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April 18, 2013

Preclusion Showing for Auction 83

Application BNPFT-20030313BIA

Narrative

This Exhibit provides a preclusion analysis to an Auction 83 construction permit application for an FM translator on Channel 271 in Bridgeport, CT with file number BNPFT 20030313BIA. The tech box proposal (short form application) was filed in a filing window for Auction 83. This Exhibit provides a preclusion showing required in a Public Notice¹ of a window to amend tech box proposals for further processing.

This application proposes no other modifications to the proposed transmitter facility filed in the original short form application.

Required Showings

The proposed transmitter facility is located inside the Market Grid of the Bridgeport market. (See attached map.) The Bridgeport market is listed as Spectrum Limited Market #125 in Appendix A of the Fourth Report and Order.² The required showing is identified as Test B, in Attachment B to the DA 13-427 Public Notice.

The proposed transmitter facility is located within 39km of five Spectrum Limited Market grids (shown in): #203, Danbury, CT; #116, New Haven; #52, Hartford-New Britain-Middletown; #148, Stamford-Norwalk, CT; #18, Nassau-Suffolk (Long Island).

All market protected channel/point combinations were generated using the Commission's updated LPFM grid tool. Per Public Notice DA 13-427, Test B, only co-channel and adjacent channels were protected; no protection is required on other channels to auction 83 participants; no I.F. channel protection is required; FM translators were protected; and all existing CPs and applications were protected.

A portion of the printout from the LPFM grid tool for each market is provided in Figure 2-10. The preliminary section of each figure confirms the parameters studied and provides a summary of the channels. Co-channel and adjacent channel-point combinations are highlighted. Within Market #125, there are no protected points on

¹ *Public Notice Media Bureau Announces FM Translator Auction 83 Filing Window and Filing Procedures*, DA13-427, released February 26, 2013. (Auction 83 Preclusion Showings)

² *In the Matter of Creation of a Low Power Radio Service, Amendment of Service and Eligibility Rules for FM Broadcast Translator Stations, Fourth Report and Order and Third Order on Reconsideration*, FCC 12-19, released March 19, 2012.

channel 271. Similarly there are no protected points on first adjacent channel 270 but there are 2 protected channel-point combinations on channel 272.

The grid analysis for the Bridgeport market (shown in Figure 2) indicates that 2 preclusion points exist for the first adjacent channel 272. The most (and least) preclusive siting (shown in Figure 3) is Point #929 at 41-24-01 073-26-19.

The grid analysis for the market #203, Danbury, CT (shown in Figure 4) indicates that 7 preclusion points exist at the first adjacent channel 272. The most (and least) preclusive siting (shown in Figure 5) is Point #512 at 41-23-41 073-28-16.

The grid analysis for the market #116, New Haven (shown in Figure 6) indicates that 7 preclusion points exist at the co-channel 271. The most (and least) preclusive siting (shown in Figure 7) is Point #157 at 41-04-29 072-45-43.

All other adjacent market grid studies for #52, Hartford-New Britain-Middletown; #148, Stamford-Norwalk, CT; and #91, Springfield, MA; show no preclusion points. These studies are shown in Figure 8, Figure 9, and Figure 10.

The distance between each preclusion point and the proposed translator site was calculated using the Distance tool provided by the FCC website. Next, the required spacing between the LPFM channel-point combination and the proposed translator site was computed. To determine the required spacing, the FM Curves tool of the FCC website was first used to compute the distance to the 60 dBu contour. Then FCC Rule 73.807(d)(1) was examined to determine the required spacing for co-channel and adjacent channels. The distance to the proposed translator 60-dBu contour towards each preclusion point is a maximum of 8.632km. According to FCC Rule 73.807 (d) (1), if the distance to the translator 60-dBu contour is between 7.3km and 13.37km, then the required minimum spacing is 21km for adjacent channels and 32km for co-channels (both radii are shown in Figure 1). The distance to each preclusion point from the proposed transmitter site is a minimum of 4.1km greater than the required spacing. The findings from the analysis of each preclusion point are summarized in Table 1.

Table 1: Preclusion Point Spacing Analysis

Market#	Point#	Distance km	Azimuth degrees	Required Spacing km	Distance Beyond Required Spacing km
125	929	25.094	302.65	21	4.1
203	512	27.131	298.46	21	6.1
116	157	42.176	122.50	32	10.2

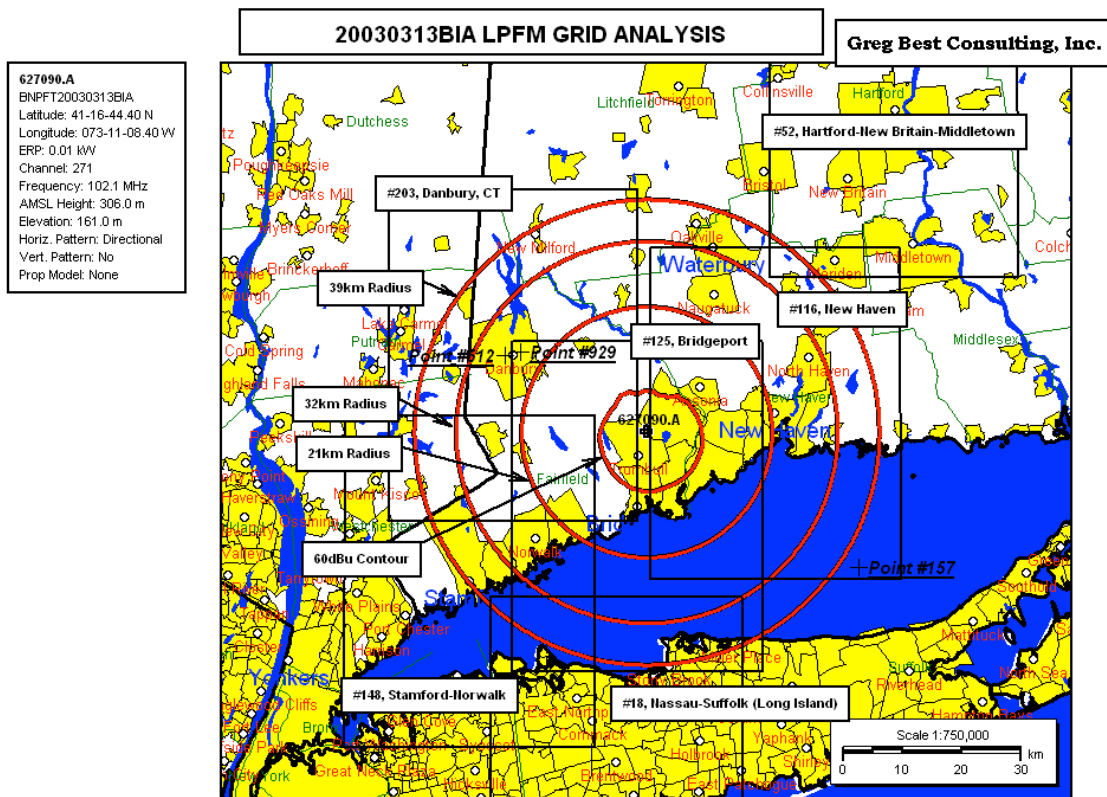


Figure 1: CH271 Bridgeport, CT Transmitter. 60 dBu Contour, 21km radius, 32km radius, 39km radius, LPFM Market Grids, and Market Preclusion Points

Figure 2: LPFM Grid Tool Output: Bridgeport, CT (Market #125)

BRIDGEPORT, CT
Latitude 41-10-01
Longitude 073-12-19
Grid Size 31 x 31
Micro FM 100 Watts at 30m HAAT
Co-Channel and 1st Adjacent Protected
2nd Adjacent Channel Not Protected
3rd Adjacent Channel Not Protected
I.F. Not Protected
TV Channel 6 Protected
CP Records Protected
APP Records Protected
FM Translators Protected
TV Channel 6 Translators/LP Protected
Auc83 FX App Records Not Protected

Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail
200	0	220	0	240	0	260	0	280	0
201	0	221	33	241	0	261	0	281	0
202	0	222	0	242	0	262	0	282	0
203	0	223	0	243	0	263	0	283	0
204	0	224	0	244	0	264	0	284	0
205	0	225	17	245	142	265	0	285	0
206	0	226	0	246	0	266	0	286	0
207	0	227	36	247	0	267	0	287	0
208	0	228	0	248	0	268	0	288	4
209	0	229	0	249	0	269	0	289	0
210	0	230	0	250	0	270	0	290	0
211	0	231	0	251	0	271	0	291	0
212	0	232	0	252	0	272	2	292	0
213	0	233	0	253	0	273	109	293	0
214	0	234	7	254	3	274	0	294	0
215	0	235	0	255	0	275	0	295	0
216	0	236	0	256	0	276	0	296	0
217	0	237	0	257	0	277	120	297	3
218	0	238	0	258	3	278	3	298	3
219	0	239	0	259	0	279	90	299	0
								300	0

Total	575								

Figure 3: : LPFM Grid Tool Output: Market #125, Bridgeport; Preclusion Points for CH272

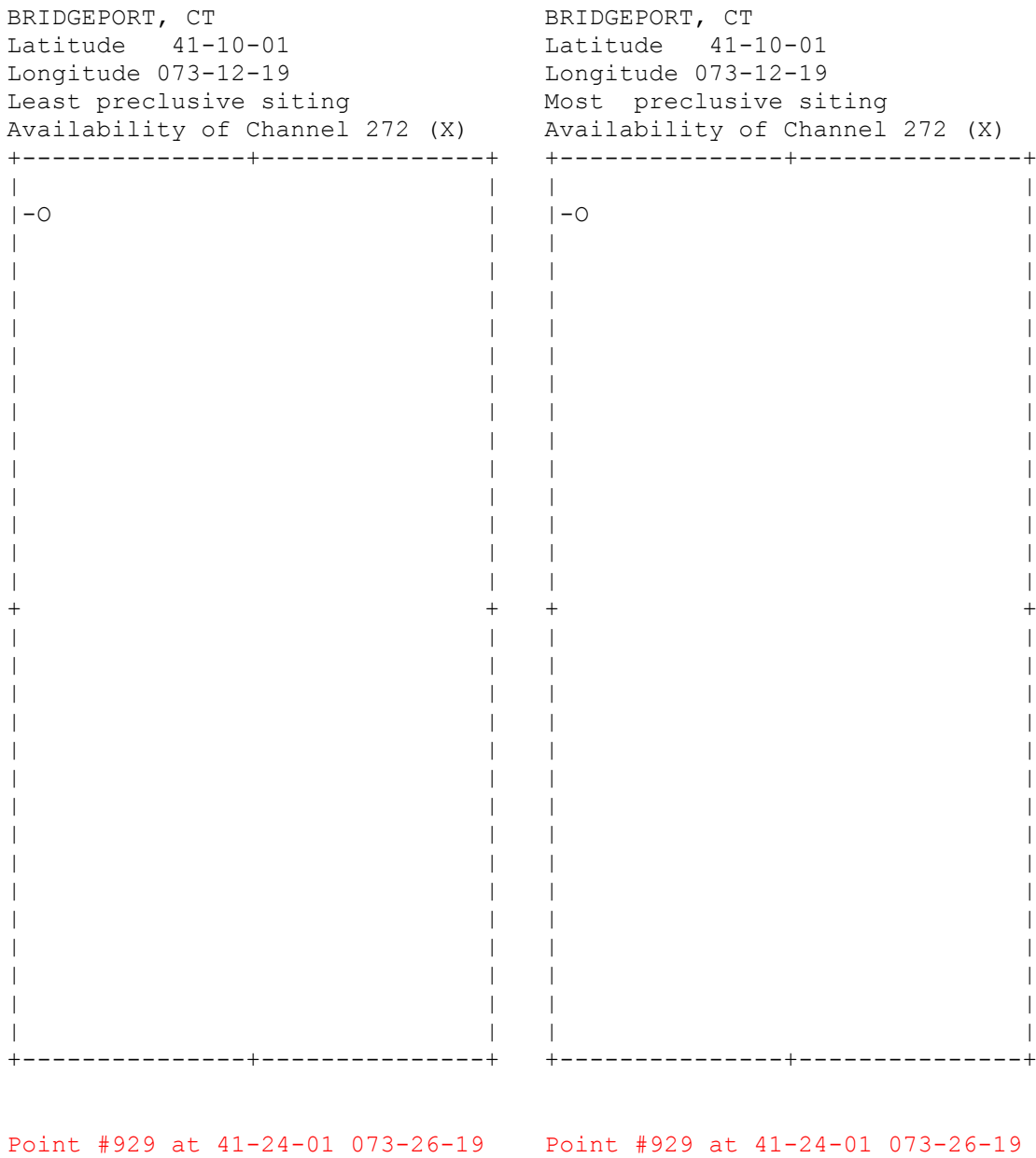


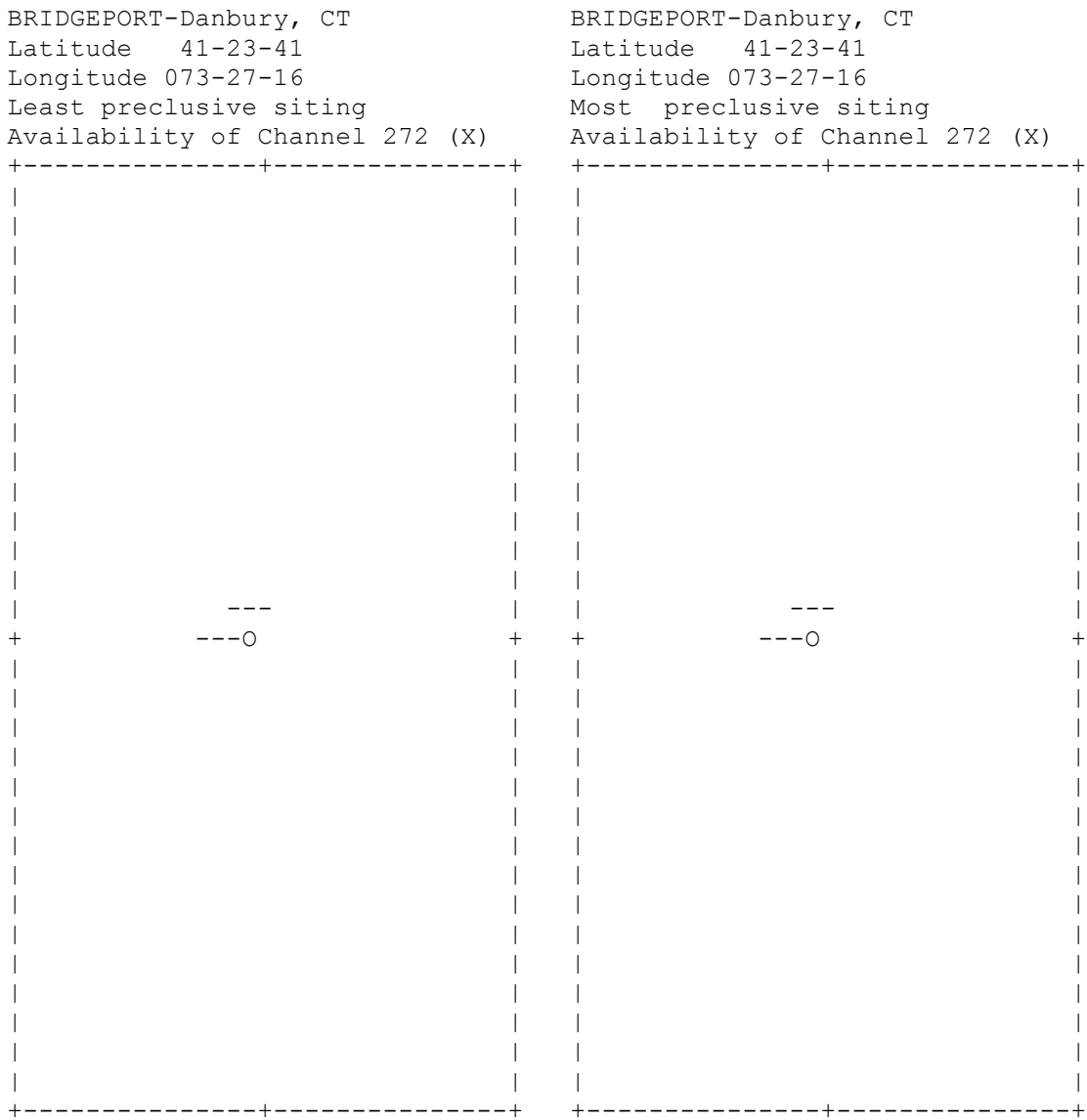
Figure 4: LPFM Grid Tool Output: Market #203, Danbury, CT

BRIDGEPORT-Danbury, CT
Latitude 41-23-41
Longitude 073-27-16
Grid Size 31 x 31
Micro FM 100 Watts at 30m HAAT
Co-Channel and 1st Adjacent Protected
2nd Adjacent Channel Not Protected
3rd Adjacent Channel Not Protected
I.F. Not Protected
TV Channel 6 Protected
CP Records Protected
APP Records Protected
FM Translators Protected
TV Channel 6 Translators/LP Protected
Auc83 FX App Records Not Protected

Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail
200	0	220	0	240	0	260	0	280	0
201	0	221	2	241	0	261	0	281	0
202	0	222	0	242	0	262	0	282	0
203	0	223	0	243	0	263	0	283	0
204	0	224	0	244	0	264	0	284	0
205	0	225	64	245	34	265	0	285	0
206	0	226	0	246	0	266	0	286	0
207	0	227	0	247	0	267	0	287	0
208	0	228	0	248	0	268	0	288	0
209	0	229	0	249	0	269	0	289	0
210	0	230	0	250	0	270	0	290	0
211	0	231	0	251	0	271	0	291	0
212	0	232	0	252	0	272	7	292	0
213	0	233	0	253	0	273	17	293	34
214	0	234	0	254	30	274	0	294	0
215	0	235	0	255	0	275	0	295	0
216	0	236	0	256	0	276	0	296	0
217	0	237	0	257	0	277	0	297	1
218	0	238	0	258	31	278	0	298	28
219	0	239	0	259	0	279	242	299	0
								300	0

Total	490								

Figure 5: LPFM Grid Tool Output: Market #203, Danbury, CT; Preclusion Points for CH272



Point #512 at 41-23-41 073-28-16

Point #512 at 41-23-41 073-28-16

Figure 6: LPFM Grid Tool Output: Market #116, New Haven

BRIDGEPORT-New Haven,
Latitude 41-18-29
Longitude 072-55-43
Grid Size 31 x 31
Micro FM 100 Watts at 30m HAAT
Co-Channel and 1st Adjacent Protected
2nd Adjacent Channel Not Protected
3rd Adjacent Channel Not Protected
I.F. Not Protected
TV Channel 6 Protected
CP Records Protected
APP Records Protected
FM Translators Protected
TV Channel 6 Translators/LP Protected
Auc83 FX App Records Not Protected

Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail
200	0	220	0	240	0	260	0	280	0
201	0	221	77	241	124	261	0	281	0
202	0	222	0	242	0	262	0	282	0
203	0	223	0	243	0	263	0	283	296
204	0	224	0	244	0	264	0	284	0
205	0	225	19	245	484	265	4	285	0
206	0	226	0	246	103	266	0	286	0
207	0	227	127	247	0	267	0	287	104
208	0	228	0	248	0	268	0	288	0
209	0	229	0	249	0	269	82	289	0
210	0	230	0	250	30	270	0	290	0
211	0	231	0	251	129	271	12	291	0
212	0	232	0	252	0	272	0	292	0
213	0	233	0	253	0	273	384	293	0
214	0	234	28	254	143	274	0	294	0
215	0	235	0	255	0	275	0	295	0
216	0	236	0	256	0	276	0	296	0
217	0	237	0	257	0	277	537	297	243
218	0	238	0	258	434	278	311	298	434
219	0	239	0	259	0	279	195	299	0
								300	0

Total	4300								

Figure 7: LPFM Grid Tool Output: Market #116, New Haven; Preclusion Points for CH271

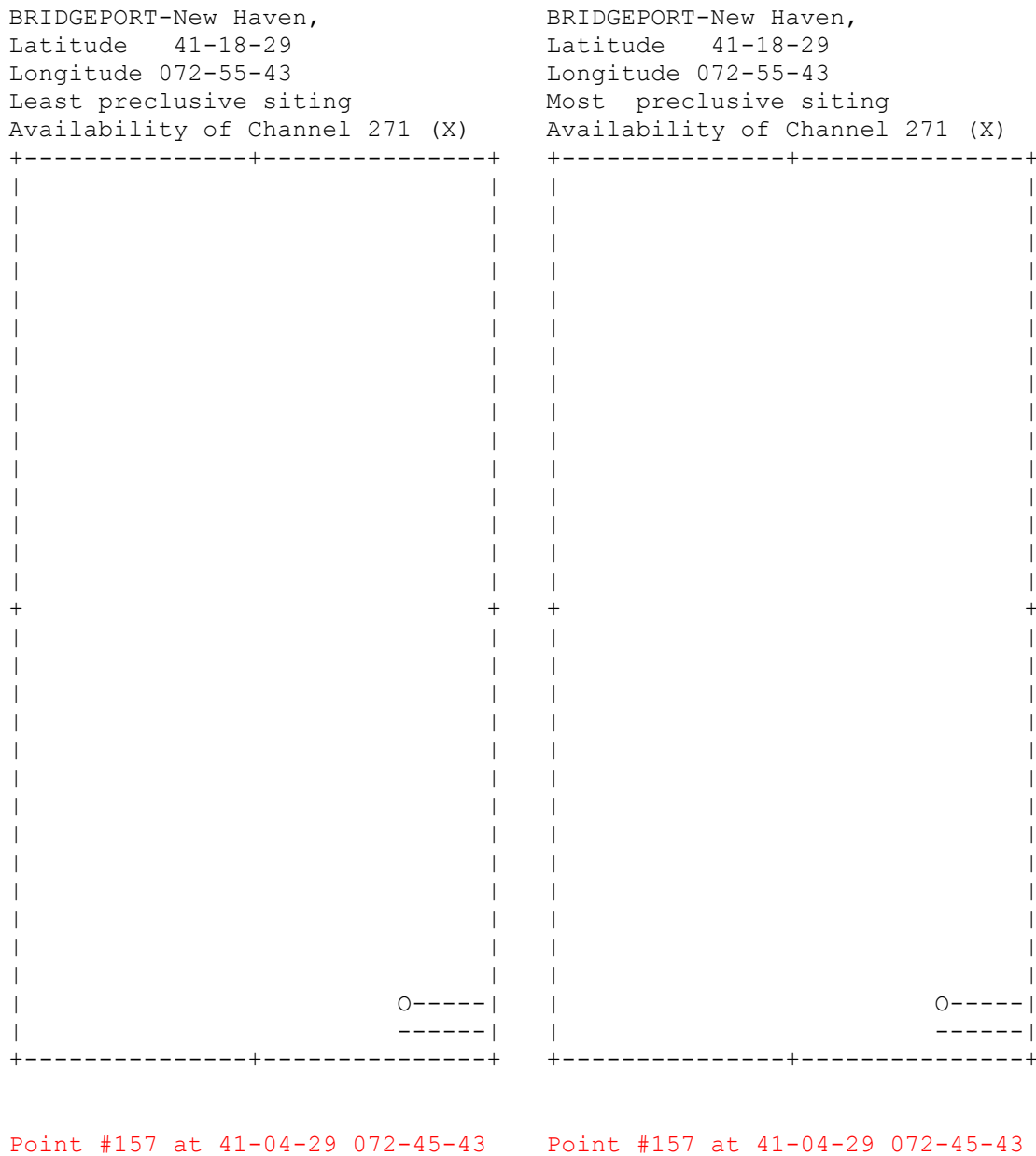


Figure 9: LPFM Grid Tool Output: Market #148, Stamford-Norwalk, CT

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BRIDGEPORT-Stamford, C
Latitude 41-03-12
Longitude 073-32-21
Grid Size 31 x 31
Micro FM 100 Watts at 30m HAAT
Co-Channel and 1st Adjacent Protected
2nd Adjacent Channel Not Protected
3rd Adjacent Channel Not Protected
I.F. Not Protected
TV Channel 6 Protected
CP Records Protected
APP Records Protected
FM Translators Protected
TV Channel 6 Translators/LP Protected
Auc83 FX App Records Not Protected
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Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail
200	0	220	0	240	0	260	0	280	0
201	0	221	0	241	0	261	0	281	0
202	0	222	0	242	0	262	0	282	0
203	0	223	0	243	0	263	0	283	0
204	0	224	0	244	0	264	0	284	0
205	0	225	0	245	0	265	0	285	0
206	0	226	0	246	0	266	0	286	0
207	0	227	0	247	0	267	0	287	0
208	0	228	0	248	0	268	0	288	130
209	0	229	0	249	0	269	0	289	0
210	0	230	0	250	0	270	0	290	0
211	0	231	0	251	0	271	0	291	0
212	0	232	1	252	0	272	0	292	0
213	0	233	0	253	0	273	0	293	0
214	0	234	0	254	0	274	0	294	0
215	0	235	0	255	0	275	0	295	0
216	0	236	0	256	0	276	0	296	0
217	0	237	0	257	0	277	0	297	0
218	0	238	0	258	0	278	0	298	0
219	0	239	0	259	0	279	0	299	0
								300	0

Total	131								

Figure 10: LPFM Grid Tool Output: Market #18, Nassau-Suffolk

BRIDGEPORT-Nassau, CT
 Latitude 40-46-52
 Longitude 073-14-48
 Grid Size 31 x 31
 Micro FM 100 Watts at 30m HAAT
 Co-Channel and 1st Adjacent Protected
 2nd Adjacent Channel Not Protected
 3rd Adjacent Channel Not Protected
 I.F. Not Protected
 TV Channel 6 Protected
 CP Records Protected
 APP Records Protected
 FM Translators Protected
 TV Channel 6 Translators/LP Protected
 Auc83 FX App Records Not Protected

Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail
200	0	220	0	240	0	260	0	280	0
201	0	221	0	241	0	261	0	281	0
202	0	222	0	242	0	262	0	282	0
203	0	223	0	243	0	263	0	283	0
204	0	224	0	244	72	264	17	284	204
205	0	225	0	245	0	265	0	285	0
206	0	226	0	246	0	266	0	286	0
207	0	227	0	247	0	267	0	287	0
208	0	228	84	248	0	268	67	288	169
209	0	229	0	249	0	269	0	289	0
210	0	230	0	250	0	270	0	290	0
211	0	231	0	251	0	271	0	291	0
212	0	232	0	252	0	272	0	292	0
213	0	233	0	253	0	273	0	293	0
214	0	234	0	254	0	274	0	294	0
215	0	235	45	255	0	275	0	295	0
216	0	236	3	256	0	276	0	296	0
217	0	237	0	257	0	277	0	297	0
218	0	238	0	258	0	278	0	298	0
219	0	239	0	259	0	279	0	299	0
								300	0

Total		661							

Conclusion

The proposed translator site has been evaluated according to the methodology prescribed in FCC Public Notice DA 13-427 and FCC rules. It was determined that the proposed facility has met all requirements and does not preclude proposed potential LPFM site locations.

Certification

I hereby certify that I am a licensed professional engineer and the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained herein are believed to be true and correct based on my personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

Gregory L. Best, P.E.