.807(c) Protection map outlines the market in red.

Public Notices by FCC require FM Translator singleton applications from the Auction #83 process to follow certain procedures for protecting potential LPFM opportunities. There are also limitations for previously licensed FM Translators to relocate from outside a LPFM Spectrum-Limited Market to a site within a LPFM Spectrum-Limited market. However, there are no known prohibitions stated for FM Translators relocating within the same market except that LPFM Window applications are not required to protect other media applications submitted after June 17, 2013.

The currently licensed facility for W259AO existed as a CP in CDBS upon FCC's June 17, 2013 Public Notice of DA13-1385. The FCC thereby requires protection of the W259AO licensed facility by new applications in the October LPFM Window. Applicant's proposed relocation moves its facility farther from the central area of the market and farther from the LPFM 30 x 30 grid to a location at the very edge of the market. This could limit some new LPFM locations but also has potential for opening up new locations for LPFM facilities within the northern portions of metro Milwaukee. There is an alternate channel available for an LPFM station at the proposed site.

LPFM at WTKM Fill-In Translator site
Lakeshore Communications, Inc

REFERENCE						DISPLAY DATES		
43 16 48.0 N.		CLASS = L1				DATA	09-04-13	
88 23 02.0 W.		Current Spacings to 2nd Adj.				SEARCH	09-25-13	
----- Channel 267 - 101.3 MHz -----								
Call	Channel		Location		Azi	Dist	FCC	Margin

WIBA-FM	LIC	268B	Sauk City	WI	255.4	96.86	96.5	0.36
WIXX	LIC	266C	Green Bay	WI	13.6	129.23	119.5	9.7

Reference station has protected zone issue:
All separation margins include rounding

Please see maps on the following pages

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§ 73.807(c) Protection

