

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington DC 20554**

In re Application of	)		
	)		
JEAN J. SUH	)	File Nos.	BNPFT-20171201AMU
	)		
For Construction Permit of	)	FCC Facility ID:	201575
NEW FM Translator,	)		
Puyallup, WA	)		

To: Office of the Secretary  
Attn: Chief Audio Division, Media Bureau

**PETITION FOR RECONSIDERATION AND REQUEST FOR REINSTATEMENT  
*NUNC PRO TUNC***

Jean J. Suh (“Ms. Suh”), applicant for a new FM translator at Puyallup, Washington (Facility ID No. 201575) (the “Station”), hereby submits this Petition for Reconsideration of the Letter Decision dated March 7, 2018 (“Letter Decision”).<sup>1</sup> The Letter Decision (1) granted the Petition to Deny filed by Olympia Broadcasters, Inc. (“Olympia”) on December 26, 2017 (the “Petition to Deny”) seeking the dismissal of Ms. Suh’s Long-Form 349 Application for the Station (File No. BNPFT-20171201AMU) (the “CP Application”), and (2) dismissed the CP Application.<sup>2</sup>

As a result of the issues brought to Ms. Suh’s attention through Olympia’s Petition to Deny, Ms. Suh has filed an amendment to the Station’s CP Application (the “Amended CP Application”) rectifying any interference concerns of Olympia to its FM broadcast station KRRY, Shelton,

---

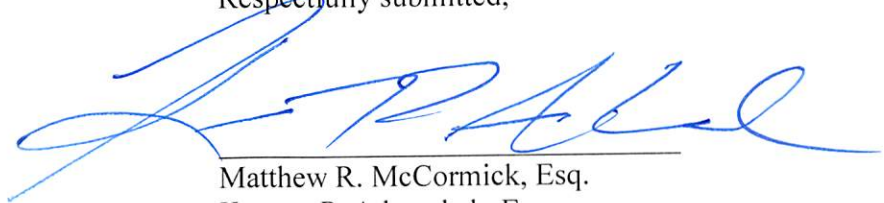
<sup>1</sup> See generally Letter from James D. Bradshaw, Deputy Chief, Audio Division, Media Bureau, Federal Communications Commission, to Jean J. Suh (Mar. 7, 2018).

<sup>2</sup> See *id.* at 2. See also Petition to Deny of Olympia Broadcasters, Inc. (File No. BNPFT-20171201AMU) at 1 (filed Dec. 26, 2017).

Washington (Facility ID No. 82527). A copy of the Amended CP Application is attached hereto as **Exhibit A**.

As the Amended CP Application addresses Olympia's concerns set forth in its Petition to Deny, Ms. Suh respectfully requests that the Audio Division reconsider the Letter Decision and accept the Amended CP Application *nunc pro tunc*. Such an action will serve the goals of the Commission's AM Revitalization proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'M. McCormick', is written over a horizontal line.

Matthew R. McCormick, Esq.  
Keenan P. Adamchak, Esq.  
Fletcher, Heald & Hildreth, PLC  
1300 N. 17th Street, Suite 1100  
Arlington, VA 22209  
Tel: (703) 812-0400  
Fax: (703) 812-0486  
mccormick@fhhlaw.com  
adamchak@fhhlaw.com

*Counsel to Jean J. Suh*

April 10, 2018

**EXHIBIT A**

**Amended CP Application**

# **Federal Communications Commission**

**FCC MB - CDBS Electronic Filing**

**Account number: 136397**

**Description: AMENDMENT TO PROPOSED FM TRANSLATOR TO  
REBROADCAST KSUH**

**Application Reference Number: 20171201AMU**

**Successfully filed at Apr 10 2018 4:00PM**

**Based on the information supplied, no fee is required.**

[Menu](#)

[Logout](#)

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 060-0405 (April 2017)	FOR FCC USE ONLY
<b>FCC 349</b>		
<b>APPLICATION FOR AUTHORITY TO CONSTRUCT OR MAKE CHANGES IN AN FM TRANSLATOR OR FM BOOSTER STATION</b>		FOR COMMISSION USE ONLY FILE NO. - 20171201AMU
Read INSTRUCTIONS Before Filling Out Form		

**Section I - General Information**

1.	Legal Name of the Applicant JEAN J. SUH										
	Mailing Address 200 S. 333RD STREET SUITE 100										
	City FEDERAL WAY	State or Country (if foreign address) WA	ZIP Code 98003 -								
	Telephone Number (include area code) 2538151212		E-Mail Address (if available)								
	FCC Registration Number: 0006141402	Call Sign NEW	Facility Identifier 201575								
2.	Contact Representative (if other than Applicant) MATTHEW H. MCCORMICK, ESQ.		Firm or Company Name FLETCHER, HEALD & HILDRETH, PLC								
	Mailing Address 1300 NORTH 17TH STREET 11TH FLOOR										
	City ARLINGTON	State or Country (if foreign address) VA	ZIP Code 22209 -								
	Telephone Number (include area code) 7038120400		E-Mail Address (if available) MCCORMICK@FHHLAW.COM								
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input checked="" type="radio"/> Other AMENDMENT <input type="radio"/> N/A (Fee Required)										
4.	Facility information: a. <input checked="" type="radio"/> FM Translator <input type="radio"/> FM Booster b. Community or communities to which the proposed facility will be licensed: <table border="1" style="width: 100%;"><tr><td>Community(ies)</td><td>State</td></tr><tr><td>PUYALLUP</td><td>WA</td></tr><tr><td> </td><td> </td></tr><tr><td> </td><td> </td></tr></table>			Community(ies)	State	PUYALLUP	WA				
Community(ies)	State										
PUYALLUP	WA										
5.	<b>Application Purpose</b> <input type="radio"/> New station <input type="radio"/> Major Modification of construction permit <input type="radio"/> Major Change in licensed facility <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Minor Change in licensed facility <input type="radio"/> Major Amendment to pending application <input checked="" type="radio"/> Minor Amendment to pending application  a. File number of original construction permit: - If an amendment, <b>submit as an Exhibit</b> a listing by Section and Question Number the portions of the      [Exhibit 1] pending application that are being revised.										

**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided. See General Instruction J.**

## Section II - Legal

1.	<b>Certification.</b> Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No									
2.	Applicant is: <table border="1"> <tr> <td><input checked="" type="radio"/> an individual</td> <td><input type="radio"/> a general partnership</td> <td><input type="radio"/> a for-profit corporation</td> </tr> <tr> <td><input type="radio"/> a limited partnership</td> <td><input type="radio"/> a not-for-profit corporation</td> <td><input type="radio"/> a limited liability company (LLC/LC)</td> </tr> <tr> <td colspan="3"><input type="radio"/> other</td> </tr> </table> a. If "other", describe nature of applicant in an Exhibit. [Exhibit 2]	<input checked="" type="radio"/> an individual	<input type="radio"/> a general partnership	<input type="radio"/> a for-profit corporation	<input type="radio"/> a limited partnership	<input type="radio"/> a not-for-profit corporation	<input type="radio"/> a limited liability company (LLC/LC)	<input type="radio"/> other			
<input checked="" type="radio"/> an individual	<input type="radio"/> a general partnership	<input type="radio"/> a for-profit corporation									
<input type="radio"/> a limited partnership	<input type="radio"/> a not-for-profit corporation	<input type="radio"/> a limited liability company (LLC/LC)									
<input type="radio"/> other											
3.	a. Applicant certifies that it is not the licensee or permittee of the commercial primary station being rebroadcast and that neither it nor any parties to the application have any interest in or connection with the commercial primary station being rebroadcast. See 47 C.F.R. Section 74.1232(d).  b. Applicant certifies that the FM translator's (a) 1mV/m coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 1mV/m coverage contour is contained within the greater of either: (i) the 2 mV/m daytime contour of the commercial AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the commercial AM primary station's transmitter site.	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A  See Explanation in [Exhibit 3]									
		<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A  See Explanation in [Exhibit 4]									
<p><b>NOTE: If No to a. and b., and no waiver has been requested in an Exhibit, this application is unacceptable for filing.</b> See 47 C.F.R. Section 74.1232(d).</p> <p>If Yes to (a) and No to (b) applicant is prohibited from receiving any support, before or after construction, either directly or indirectly from the commercial primary station being rebroadcast or from any person or entity having any interest whatsoever, or any connection with the primary FM station. Interested and connected parties include group owners, corporate parents, shareholders, officers, directors, employees, general and limited partners, family members and business associates. See 47 C.F.R. Section 74.1232(e).</p>											
4.	The applicant, if for a commercial FM translator station with a coverage contour extending beyond the protected contour of the commercial primary station being rebroadcast, certifies that it has not received any support, before or after constructing, directly or indirectly, from the licensee/permittee of the primary station or any person with an interest in or connection with the licensee or permittee of the primary station, except for technical assistance as provided for under 47 C.F.R. Section 74.1232(e).	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A  See Explanation in [Exhibit 5]									
5.	For applicants proposing translator rebroadcasts that are not the licensee of the primary station, the applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted. <b>If No, this application is unacceptable for filing.</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A									
6.	<b>Character Issues.</b> Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:  a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 6]									

7.	<b>Adverse Findings.</b> Applicant certifies that, with respect to the applicant, any party to the application, and any non-party equity owner in the applicant, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.  If the answer is "No," attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and a description of the disposition of the matter. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 C.F.R. Section 1.65, the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and date of filing; and (ii) the disposition of the previously reported matter.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 7]
8.	<b>Alien Ownership and Control.</b> Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 8]
9.	<b>Program Service Certification.</b> Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.	<input checked="" type="radio"/> Yes <input type="radio"/> No
10.	<b>Local Public Notice.</b> Applicant certifies compliance with the public notice requirements of 47 C.F.R. Section 73.3580.	<input checked="" type="radio"/> Yes <input type="radio"/> No
11.	<b>Auction Authorization.</b> If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.  An exhibit is required unless this question is inapplicable.	<input type="radio"/> Yes <input type="radio"/> No  <input checked="" type="radio"/> N/A  See Explanation in [Exhibit 9]
12.	<b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
13.	<b>Equal Employment Opportunity (EEO).</b> If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	<input type="radio"/> Yes <input type="radio"/> No  <input checked="" type="radio"/> N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing JEAN J. SUH	Typed or Printed Title of Person Signing SOLE PROPRIETOR LICENSEE
Signature	Date 4/10/2018

### SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name BRUCE BELLAMY		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 4/9/2018	
Mailing Address MUNN-REESE P.O. BOX 220			
City COLDWATER		State or Country (if foreign address) MI	Zip Code 49036 -
Telephone Number (include area code) 5172787339		E-Mail Address (if available) BRUCE@MUNN-REESE.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

### Section III-A - Engineering

#### TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

#### TECH BOX

1.	Channel: 233											
2.	Primary Station:											
	Facility ID Number			Call Sign			City			State		
	32339			KSUH			PUYALLUP			WA		
3.	Delivery Method (Select One): <input type="radio"/> Off-air <input type="radio"/> Microwave <input type="radio"/> Satellite <input type="radio"/> Via <input checked="" type="radio"/> Other											
4.	Antenna Location Coordinates: (NAD 27)											
	Latitude: Degrees 47 Minutes 19 Seconds 52.5 <input checked="" type="radio"/> North <input type="radio"/> South											
	Longitude: Degrees 122 Minutes 5 Seconds 13.6 <input checked="" type="radio"/> West <input type="radio"/> East											
5.	Antenna Structure Registration Number: 1238019 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA											
6.	Antenna Location Site Elevation Above Mean Sea Level:										166 meters	
7.	Overall Tower Height Above Ground Level:										37 meters	
8.	Height of Radiation Center Above Ground Level:										26 meters(H)   26 meters(V)	
9.	Effective Radiated Power:										0.22 kW(H)   0.22 kW(V)	
10.	Transmitting Antenna:											
	Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under <a href="http://licensing.fcc.gov/prod/cdbb/pubacc/prod/cdbb_pa.htm">CDBS Public Access</a> (http://licensing.fcc.gov/prod/cdbb/pubacc/prod/cdbb_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search.											
	<input type="radio"/> Nondirectional <input type="radio"/> Directional Off-the Shelf <input checked="" type="radio"/> Directional composite											
	Manufacturer NIC Model BKY3/P-3 (0.85 SP SLANT 45)											
	Rotation: 230degrees <input type="checkbox"/> No Rotation											
	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
	0	1	10	0.99	20	0.97	30	0.93	40	0.88	50	0.81



60	0.73	70	0.63	80	0.53	90	0.44	100	0.36	110	0.29
120	0.25	130	0.22	140	0.22	150	0.22	160	0.23	170	0.23
180	0.23	190	0.23	200	0.23	210	0.22	220	0.22	230	0.22
240	0.25	250	0.29	260	0.36	270	0.44	280	0.53	290	0.63
300	0.73	310	0.81	320	0.88	330	0.93	340	0.97	350	0.99
Additional Azimuths											

[Relative Field Polar Plot](#)

<p>11. <b>For FM Boosters and Fill-in translators only.</b></p> <p>a. <b>FM Fill-in translators.</b> Applicant certifies that the FM translator's (a) 1mV/m coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 1mV/m coverage contour is contained within the greater of either: (i) the 2 mV/m daytime contour of the commercial AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the commercial AM primary station's transmitter site.</p> <p>b. <b>FM Boosters.</b> Applicant certifies that the FM Booster station's service contour is entirely within the primary station's protected coverage contour.</p>	<p align="right"> <input checked="" type="radio"/> Yes <input type="radio"/> No  <input type="radio"/> N/A              See Explanation in [Exhibit 10]    <input type="radio"/> Yes <input type="radio"/> No  <input checked="" type="radio"/> N/A              See Explanation in [Exhibit 11]         </p>
<p>12. <b>Interference.</b> The proposed facility complies with all of the following applicable rule sections. Check all that apply:</p> <p><b>Overlap Requirements.</b>  <input checked="" type="checkbox"/> a) 47 C.F.R. Section 74.1204  <b>Exhibit Required.</b></p> <p><b>Television Channel 6 Protection.</b>  <input type="checkbox"/> b) 47 C.F.R. Section 74.1205 with respect to station(s)  <b>Exhibit Required.</b></p>	<p align="right"> <input checked="" type="radio"/> Yes <input type="radio"/> No              See Explanation in [Exhibit 12]                [Exhibit 13]              [Exhibit 14]         </p>
<p>13. <b>Unattended operation.</b> Applicant certifies that unattended operation is not proposed, or if this application proposes unattended operation, the applicant certifies that it will comply with the requirements of 47 C.F.R. Section 74.1234.</p>	<p align="right"> <input checked="" type="radio"/> Yes <input type="radio"/> No              See Explanation in [Exhibit 15]         </p>
<p>14. <b>Multiple Translators.</b> Applicant certifies that it does not have any interest in an application or an authorization for an FM translator station that serves substantially the same area and rebroadcasts the same signal as the proposed FM translator station.</p>	<p align="right"> <input checked="" type="radio"/> Yes <input type="radio"/> No              See Explanation in [Exhibit 16]         </p>
<p>15. <b>Environmental Protection Act.</b> Applicant certifies that the proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an <b>Exhibit is required.</b></p> <p>By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.</p>	<p align="right"> <input checked="" type="radio"/> Yes <input type="radio"/> No              See Explanation in [Exhibit 17]         </p>
<p><b>PREPARER'S CERTIFICATION ON PAGE 4 MUST BE COMPLETED AND SIGNED.</b></p>	

**Section IV -- Noncommercial Educational Point System Factors - -New and Major Change Applications on Reserved Channels Only** ( used to select among mutually exclusive applications for new stations and major modifications) **NOTE:** Applicants will not received any additional points for amendments made after the close of the application filing window.

<b>Preliminary Matter:</b> Does this application provide fill-in service only?		<input type="radio"/> Yes <input type="radio"/> No
1. <b>Established Local Applicant:</b> Applicant certifies that for at least the 24 months immediately prior to application, and continuing through the present, it qualifies as a local applicant pursuant to 47 C.F.R. Section 73.7000, that its governing documents require that such localism be maintained, and that it has placed documentation of its qualifications as an established local applicant in a local public inspection file and has submitted to the Commission copies of the documentation.		<input type="radio"/> Yes <input type="radio"/> No
2. <b>Diversity of Ownership:</b> Applicant certifies that the principal community (city grade) contour of the proposed station does not overlap the principal community contour of any other authorized radio station (including AM, FM, and non-fill-in FM translator stations, commercial or noncommercial) in which any party to the application has an attributable interest as defined in 47 C.F.R. Section 73.3555, that its governing documents require that such diversity qualification in a local public inspection file and has submitted to the Commission copies of the documentation.		<input type="radio"/> Yes <input type="radio"/> No
3. <b>State-wide Network:</b> Applicant certifies that (a) it has NOT claimed a credit for diversity of ownership above; (b) it is one of the three specific types of organizations described in 47 C.F.R. Section 73.7003(b)(3); and (c) it has placed documentation of its qualifications in a local public inspection file and has submitted to the Commission copies of the documentation.		<input type="radio"/> Yes <input type="radio"/> No
4. <b>Technical Parameters:</b> Applicant certifies that the numbers in the boxes below accurately reflect the new (increased) area and population that its proposal would serve with a 60 dBu signal measured in accordance with the standard predicted contours in 47 C.F.R. Section 73.713(c) and that it has documented the basis for its calculations in the local public inspection file and has submitted copies to the Commission. Major modification applicants should include the area of proposed increase only (exclude the station's existing service area). (Points, if any, will be determined by FCC)		<input type="radio"/> Yes <input type="radio"/> No
New (increased) area served in square kilometers (excluding areas of water):		
Population served based on the most recent census block data from the United States Bureau of Census using the centroid method:		
<b>Tie Breakers</b>		
5. <b>Existing Authorizations.</b> a. By placing a number in the box, the applicant certifies that it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, existing authorizations for the following number of relevant broadcast stations. FM translator applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial and FM translator stations other than fill-in stations.  (number of attributable commercial and non-commercial licenses and construction permits)  b. (Fill-in Applicants Only.) By placing a number in the box, the applicant certifies that, in addition to the station identified in 5(a), it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, existing authorizations for the following number of FM translators.		
6. <b>Pending Applications.</b> a. By placing a number in the box, the applicant certifies that it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, pending applications for new or major changes to the following number of relevant broadcast stations, AM and FM, commercial and non-commercial and FM translator stations other than fill-in stations.  (number of attributable commercial and non-commercial applications)  b. (Fill-in Applicants Only.) By placing a number in the box, the applicant certifies that, in addition to the station identified in 5(a), it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date of filing, existing authorizations for the following number of FM translators.		

## Section VI -- Certification

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing JEAN J. SUH	Typed or Printed Title of Person Signing OWNER
Signature	Date 4/10/2018

---

## Exhibits

### Exhibit 1

**Description:** NATURE OF AMENDMENT

THROUGH THIS AMENDMENT, APPLICANT, JEAN J. SUH, PROPOSES THE RELOCATION OF THE TRANSMITTER SITE FOR ITS PROPOSED NEW FM TRANSLATOR, PUYALLUP, WA (FIN 201575) ('PROPOSED NEW FM TRANSLATOR'), FROM ASRN 1010564 TO ASRN 1238019 IN ORDER TO ADDRESS THE INTERFERENCE ISSUES RAISED BY OLYMPIA BROADCASTERS, INC. ('OLYMPIA') IN ITS DECEMBER 26, 2017 PETITION TO DENY ('PETITION TO DENY') APPLICANT'S LONG-FORM 349 APPLICATION FOR THE PROPOSED NEW FM TRANSLATOR (FILE NO. BNPFT-20171201AMU) ('ORIGINAL LONG-FORM 349'). OLYMPIA ALLEGED IN ITS PETITION TO DENY THAT THE PROPOSED NEW FM TRANSLATOR'S FACILITIES PROVIDED IN THE ORIGINAL LONG-FORM 349 WOULD CAUSE INTERFERENCE TO OLYMPIA'S FM BROADCAST STATION KRXY, SHELTON, WASHINGTON (FACILITY ID NO. 82527) ('KRXY').

THE OVERLAP OF THE ORIGINAL AND NEW PROPOSED 60 DBU F(50:50) CONTOURS FOR THE PROPOSED NEW FM TRANSLATOR IS SHOWN IN EXHIBIT 13.2. THE OVERLAP AREA BETWEEN THE NEW AND PROPOSED 60 DBU SERVICE CONTOURS IS LESS THAN 1 SQ. KM, AND CONTAINS A POPULATION OF FIFTEEN (15) PERSONS. ACCORDINGLY, NONE OF THE LISTENERS OF KRXY RELIED UPON BY OLYMPIA IN ITS PETITION TO DENY ARE BELIEVED TO LISTEN TO KRXY WITHIN THE FM TRANSLATOR'S NEW PROPOSED 60 DBU SERVICE CONTOUR.

---

### Attachment 1

---

### Exhibit 3

**Description:** OWNERSHIP OF PRIMARY STATION

APPLICANT, JEAN J. SUH, IS THE LICENSEE OF KSUH(AM), PUYALLUP, WA (FIN 32339), WHICH IS THE PROPOSED PRIMARY STATION FOR NEW FM TRANSLATOR, PUYALLUP, WA (FIN 201575). COMMON OWNERSHIP OF A CROSS-SERVICE FM TRANSLATOR AND ITS PRIMARY STATION IS PERMISSIBLE PURSUANT TO THE COMMISSION'S RULES.

---

### Attachment 3

---

### Exhibit 10

**Description:** FILL-IN TRANSLATOR REQUIREMENTS

SEE DISCUSSION IN EXHIBIT 13

---

### Attachment 10

---

### Exhibit 13

**Description:** ENGINEERING DISCUSSION AND EXHIBITS

THE APPLICANT WOULD LIKE TO NOTE USAGE OF THE NED 03 SECOND TERRAIN DATABASE FOR THE TERRAIN-BASED SHOWINGS CONTAINED HEREIN.

**Attachment 13**

Description
<a href="#">Amended Engineering Statement</a>
<a href="#">Amended Exhibits 13.1 to 13.5</a>

**Exhibit 17****Description:** ENVIRONMENTAL COMPLIANCE**Attachment 17**

Description
<a href="#">Exhibit 17.1</a>

# **ENGINEERING REPORT**

## **FM Translator New Station Construction Permit Application**

for

## **New FM Translator**

as an AM Fill-In Translator for  
**KSUH(AM) – Puyallup, WA**

**“Minor Amendment to Pending  
Long Form Application for FM  
Translator Auction Window 99”**

April 2018

COPYRIGHT 2018

**MUNN-REESE**

Broadcast Engineering Consultants  
Coldwater, MI 49036

# **Table of Contents**

---

Discussion of Report

**FM Booster/Fill-in Translator Requirements** (See Discussion)

**Interference/Overlap Requirements**

Exhibit 13.1 - Copy of Existing Antenna Structure Registration (if applicable)

Exhibit 13.2 - Proposed Service and AM Fill-In Contour Map

Exhibit 13.3 - Tabulation of Proposed Allocation

Exhibit 13.4 - §74.1204(d) 2<sup>nd</sup>/3<sup>rd</sup> Adjacent Waiver Request (if applicable)

Exhibit 13.5 - Copy of Manufacturer's Vertical Radiation Pattern (if applicable)

**TV Channel 6 Protection Requirements** (See Discussion)

**Multiple Translator Requirements** (See Discussion)

**RF Radiation Study Requirement**

Exhibit 17.1 - RF Compliance Study

(Exhibit numbering is in response to FCC Online Form 349, Section III-A)

# Discussion

---

This firm has been retained to prepare the required engineering report in support of a minor amendment to Jean J. Suh's ("Applicant") Long-Form 349 application (File No. BNPFT-20171201AMU) ("Original Long-Form 349") for a new FM translator station at Puyallup, WA (the "FM Translator") filed in the Auction 99 filing window. The FM Translator will rebroadcast Class D Primary Station KSUH(AM), Puyallup, WA (Facility ID No. 32339) (1450 kHz) ("KSUH").

This minor amendment changes the FM Translator's proposed technical parameters in order to resolve the interference issues raised by Olympia Broadcasters, Inc. ("Olympia") in its Petition to Deny dated December 26, 2017 ("Petition to Deny"). In its Petition to Deny, Olympia alleged that the technical parameters proposed for the FM Translator in the Original Long-Form 349 would cause interference to its FM broadcast station KRXY, Shelton, WA (Facility ID No. 82527) ("KRXY").

Applicant originally proposed that the FM Translator would operate on CH233D at an Antenna Location Site Elevation Above Mean Sea Level (AMSL) of 131 meters and an Effective Radiated Power (ERP) of 0.090 kW (H&V) from a location at ASRN 1033592. Through this minor amendment, Applicant proposes operation of the FM Translator on CH233D with a radiation center 192 meters AMSL and an ERP of 0.220 kW (H&V) from a new location at ASRN 1238019. A copy of ASRN 1238019 has been included in **Exhibit 13.1**.

The amended proposed 60 dBμ contour of the FM Translator lies wholly inside a circle with a 25 mile radius centered at KSUH's transmitter site. See **Exhibit 13.2**.

Furthermore, the overlap of the FM Translator's original and the new proposed 60 dBμ F(50:50) contours is shown in **Exhibit 13.2**. The overlap area is less than 1 sq. km, and contains a population of 15 persons. Therefore the vast majority of population that was within the FM Translator's original proposed 60 dBμ F(50:50) contour is no longer within the new proposed 60 dBμ F(50:50) contour. The FM Translator's new proposed site location is at an azimuth of 39.6 degrees and a distance of 22 km from the original proposed location as shown in **Exhibit 13.3**. Accordingly, none of the listeners of KRXY relied upon by Olympia in its Petition to Deny are believed to listen to KRXY within the FM translator's new proposed 60 dBμ F(50:50) contour.

It has been determined the FM Translator may be used in the area without interference to any existing FM broadcast station or facility. General allocation details are found in **Exhibit 13.3**. It is believed sufficient clearance exists precluding the need for additional contour protection showings.

Applicant would like to note the existence of a § 74.1204(d) Second/Third Adjacent Channel Given Interference Waiver Request toward KUOW-FM – Seattle, WA (CH235C1) and KSWD(FM), Seattle, WA (CH231C) as noted in **Exhibit 13.4**. Protection has been based on the worst case calculated 116 dBμ F(50:10) Interference Contour, corresponding to the worst case 76 dBμ F(50:50) Protected Contour. Protection has been demonstrated through a downward vertical radiation study. Full protection will be afforded the facility as the interference will not reach a 5 meter artificial plane outside of a 40 meter radius of the tower site when taking into account the downward radiation characteristics of the antenna as supplied by the antenna

## Discussion (continued)

---

manufacturer. This 40 meter radius does not contain any houses or main roads. The antenna manufacturer's specifications are included in **Exhibit 13.5**.

The Applicant certifies FM Translator's proposed 34 dBµ F(50:10) Interference Contour does not enter Canadian territory. Documentation of the proposed 34 dBµ F(50:10) Interference Contour will be supplied upon request.

The FM Translator is not within the affected distance of any TV Channel 6 stations.

Applicant would like to note usage of the NED 03 second terrain database for the terrain-based showings contained herein.

**RADIATION PROTECTION:** The Commission requires an engineering study regarding compliance with the guidelines for human protection from radiofrequency radiation. This report section is in response to that provision of the Rules. The current Federal Communications Commission guidelines for RF radiation protection are set forth in OET Bulletin No. 65 (Edition 97-01), and the accompanying Supplement A, (Edition 97-01).

The FM Broadcast facility proposed in this application will not produce human exposure to radiofrequency radiation in excess of the applicable safety standards specified in § 1.1307(b)(3) of the Commission's rules concerning RF contributors of less than 5%. **Exhibit 17.1** provides the details of the study that was made to demonstrate compliance. The facility is properly marked with signs, and entry is restricted by means of fencing with locked doors and/or gates. Any other means as may be required to protect employees and the general public will be employed.

***In the event work would be required in proximity to the antenna such that the person or persons working in the area would be potentially exposed to fields in excess of the guidelines set forth in OET Bulletin No. 65 (Edition 97-01), the transmitter power will be reduced or the station will cease operation during the critical period.***



**Registration Detail**

Reg Number	1238019	Status	Constructed
File Number	A1029609	Constructed	06/24/2003
EMI	No	Dismantled	
NEPA	No		

**Antenna Structure**

Structure Type POLE - Any type of Pole

**Location** (in NAD83 Coordinates)

Lat/Long	47-19-51.9 N 122-05-18.0 W	Address	30040 188th Avenue SE
City, State	Kent , WA		
Zip	98042	County	KING
Center of AM Array		Position of Tower in Array	

**Heights (meters)**

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
165.5	36.6
Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
202.1	36.6

**Painting and Lighting Specifications**

FAA Chapters 4, 5, 12

Paint and Light in Accordance with FAA Circular Number 70/7460-1K

**FAA Notification**

FAA Study	2002-ANM-1963-OE	FAA Issue Date	01/30/2003
-----------	------------------	----------------	------------

**Owner & Contact Information**

FRN	0023254592	Owner Entity Type	Limited Liability Company
-----	------------	-------------------	---------------------------

**Owner**

CCATT LLC  
2000 Corporate Drive  
Canonsburg , PA 15317

P: (724)416-2000  
F:  
E: Regulatory.Department@Crownncastle.com

**Contact**

Snyder , Don  
2000 Corporate Drive  
Canonsburg , PA 15317

P: (724)416-2470  
F:  
E: Don.Snyder@crowncastle.com

**Last Action Status**

Status	Constructed	Received	05/09/2016
Purpose	Admin Update	Entered	05/09/2016
Mode	Interactive		

**Related Applications**

05/09/2016	A1029609 - Admin Update (AU)
05/05/2016	A1007892 - Admin Update (AU)

05/01/2015      A0951093 - Admin Update (AU)

Related applications (17)

Comments

Comments

None

History

Date	Event
05/10/2016	Registration Printed
05/09/2016	ASR Application receipt email sent: Tower email
05/09/2016	Administrative Update Received
All History (49)	

Automated Letters

05/10/2016	Authorization, Reference
05/06/2016	Authorization, Reference
05/02/2015	Authorization, Reference
All letters (18)	

CLOSE WINDOW

Exhibit 13.2 - KSUH(AM) - Present and Proposed FM translator vs KSUH(AM) Contours

Munn-Reese.com

KSUH.L

Latitude: 47-10-41 N  
Longitude: 122-16-24 W  
Frequency: 1450 kHz

1771567.A  
BNPFT20171201AMU  
Latitude: 47-10-41 N  
Longitude: 122-16-24 W  
ERP: 0.09 kW  
Channel: 233  
Frequency: 94.5 MHz  
AMSL Height: 131.0 m  
Elevation: 18.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

1771567.P  
Proposed Operation  
Latitude: 47-19-52.54 N  
Longitude: 122-05-13.58 W  
ERP: 0.22 kW  
Channel: 233  
Frequency: 94.5 MHz  
AMSL Height: 192.0 m  
Elevation: 166.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

- KSUH.L
- 1771567.P (233)
- 1771567.A (233)

Circle R = 40.0 km

FCC F(50-50) 60.00 dBu (FCC HAAT)

FCC F(50-50) 60.00 dBu (FCC HAAT)

2.0 mV/m

Overlap Area

Population Database: 2010  
US Census (PL)

Total Population: 15  
Housing Units: 6  
Overlap Area: 0.26 sq. km

Scale 1:500,000

0 7 14 21 km

V-Soft Communications LLC ©

Munn-Reese  
Coldwater, M 49036

Exhibit 13.3

Jean J. Suh

REFERENCE  
47 19 52.5 N  
122 05 13.6 W

CH# 233D - 94.5 MHz, Pwr = 0.22 kW DA, HAAT = 42.1 M COR = 192 M  
Average Protected F(50-50) = 8.11 km  
Standard Directional

DISPLAY DATES  
DATA 04-05-18  
SEARCH 04-09-18

CH CI TY	CALL	TYPE STATE	ANT STATE	AZI -<-	DI ST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LI CENSEE	*IN* (Overlap in km)	*OUT* (Overlap in km)
231C	KSWD	LI C_C_	VA_	24.9 205.0	21.27 BMLH20130522ACI	47 30 17.0 121 58 04.0	73.000 698	13.7 932	94.7 Obs Radi o St at i o n s I n c.	3.8*	-73.7*<
235C1	KUOW FM	LI C_CX	VA_	332.4 152.3	35.74 BMLH20040623ABY	47 36 58.0 122 18 28.0	100.000 224	9.3 262	68.7 The Uni v e r s i t y O f W a s h i n g t	21.1*	-33.3*<
233C1	KATS	LI C_CN	VA_	125.9 307.0	149.40 BLH19840625CS	46 31 59.0 120 30 14.0	100.000 277	166.6 631	67.7 Townsquare Medi a Yaki ma Li	-21.1*<	69.2
233A	KRKY	LI C_NCX	VA_	255.3 74.6	82.28 BLH20131112AYX	47 08 20.0 123 08 23.0	0.830 272	89.4 390	33.0 Q y n p i a B r o a d c a s t e r s , I n c.	-20.1*<	4.8
233D	1771567	APP_C_	VA_	219.6 39.5	22.08 BNPFT20171201AMU	47 10 41.0 122 16 24.0	0.090	22.08 131	22.08 Jean J. Suh	64.5R	-42.4M
233D	1763520	APP_C_	VA_	219.6 39.5	22.08 BNPFT20170801ABA	47 10 41.0 122 16 24.0	0.090	18.0 131	5.5 Jean J. Suh	-5.8<	-16.4*<
233D	K233BU	LI C_DC_	VA_	356.4 176.4	23.59 BLFT20170531ADG	47 32 35.0 122 06 25.0	0.099	26.8 489	7.8 Bonneville I n t e r n a t i o n a l C	-7.1*<	3.4
287C1	KQMS	LI C_CY	VA_	356.4 176.3	23.75 BLH20010212AAE	47 32 40.0 122 06 26.0	54.000 385	11.2 511	77.4 C r i s t a M i n i s t r i e s	21.5R	2.3M
233C	CFBT- FM	OPE ?HN	BC	344.4 163.7	234.01 20000928CA1	49 21 17.0 122 57 25.0	90.000 618	216.5 921	108.3 12.3	101.3	
233D	1774510	APP_DV_	VA_	332.4 152.2	38.25 BNPFT20180130AEC	47 38 09.0 122 19 26.0	0.025	8.5 29	2.7 Bonneville I n t e r n a t i o n a l C	24.4	18.1
233A	AL5697	VAC_	VA_	339.0 158.6	114.70 RMI1328*	48 17 36.0 122 38 31.0	6.000 100	90.5 124	31.1 B i b l e B r o a d c a s t i n g N e t w o r k	19.5	68.7
233A	KLYK	LI C_ZCN	VA_	207.5 26.9	131.36 BLH20030305AAA	46 16 49.0 122 52 34.0	3.000 145	79.2 334	27.5 B i c o a s t a l M e d i a L i c e n s e s I	43.3	74.5
236A	KITI- FM	LI C_NCX	VA_	219.3 38.6	112.54 BLH20141126AOC	46 32 37.0 123 01 06.0	0.410 256	1.4 410	25.2 P r e m i e r B r o a d c a s t e r s , I n c.	101.3	86.3
234A	R29980	ADD_	BC	317.6 136.5	162.85	48 24 09.0 123 34 20.0	6.000 100	59.9 228	38.0 94.9	108.4	
234C3	KZAL	LI C_CX	VA_	67.3 248.7	155.31 BLH20070201BRH	47 51 16.0 120 09 59.0	10.300 158	27.0 902	18.3 I c i c l e B r o a d c a s t i n g , I n c.	125.0	132.4
232A	KRKZ- FM	LI C_NCX	VA_	230.5 49.2	180.09 BLH20130605ACE	46 17 12.0 123 53 46.0	0.400 380	40.4 436	26.7 M e a d o w s B r o a d c a s t i n g , L I c	126.9	134.3
234C2	KNRK	LI C_ZCX	VA_	193.0 12.6	210.05 BLH20030326AIC	45 29 20.0 122 41 40.0	6.300 403	73.3 497	48.3 E n t e r c o m L i c e n s e , L I c	127.6	148.9
233B	AL1343	VAC_	BC	35.5 217.4	304.08	49 31 44.0 119 38 25.0	50.000 150	171.9 150	65.0 128.9	224.4	
234D	KZAL- FM	LI C_DV_	VA_	87.0 268.3	135.65 BLFTB20070516ACL	47 22 51.0 120 17 15.0	0.099	1.6 631	1.6 I c i c l e B r o a d c a s t i n g , I n c.	130.8	129.5
236A	AU9861581	VAC_	VA_	164.1 344.5	147.65 RMI0668	46 03 10.0 121 33 47.0	6.000 100	1.6 1168	15.8 N e w N o r t h w e s t B r o a d c a s t e r s	140.5	131.2
230C1	KPDQ- FM	LI C_NC_	OR_	193.0 12.6	210.05 BLH20060208AMF	45 29 20.0 122 41 40.0	52.000 387	10.1 480	77.0 S a l e m M e d i a O f O r e g o n , I n c	190.8	132.1
286A	R29889	ADD_	BC	317.6 136.5	162.89	48 24 09.0 123 34 20.0	6.000 100	11.2 228	77.4 5.0R	157.9M	
232C2	KZZR	LI C_C_	OR_	172.5 352.8	223.95 BLH20110208ADF	45 20 01.0 121 42 45.0	3.400 513	52.3 1872	35.0 B u s t o s M e d i a H o l d i n g s , L I	165.8	180.5
230C3	KTAC	LI C_CX	VA_	89.4 271.3	189.47 BLH20020618AAE	47 19 13.0 119 34 22.0	18.000 117	2.1 628	21.0 T a c o m a B r o a d c a s t e r s , I n c o r	184.2	168.3
235D	KBGE- FM	LI C_DV_	OR_	226.9 45.6	183.80 BLFTB20060517AAT	46 11 17.0 123 49 50.0	0.130	0.5 24	4.8 S p i n l o g i c E n t e r p r i s e s , I n c	171.5	177.9

CH CI TY	CALL	TYPE ANT STATE	AZI -<-	DI ST FI LE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LI CENSEE	*IN* (Overl ap i n km)	*OUT*
235C3 Cannon Beach	KBGE	LI C NEX OR	223.3 42.0	208.43 BLH20060517AAN	45 57 08.0 123 56 14.0	7.000 92	3.0 243	31.2 Spi nl ogi c Enterpri ses, Inc	194.3	176.2
230A Port Renfrew	AL0774	VAC ____ BC	308.9 127.2	219.49	48 32 48.0 124 24 10.0	6.000 100	3.5 322	38.0	207.1	180.4
235C Richland	KJOK	LI C _CX WA	120.8 302.9	259.80 BMLH20120420AAW	46 05 47.0 119 11 36.0	100.000 381	10.5 736	74.3 Ingst ad Radi o Vashi ngton,	245.6	185.2
286C1 Mbl al l a	KRSK	LI C NC_ OR	194.3 13.9	207.33 BLH20040303ACH	45 31 21.0 122 44 45.0	22.500 470	11.2 561	77.4 Ent er com Li cense, Li c	21.5R	185.8M
233C1 Eugene	KMGE	LI C _EN OR	192.5 11.8	378.70 BLH19970925KE	44 00 04.0 123 06 45.0	49.000 396	172.1 588	76.7 Mckenzi e Ri ver Broadcast i n	197.5	272.2

Terrain database is NED 03 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM M= Margin in KM  
Contour distances are on direct line to and from reference station. Reference zone= West Zone, Co to 3rd adjacent.  
All separation margins (if shown) include rounding.  
Ant Colum: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omi), Polarization (C, H, V, E), Beam tilt (Y, N, X)  
\*\*\*affixed to 'IN' or 'OUT' values = site inside restricted contour.  
< = Contour Overlap

# Exhibit 13.4 - KSUH(AM) - Present and Proposed FM translator vs KSWD(FM) and KUOW-FM in support of a 74.1204(d) Waiver Request

Munn-Reese.com

1771567.P  
Proposed Operation  
Latitude: 47-19-52.54 N  
Longitude: 122-05-13.58 W  
ERP: 0.22 kW  
Channel: 233  
Frequency: 94.5 MHz  
AMSL Height: 192.0 m  
Elevation: 166.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

1771567.A  
BNPFT20171201AMU  
Latitude: 47-10-41 N  
Longitude: 122-16-24 W  
ERP: 0.09 kW  
Channel: 233  
Frequency: 94.5 MHz  
AMSL Height: 131.0 m  
Elevation: 18.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

KSWD  
BMLH20130522ACI  
Latitude: 47-30-17 N  
Longitude: 121-58-04 W  
ERP: 73.00 kW  
Channel: 231  
Frequency: 94.1 MHz  
AMSL Height: 932.0 m  
Elevation: 867.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

KUOW-FM  
BMLED20040623ABY  
Latitude: 47-36-58 N  
Longitude: 122-18-28 W  
ERP: 100.00 kW  
Channel: 235  
Frequency: 94.9 MHz  
AMSL Height: 262.0 m  
Elevation: 125.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

- 1771567.P (233)
- 1771567.A (233)
- KSWD (231)
- KUOW-FM (235)

FCC F(50-50) 94.07 dBu (FCC H

FCC F(50-50) 76.00 dBu (FCC HAAT)

FCC F(50-50) 60.00 dBu (FCC HAAT)

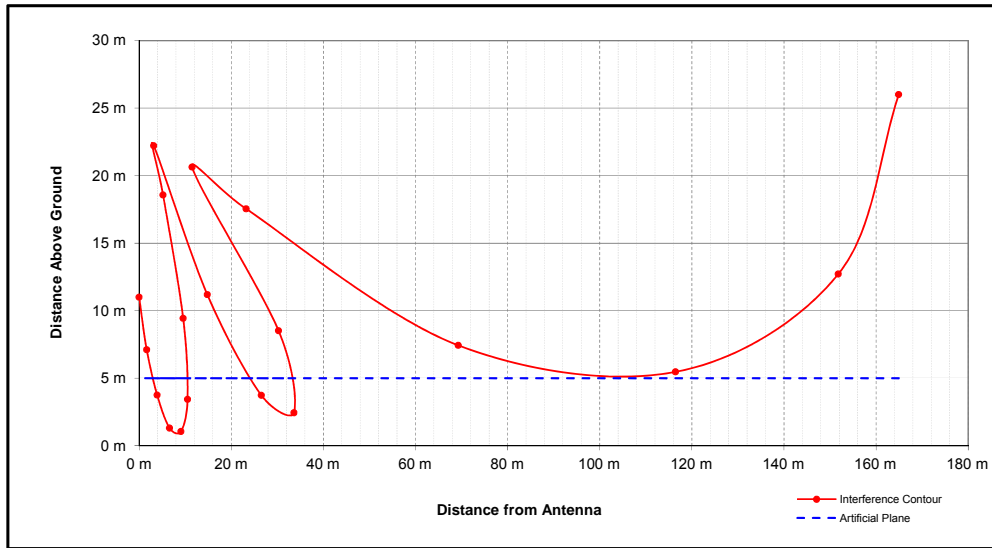
FCC F(50-50) 60.00 dBu (FCC HAAT)

Scale 1:500,000

0 7 14 21 km

V-Soft Communications LLC ©

# **Exhibit 13.4 - Antenna Downward Radiation Study in support of a 74.1204(d) Waiver Request**



<b>Proposed Antenna:</b> 3 Bay Nicom BKY3/P-3DA(Slant45) 0.85 Spaced <b>Proposed Power:</b> 0.22 kW <b>Antenna Height AGL:</b> 26 meters <b>Interference Contour:</b> 116 dBu f(50:10) <b>Artificial Ground Plane Height:</b> 5 meters <b>Distance (Free Space) Equation:</b> $= (10^{((106.92 - [\text{desired dBu}] + [\text{ERP in dBk}]) / 20)) * 1000}$ <b>Field Strength (dBu) Equation:</b> $= 106.92 - (20 * (\text{LOG10}[\text{DistMeters} / 1000])) + [\text{ERP in dBk}]$								
Depression Angle	Antenna Relative	ERP	ERP	Distance from Ant. to Interference Contour	Distance from Ant. to Artificial Plane	Field Strength in dBu @ Artificial Plane	Distance from Ant. to Ground Level	Field Strength in dBu @ Ground Level
Below Horizon	Field	in kW	in dBk					
0°	1.000	0.220	-6.58	164.90 m	infinite	---	---	---
-5°	0.924	0.188	-7.26	152.36 m	240.95 m	112.02 dBu	298.32 m	110.16 dBu
-10°	0.717	0.113	-9.47	118.23 m	120.93 m	115.80 dBu	149.73 m	113.95 dBu
-15°	0.435	0.042	-13.81	71.73 m	81.14 m	114.93 dBu	100.46 m	113.07 dBu
-20°	0.150	0.005	-23.05	24.73 m	61.40 m	108.10 dBu	76.02 m	106.25 dBu
-25°	0.077	0.001	-28.85	12.70 m	49.69 m	104.15 dBu	61.52 m	102.29 dBu
-30°	0.212	0.010	-20.05	34.96 m	42.00 m	114.41 dBu	52.00 m	112.55 dBu
-35°	0.249	0.014	-18.65	41.06 m	36.61 m	117.00 dBu	45.33 m	115.14 dBu
-40°	0.210	0.010	-20.13	34.63 m	32.67 m	116.51 dBu	40.45 m	114.65 dBu
-45°	0.127	0.004	-24.50	20.94 m	29.70 m	112.97 dBu	36.77 m	111.11 dBu
-50°	0.030	0.000	-37.03	4.95 m	27.41 m	101.13 dBu	33.94 m	99.27 dBu
-55°	0.055	0.001	-31.77	9.07 m	25.64 m	106.97 dBu	31.74 m	105.12 dBu
-60°	0.116	0.003	-25.29	19.13 m	24.25 m	113.94 dBu	30.02 m	112.08 dBu
-65°	0.151	0.005	-23.00	24.90 m	23.17 m	116.62 dBu	28.69 m	114.77 dBu
-70°	0.161	0.006	-22.44	26.55 m	22.35 m	117.50 dBu	27.67 m	115.64 dBu
-75°	0.155	0.005	-22.77	25.56 m	21.74 m	117.41 dBu	26.92 m	115.55 dBu
-80°	0.137	0.004	-23.84	22.59 m	21.32 m	116.50 dBu	26.40 m	114.65 dBu
-85°	0.115	0.003	-25.36	18.96 m	21.08 m	115.08 dBu	26.10 m	113.23 dBu
-90°	0.091	0.002	-27.39	15.01 m	21.00 m	113.08 dBu	26.00 m	111.23 dBu

## Exhibit 13.5 - Manufacturers Antenna Specifications

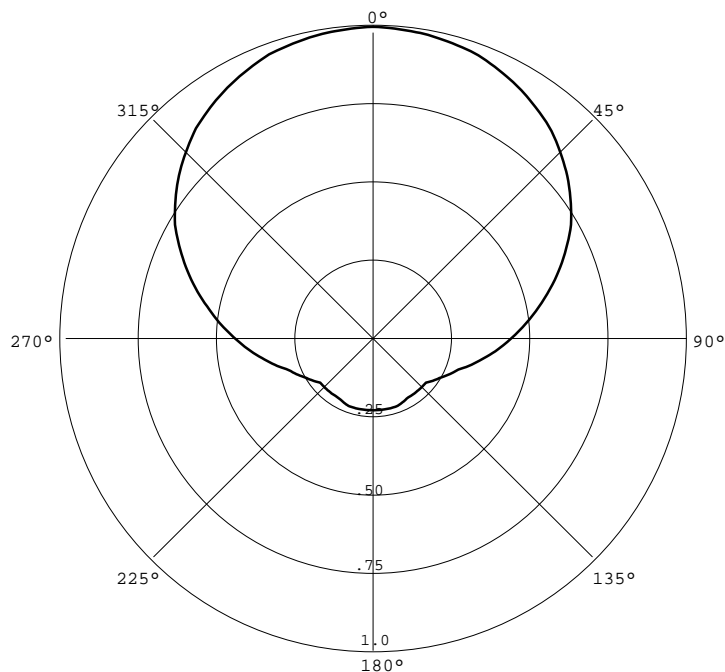
BKY3/P-3L(Slant45) - 0.85WL

RMS(V)= .608

COMPOSITE PATTERN

Graph is Relative Field

Azi	Field	dBk
000	1.000	-10.000
010	0.990	-10.087
020	0.970	-10.265
030	0.930	-10.630
040	0.880	-11.110
050	0.810	-11.830
060	0.730	-12.734
070	0.630	-14.013
080	0.530	-15.514
090	0.440	-17.131
100	0.360	-18.874
110	0.290	-20.752
120	0.250	-22.041
130	0.220	-23.152
140	0.220	-23.152
150	0.220	-23.152
160	0.230	-22.765
170	0.230	-22.765
180	0.230	-22.765
190	0.230	-22.765
200	0.230	-22.765
210	0.220	-23.152
220	0.220	-23.152
230	0.220	-23.152
240	0.250	-22.041
250	0.290	-20.752
260	0.360	-18.874
270	0.440	-17.131
280	0.530	-15.514
290	0.630	-14.013
300	0.730	-12.734
310	0.810	-11.830
320	0.880	-11.110
330	0.930	-10.630
340	0.970	-10.265
350	0.990	-10.087



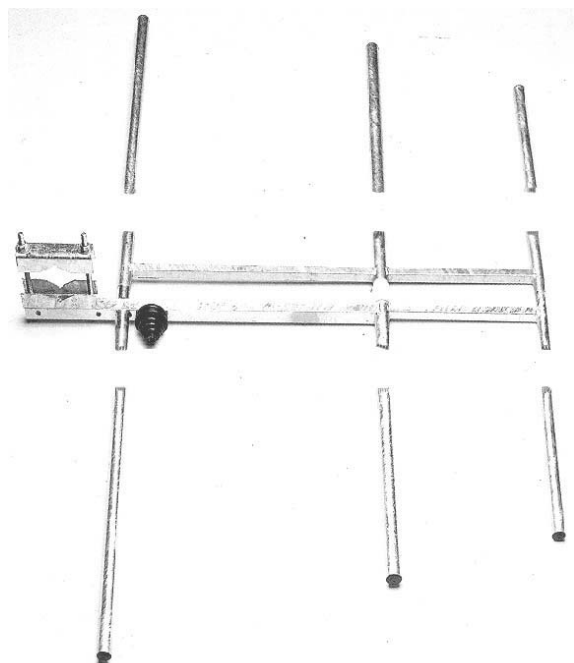
The directional antenna pattern will be produced by means of a Nicom Dipole Reflector BKY3/P broadcast element mounted at a 45° (degree) slant orientation to achieve horizontal and vertical polarization. The BKY3/P-1DA(Slant45) Directional Pattern is therefore a maximum composite pattern of the current horizontal and vertical broadcast patterns as notified by Nicom USA, Inc.

The maximum antenna gain for a single BKY3/P-1DA(Slant45) element will be 1.5 dBd or the common horizontal or vertical maximum antenna gain of 4.5 dBd adjusted by 3 dBd for dual broadcast in the Horizontal and Vertical planes (1.5 dBd = 4.5 dBd - 3.0 dBd). The maximum gain for multiple bay options of the Nicom BKY3/P-DA(Slant45) antenna would therefore also be adjusted by -3 dBd to account for operation in the horizontal and vertical planes.

The antenna proposed in this application will be mounted in accordance with specific instructions provided by the antenna manufacturer. The directional antenna will be mounted on the tower which is of uniform cross section. No other antennas of any type are or will be mounted on the same tower level as the directional antenna.

No antenna is or will be mounted within any vertical or horizontal distance specified by the antenna manufacturer as being necessary for proper operation of the directional antenna. In addition, the antenna will be assembled under the supervision of a qualified engineer and installed pursuant to the manufacturer's instructions and manufacturer specified antenna orientation.





**BKY3/P**

*Medium Power*

Portable

Broadband FM

Directional Antenna

*Antena Portátil*

*Direccional*

*de FM Banda Ancha*

This broadband dipole antenna constructed of stainless steel is designed to last a long time in any weather condition. Because of its sturdy construction it can support up to 2 kw of input power with the appropriate connector. Since it has a wide angle of radiation it is strongly recommended for omnidirectional arrays. Due to the fact that it is easily disassembled and reassembled, it can be placed in a compact container making it very portable and

inexpensive to ship.

Esta antena dipolo de banda ancha, fabricada de acero inoxidable fue concebida para ser duradera en cualquier condición de clima. Debido a su robusta construcción puede soportar hasta 2 kw de potencia de entrada con el conector apropiado. Esta antena es recomendada para formaciones omnidireccionales ya que tiene un gran ángulo de irradiación. Dado al hecho que es fácil de armar y desarmar esta antena puede ser enviada en un contenedor muy compacto rendiéndola portátil y económica para envíos.

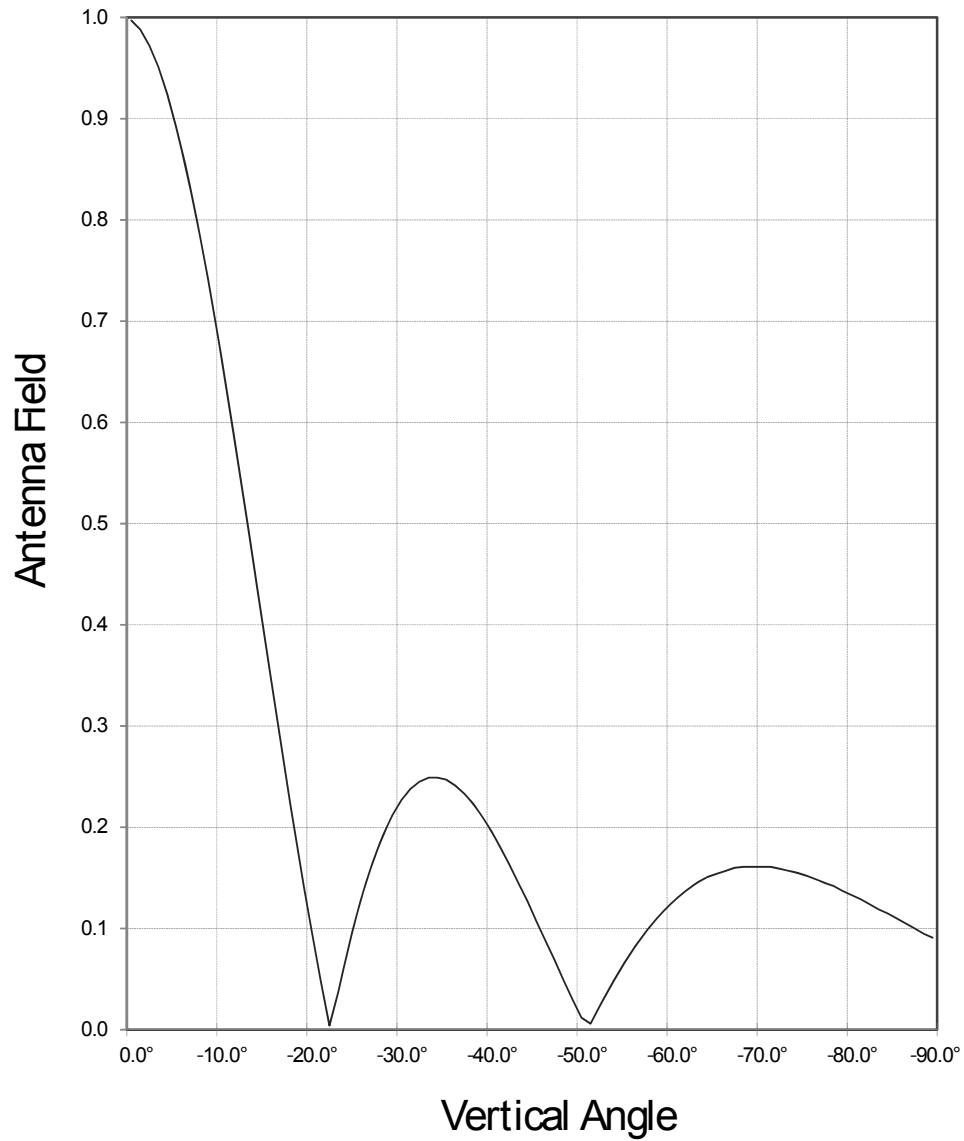
#### TECHNICAL SPECIFICATIONS

Antenna type	3 element directional antenna
Frequency range	87.5 - 108 MHz
Bandwidth	20 MHz
Impedance	50 Ohms
Connectors	N type (1 kw) - EIA 7/8 (2 kw)
Power rating	2000 Watts max.
VSWR	< 1.2 max.
Polarization	vertical or horizontal
Gain	4.5 dB (referred to half-wave dipole)
H plane	150 degrees
V plane	70 degrees

Front-to-back ratio	18 dB
Lightning protection	all parts grounded
Max wind velocity	130 mph (208 km/h)
Wind load	48.4 Lbs (22 kg)
Wind surface	2.0 ft <sup>2</sup> (0.19 m <sup>2</sup> )
Materials (external)	stainless steel
Mounting	from 2" to 4"
Weight	20 Lbs (9 kg)
Dimensions	50"×72"×3" (1250×1800×60mm)
Packing	53"×19"×4" (1300×480×100mm)

## Plot of Vertical Radiation Pattern

Manufacturer:	NicomUSA, Inc.	Frequency:	87.5 MHz - 108.0 MHz
Make/ Model:	BKY3P/3L(Sant45)	Weight:	60 lbs (145.2 lbs wind load)
Polarization:	Circular	Max Power:	1.5 kW
Inter Bay Spacing:	0.85 $\lambda$ (Wavelength)	Antenna Gain:	8.14 dB
Source Code:	The RF Specialties' Technical Programs Disk Version 2.48		



## Tabulation of Vertical Radiation Pattern

Manufacturer: NicomUSA, Inc. Frequency: 87.5 MHz - 108.0 MHz  
 Make/ Model: BKYP/3L(Sant45) Weight: 60 lbs (145.2 lbs wind load)  
 Polarization: Circular Max Power: 1.5 kW  
 Inter Bay Spacing:  $0.85 \lambda$  (Wavelength) Antenna Gain: 8.14 dB  
 Source Code: The RFSSpecialties' Technical Programs Disk Version 2.48

Vertical Azimuth	Field (%)	dB	Vertical Azimuth	Field (%)	dB	Vertical Azimuth	Field (%)	dB
0.0°	1.000	0.00	-30.0°	0.212	-6.74	-60.0°	0.116	-9.36
-1.0°	0.997	-0.01	-31.0°	0.227	-6.44	-61.0°	0.125	-9.03
-2.0°	0.988	-0.05	-32.0°	0.238	-6.23	-62.0°	0.133	-8.76
-3.0°	0.972	-0.12	-33.0°	0.245	-6.11	-63.0°	0.140	-8.54
-4.0°	0.951	-0.22	-34.0°	0.249	-6.04	-64.0°	0.146	-8.36
-5.0°	0.924	-0.34	-35.0°	0.249	-6.04	-65.0°	0.151	-8.21
-6.0°	0.891	-0.50	-36.0°	0.247	-6.07	-66.0°	0.154	-8.12
-7.0°	0.854	-0.69	-37.0°	0.241	-6.18	-67.0°	0.157	-8.04
-8.0°	0.812	-0.90	-38.0°	0.233	-6.33	-68.0°	0.160	-7.96
-9.0°	0.766	-1.16	-39.0°	0.223	-6.52	-69.0°	0.161	-7.93
-10.0°	0.717	-1.44	-40.0°	0.210	-6.78	-70.0°	0.161	-7.93
-11.0°	0.664	-1.78	-41.0°	0.196	-7.08	-71.0°	0.161	-7.93
-12.0°	0.609	-2.15	-42.0°	0.180	-7.45	-72.0°	0.161	-7.93
-13.0°	0.552	-2.58	-43.0°	0.163	-7.88	-73.0°	0.159	-7.99
-14.0°	0.494	-3.06	-44.0°	0.145	-8.39	-74.0°	0.157	-8.04
-15.0°	0.435	-3.62	-45.0°	0.127	-8.96	-75.0°	0.155	-8.10
-16.0°	0.376	-4.25	-46.0°	0.107	-9.71	-76.0°	0.152	-8.18
-17.0°	0.318	-4.98	-47.0°	0.088	-10.56	-77.0°	0.149	-8.27
-18.0°	0.260	-5.85	-48.0°	0.069	-11.61	-78.0°	0.145	-8.39
-19.0°	0.204	-6.90	-49.0°	0.049	-13.10	-79.0°	0.142	-8.48
-20.0°	0.150	-8.24	-50.0°	0.030	-15.23	-80.0°	0.137	-8.63
-21.0°	0.099	-10.04	-51.0°	0.012	-19.21	-81.0°	0.133	-8.76
-22.0°	0.050	-13.01	-52.0°	0.006	-22.22	-82.0°	0.129	-8.89
-23.0°	0.004	-23.98	-53.0°	0.023	-16.38	-83.0°	0.124	-9.07
-24.0°	0.038	-14.20	-54.0°	0.039	-14.09	-84.0°	0.119	-9.24
-25.0°	0.077	-11.14	-55.0°	0.055	-12.60	-85.0°	0.115	-9.39
-26.0°	0.112	-9.51	-56.0°	0.069	-11.61	-86.0°	0.110	-9.59
-27.0°	0.143	-8.45	-57.0°	0.083	-10.81	-87.0°	0.105	-9.79
-28.0°	0.170	-7.70	-58.0°	0.095	-10.22	-88.0°	0.100	-10.00
-29.0°	0.193	-7.14	-59.0°	0.106	-9.75	-89.0°	0.095	-10.22
						-90.0°	0.091	-10.41

## Exhibit 17.1

### Compliance with Radiofrequency Radiation Guidelines

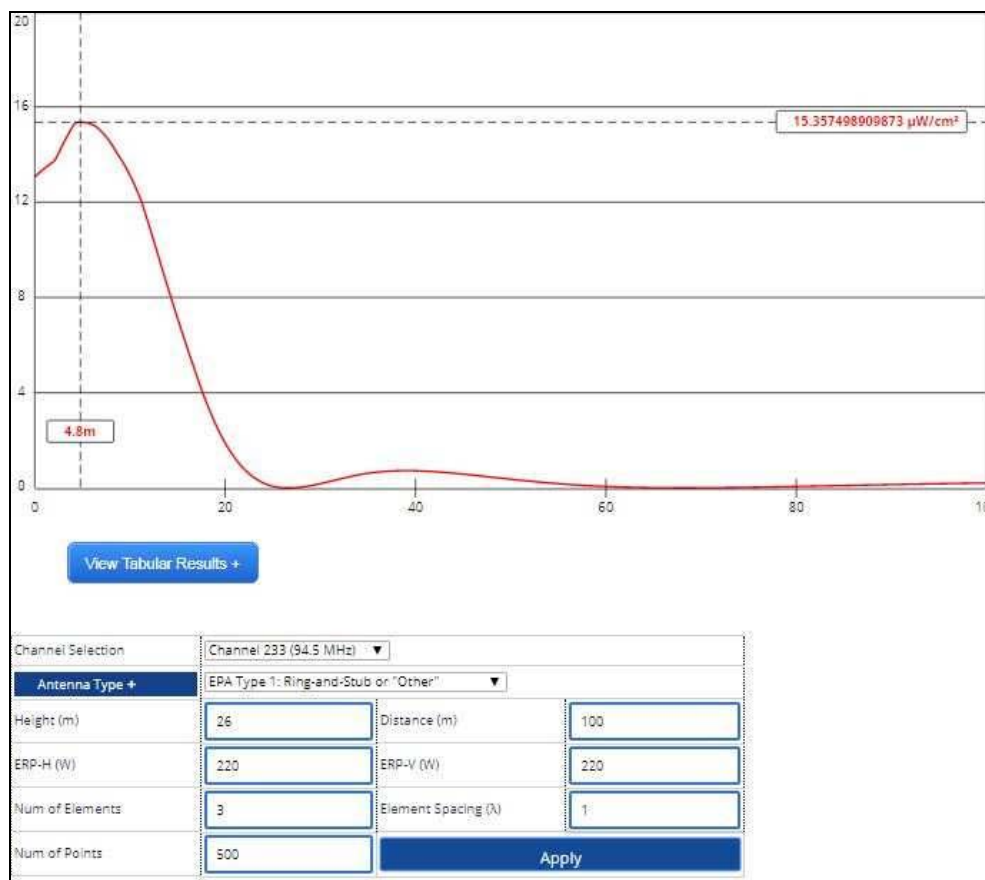
The RF Compliance Study has been evaluated for human exposure to non-ionizing radiofrequency radiation at the transmitter site. The site is intended to house multiple transmitters. The potential for human exposure to non-ionizing radiofrequency radiation at the proposed transmitter site has therefore been evaluated with regards to the §1.1307(b)(3), five percent (5%) contribution rule, for multiple transmitter sites.

The proposed operation will broadcast from an antenna COR mounted 26 meters above ground level (AGL). The facility will operate with a three bay antenna employing EPA Type 1 elements as defined by *FM Model - Appendix B* issued March 31, 2016<sup>1</sup>. This facility will not operate with HD/IBOC facilities at this time.

To evaluate the total exposure to non-ionizing radio-frequency radiation with regards to the five percent contribution exclusion rule, it is necessary to establish 5.0% of the maximum permissible limit. 5.0% of the 200  $\mu\text{W}/\text{cm}^2$  results in 10  $\mu\text{W}/\text{cm}^2$ . Therefore if the resulting contribution is less than or equal to 10  $\mu\text{W}/\text{cm}^2$  or 5.0%, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01) and §1.1307(b)(3). Protection of the more restrictive uncontrolled limit implies protection of the controlled limit.

Inspection of the graph below indicates the maximum contribution for the uncontrolled environment is less than the 10  $\mu\text{W}/\text{cm}^2$  (5.0%) limit as set forth by §1.1307(b)(3), therefore the facility is in compliance with FCC guidelines. §1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where its contribution is less than five percent. Since this instant application meets the five percent exclusion test at all ground level areas, the impact of the proposed facility may be considered independently from other facilities operating at or nearby this site. It is believed the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b)(3).

In addition to the protection afforded by the proposed antenna height above ground, the facility is or will be properly marked with signs, and entry to the facility will be restricted by means of fencing with locked doors and/or gates if required. Any other means that may be required to protect employees and the general public will also be employed. In the event work is required in proximity to the antenna(s) such that the person or persons working in the area will be potentially exposed to fields in excess of the current guidelines, an agreement signed by all broadcast parties at the site will be in effect for the offending transmitter(s) to reduce power, or cease operation during the critical period.



<sup>1</sup> The current FM Model web-based software application employs the standards as detailed in OET Bulletin No. 65 (Edition 97-01). FM radiofrequency radiation levels have been predicted using both the array pattern, the calculations of which are based on the number of bays in the antenna and wavelength spacing between the bays, and the element pattern. The element pattern has been determined by using measured element data prepared by the EPA and published in "An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM and TV Services," by Paul C. Gailey and Richard Tell - April 1985, U.S. Environmental Protection Agency. The results of the evaluation for the FM station have been shown at the end of this RF compliance discussion. To ensure complete protection, the maximum FM contribution has been assumed without regard to any restricted access fencing distance.



**CERTIFICATE OF SERVICE**

I, Deborah N. Lunt, of Fletcher, Heald & Hildreth, PLC, do hereby certify that a copy of the foregoing Petition for Reconsideration and Request for Reinstatement *Nunc Pro Tunc* is being sent via first-class, U.S. Mail, postage prepaid or e-mail (where indicated), this 10th day of April, 2018, to the following:


Albert Shuldiner\*  
Chief Audio Division Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 2-A360  
Washington, DC 20554  
albert.shuldiner@fcc.gov

Robert Gates\*  
Audio Division Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 2-A230  
Washington, DC 20554  
robert.gates@fcc.gov

Meredith S. Senter, Jr.\*\*  
Laura M. Berman  
Lerman Senter PLLC  
2001 L Street, NW, Suite 400  
Washington, DC 20036

\*via e-mail

\*\* via e-mail and First Class U.S. Mail

  
\_\_\_\_\_  
Deborah N. Lunt