

MINOR CHANGE APPLICATION
POSITIVE ALTERNATIVE RADIO, INC.
W273AA FM TRANSLATOR STATION
CH 253D - 98.5 MHZ - 0.010 KW
BLACKSBURG, VIRGINIA
September 2011

TECHNICAL STATEMENT

This technical statement was prepared on behalf of Positive Alternative Radio, Inc. ("PAR"), licensee of FM translator station W273AA, Channel 273D, Blacksburg, Virginia. PAR herein proposes to make minor changes in the W273AA facilities by changing channels to Channel 253D, relocating and increasing the height of the center of radiation above ground and above mean sea level. The proposed change of channel from Channel 273D to Channel 253D is requested based on the displacement of FM translator W273AA from Channel 273D by the permit for a new FM station on Channel 273A at Shawsville, Virginia (BPH-19971022MC). The outstanding permit for the new FM at Shawsville will receive theoretical interference from the licensed W273AA facility. Since the proposed channel change for W273AA is greater than the adjacent channels, a waiver of §74.1233(a)(1) of the rules is respectfully requested.

The proposed W273AA facility on Channel 253D will rebroadcast the signal of WPIN-FM, Channel 218A, Dublin, Virginia. As the proposed W273AA translator on Channel 253D is located outside the 60 dBu contour of WPIN-FM, it is a non-fill in translator. There is a common area of 60 dBu contour overlap between the licensed W273AA facility and the proposed

W273AA translator on Channel 253D (Exhibit A). It is noted that the licensed and proposed sites for W273AA are not located in a spectrum limited market, as identified on Appendix A, Third Further Notice of Proposed Rule Making, FCC 11-105, MM Docket #99-25/MB Docket #07-172, released July 12, 2011.

As a result of the permit for a new FM on Channel 273A at Shawsville, Virginia, a review of the W273AA adjacent channels was undertaken (three above, three below, and the two intermediate frequency {IF} channels). The operation of W273AA on the adjacent channels (from its licensed site) would cause prohibited interference to one or more authorized or proposed facilities on each of these channels. The individual channel studies are attached as Exhibits B1 through B9.¹ There are no rule compliant adjacent or intermediate frequency channels to which W273AA can be relocated. Based on the foregoing, it is respectfully requested that W273AA be allowed to move to Channel 253 and that a waiver of §74.1233(a)(1) of the rules be allowed.

The proposed W273AA antenna system will be located on an existing tower structure that has been registered with the Commission and has been assigned Antenna Structure Registration Number 1238674. In order to accommodate the proposed increased height of the antenna for W273AA, it is necessary to increase the height of the tower. As such, the Federal Aviation Administration was apprised of this proposal. When the expected updated Determination of No Hazard is received, ASRN 1238674 will be modified. Exhibit C is a study demonstrating that

1) The stations shown in italics are the ones primarily impacted by the operation of FM translator W273AA on the respective channels.

the proposed W273AA translator will not cause interference to any full service station, nor will interference be delivered to or received from any existing FM translator station or LPFM application.

As the W273AA antenna system is located on one of many towers in the same general vicinity, use of the worksheet associated with Form 349 was not possible to demonstrate compliance with the FCC radio frequency radiation exposure rules. Therefore, attached as Exhibit D is a study which shows this proposal complies with the RF exposure limits.

All supporting data used in the preparation of this application has been forwarded to PAR and is available for submission to the Commission upon request.²

2) All data regarding broadcast facilities was extracted from the CBDS database on the date of the interference tabulation. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein. Only the radiofrequency exposure review of the environmental analysis was undertaken as part of this instant engineering application.