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August 17, 2017

VIA COURIER

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

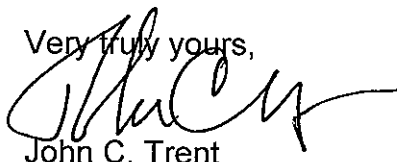
Re: NEW FM Translator BNPFT-20170726AMT, Baraboo, WI
(FCC Facility ID No. 201160); Request to Correct Coordinates

Dear Madam Secretary:

On behalf of Magnum Communications, Inc. ("Magnum"), applicant for a new FM Translator Construction Permit (BNPFT-2017026AMT) at Baraboo, Wisconsin, we respectfully request a "correction of the coordinates" which are identified on Section III-A, item 4 of Magnum's FCC Form 349-Short Form Application. The Latitude was inadvertently entered as 42 degrees, rather than the correct 43 degrees. Attached hereto is an Engineering Exhibit prepared by Timothy L. Warner, P.E., wherein he explains the situation in detail. Mr. Warner provides clear evidence that this correction is justified, and was the result of a simple typographical error.

If you have any questions or require any other information to process this instant request, please contact this office.

Very truly yours,



John C. Trent

cc: Mr. James Bradshaw, Deputy Division Chief, Audio Division (via E-mail Only)

Engineering Exhibit
In Support of Request for Correction of Coordinates
(Typographic Error Correction)
by
Magnum Communications, Inc.

NEW
BNPFT-20170726AMT
Baraboo, Wisconsin
Application for New FM Translator
On Channel 224 Class D

August 2017

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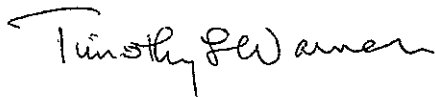
Timothy L. Warner, Inc.
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Asheville, North Carolina 28814-8045
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Declaration

I declare, under penalty of perjury, that I am a technical consultant to broadcasting and other communications systems, that I have over twenty-five years of experience in the engineering of broadcast and other communications systems, that I am familiar with the Federal Communications Commission's Rules found in the Code of Federal Regulations Title 47, that I am a Professional Engineer registered in North Carolina, that I have prepared or supervised the preparation of the attached Engineering Exhibit In Support of Request for Correction of Coordinates by Magnum Communications, Inc. ("Magnum"), and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief.



Timothy L. Warner, P.E.
Post Office Box 8045
Asheville, North Carolina 28801
(828) 258-1238
twarner@tlwinc.net
15 August 2017

Typographic Error Correction

This Exhibit provides engineering details of a proposed new translator for Baraboo, Wisconsin, BNPFT-20170726AMT. A typographic error was made in that application, Section III-A Tech Box, item 4. The Latitude was entered with 42 degrees, rather than the intended 43 degrees. This Exhibit provides details to confirm that the intended 43 degrees can be verified by other information already filed in the application.

Antenna Structure Registration Data

The application includes the Antenna Structure Registration Number for the proposed mounting structure, 1022018. A web print of the registration is included in this Exhibit as Attachment 1. The NAD83 coordinates for that structure are:

43° 25' 50.0" North Latitude

89° 39' 13.0" West Longitude

Converting using NADCON¹ to NAD 27 results in:

43° 25' 50.05546" North Latitude rounding to 43° 25' 50.1 North

89° 39' 12.55888" West Longitude rounding to 89° 39' 12.6" West

The coordinates entered in the application are:

42° 25' 50.1" North

89° 39' 12.6" West

Where the difference is the use of 42 degrees rather than the desired 43 degrees.

¹ <https://www.ngs.noaa.gov/cgi-bin/nadcon.pr1>

The elevations also match the antenna structure registration data.

Section III-A Item	ASRN 1022018	Tech Box
6. Antenna Location Site Elevation Above Mean Sea Level:	466.3	466
7. Overall Tower Height Above Ground Level:	Overall Height Above Ground w/o Appurtenances: 121.9 Overall Height Above Ground (AGL): 129.5	122

Note that the overall height was the overall height of the structural steel, not the height with appurtenances.

The coordinates in the Tech Box correspond to a location South of Orangeville, Illinois, with an elevation of roughly 276 meters. There are no antenna structures registered in the vicinity. The radiation center in the Tech Box of 587 meters above mean sea level would produce a radiation center above ground of 311 meters (1,020 feet). There are no significant towers anywhere near the Tech Box coordinates.

Figure 1 shows, with a color code, locations with terrain over 375 meters above mean sea level. There are few locations on the map where the site elevation of 466 meters (colored yellow) would be possible.

WDLS Fill-In Application

The application was filed as a fill-in application for AM station WDLS, Wisconsin Dells, Wisconsin, a Class D AM station eligible to apply for a new FM translator in the Auction 99 Filing Window. Figure 1 shows the WDLS 2 mV/m service contour and a 25 mile radius circle around the WDLS transmitter site. The facilities proposed in BNPFT-20170726AMT (identified by Application ID 1762723.A) are shown (assuming that the center of radiation above mean sea level were correct). Also shown are the facilities at the intended

coordinates, identified as 1762723corr. As Figure 1 shows, the intended facilities comply with requirements for a fill-in translator for WDLS.

No Minor Modification Compliant Application from Incorrect Coordinates

The request for correction of coordinates is being filed as a way to allow the application to proceed. This can, pending any mutually exclusive application modifications, settlements, or auction, lead to an opportunity to file a long form application for a rules compliant AM fill-in translator for WDLS. As Figure 1 shows, there is no possibility to propose a minor modification of the Tech Box facilities which is also a valid fill-in for WDLS.

Although not relevant to the limited issue of correcting the typographic error, a study shows that a minor modification of the intended facilities can be clear of all other applications filed for new translators in the Auction 99 filing window.

Community of License

The community of license shown in Section I, item 4, of the Form 349 application lists Baraboo, Wisconsin. That was a deliberate choice to indicate the planned service area, as distinct from the WDLS community of license, Wisconsin Dells, Wisconsin. Figure 1 shows that the corrected facilities would provide a 60 dBu signal reaching Wisconsin Dells, but centered on Baraboo. The coordinates with the typographic error are more appropriate for communities of license of Orangeville, Illinois, or perhaps Monroe, Wisconsin.

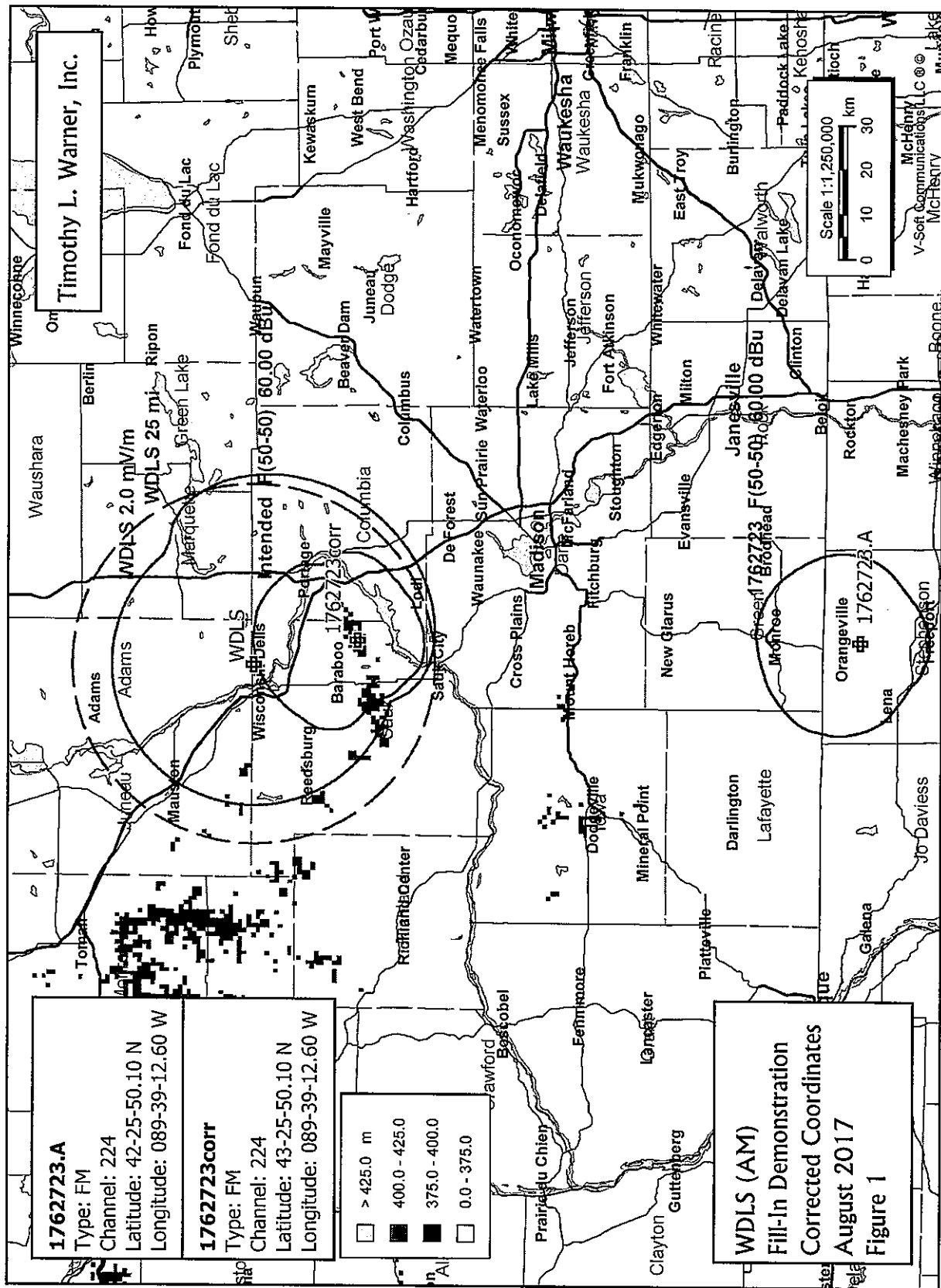
Other Magnum Communications Applications

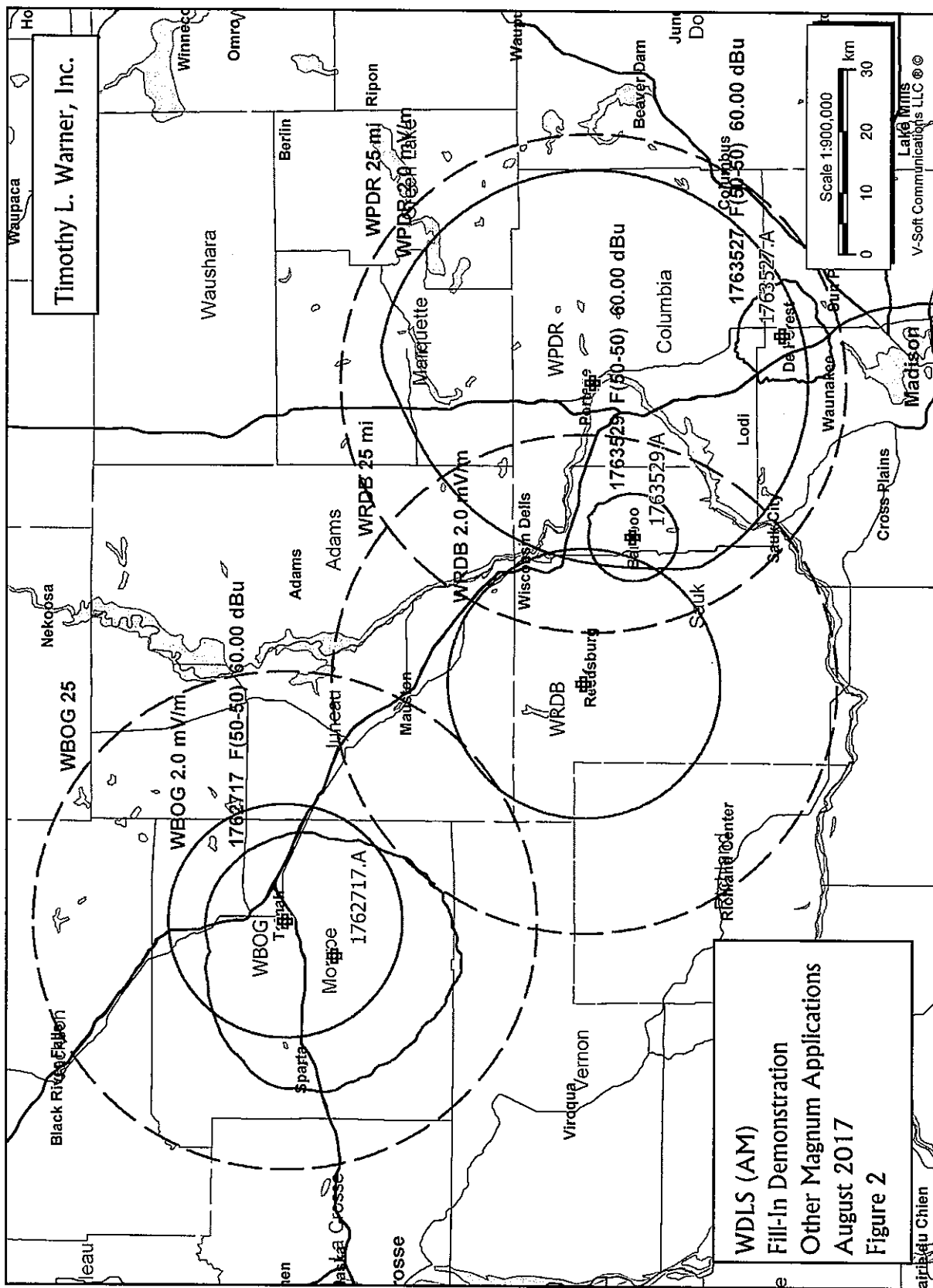
Magnum has three additional AM radio stations that are Class C or Class D and were eligible to apply for new translators in the Auction 99 filings window. All did so. In each case, the translator application complies with the requirements for fill-in translators. Figure 2 shows the other AM stations, with 2 mV/m contours and 25 mile radius circles, and the applications filed in the window. Figure 2 demonstrates that Magnum had the intention to file rules compliant applications in the Auction 99 filing window.

Source of Data

Transmitter location, effective radiated power, directional antenna pattern, and elevation data are extracted from the Commission's CDBS. All contours for existing and proposed facilities are calculated using height above average terrain calculated at one degree horizontal increments.

The contours were evaluated using terrain extracted from the GLOBE 30 arcsecond terrain database, formatted by V-Soft Communications to work with its allocation and mapping programs.





Attachment 1

ASRN 1022018

ASR Registration Search

Registration 1022018 [Map Registration](#)**Registration Detail**

Reg Number	1022018	Status	Constructed
File Number	A0026300	Constructed	06/07/1997
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long	43-25-50.0 N 089-39-13.0 W	Address	E13445 TOWER RD
City, State	BARABOO , WI		
Zip	53913	County	SAUK
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
466.3	129.5
Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
595.8	121.9

Painting and Lighting Specifications

FAA Chapters 4, 6, 13

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

FAA Notification

FAA Study	97-AGL-0531-OE	FAA Issue Date	02/28/1997
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Owner & Contact Information

FRN

Owner Entity
Type**Owner**POINTON, BRADLEY P DBA = POINTON
COMMUNICATIONS
601 SOUTH BLVD
P.O. Box 14
BARABOO , WI 53913P: (608)355-0257
F:
E: BPOINTON@POINTON.COM**Contact**P:
F:
E:**Last Action Status**

Status	Constructed	Received	05/19/1997
Purpose	New	Entered	05/22/1997
Mode	Mail In (Manual)		

Related Applications

05/19/1997 A0026300 - New (NE)

Comments

Comments

None

History

Date

Event

None

Automated Letters

None

CLOSE WINDOW