

Section 74.1204 - Statement of Compliance
W260CY-CP, Cleveland, Ohio
FCC File No. BMPFT-20160729ANZ
FM Translator Facility ID. 143930
February, 2017

The Applicant proposes a minor modification to the above-referenced, non-reserved band, FM translator authorization. Specifically, the applicant proposes herein to relocate and change the antenna power, height, make and model. No further changes are proposed herein. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) 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 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 station WGAR-FM, Cleveland, OH (Channel 258B) and to a concurrently filed application for a minor modification of Construction Permit for second-adjacent channel FM translator station W262CY, Cleveland, Ohio (Facility ID 145205) are 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 station, listed above resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator's proposed transmitter site, WGAR-FM is predicted to produce an F(50,50) signal strength of 87 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 127 dBu contour relative to WMMS(FM).

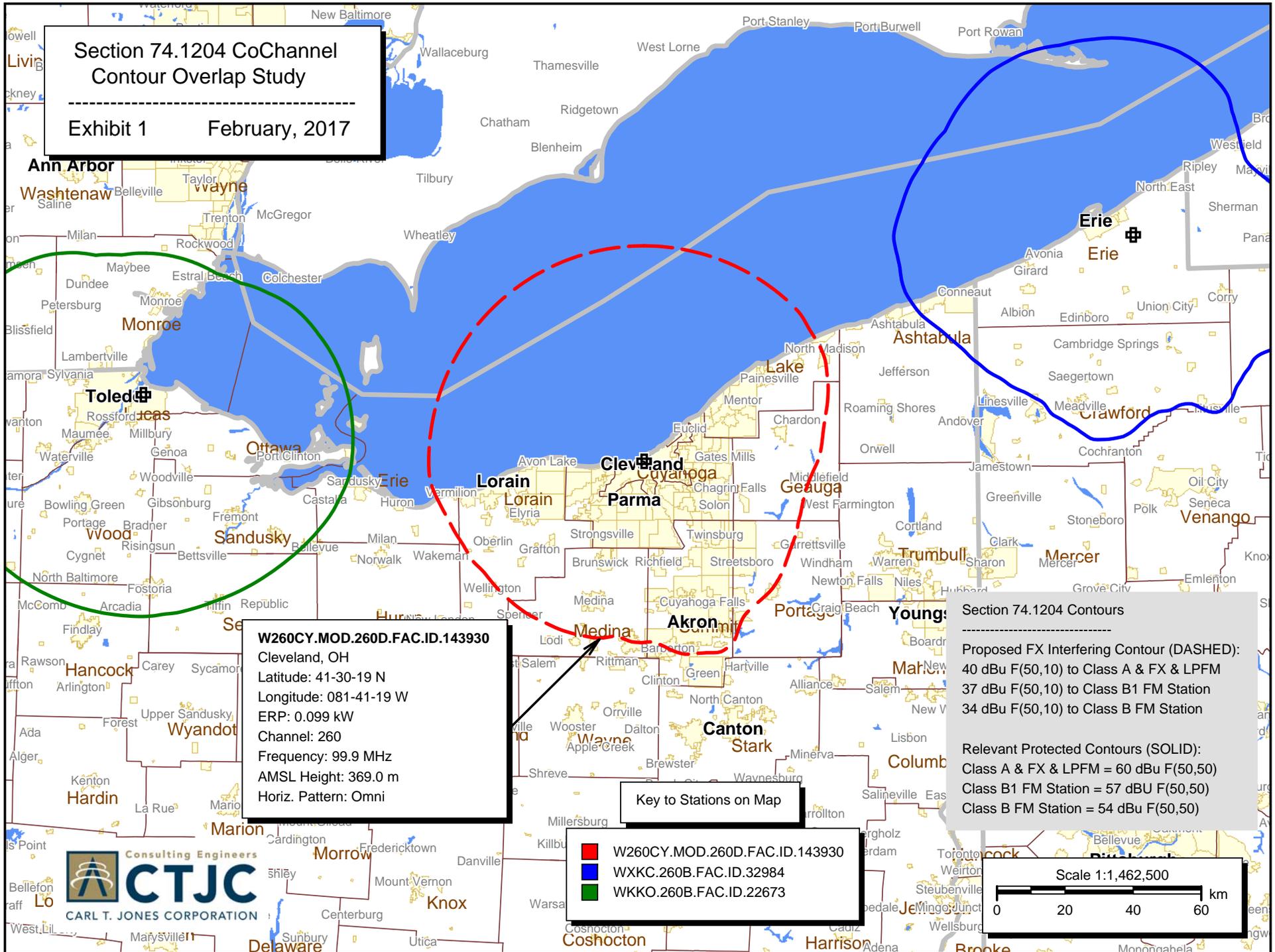
According to free space calculations, the translator's predicted interfering contour will extend only 32 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 173 meters above ground level, the predicted interference area will neither reach ground level nor will the predicted interference area reach any buildings within a 32 meter horizontal distance from the proposed antenna location (See attached aerial image). Therefore, the proposed minor change will cause no interference to any population served by WGAR-FM.

Additionally, the proposed transmitting antenna will be shared by the modified W262CY second-adjacent channel FM translator facility proposed in an application for modification for Construction Permit which will be filed concurrently with the instant application. The W260CY facility proposed herein will operate with an Effective Radiated Power of 99 watts while the proposed W262CY facility will operate with an Effective Radiated Power of 160 watts. Because the FM translator stations will be collocated on a second-adjacent channel basis with an operating difference of only 2 dB, which is much less than the minimum required +40 dB U/D protection ratio, no interference is predicted to any population within either translator's protected service areas.

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".

**Section 74.1204 CoChannel
Contour Overlap Study**

Exhibit 1 February, 2017



W260CY.MOD.260D.FAC.ID.143930
 Cleveland, OH
 Latitude: 41-30-19 N
 Longitude: 081-41-19 W
 ERP: 0.099 kW
 Channel: 260
 Frequency: 99.9 MHz
 AMSL Height: 369.0 m
 Horiz. Pattern: Omni

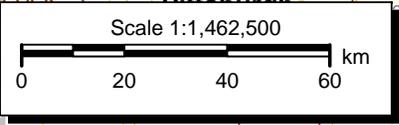
Key to Stations on Map

- W260CY.MOD.260D.FAC.ID.143930
- WXKC.260B.FAC.ID.32984
- WKKO.260B.FAC.ID.22673

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):
 40 dBu F(50,10) to Class A & FX & LPFM
 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 & 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)



Section 74.1204 First-Adjacent Channel Contour Overlap Study

Exhibit 2

February, 2017

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):

- 54 dBu F(50,10) to Class A & FX & LPFM
- 51 dBu F(50,10) to Class B1 FM Station
- 48 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):

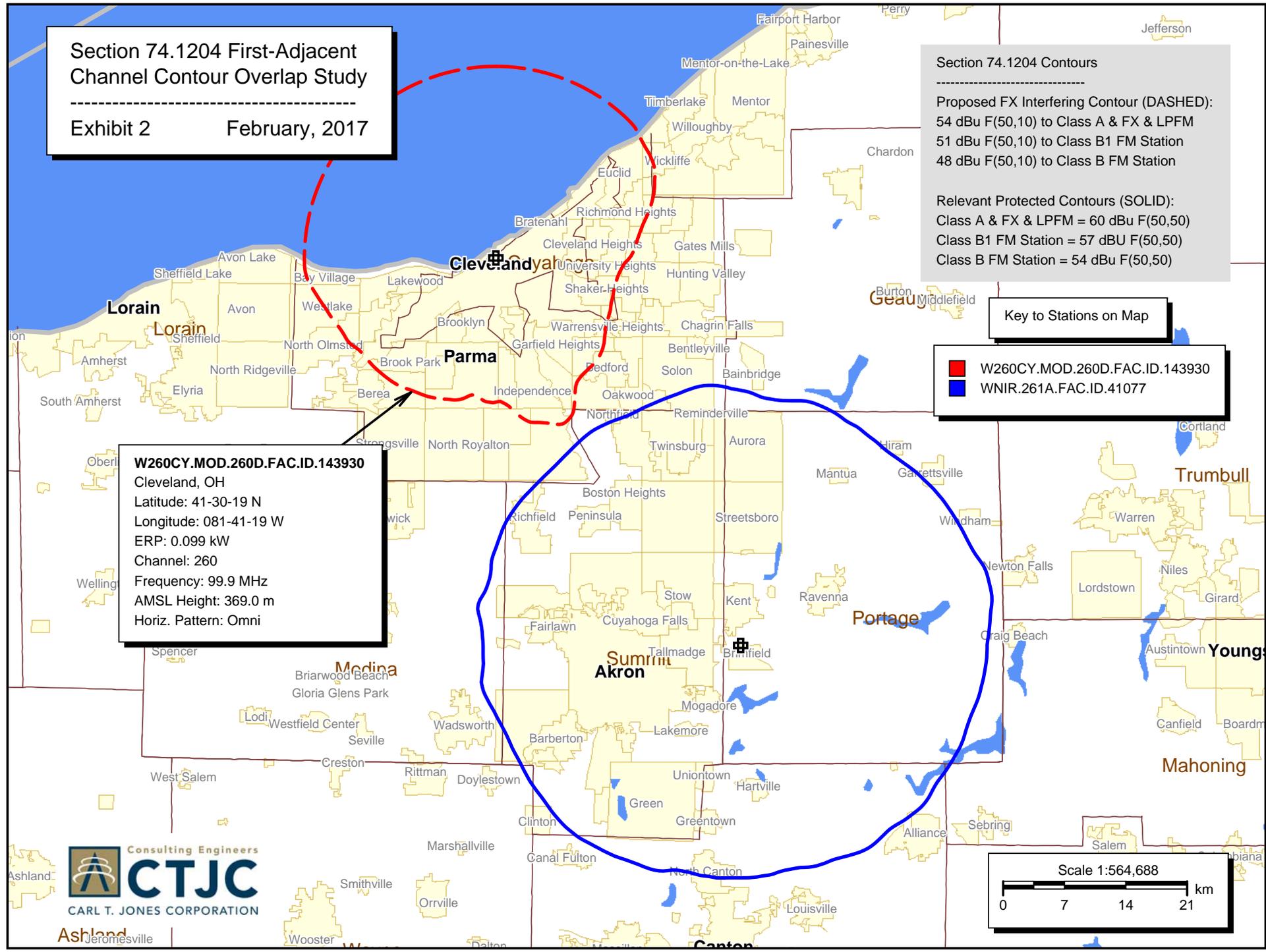
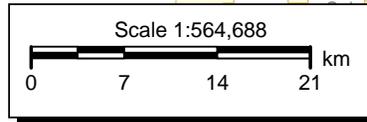
- Class A & FX & LPFM = 60 dBu F(50,50)
- Class B1 FM Station = 57 dBu F(50,50)
- Class B FM Station = 54 dBu F(50,50)

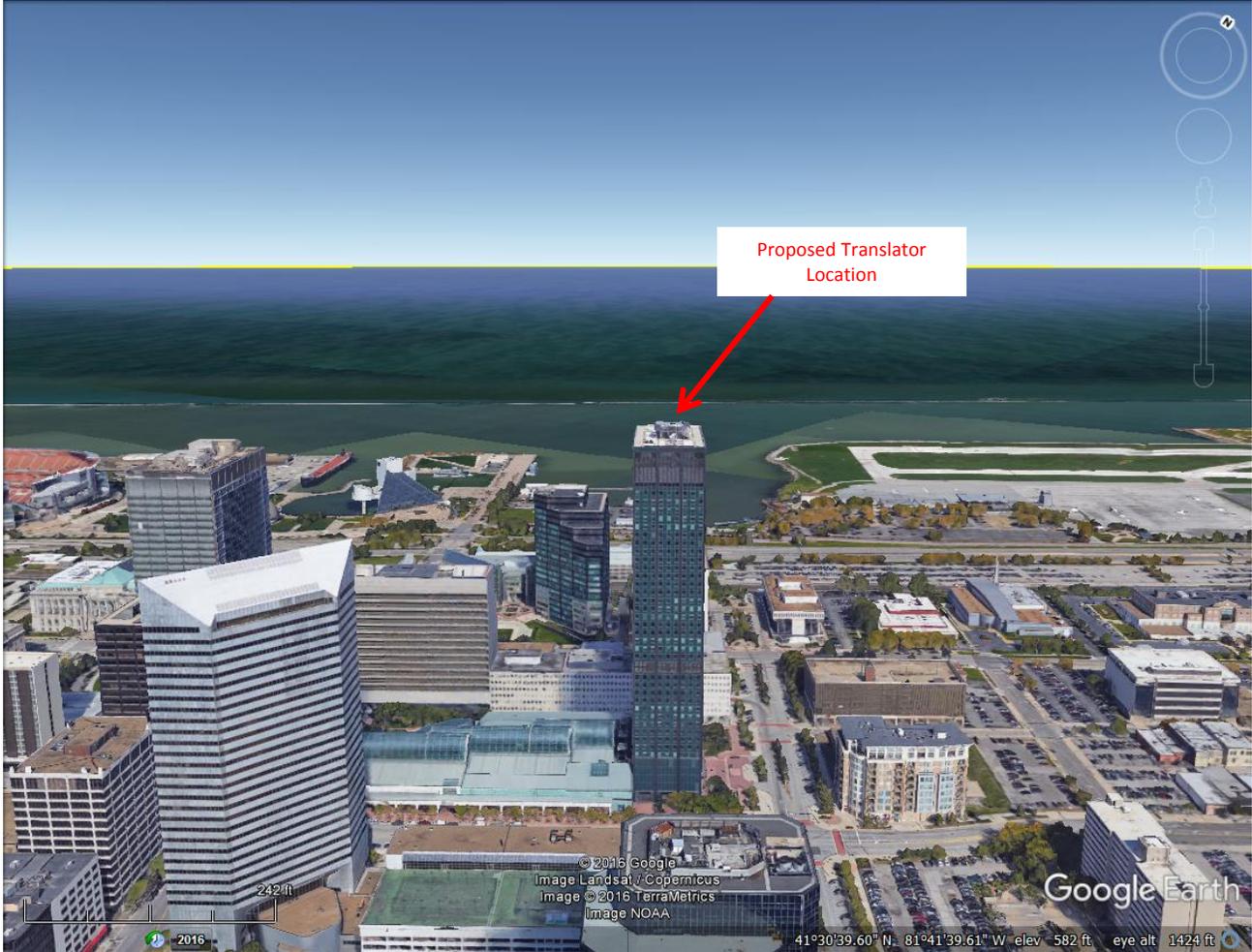
Key to Stations on Map

-  W260CY.MOD.260D.FAC.ID.143930
-  WNIR.261A.FAC.ID.41077

W260CY.MOD.260D.FAC.ID.143930

Cleveland, OH
Latitude: 41-30-19 N
Longitude: 081-41-19 W
ERP: 0.099 kW
Channel: 260
Frequency: 99.9 MHz
AMSL Height: 369.0 m
Horiz. Pattern: Omni





Rooftop FM Translator Antenna Placement
W260CY and W262CY, Cleveland, Ohio
1301 E. Ninth St. Cleveland, Ohio
February, 2017