

**Before the
Federal Communications Commission
Washington, DC 20554**

In Re Application of)	
)	
Polnet Communications Ltd.)	File No. 0000208896
For Construction Permit of Minor Modification)	
of Station W223CN, Zion, Illinois)	Facility ID No. 142464
)	
To: Office of the Secretary		
Attn: Chief, Audio Division, Media Bureau		

RESPONSE TO 2ND SUPPLEMENT TO INFORMAL OBJECTION

Polnet Communications Ltd. ("Polnet"), licensee of Station W223CN, Zion, Illinois (Facility ID No. 142464), hereby responds to the "2ND Supplement to Informal Objection" filed by Magnum Communications, Inc. ("MCI"), which again asserts that it has more than the required number of listeners in its 45 dBu contour who would complain of interference from the proposed application. Polnet has decided to file a second Amendment to avoid as many listeners as possible. For this Amendment, there should be only 4 remaining listeners located within the affected 45 dBu overlap area. As such, the Second Amendment complies with Sections 74.1201(k) and 74.1203(a)(3) which requires at least 15 listeners within the population of WMBZ's relevant contour. The Second Amendment is attached.

Accordingly, Polnet requests that the Commission grant the W223CN application as amended in order to resolve the MCI Objection.

Respectfully submitted,

Polnet Communications Ltd.

By: /s/ Mark N. Lipp

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Its Counsel

March 21, 2023

**ENGINEERING STATEMENT
APPLICATION FCC 349
Prepared For Polnet Communications, Ltd
W223CN Zion, Illinois
Facility ID 142464 92.5 FM .250 kW
FCC Form 349-Instant Application**

- 1) Statement-Nature Of Proposal
- 2) Exhibit 1 - Proposed W223CN 60 dBu and 25 mile ARC with WPJX AM 1500 Facility ID 49293(Primary Station).
- 3) Exhibit 2 - W223CN - 54 dBu And First Adjacent WCPY 60 dBu.
- 4) Exhibit 3 – W223CN Proposed 100 dBu And Second Adjacent WVTY 60 dBu.
- 5) Exhibit 4 – W223CN Proposed 48 dBu And First Adjacent WPWX Licensed 54 dBu.
- 6) Exhibit 5 - Proposed W223CN 34 dbu and Co Channel WCLR 54 dBu Contour.
- 7) Exhibit 6 – W223CN 34 dBu and Co Channel WMBZ 54 dBu Contour.
- 8) Exhibit 7 - Proposed Kathrein K524017 2C Directional Pattern.
- 9) Exhibit 8 – Proposed WMBZ overlap Area Reduction
- 10) Exhibit 9 – Co Channel WMBZ Contours/Persons/Letters
- 11) Exhibit 9a – Co Channel WMBZ Contours/Persons/Letters Expanded View
- 12) Exhibit 9c – Co Channel WMBZ Contours//Letters/Pass/Fail -20 dBu U/D

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Statement - Nature Of Proposal

Polnet Communications, Ltd. ("Polnet") is the licensee of Translator Station W223CN, 92.5 FM, Zion, Illinois (Facility ID 142464) W223CN is a licensed Class D FM station with authority to operate .065 kW with a Directional facility (BLFT-20161201AEQ). WPJX AM 1500-Zion, Illinois is the Primary station (BL-20091230ACS). Facility ID(49293).

Polnet herein proposes an amendment to the instant application(0000208896) and proposes to utilize a different antenna than the current License(BLFT-20161201AEQ). Polnet is requesting a change to a SWR FMPL/2-TACU directional pattern. Polnet Proposes the currently licensed tower and coordinates for this instant application(Tower ASR #1008305). Polnet requests a change from 249'(76 meters) to 270 Feet(82.3 meters).

Polnet Requests operation at .250 kW power ERP Vertical and Horizontal.

Polnet is addressing the concerns of WMBZ FM by reducing 34 dBu(50,10) WMBZ 54 dBu(50,50) in this amendment. The overlap area is reduced by 283.59 Sq Miles(734.19 Km). As a result population potentially affected is reduced by 191,579 persons.

Polnet has satisfied 74.1203(a)(3) as defined by 74.1201(k) which requires a total of 15 letters for a population of 1,000,000 to 1,499,999. As a result of the amendment 4 letters remain.

The proposed W223CN FM 92.5 amended 60 dBu contour remains within the 25 mile arc of the primary station WPJX AM 1500(BL-20091230ACS).

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Statement - Nature Of Proposal Page 2**

W223CN FM 92.5 Proposed Site

Tower ASR:

1008305

Coordinates: NAD 83

42-26-34.8 N

88-03-25.8 W

Elevation:

AGL: 270.0'(82.3 Meters)

G-AMSL: 833.33' (254.00m)

RC-AMSL: 1103.33' (336.30m)

HAAT: 345.77' (105.40m)

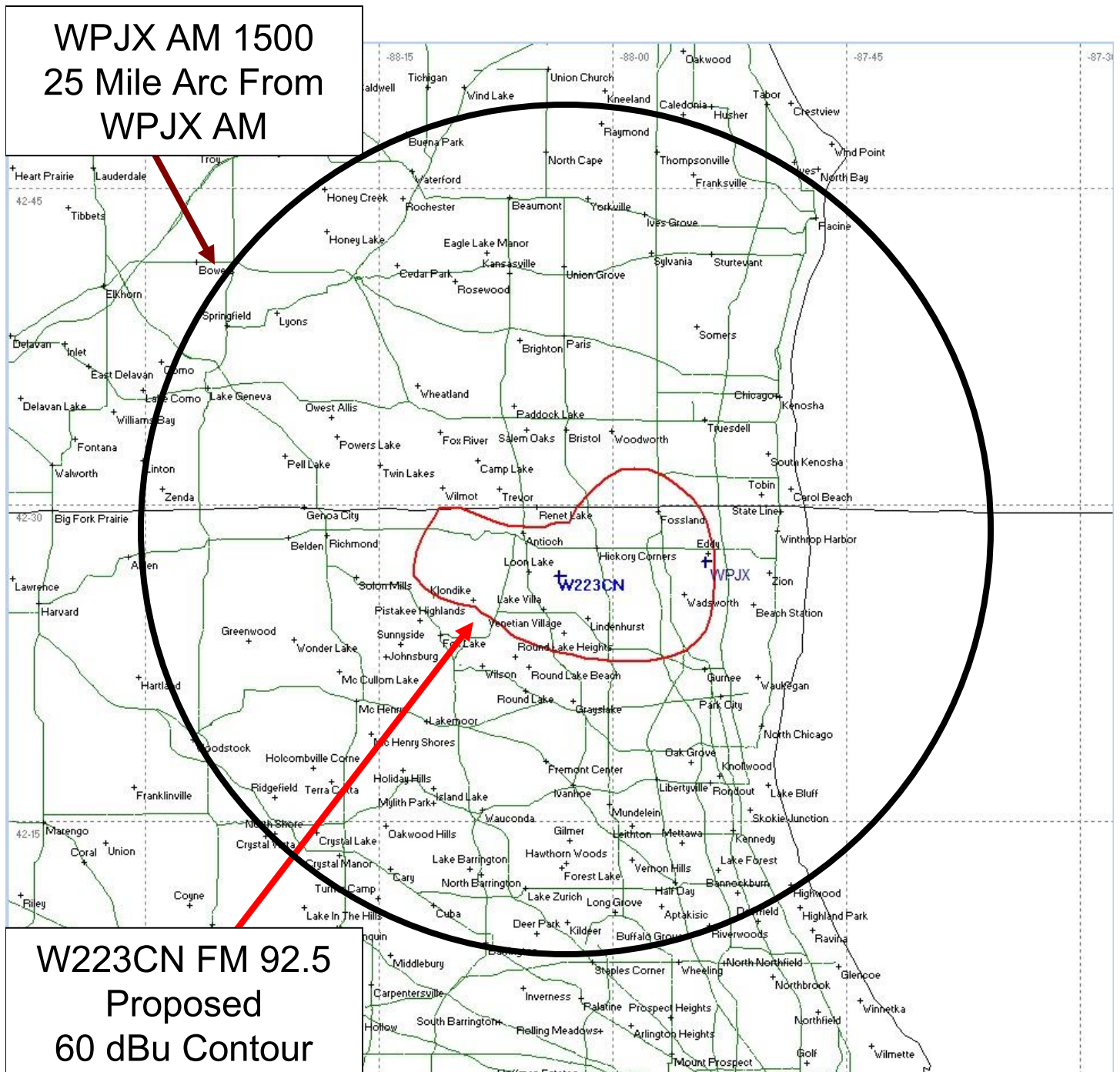
Directional Antenna

SWR FMPL/2-TACU

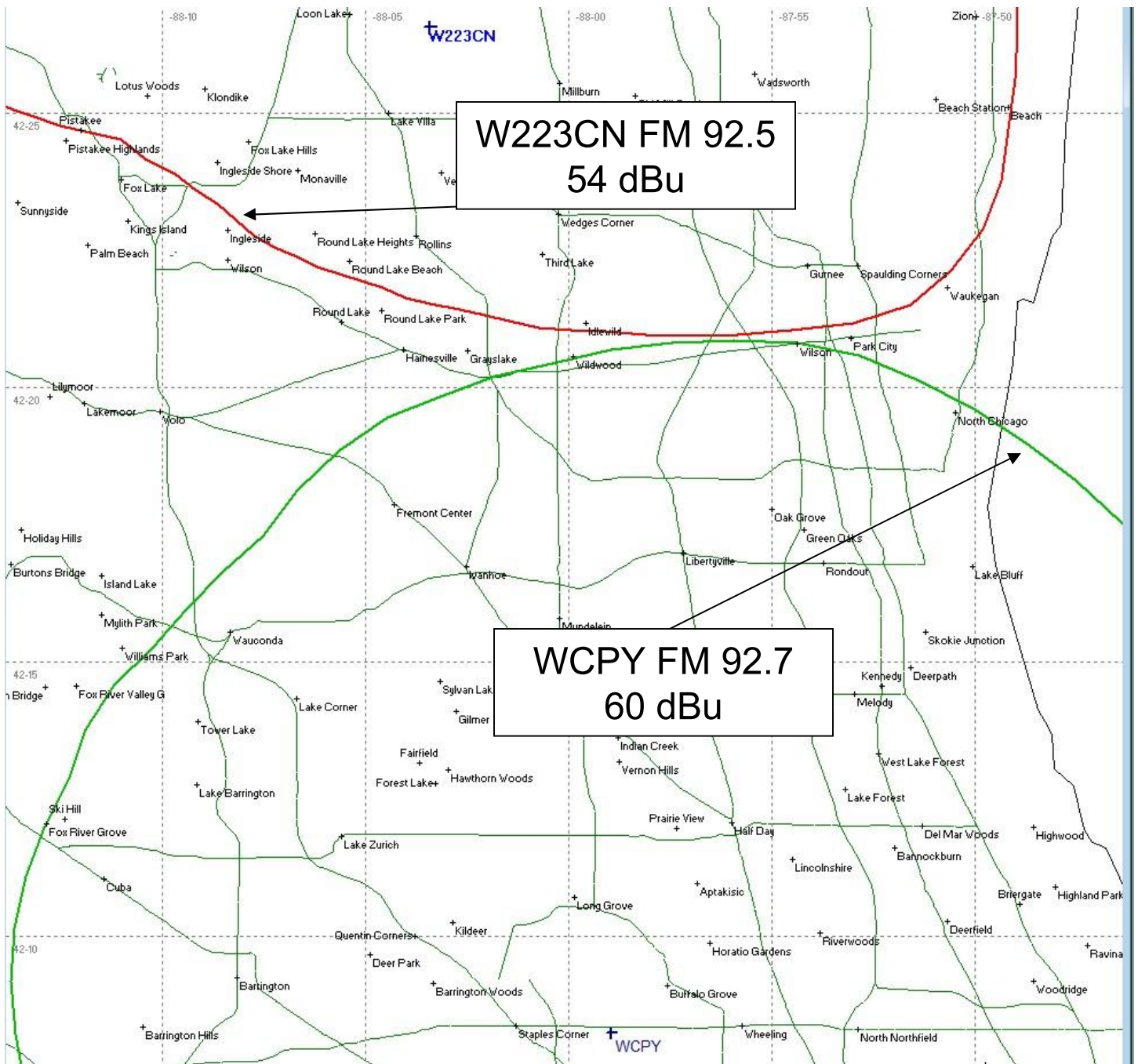
Power:

250 Watts ERP

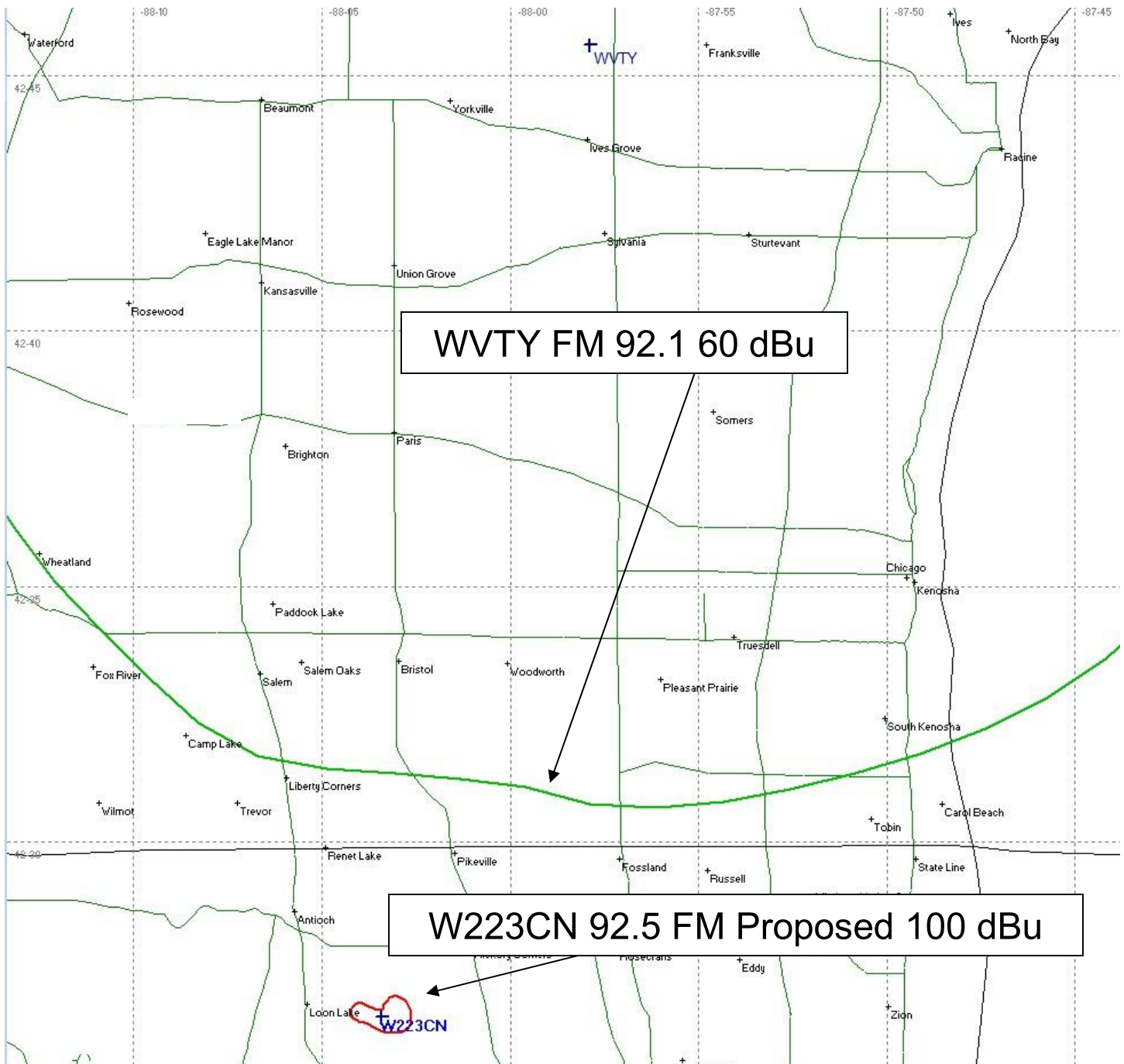
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Exhibit 1 - 25 Mile Arc



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Exhibit 2
W223CN - 54 dBu First Adjacent WCPY 60 dBu



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Exhibit 3
W223CN Proposed 100 dBu - Second Adjacent WVTY 60 dBu**



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APPLICATION FCC 349**

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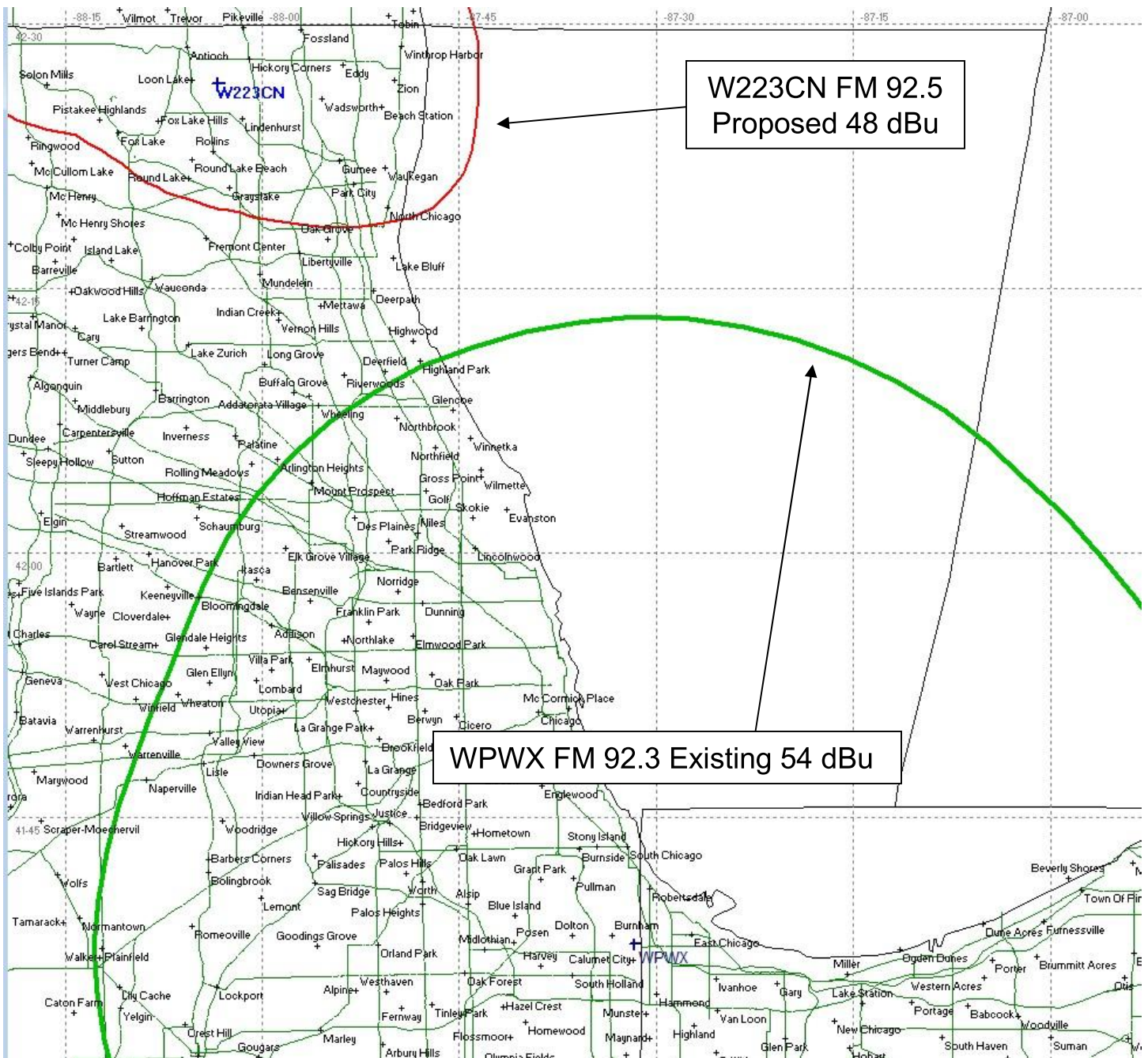
W223CN Zion, Illinois

Facility ID 142464 92.5 FM .250 kW

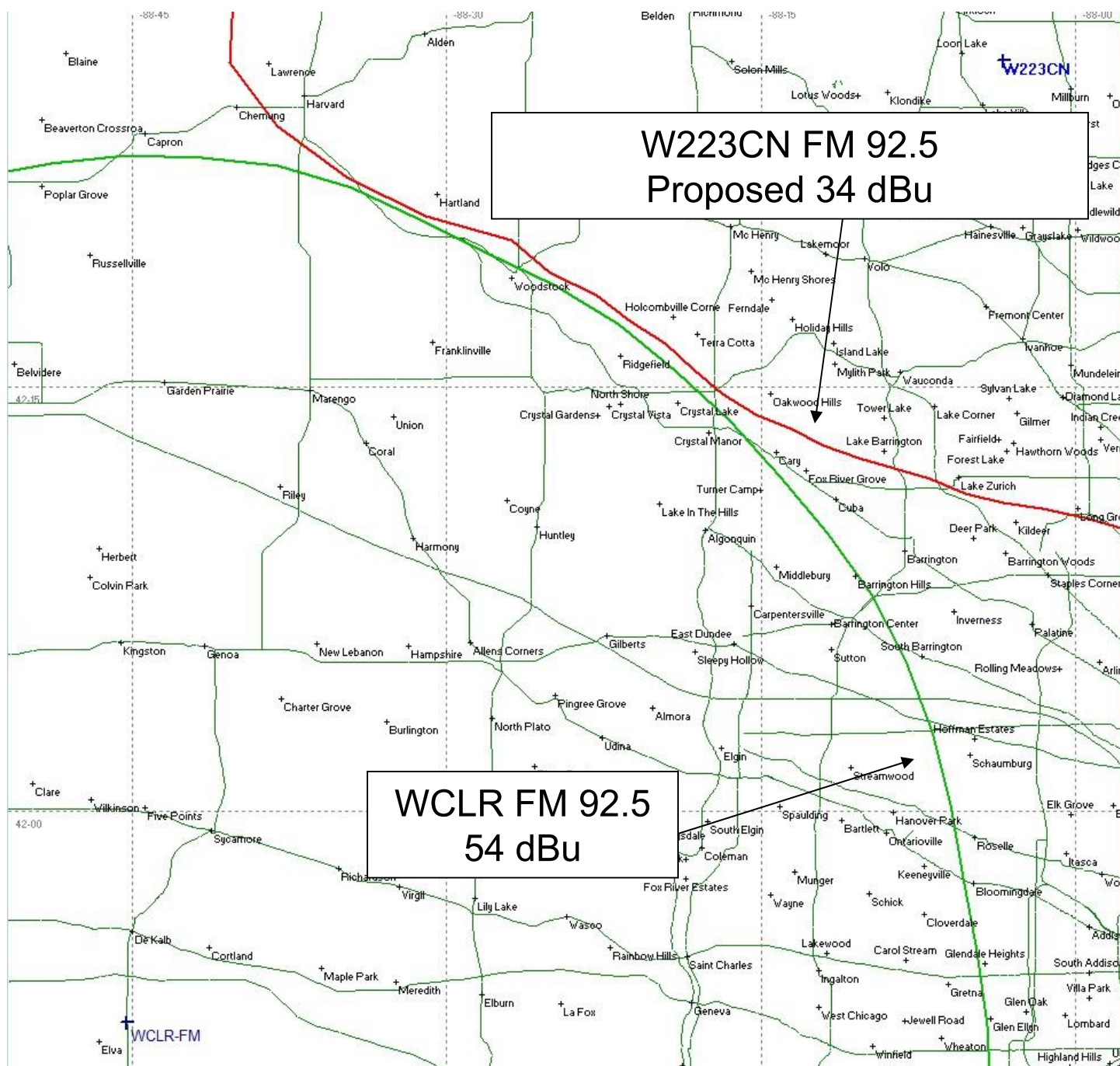
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Exhibit 4

W223CN Proposed 48 dBu – First Adjacent WPWX Licensed 54 dBu



Proposed W223CN 34 dbu and Co Channel WCLR 54 dBu Contour



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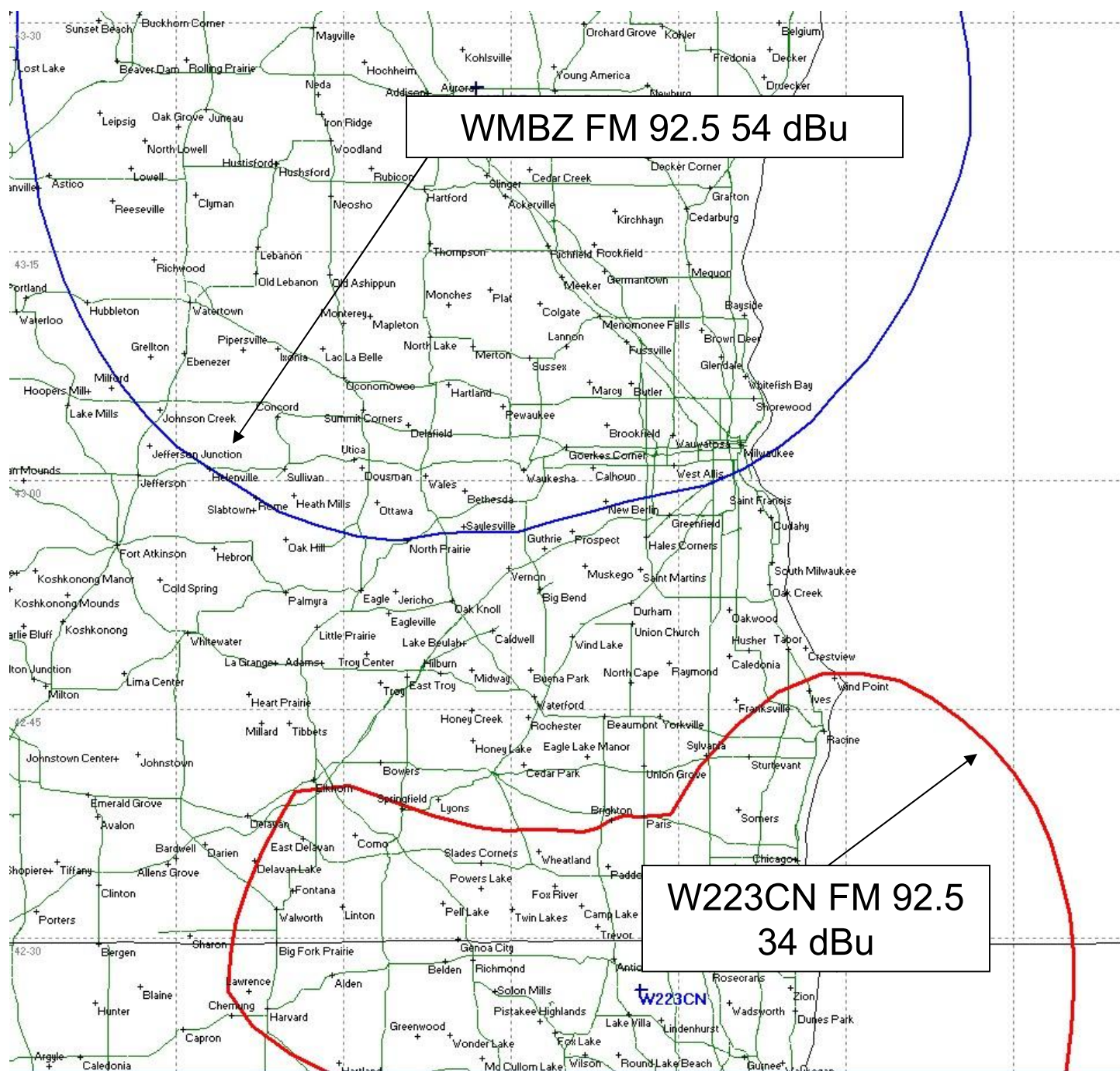
W223CN Zion, Illinois

Facility ID 142464 92.5 FM .250 kW

FCC Form 349-Instant Application

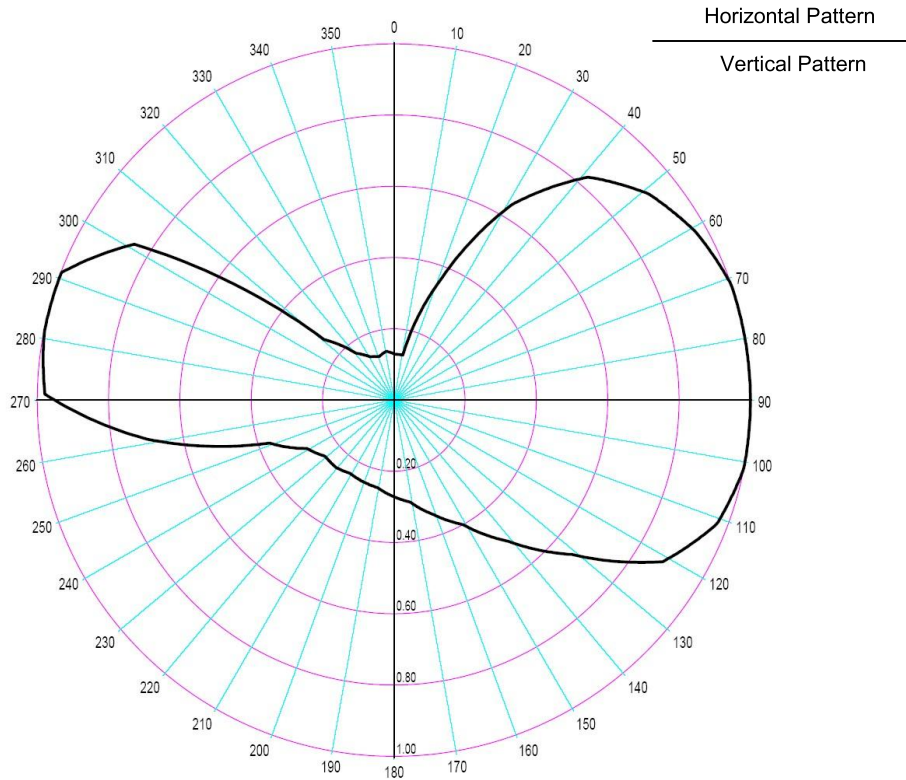
Exhibit 6

W223CN 34 dBu And Co Channel WMBZ 54 dBu Contour



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Exhibit 7

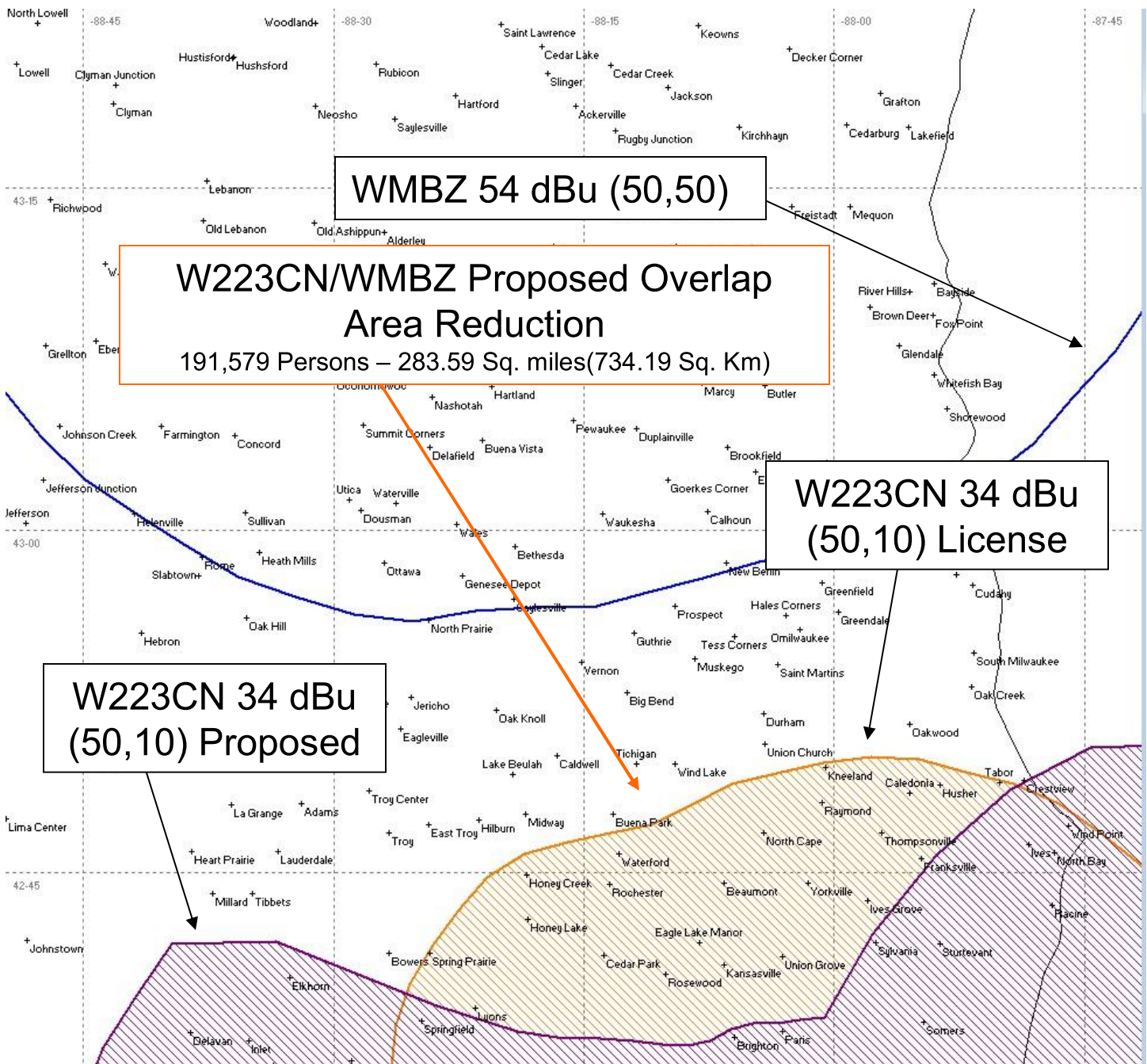
SWR FMPL/2-TACU Directional Pattern



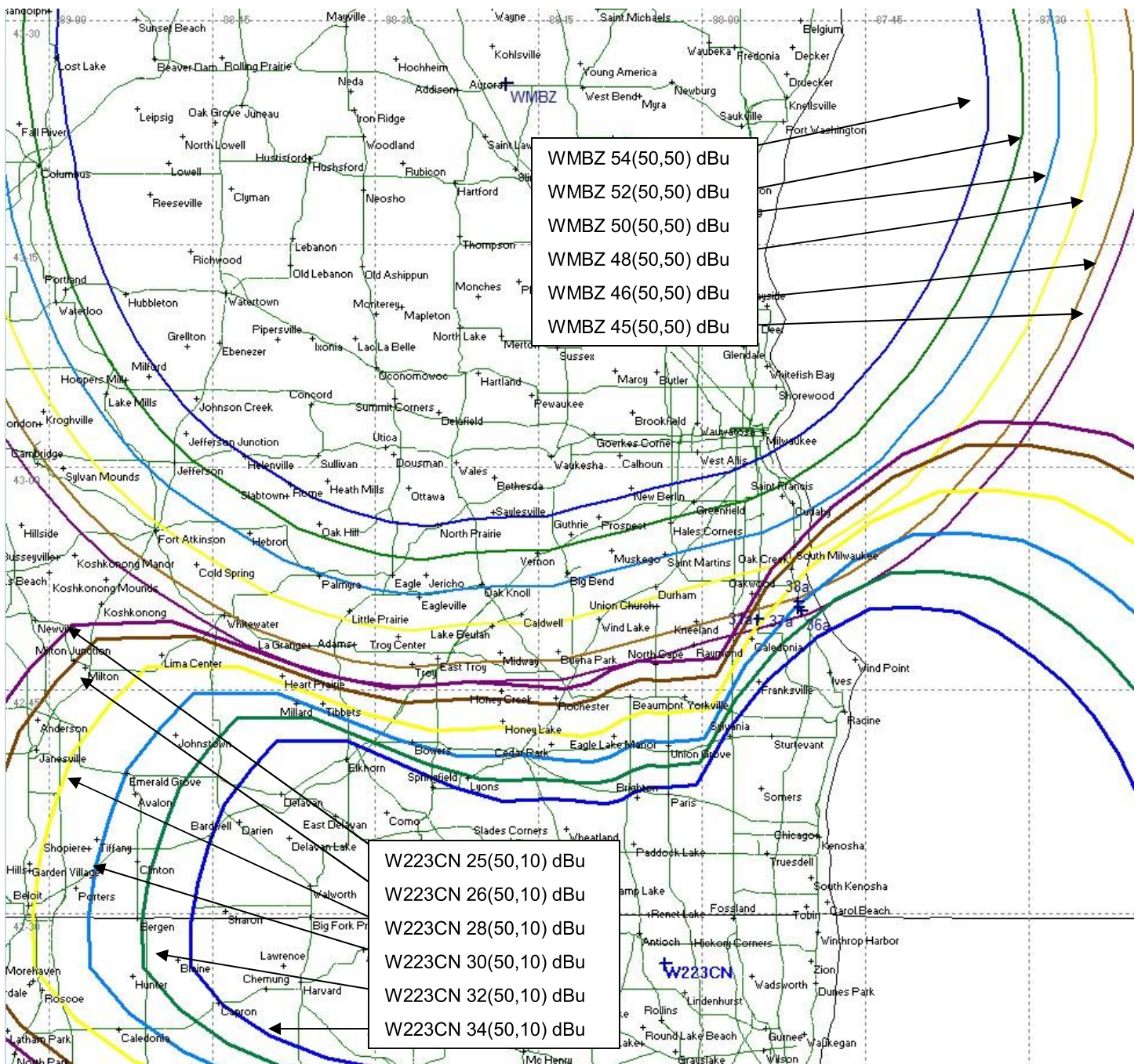
Azim	Rel.FS	ERP [W]	dBk	Azim	Rel.FS	ERP [W]	dBk	Azim	Rel.FS	ERP [W]	dBk	Azim	Rel.FS	ERP [W]	dBk
0.0	0.130	4.226	-23.741	90.0	0.999	249.566	-6.028	180.0	0.271	18.365	-17.360	270.0	0.951	226.160	-6.456
5.0	0.129	4.161	-23.808	95.0	0.999	249.566	-6.028	185.0	0.261	17.035	-17.687	275.0	0.987	243.607	-6.133
10.0	0.129	4.161	-23.808	100.0	0.999	249.566	-6.028	190.0	0.251	15.754	-18.026	280.0	0.997	248.568	-6.046
15.0	0.221	12.213	-19.132	105.0	0.987	243.607	-6.133	195.0	0.247	15.256	-18.166	285.0	0.999	249.566	-6.028
20.0	0.336	28.231	-15.493	110.0	0.972	236.258	-6.266	200.0	0.245	15.010	-18.236	290.0	0.999	249.566	-6.028
25.0	0.471	55.475	-12.559	115.0	0.933	217.680	-6.622	205.0	0.242	14.645	-18.343	295.0	0.939	220.488	-6.566
30.0	0.611	93.355	-10.299	120.0	0.888	197.188	-7.051	210.0	0.240	14.404	-18.415	300.0	0.864	186.673	-7.289
35.0	0.715	127.840	-8.933	125.0	0.791	156.462	-8.056	215.0	0.243	14.766	-18.307	305.0	0.613	93.967	-10.270
40.0	0.810	164.068	-7.850	130.0	0.681	115.971	-9.357	220.0	0.248	15.380	-18.130	310.0	0.318	25.288	-15.971
45.0	0.865	187.106	-7.279	135.0	0.599	89.724	-10.471	225.0	0.249	15.504	-18.095	315.0	0.223	12.436	-19.053
50.0	0.910	207.080	-6.839	140.0	0.524	68.662	-11.633	230.0	0.249	15.504	-18.095	320.0	0.178	7.923	-21.011
55.0	0.939	220.488	-6.566	145.0	0.465	54.071	-12.670	235.0	0.261	17.035	-17.687	325.0	0.157	6.164	-22.101
60.0	0.964	232.385	-6.338	150.0	0.410	42.036	-13.764	240.0	0.276	19.049	-17.201	330.0	0.142	5.042	-22.974
65.0	0.981	240.654	-6.186	155.0	0.375	35.166	-14.539	245.0	0.315	24.813	-16.053	335.0	0.135	4.557	-23.413
70.0	0.996	248.070	-6.054	160.0	0.345	29.764	-15.263	250.0	0.360	32.409	-14.893	340.0	0.130	4.226	-23.741
75.0	0.999	249.566	-6.028	165.0	0.319	25.447	-15.944	255.0	0.501	62.767	-12.023	345.0	0.133	4.423	-23.542
80.0	0.999	249.566	-6.028	170.0	0.294	21.615	-16.653	260.0	0.666	110.918	-9.550	350.0	0.138	4.762	-23.222
85.0	0.999	249.566	-6.028	175.0	0.281	19.745	-17.045	265.0	0.811	164.474	-7.839	355.0	0.135	4.557	-23.413

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Exhibit 8**

**W223CN 34 dBu(50,10)License, W223CN Proposed 34 dBu(50,10)
Co Channel WMBZ 54 DBU(50,50) Contour
Proposed Overlap Reduction Area**

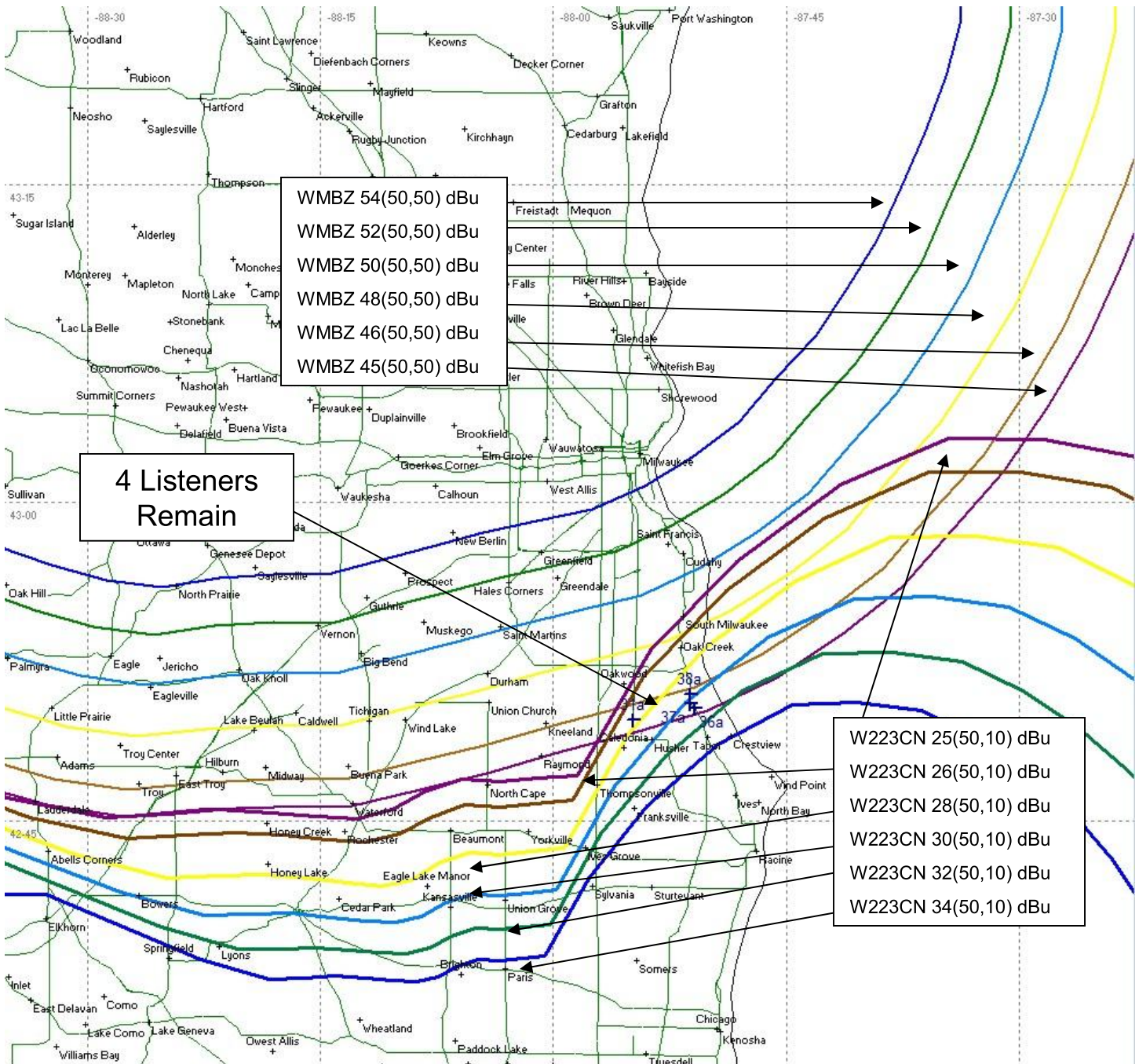


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Exhibit 9
Co Channel WMBZ Contours/Persons/Letters



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Exhibit 9b

Co Channel WMBZ Contours/Persons/Letters Expanded View



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Exhibit 9c
Co Channel WMBZ Contours//Letters/ Pass Fail -20 dbu U/D

WMBZ Listener Data:

1a) 42-47-50.5 N 88-24-13.1 W- Pass	20a) 42-52-20.9 N 87-56-13.8 W- Pass
2a) 42-46-59.1 N 88-24-17.2 W- Pass	21a) 42-47-31.5 N 88-23-06.1 W- Pass
3a) 42-45-37.9 N 88-10-10.7 W- Pass	22a) 42-54-58.2 N 87-56-08.6 W- Pass
4a) 42-51-05.3 N 88-33-36.0 W- Pass	23a) 42-51-05.0 N 88-19-18.7 W- Pass
5a) 42-53-28.2 N 88-01-30.1 W- Pass	24a) 42-53-06.1 N 88-09-30.3 W- Pass
6a) 42-53-27.3 N 88-17-41.1 W- Pass	25a) 42-55-55.3 N 88-09-30.3 W- Pass
7a) 42-52-41.5 N 88-18-58.4 W- Pass	26a) 42-49-47.0 N 87-57-09.8 W- Pass
8a) 42-54-24.6 N 88-14-21.8 W- Pass	27a) 42-57-32.6 N 87-56-00.4 W- Pass
9a) 42-52-19.6 N 88-17-56.3 W- Pass	28a) 42-51-02.5 N 87-56-36.9 W- Pass
10a) 42-50-32.7 N 88-04-45.2 W- Pass	28b) 42-49-50.3 N 87-57-23.8 W-Pass
10b) 42-47-30.6 N 88-13-04.4 W- Pass	29a) 42-58-07.2 N 88-04-21.3 W- Pass
11a) 42-53-19.6 N 87-56-41.9 W- Pass	30a) 42-49-57.0 N 88-43-04.5 W- Pass
12a) 42-51-58.8 N 87-54-24.2 W- Pass	31a) 42-49-44.4 N 87-54-51.4 W- Fail
13a) 42-56-05.9 N 87-59-23.3 W- Pass	32a) 42-52-18.9 N 87-54-46.0 W- Pass
14a) 42-52-29.0 N 87-57-51.5 W- Pass	33a) 42-48-46.0 N 87-57-11.0 W- Pass
15a) 42-54-03.5 N 88-08-27.0 W- Pass	34a) 42-58-57.9 N 87-57-10.5 W- Pass
16a) 42-53-17.8 N 88-14-51.5 W- Pass	35a) 42-49-06.0 N 87-57-10.1 W- Pass
17a) 42-56-22.3 N 87-58-59.9 W- Pass	36a) 42-50-18.2 N 87-50-53.1 W- Fail
18a) 42-46-14.3 N 88-14-09.1 W- Pass	37a) 42-50-33.0 N 87-51-10.5 W- Fail
19a) 42-46-23.5 N 88-11-37.5 W- Pass	38a) 42-50-58.6 N 87-51-12.4 W- Fail

4 Listeners remain

Criteria 1 - The required minimum number of valid listener complaints as determined using Table 1 of §74.1203(a)(3) and as defined in §74.1201(k). Affected station WMBZ(FM) serves a population of 1,467,662 within its Class B, 54 dBμ F(50:50) Service Contour. Table 1 of §74.1203(a)(3) mandates a minimum of fifteen (15) listener complaints for populations ranging from 1,000,000-1,499,999.

CERTIFICATE OF SERVICE

I, Michelle Brown Johnson, hereby certifies that the foregoing "Response to 2nd Supplement to Informal Objection was sent by first class mail and via email on March 21, 2023 to the following:

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/s/ Michelle Brown Johnson

Michelle Brown Johnson