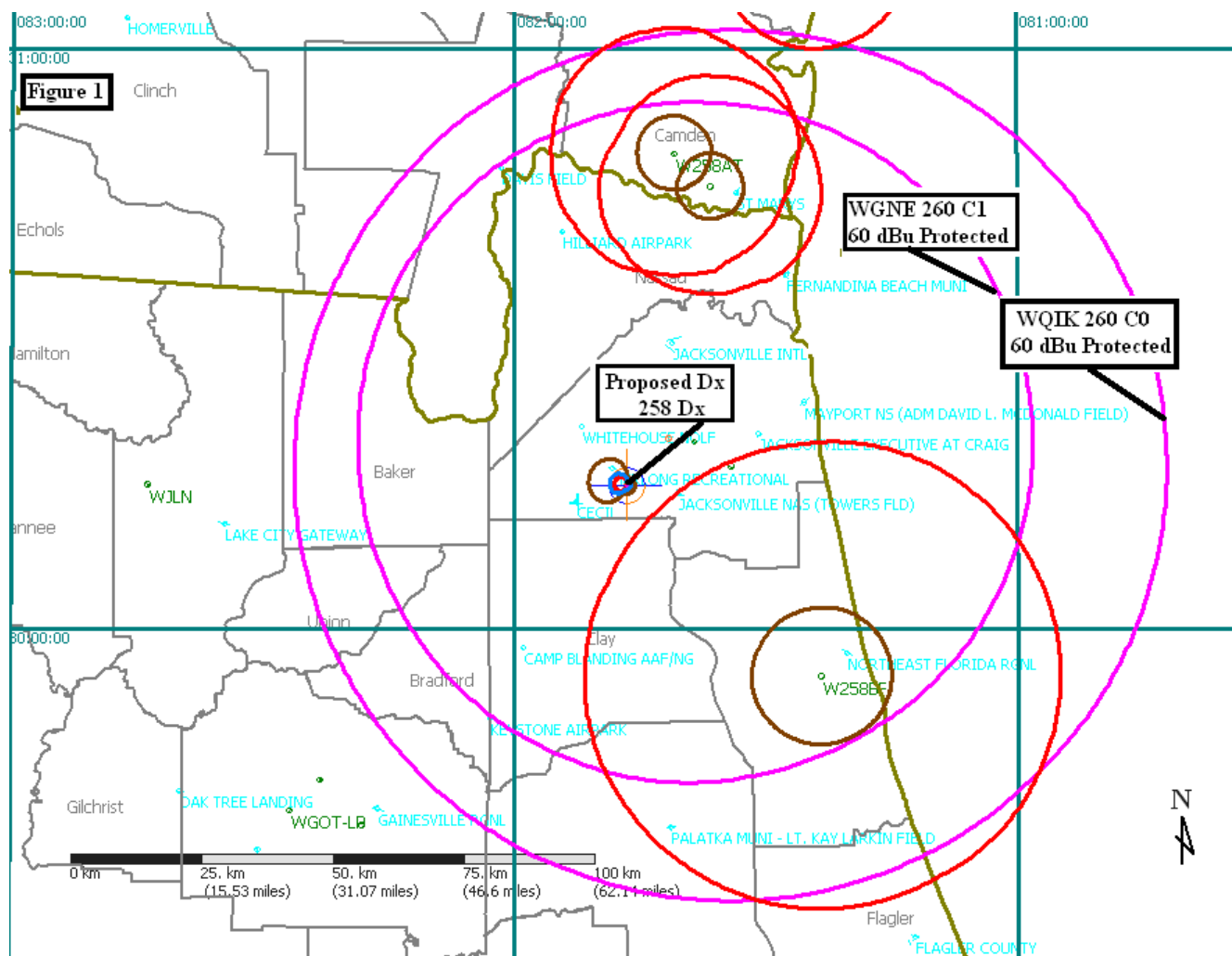


Exhibit EE-2 Engineering Statement in Support of:
FCC Form 349
Application for authority to construct or make changes in an FM
Translator or FM Booster Station
(For a New FM Translator)

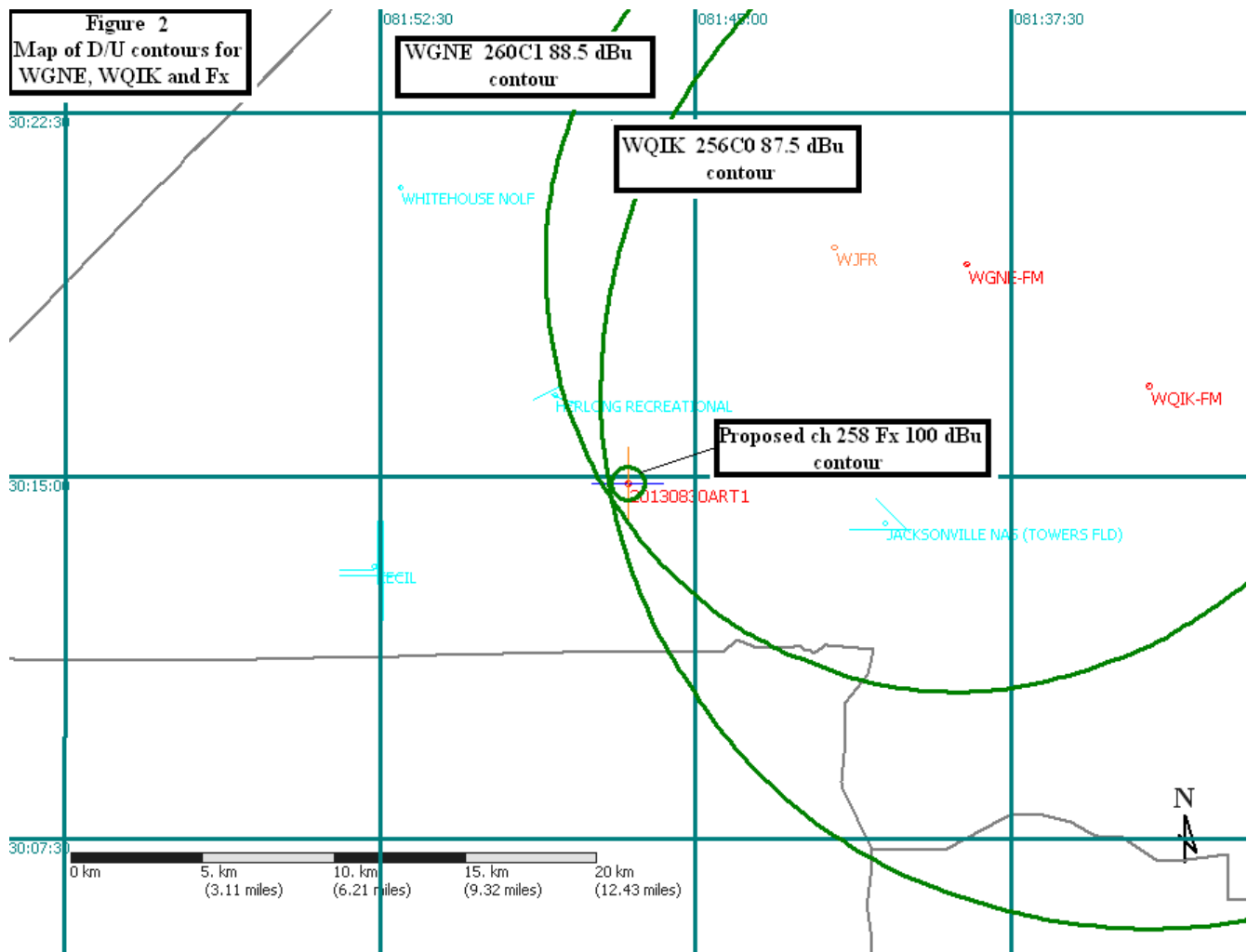
This Exhibit supports a long form application, with Minor Modifications, to an existing application by Barry J. Magrill (the applicant) for a new FM translator serving the community of Jacksonville, FL. The facility ID is 157039 and the file number is currently BNPFT-20030317MIS. A subsequent application is pending which is BNPFT20130830ART. This new application seeks operation on the tower proposed in a previous application and a change to channel 258* which is clear of LPFM applicants. The proposed facility will operate at the 41 m AGL and with a power of 3 Watts. A directional pattern is proposed using a Scala CL FM-H

This application was prepared using FCC 30-arc-second terrain data.

Figure 1 is a map showing the proposed and affected stations on ch 258 and its adjacencies. There are two stations that overlap second adjacent spacing, WGNE and WQIK. Thus **a 2nd Adjacency waiver is requested.** Figure 4 shows the protected 60 dBu contours from both full power stations with respect to the proposed translator. The protected contour level for WGNE is 88.5 and the protected contour level for WQIK is 87.5. These two contours completely encompass the proposed translator's interfering (100 dBu) contour. Second adjacent channels use 40 dB for a D/U analysis. 40 dB was added to the two full power protected contours. This yields $87.5 + 40 = 127.5$ for WQIK and $88.5 + 40 = 128.5$ for WGNE. The weaker signal (127.5) is the more fragile one. The interfering contour from the translator does not make it to the ground nor does it get to a plane 2 meters above the ground. A more rigorous proof is given below in the D/U analysis. Additionally, all translators clear the contours of the proposed 3 watt station.



D/U Analysis

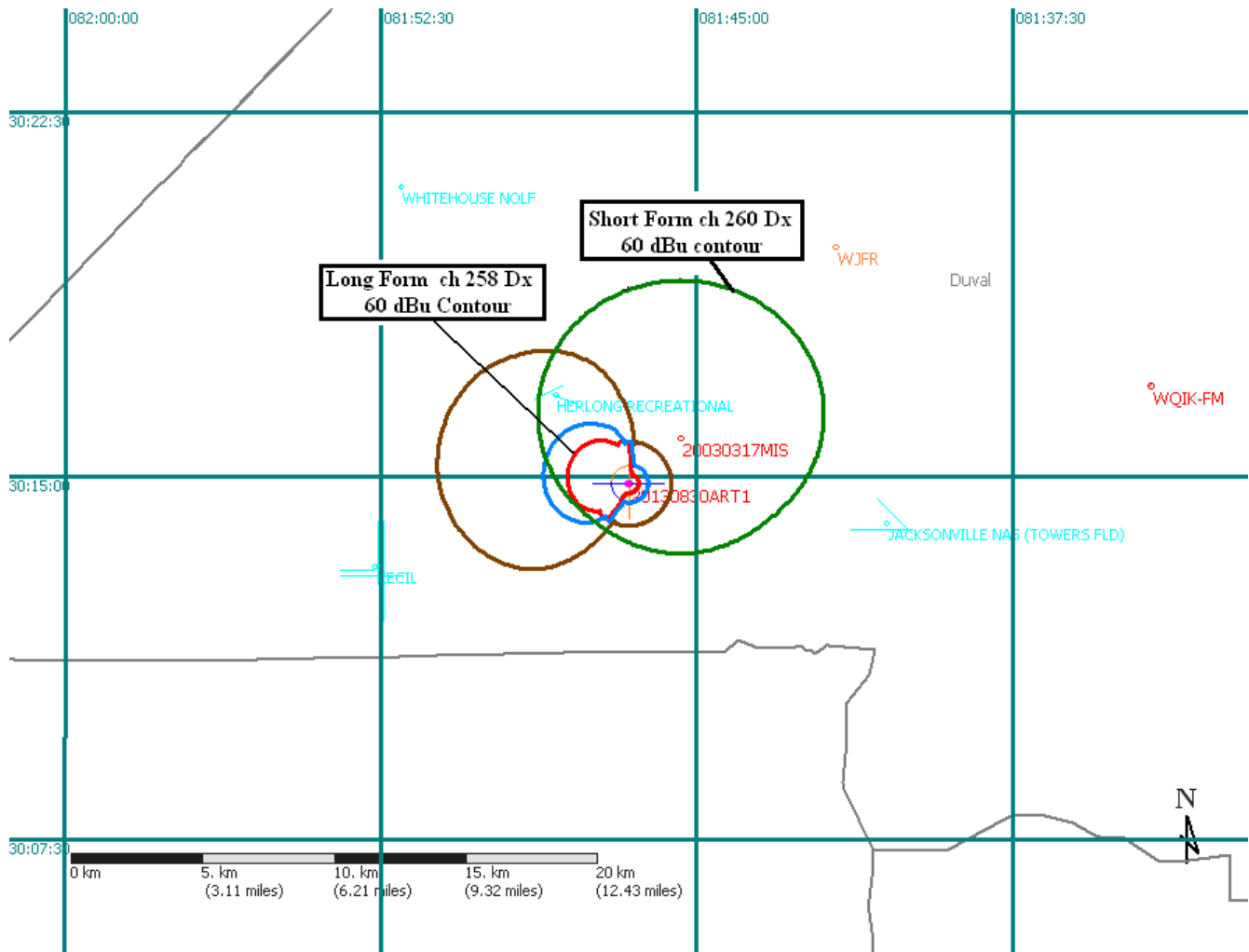


The minimum contour to receive interference, is 127.5 dBu. At 3 watts, the radiation from the antenna is 149.9 dBu. The difference between the protected contour and the maximum radiation of the antenna is 22.4 dB which translates to 3.14 meters of travel based on the “free space equation”. An isotropic emitter is assumed. The free space formula that was used is: “Path loss (dB) = 32.44 + 20 Log (MHz) + 20 Log D(km) + G (tx) + G (rx)”. G(tx) is 0 due to the isotropic radiator and the gain of the receiver is assumed to be 0. Path loss = 32.44 + 20 log 100MHz + 20 log D km. 20 log 100 is 40. 40 + 32.44 is 72.44. Path loss = 72.44 + 20 log D (km) also 22.4dB = 72.44dB + 20log D. 72.44 – 22.4= 50.04. Path loss= 50.04 + 20 log D(km). Antilog base 10 of (50.04/ 20) = D(km), for (22.4dB) D= 3.14 m The antenna height is 41 meters. Therefore, the minimum height of the interference would occur

37.8 meters above the land surface. There is nothing within 3 meters of the tower. There is a building nearby, however, it is a single story structure more than 3 meters away. No interference reaches any population, major roadway or occupied structure, so 47CFR73.1204 is satisfied.

Figure 3

Required Overlap of 60 dBu Contours



The required overlap of the 60 dBu contours is demonstrated in the map above. The 60 dBu from the original short form (green) covers the 60 dBu contour (red) of the long form proposal.

NEPA

This proposal is for a facility on an existing monopole. The proposed tower has another occupant on it. The proposed translator is in compliance with 47CFR Section 1.1306 with regards to radio-frequency exposure, in that the rf levels anticipated are less than 1% of the maximum public exposure limits. The translator contributes less than 5% of the total exposure limit for uncontrolled environments and so is categorically excluded. Should work be necessary on this tower the applicant will reduce power or shut down and will coordinate with the other owners of rf emitters on the tower. The calculations are shown below. First I assume that the extremely low power 3 Watts and the relatively high antenna height will result in a categorical exclusion. Therefore, I will treat the rf separately from other rf sources on the tower. The height of the C/R of the antenna is 41 meters. The height over head is 41m-2m or 39 meters. The power level from the antenna is 0.003kW. Doubling that to account for reflections from the ground that may occur in phase with the direct ray we have 0.006kW. This is multiplied by 33.41 which yields 0.20046kW. The distance is then squared which gives 1521m². Dividing the power by the square of the distance yields 0.0001317kW/m². By multiplying by 100, one changes a decimal fraction to a percent. In this case 0.013% when you multiply this number by 5 you obtain the exposure in terms of the uncontrolled public environment. This is 0.06585%. It is excluded and no further calculations are needed.

Barry J Magrill, President/Applicant
PE FL Reg 45305
8 August 2013

Engineering Exhibit EE-1 Engineering Statement in Support of:
FCC Form 349
Application for authority to Construct or make changes in an FM
Translator or FM Booster Station
(For a New FM Translator)

(discussion of minor change status)

This amendment is to change the frequency specified in the Tech Box (and wherever specified in the application) to Channel 258, and is filed based on the belief that it is an acceptable minor change amendment. The applicant believes this to be a minor change for several reasons. The applicant's originally specified frequency in its 2003 filing was Channel 260 (which the applicant had to leave because of the relocation of WGNE on 260 to Jacksonville). Channel 258 is second adjacent to Channel 260. The FCC's Public Notices on the Auction 83 window have made it clear that the 2003 short-form is the base for determining what is a minor change.

The FCC's engineering database continues to list the applicant's original Channel 260 short-form application, as well as the later amended designation of Channel 262 in its full 349. LPFM applicants were required to protect the Channel 260 application, not the amended designation of Channel 262, during the LPFM filing window. Since the close of the LPFM filing window, the applicant has determined that Channel 258, which because of theoretical LPFM preclusion was closed to the applicant during its August 2013 filing window, is fully available to the applicant without conflict with any full power FM, FM translator or LPFM authorization or pending application.

Should this be determined by the FCC to not be a minor change amendment, the applicant requests that this proposed change be dismissed and that the previous application be returned to the processing queue. .

Barry J Magrill, President/Applicant

PE FL Reg 45305
19 December 2013

Tech Box

- 1) channel 258
- 2) Primary Station FID 68201
 1. WGS8- Mayo, FL 89.5 MHz
- 3) Delivery Method Off Air
- 4) Antenna Location Coordinates (NAD 27)
 - 30-14-50 N Lat
 - 81-46-38 W Long
- 5) ASRN 1210773
- 6) Tower site location elevation AMSL 24.4 meters
- 7) Overall tower height above ground 47.5 meters
- 8) Height of Radiation Center above ground 41 m H AGL
- 9) ERP 0.003kW
- 10) Transmitting Antenna Scala CL FM-H
- 11) Fill in Translator No
- 12) Interference Yes
 - a) Section 74.1204 Checked See EE-2
 - b) Section 74.1205 unchecked
- 13) Unattended operation Yes
- 14) Multiple Translators Yes
- 15) NEPA Yes
 - Please see EE-2