

**Section 74.1204 - Statement of Compliance**  
**AM Revitalization 250-Mile Window Application**  
**W256CO, Angola, IN to Cleveland, OH, Channel 260**  
**FM Translator Facility ID. 143930**  
**July, 2016**

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 WHK(AM), Cleveland, OH (Facility ID 72299). 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 stations WGAR-FM, Cleveland, OH (Channel 258B) 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 WGAR-FM 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 88 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator’s relevant interfering contour is the 128 dBu contour relative to WGAR-FM.

According to free space calculations, the translator’s predicted interfering contour will extend only 18 meters from the proposed transmit antenna. Because the proposed

---

<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.

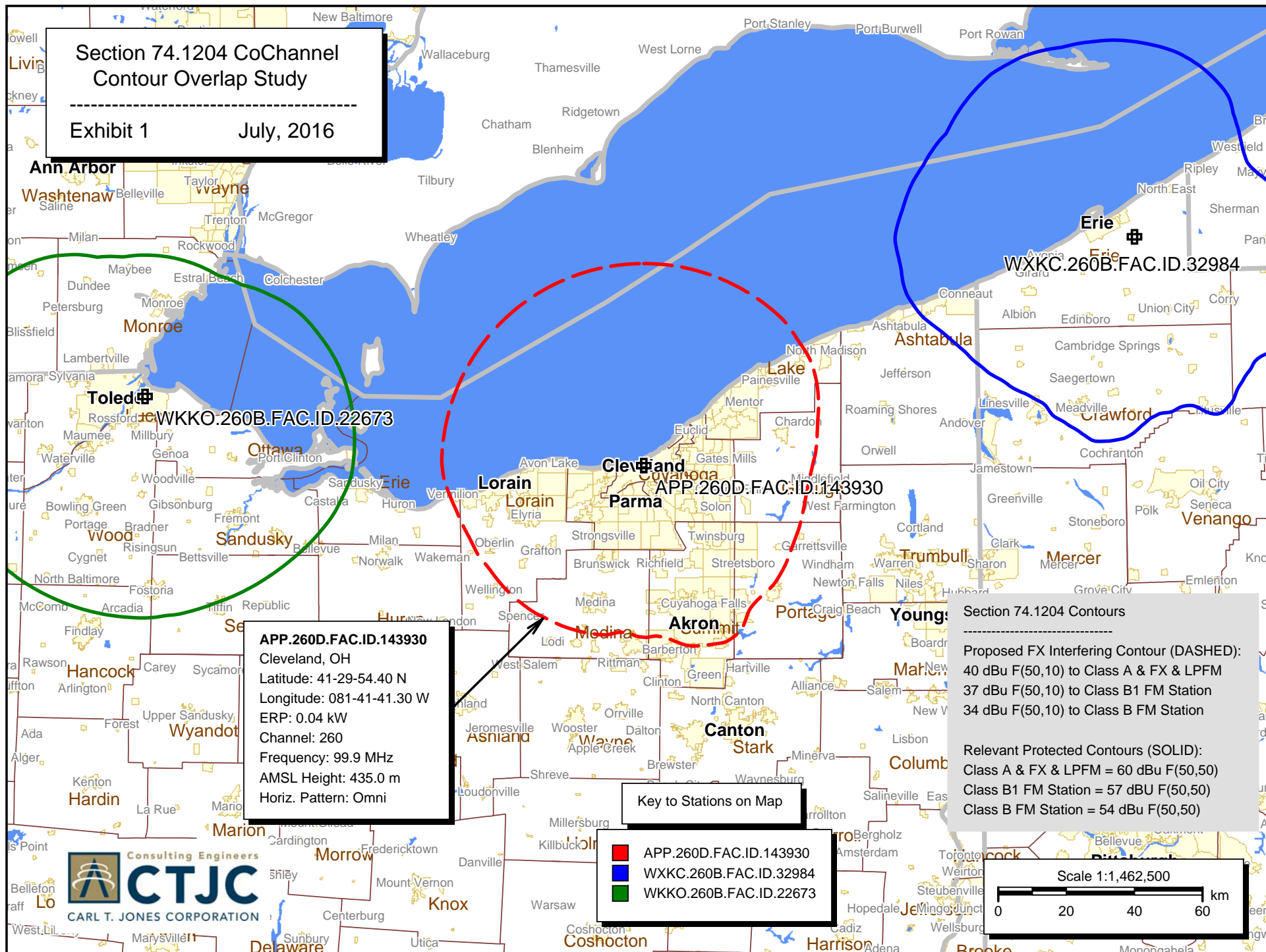
transmit antenna will be located 229 meters above ground level, the predicted interference area will neither reach ground level nor will the predicted interference area reach any buildings within a 18 meter horizontal distance from the proposed antenna location (See attached aerial image). Therefore, the proposed minor change will cause no interference to any population served by WGAR-FM.

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

July, 2016



# Section 74.1204 First-Adjacent Channel Contour Overlap Study

Exhibit 2

July, 2016

## 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)

### APP.260D.FAC.ID.143930

Cleveland, OH  
Latitude: 41-29-54.40 N  
Longitude: 081-41-41.30 W  
ERP: 0.04 kW  
Channel: 260  
Frequency: 99.9 MHz  
AMSL Height: 435.0 m  
Horiz. Pattern: Omni

### Key to Stations on Map

APP.260D.FAC.ID.143930  
WNIR.261A.FAC.ID.41077

Scale 1:564,688

0 7 14 21 km

Consulting Engineers  
**CTJC**  
CARL T. JONES CORPORATION



Proposed CH260 Translator Cleveland  
Interfering Contour to WGAR-FM  
extends no further than 18 meters,  
and as seen does not affect any nearby  
occupied structures or reach the ground

Proposed Translator Antenna Location



© 2016 Google  
Image Landsat  
Image NOAA  
Image © 2016 TerraMetrics