

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In re Auction 99 Form 349 Tech Box of)	
)	
Estuardo Valdemar Rodriguez and)	Facility Id No. 201020
Leonor Rodriguez)	
(Wilson, North Carolina))	

To Chief, Audio Division

REQUEST TO CORRECT COORDINATES

Estuardo Valdemar Rodriguez and Leonor Rodriguez, through their counsel, respectfully request that the North Latitude coordinates specified in the above-referenced Auction 99 Form 349 Tech Box (the "WLLY Form 349 Tech Box") be corrected to 35 Degrees, 43 Minutes, 24 Seconds. As demonstrated herein, the North Latitude coordinates entered into the WLLY Form 349 Tech Box were off by exactly one degree due to a typographical error.

Mr. and Ms. Rodriguez engaged Munn-Reese, a broadcast consulting engineering firm, to prepare several Auction 99 Form 349 Tech Boxes for them, including a Form 349 Tech Box for a proposed FM translator to rebroadcast Station WLLY (AM), Wilson, North Carolina, of which they jointly are the licensee.

Bruce Bellamy is the President and owner of Munn-Reese. In his attached Declaration, Mr. Bellamy reports that in preparing the WLLY Form 349 Tech Box, he inadvertently entered the wrong North Latitude. What he entered was 36-43-24 NL, which was exactly one degree off from what he intended. The intended coordinates are 35-43-24 NL (NAD 27).

Significantly, the intended coordinates match those of the WLLY (AM) tower.

Furthermore, there are other parts of the WLLY Form 349 Tech Box that demonstrate the intent to locate the proposed FM translator on the WLLY (AM) tower. The elevation matches that of the correct coordinates; it does not match that of the entered coordinates. The tower height above ground matches that of the WLLY (AM) tower. The community of license listed in the form, Wilson, North Carolina, is nearly completely covered by the translator's 60 dBu contour if located at the WLLY (AM) tower. Wilson is located near the middle of North Carolina, whereas the coordinates mistakenly entered would put the proposed translator in Virginia, approximately 112 km away from the WLLY (AM) tower.

Mr. Bellamy states that at its intended coordinates, the proposed translator would be a singleton. Thus, correction of the coordinates in the WLLY Form 349 Tech Box will cause no prejudice to any other party.

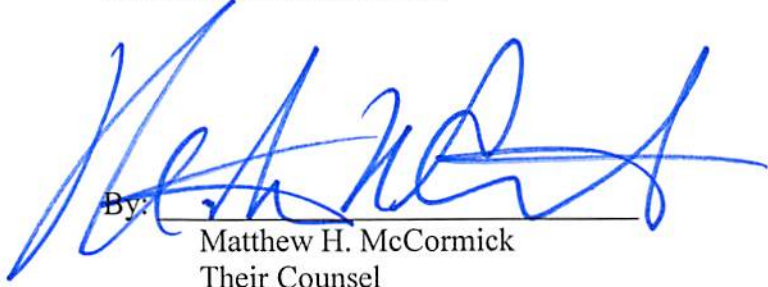
Grant of this request will facilitate Mr. and Ms. Rodriguez being able to obtain an FM translator to rebroadcast WLLY (AM) and thus would further the objectives of the AM Revitalization program to provide immediate and dramatic coverage relief to AM broadcasters.¹

Mr. and Ms. Rodriguez respectfully request that, to the extent necessary, the Public Notice released June 6, 2017² be WAIVED to permit amendment of the WLLY Form 349 Tech Box and that the North Latitude coordinates listed in the WLLY Form 349 Tech Box be CORRECTED to 35 Degrees, 43 Minutes, 24 Seconds.

¹ E.g., *FCC Announces Opening of First Auction Filing Window for AM Broadcasters Seeking New FM Translators*, FCC 17-67, 32 FCC Rcd 5159 (released June 1, 2017).

² *Filing Instructions for Cross-Service FM Translator Auction Filing Window for AM Broadcasters to be Open July 26 – August 2, 2017*, AU Docket No. 17-143, DA 17-533, 32 FCC Rcd 4663 (released June 6, 2017).

**ESTUARDO VALDEMAR RODRIGUEZ AND
LEONOR RODRIGUEZ**


By: _____
Matthew H. McCormick
Their Counsel

Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street
11th Floor
Arlington, VA 22209
703-812-0400

August 23, 2017

Declaration of Bruce Bellamy

I, Bruce Bellamy, declare under penalty of perjury, the following:

I am President and owner of Munn-Reese, a broadcast consulting engineering firm. Munn-Reese was engaged to prepare several Auction 99 Form 349 Tech Boxes for Estuardo Valdemar Rodriguez and Leonor Rodriguez, including a Form 349 Tech Box for a proposed FM translator to rebroadcast Station WLLY (AM), Wilson, North Carolina. The Facility ID for the Form 349 Tech Box in question is 201020 (the "WLLY Form 349 Tech Box").

In preparing the WLLY Form 349 Tech Box, I inadvertently entered the wrong North Latitude. What I entered was 36-43-24 NL, which was exactly one degree off from what I intended. The intended coordinates are 35-43-24 NL (NAD 27).

The intended coordinates match those of the WLLY (AM) tower.

Furthermore, there are other parts of the WLLY Form 349 Tech Box that demonstrate the intent to locate at the proposed FM translator on the WLLY (AM) tower. The elevation matches that of the correct coordinates. It does not match that of the entered coordinates. The tower height above ground matches that of the WLLY (AM) tower. The community of license listed in the form, Wilson, North Carolina, is nearly completely covered by the translator's 60 dBu contour if located at the WLLY (AM) tower. Wilson is in the middle of North Carolina, whereas the coordinates mistakenly entered would put the proposed translator in Virginia, approximately 112 km away from the WLLY (AM) tower.

I note that at its intended coordinates, the proposed translator would be a singleton. Thus, correction of the coordinates in the WLLY Form 349 Tech Box will cause no prejudice to any other party.

According, I respectfully request that the North Latitude coordinates listed in the WLLY Form 349 Tech Box be corrected to 35 Degrees, 43 Minutes, 24 Seconds.

Signed this 22nd day of August, 2017.



Bruce Bellamy

Munn-Reese
Coldwater, MI 49036

REFERENCE		CH# 298D - 107.5 MHz, Pwr= 0.25 kw, HAAT= 52.9 M, COR= 92 M							DISPLAY DATES		
35 43 24.0 N.		Average Protected F(50-50)= 7.09 km							DATA 08-08-17		
77 55 16.0 W.		Omni-directional							SEARCH 08-09-17		
CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR(kw)	INT(km)	PRO(km)	*OUT*	
CITY	STATE			<--	FILE #	LNG	HAAT(M)	COR(M)	LICENSEE	(Overlap	in km)
300C	WNCT-FM	LIC	NCN	129.7	62.12	35 21 55.0	100.000	12.7	87.8	-26.7*<	
Greenville	NC			310.0	BMLH19980323KE	77 23 38.0	518	530	Inner Banks Media, LLC		
298D	W298BX	CP	_C	114.3	49.90	35 32 15.3	0.250	41.8	12.1	3.8	
Winterville	NC			294.6	BMPFT20161011ABN	77 25 06.3		109	Ctc Media Group		
297A	WVRA	LIC	NCX	14.5	50.88	36 09 59.0	4.100	37.0	24.4	13.7	
Enfield	NC			194.6	BMLH20120110AAE	77 46 46.0	85	127	Liberty University, Inc.		
245C0	WWPL	LIC	_CX	208.2	41.00	35 23 52.0	100.000	169.8	84.6	24.5R	16.5M
Goldsboro	NC			28.1	BMLH20090708AEX	78 08 07.0	300	337	New Age Communications, Lt		
297C3	WCLN-FM	LIC	_C	222.6	89.74	35 07 37.0	9.200	55.1	36.7	39.4	
Clinton	NC			42.2	BLH20000926ABY	78 35 19.0	163	201	Christian Listening Networ		
299D	W299AP	LIC	DC	269.5	80.94	35 42 50.4	0.250	38.8	25.4	43.4	
Apex	NC			89.0	BLFT20130910ADJ	78 49 04.0		500	Radio Training Network, In		
295D	1762476	APP	_C	151.3	58.88	35 15 31.0	0.095	0.7	8.2	49.6	
Kinston	NC			331.4	BNPFT20170727AGQ	77 36 33.0		97	Estuardo Valdemar Rodrigue		
296C3	WFXC	LIC	NCX	289.6	85.46	35 58 39.0	8.000	3.3	34.3	50.1	
Durham	NC			109.0	BLH20090611ABC	78 48 58.0	146	248	Radio One Licenses, LLC		
298D	W298BX	LIC	_C	130.0	101.55	35 07 59.0	0.250	28.9	8.7	58.4	
New Bern	NC			310.5	BLFT20151009AIR	77 03 56.0		50	Ctc Media Group		
298D	1762535	APP	_C	0.0	111.18	36 43 24.0	0.070	16.7	5.1	75.7	
Wilson	NC			180.0	BNPFT20170727AGL	77 55 16.0		92	Estuardo Valdemar Rodrigue		
298C2	WAZO	LIC	ZCX	186.4	165.54	34 14 37.0	21.000	129.2	52.5	79.2	
Southport	NC			6.3	BLH20130530AJH	78 07 24.0	234	243	Sunrise Broadcasting, LLC		
299A	AL6341	RSV-A	___	1.2	127.20	36 52 02.0	6.000	45.5	29.5	84.8	
Alberta	VA			181.2	RM10185	77 53 31.0	100	198			
295C	WAFX	LIC	_CX	40.7	159.11	36 48 09.0	100.000	10.1	72.1	85.9	
Suffolk	VA			221.4	BLH20021227ABL	76 45 19.0	300	316	Tidewater Communications,		
299A	WWDW	LIC	_CX	1.2	127.20	36 52 02.0	2.200	42.6	28.3	86.1	
Alberta	VA			181.2	BMLH20090327AHS	77 53 31.0	163	255	First Media Radio, LLC		
298C	WKZL	LIC	NCN	289.3	191.76	36 16 33.0	100.000	171.2	71.8	93.8	
Winston-salem	NC			108.1	BLH19921016KD	79 56 27.0	303	539	Dick Broadcasting Company,		
295C2	WMGU	LIC	ZCX	236.9	145.96	34 59 53.0	50.000	5.7	50.7	94.2	
Southern Pines	NC			56.1	BLH20090330AIO	79 15 47.0	143	226	Cumulus Licensing LLC		
299C3	WUKS	LIC	NCN	229.9	146.09	34 52 17.0	5.200	56.6	38.2	94.5	
St. Pauls	NC			49.2	BLH19981020KB	79 08 49.0	200	261	Beasley Media Group, LLC		
300D	W300CE	LIC	DC	288.7	110.01	36 02 08.0	0.250	1.1	13.2	95.7	
Chapel Hill	NC			108.1	BLFT20160222AAY	79 04 48.0		232	Radio Training Network, In		
297D	1763606	APP	_C	71.2	125.41	36 04 45.9	0.250	14.4	10.4	101.4	
Edenton	NC			252.0	BNPFT20170801AIU	76 35 59.0		66	Lawrence F. Loesch & Marga		
296C1	WTKF	LIC	NCX	125.6	158.73	34 53 01.0	46.000	6.5	55.8	101.9	
Atlantic	NC			306.4	BLH20080129ABO	76 30 22.3	190	192	Atlantic Ridge Telecasters		
244A	WKRX	LIC	_CN	306.8	120.64	36 22 04.0	3.000	169.8	84.6	9.5R	111.1M
Roxboro	NC			126.2	BLH6712	78 59 58.0	91	273	Roxboro Broadcasting Compa		
299B1	WMOV-FM	LIC	ZCX	50.1	190.17	36 48 37.0	15.000	58.5	44.5	128.8	
Norfolk	VA			231.0	BLH20110217AAQ	76 16 58.7	130	131	Cc Licenses, LLC		
297A	WB8T-FM	LIC	NCX	5.5	198.97	37 30 16.0	1.400	42.3	28.0	157.9	
Powhatan	VA			185.7	BLH20110525ABA	77 42 14.0	207	282	Alpha Media Licensee LLC		
300C1	WYYD	LIC	_CX	326.7	233.70	37 28 19.0	19.000	7.7	74.5	158.1	
Amherst	VA			145.9	BLH20081117AAL	79 22 28.0	549	872	Capstar Tx, LLC		
296C2	WRXZ	LIC	_CN	205.9	220.23	33 56 14.0	50.000	5.7	50.7	168.4	
Briarcliff Acres	SC			25.3	BMLH19990825KB	78 57 53.0	150	165	Amfm Radio Licenses, L.L.C		

Page # 2										
CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR(kw)	INT(km)	PRO(km)	*OUT*
CITY		STATE		<--	FILE #	LNG	HAAT(M)	COR(M)	LICENSEE	(Overlap in km)
296A	WTTX-FM	LIC _CX		336.3	200.64	37 22 19.0	1.700	2.1	24.1	175.4
Appomattox		VA		155.7	BMLED20060112AEE	78 50 06.0	130	341	Positive Alternative Radio	
244C2	WKJX	LIC _CX		73.3	192.25	36 12 10.0	50.000	169.8	84.6	14.5R 177.8M
Elizabeth City		NC		254.5	BLH20040618AAH	75 52 23.0	124	124	East Carolina Radio Of Eli	
297A	WVSZ	LIC NCX		241.2	226.83	34 43 12.0	4.500	43.7	28.5	185.2
Chesterfield		SC		59.9	BMLH20080304AAI	80 05 45.0	100	184	Our Three Sons Broadcastin	
300A	WBQK	LIC NCX		26.9	215.96	37 27 00.0	4.000	2.5	26.2	188.7
West Point		VA		207.6	BLH20050726ANA	76 48 46.0	100	119	Davis Media, Llc	

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= East Zone, Co to 3rd adjacent.
All separation margins (if shown) include rounding.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
Incoming contour overlap is ignored.
**"affixed to 'IN' or 'OUT' values = site inside restricted contour.
< = Contour Overlap
Reference station has protected zone issue: AM tower