

**Section 74.1204 - Statement of Compliance**  
**AM Revitalization Auction 99 FM Translator**  
**Long-Form Application Filing Window**  
**NEW FM Translator Station Facility ID. 201134**  
**Tech Box Proposal FCC File No. BNPFT-20170727AFG**  
**December, 2017**

The instant “Long Form Application for FM Translator in Auction Window 99” is filed in response to the FCC’s Public Notice, DA 17-1068, Released November 1, 2017, for a new FM translator station to rebroadcast Class C AM station: WENK, Union City, TN (Facility ID 71504). The Public Notice announced a window, opening from December 1, 2017, to December 21, 2017, for the filing of FM translator new station construction permit applications for singleton “Tech Box” proposals such as the Tech Box proposal referenced above. As a “singleton” proposal, the instant application is exempt from the Commission’s auction procedures.

This long-form application specifies the identical technical facility as previously submitted in the Tech Box proposal. Accordingly, the instant proposal may be considered a “minor change”. Further, the instant long-form application does not create a new conflict to any pending Auction 99 Tech Box proposal, or to any prior-filed Form 349 application. 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 is a map which demonstrates 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) 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

Attached is a map (See Exhibit 2) which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to second-adjacent channel stations WCDZ(FM), Dresden, TN (Channel 236C3) and WGKY(FM), Wickliffe, KY (Channel 240A) and third-adjacent channel station W241BE, Martin, TN (Channel 241D). The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

# Section 74.1204 CoChannel Contour Overlap Study

Exhibit 1 December, 2017

## Key to Stations on Map

- FX.APP.238
- W238AN.238D.FAC.ID.145533

## Section 74.1204 Contours

### Proposed FX Interfering Contour (DASHED):

- 40 dBu F(50,10) to Class A & FX & LPFM
- 40 dBu F(50,10) to Class C, C0, C1, C2, C3
- 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, C, Cx, 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)

## FX.APP.238

Union City, TN  
Latitude: 36-25-40 N  
Longitude: 089-02-05 W  
ERP: 0.25 kW  
Channel: 238  
Frequency: 95.5 MHz  
AMSL Height: 152.0 m  
Horiz. Pattern: Omni

# Section 74.1204 2nd & 3rd Adjacent Channel Contour Overlap Study

Exhibit 2

December, 2017

## Key to Stations on Map

- FX.APP.238
- WCDZ.236C3.FAC.ID.67055
- WGKY.240A.FAC.ID.53945
- W241BE.241D.FAC.ID.141075

### FX.APP.238

Union City, TN  
Latitude: 36-25-40 N  
Longitude: 089-02-05 W  
ERP: 0.25 kW  
Channel: 238  
Frequency: 95.5 MHz  
AMSL Height: 152.0 m  
Horiz. Pattern: Omni

## Section 74.1204 Contours

Proposed FX Interfering Contour (SMALL):  
100 dBu F(50,10) to Class A & FX & LPFM  
100 dBu F(50,10) to Class C, C0, C1, C2 & C3  
97 dBu F(50,10) to Class B1 FM Station  
94 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
Class A & FX & LPFM = 60 dBu F(50,50)  
Class C, C0, C1, C2 & C3 = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)