

2018 FEB -8 PM 1:55

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

JACKSON TELECASTERS, INC.

FM Translator Station W245DB  
Chattanooga, Tennessee

TO: The Secretary  
ATTN: Chief, Audio Division  
Media Bureau

)  
)  
) Facility ID #156865  
)  
)  
)

**ACCEPTED/FILED**

**FEB -7 2018**

**Federal Communications Commission  
Office of the Secretary**

**RESPONSE TO INTERFERENCE COMPLAINT**

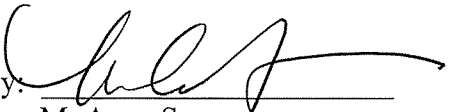
Jackson Telecasters, Inc. ("JTI"), licensee of the above-captioned translator, by counsel and pursuant to §1.45 of the Commission's rules, 47 C.F.R. §1.45, hereby responds to the "Interference Complaint" filed on January 25, 2018, by Mountain Educational Services Corporation, licensee of low-power FM station WSDA-LP in Trenton, Georgia.

JTI is reviewing the issues noted in the Interference Complaint. As part of this process, on February 2, 2018, JTI submitted the attached request for Special Temporary Authorization

("STA"), which was today granted by the Commission. JTI is operating consistently with the STA during its review.

Respectfully submitted,

JACKSON TELECASTERS, INC.

By:   
M. Anne Swanson

Wilkinson, Barker, Knauer, LLP  
1800 M Street, NW  
Suite 800N  
Washington, D.C. 20036  
202-383-3342

Its Attorneys

February 7, 2018

**FCC MB - CDBS Electronic Filing**  
**Application Reference Number: 20180202AAU**  
**Successfully filed at Feb 2 2018 4:45PM**

**A Fee Payment is Required for this application. The Total Fee is \$190.**

You can use the FCC's Electronic Form 159 System to pay electronically and/or to print out an appropriate Form 159. Press the button below now or return to this screen later by pressing the "Pay Fee" button on the CDBS Main Menu/ Informal Menu. See the [CDBS User's Guide](#) for more information about fee payment.

[Electronic Form 159](#)[Return to Informal Menu](#)[Logout](#)

Payment must be received by US Bank within 14 (calendar) days of the date that the application is officially received by the Media Bureau's electronic filing system (indicated by the reference number above). This deadline applies to any payment submission method (electronic or via a paper check). If payment is not received in time, the filed application will be considered to be **not paid** and will therefore not be processed by the MB.

**Agency Tracking ID:PGC3052991 Authorization  
Number:04863C  
Successful Authorization -- Date Paid: 2/2/18  
FILE COPY ONLY!!**

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING  (1) LOCKBOX #979089	FEDERAL COMMUNICATIONS COMMISSION <b>REMITTANCE ADVICE</b> <b>FORM 159</b> PAGE NO 1 OF 1	APPROVED BY OMB 3060-059 SPECIAL USE FCC USE ONLY
<b>SECTION A - Payer Information</b>		
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) <b>Wilkinson Barker Knauer, LLP</b>		(3) TOTAL AMOUNT PAID (dollars and cents) <b>\$190.00</b>
(4) STREET ADDRESS LINE NO. 1 <b>1800 M Street, NW</b>		
(5) STREET ADDRESS LINE NO. 2 <b>Suite 800N</b>		
(6) CITY <b>Washington</b>	(7) STATE <b>DC</b>	(8) ZIP CODE <b>20036</b>
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) <b>202-7834141</b>		(10) COUNTRY CODE (IF NOT IN U.S.A.) <b>US</b>
<b>FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED</b>		
(11) PAYER (FRN) <b>0003775731</b>		(12) FCC USE ONLY
IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)		
(13) APPLICANT NAME <b>JACKSON TELECASTERS, INC.</b>		
(14) STREET ADDRESS LINE NO. 1 <b>C/O BEVERLY POSTON</b>		
(15) STREET ADDRESS LINE NO. 2 <b>ONE TELEVISION PLACE</b>		
(16) CITY <b>CHARLOTTE</b>	(17) STATE <b>NC</b>	(18) ZIP CODE <b>28205-</b>
(19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) <b>7043724434</b>		(20) COUNTRY CODE (IF NOT IN U.S.A.) <b>USA</b>
<b>FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED</b>		
(21) APPLICANT (FRN) <b>0001769991</b>		(22) FCC USE ONLY
<b>COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET</b>		
(23A) FCC Call Sign/Other ID <b>W254DB</b>	(24A) Payment Type Code(PTC) <b>MGF</b>	(25A) Quantity <b>1</b>
(26A) Fee Due for (PTC) <b>\$190.00</b>	(27A) Total Fee <b>\$190.00</b>	FCC Use Only
(28A) FCC CODE 1 <b>156865</b>		(29A) FCC CODE 2 <b>CDBS20180202AAU</b>
<b>COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET</b>		
(23B) FCC Call Sign/Other ID	(24B) Payment Type Code(PTC)	(25B) Quantity
(26B) Fee Due for (PTC)	(27B) Total Fee	FCC Use Only
(28B) FCC CODE 1		(29B) FCC CODE 2

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0386 (July 2002)	FOR FCC USE ONLY
<b>Engineering STA</b>		FOR COMMISSION USE ONLY FILE NO. - 20180202AAU
Read Instructions/FAQ before filling out form		

**Section I - General Information**

1.	Legal Name of the Applicant JACKSON TELECASTERS, INC.		
	Mailing Address C/O BEVERLY POSTON ONE TELEVISION PLACE		
	City CHARLOTTE	State or Country (if foreign address) NC	Zip Code 28205 -
	Telephone Number (include area code) 7043724434		E-Mail Address (if available) BEVERLY.POSTON@BAHAKEL.COM
	FCC Registration No 0001769991	Call Sign W254DB	Facility ID Number 156865
2.	Contact Representative (if other than licensee/permittee) M. ANNE SWANSON		Firm or Company Name WILKINSON BARKER KNAUER
	Mailing Address 1800 M STREET NW SUITE 800N		
	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20036 -
	Telephone Number (include area code) 2023833342		E-Mail Address (if available) ASWANSON@WBKLAW.COM
3.	Purpose:		
	<input checked="" type="radio"/> Engineering STA		
	<input type="radio"/> Extension of Existing Engineering STA		
	<input type="radio"/> Legal STA		
	<input type="radio"/> Extension of Existing Legal STA		
4.	Service: FX		
5.	Community of License: City: CHATTANOOGA State: TN		
6.	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 type="radio"/> Other <input type="radio"/> N/A (Fee Required)		

**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**

7.1.	Channel: 254		
7.2.	Primary Station:		
	Facility Identifier	Call Sign	City
	57845	WXCT	CHATTANOOGA
			State
			TN

7.3.	Delivery Method (Select One): <input type="radio"/> Off-air <input type="radio"/> Microwave <input checked="" type="radio"/> Satellite <input type="radio"/> Via <input checked="" type="radio"/> Other											
7.4.	Antenna Location Coordinates: (NAD 27)  Latitude: Degrees 35 Minutes 0 Seconds 33 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 85 Minutes 20 Seconds 41 <input checked="" type="radio"/> West <input type="radio"/> East											
7.5.	Antenna Structure Registration Number: 1225696 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA											
7.6.	Antenna Location Site Elevation Above Mean Sea Level:										643 meters	
7.7.	Overall Tower Height Above Ground Level:										33 meters	
7.8.	Height of Radiation Center Above Ground Level:										30 meters(H) 30 meters(V)	
7.9.	Effective Radiated Power:										0.062 kW(H) 0.062 kW(V)	
7.10.	Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under CDBS Public Access ( <a href="http://licensing.fcc.gov/prod/cdbspubacc/prod/cdbsp_a.htm">http://licensing.fcc.gov/prod/cdbspubacc/prod/cdbsp_a.htm</a> ). 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 SHI Model 6800 SERIES Rotation: 0 degrees <input type="checkbox"/> No Rotation											
	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
	0	1	10	1	20	0.962	30	0.91	40	0.781	50	0.6
	60	0.4	70	0.18	80	0.18	90	0.221	100	0.237	110	0.273
	120	0.289	130	0.306	140	0.313	150	0.295	160	0.303	170	0.276
	180	0.202	190	0.142	200	0.065	210	0.046	220	0.037	230	0.032
	240	0.03	250	0.045	260	0.187	270	0.388	280	0.57	290	0.715
	300	0.829	310	0.92	320	0.979	330	1	340	1	350	1
	Additional Azimuths											
8.	<b>For FM Boosters and Fill-in translators only.</b> Applicant certifies that the proposal is for a fill-in translator or booster station entirely within the primary station's protected contour. <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A  See Explanation in [Exhibit 7];											
9.	<b>Interference.</b> The proposed facility complies with all of the following applicable rule sections. Check all that apply: <input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 8]  <b>Overlap Requirements.</b> <input checked="" type="checkbox"/> a) 47 C.F.R. Section 74.1204 [Exhibit 9] <b>Exhibit Required.</b>  <b>Television Channel 6 Protection. (Ch 201 - 220 only)</b> <input type="checkbox"/> b) 47 C.F.R. Section 74.1205 with respect to station(s) [Exhibit 10] <b>Exhibit Required.</b>											
10.	<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 <input checked="" type="radio"/> Yes <input type="radio"/> No											

	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>  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.	See Explanation in [Exhibit 11]
11.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.	[Exhibit 12]
12.	Anti-Drug Abuse Act Certification. 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

I certify that I have prepared 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 HERMAN E. HURST, JR.		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date (mm/dd/yyyy) 2/1/2018	
Mailing Address CARL T. JONES CORPORATION 7901 YARNWOOD COURT			
City SPRINGFIELD	State or Country (if foreign address) VA	Zip Code 22153 -	
Telephone Number (No dashes or parentheses, include area code) 7035697704	E-Mail Address (if available) HHURST@CTJC.COM		

I hereby 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.

Typed or Printed Name of Person Signing BEVERLY POSTON	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date (mm/dd/yyyy) 2/1/2018

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).

## Exhibits

### Exhibit 7

**Description:** FILL-IN TRANSLATOR EXHIBIT

AT THE REDUCED POWER SPECIFIED HEREIN, THE FILL-IN TRANSLATOR COVERAGE WILL REMAIN ENTIRELY WITHIN THE PRIMARY STATION'S PROTECTED CONTOUR.

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**Attachment 7**

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**Exhibit 9**

**Description:** SECTION 74.1204 COMPLAINT

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AT THE REDUCED POWER PROPOSED HEREIN, THE TRANSLATOR STATION WILL REMAIN COMPLIANT WITH SECTION 74.1204 OF THE FCC RULES.

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**Attachment 9**

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**Exhibit 11**

**Description:** RFR STATEMENT OF COMPLIANCE

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BASED ON THE FCC'S FM MODEL PROGRAM, WHICH CONSIDERS THE SPECIFIC ANTENNA TYPE AND PREDICTS THE POWER DENSITY AT TWO METERS ABOVE GROUND LEVEL, A SINGLE BAY FM ANTENNA (EPA TYPE 1) IS PREDICTED TO PRODUCE A MAXIMUM WORST-CASE POWER DENSITY OF 3.2 MICROWATTS PER SQUARE CENTIMETER AT TWO METERS ABOVE GROUND LEVEL. USE OF THE FM DIPOLE ANTENNA (EPA TYPE 1) IN THIS INSTANCE ALLOWS FOR A WORST-CASE RFR ANALYSIS.

BASED ON THE CALCULATIONS DISCUSSED ABOVE, THE PREDICTED POWER DENSITY REPRESENTS ONLY 1.6% OF THE FCC GUIDELINE VALUE FOR UNCONTROLLED RFR ENVIRONMENTS. PURSUANT TO SECTION 1.1307(B)(3) OF THE FCC RULES, THE PROPOSAL'S POWER DENSITY CONTRIBUTION IS INSIGNIFICANT.

FURTHER, THE APPLICANT IS COMMITTED TO REDUCING POWER AND/OR CEASING OPERATION DURING TIMES OF SERVICE OR MAINTENANCE OF THE TRANSMISSION SYSTEMS AS NECESSARY TO AVOID POTENTIALLY HARMFUL EXPOSURE TO PERSONNEL. IN LIGHT OF THE ABOVE, THE PROPOSED FACILITY SHOULD BE CATEGORICALLY EXCLUDED FROM RF ENVIRONMENTAL PROCESSING UNDER SECTION 1.1307(B) OF THE COMMISSION'S RULES.

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**Attachment 11**

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**Exhibit 12**

**Description:** NATURE OF STA REQUEST

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**Attachment 12**

Description
STA Statement

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STATEMENT OF HERMAN E. HURST, JR.  
IN SUPPORT OF A REQUEST FOR  
SPECIAL TEMPORARY AUTHORITY  
W254DB – CHATTANOOGA, TENNESSEE  
98.7 MHz – 0.25 kW – DA  
Facility ID: 156865

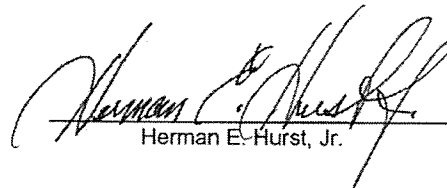
Applicant: Jackson Telecasters, Inc.

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

It has come to the attention of Jackson Telecasters, Inc., ("Jackson") licensee of W254DB at Chattanooga, Tennessee, that the W254DB antenna may be performing improperly. Jackson has authorized this office to coordinate with the antenna manufacturer to identify the cause and magnitude of the problem and to effect a repair or replacement of the antenna to ensure that the translator system is properly performing in accordance with its authorization.

Until this problem is resolved, this office has recommended W254DB reduce effective radiated power to 25% of licensed value, i.e. 62.5 watts.

February 1, 2018



Herman E. Hurst, Jr.

## CERTIFICATE OF SERVICE

The undersigned, Karla E. Huffstickler, hereby certifies this 7<sup>th</sup> day of February 2018, that a copy of the foregoing Response to Interference Complaint has been served by first class United States mail upon the following:

Donald E. Martin  
P.O. Box 8433  
Falls Church, Virginia 22041  
Counsel for Mountain Educational Services Corporation

James Bradshaw\*  
Audio Division  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Parul Desai\*  
Audio Division  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554



Karla E. Huffstickler

\*Served by electronic mail.