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MEMBER, DISTRICT OF COLUMBIA BAR
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November 23, 2018

BY EXPRESS MAIL

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

ATTENTION: Albert Shuldiner
Chief, Audio Division, Media Bureau

RE: New Beginnings Movement, Incorporated
NCE FM Broadcast Station WJCF-FM, Facility ID 91193
Morristown, Indiana
FCC File No. BXPED-20181116ADC

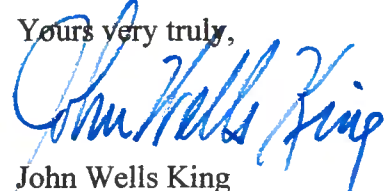
SUBJECT: Informal Objection

Dear Ms. Dortch:

On behalf of Dayton Public Radio, Inc., licensee of Noncommercial Educational FM Broadcast Station WDPR, Dayton, Ohio, I transmit herewith in triplicate its Informal Objection to a grant of the above-reference application for construction permit.

Kindly communicate any questions directly to this office.

Yours very truly,


John Wells King

JWK/

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Before The

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)
)
NEW BEGINNINGS MOVEMENT, INCORPORATED) FCC File No. BXPED-20181116ADC
)
NCE FM Broadcast KJCF-FM) Facility ID No. 91193
Morristown, Indiana)

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

Informal Objection

Dayton Public Radio, Inc., licensee of Noncommercial Educational FM Broadcast Station WDPR, Facility ID No. 61582, Dayton, Ohio ("DPR"), objects to a grant of the above-captioned application of New Beginnings Movement, Incorporated ("NBMI") for auxiliary facilities for its Noncommercial Educational FM Broadcast Station WJCF-FM, Facility ID No. 91193, at Morristown, Indiana.

The application violates the coverage limitations of the Commission's rules for auxiliary facilities.

WJCF-FM operates with effective radiated power of 28 kW at a height above average terrain of 49 meters, from a site located at 39° 45' 01" north latitude, 85° 33' 19" west longitude. NBMI proposes to operate auxiliary facilities with effective radiated power of 1.0 kW at a height above average terrain of 97.41 meters, from a site located at 39° 42' 22" north latitude, 85° 29' 41" west longitude. According to the attached statement of James M. Stitt,

President of J.M. Stitt & Associates, Inc., the proposed auxiliary transmitter site is located about 7 km (4.4 miles) southeast of the licensed transmitter site.

Section 73.1675(a)(1)(ii) of the Commission's rules provides that the 1.0 mV/m service contour of a station's auxiliary facilities may not extend beyond the 1.0 mV/m service contour of the station's main facilities.

The coverage contour map supplied by Mr. Stitt demonstrates that the 1.0 mV/m (60 dBu) service contour of the auxiliary facilities proposed by NBMI extends far beyond the 1.0 mV/m service contour of WJCF-FM's licensed main facilities.

Because the NBMI application violates the coverage limitations of the Commission's rules for auxiliary facilities, the application must be dismissed. It is respectfully requested.

Respectfully submitted,

DAYTON PUBLIC RADIO, INC.

By: 

John Wells King
Its Attorney

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Dated: November 23, 2018



J.M. Stitt & Associates, Inc.

RE: File Number: EXPED-20181116ADC App ID: 1796274

This engineering exhibit is being provided on behalf of Dayton Public Radio, Inc., licensee of Noncommercial Educational FM Broadcast Station WDPR, Facility ID No. 61582, Dayton, Ohio in support of their informal objection to a grant of the above-referenced application of New Beginnings Movement, Incorporated ("NBMI") for proposed auxiliary facilities for its Noncommercial Educational FM Broadcast Station WJCF-FM, Facility ID No. 91193, at Morristown, Indiana on the grounds it violates the coverage limitations of the Commission's rules for auxiliary facilities in section 73.1675(a)(1)(ii).

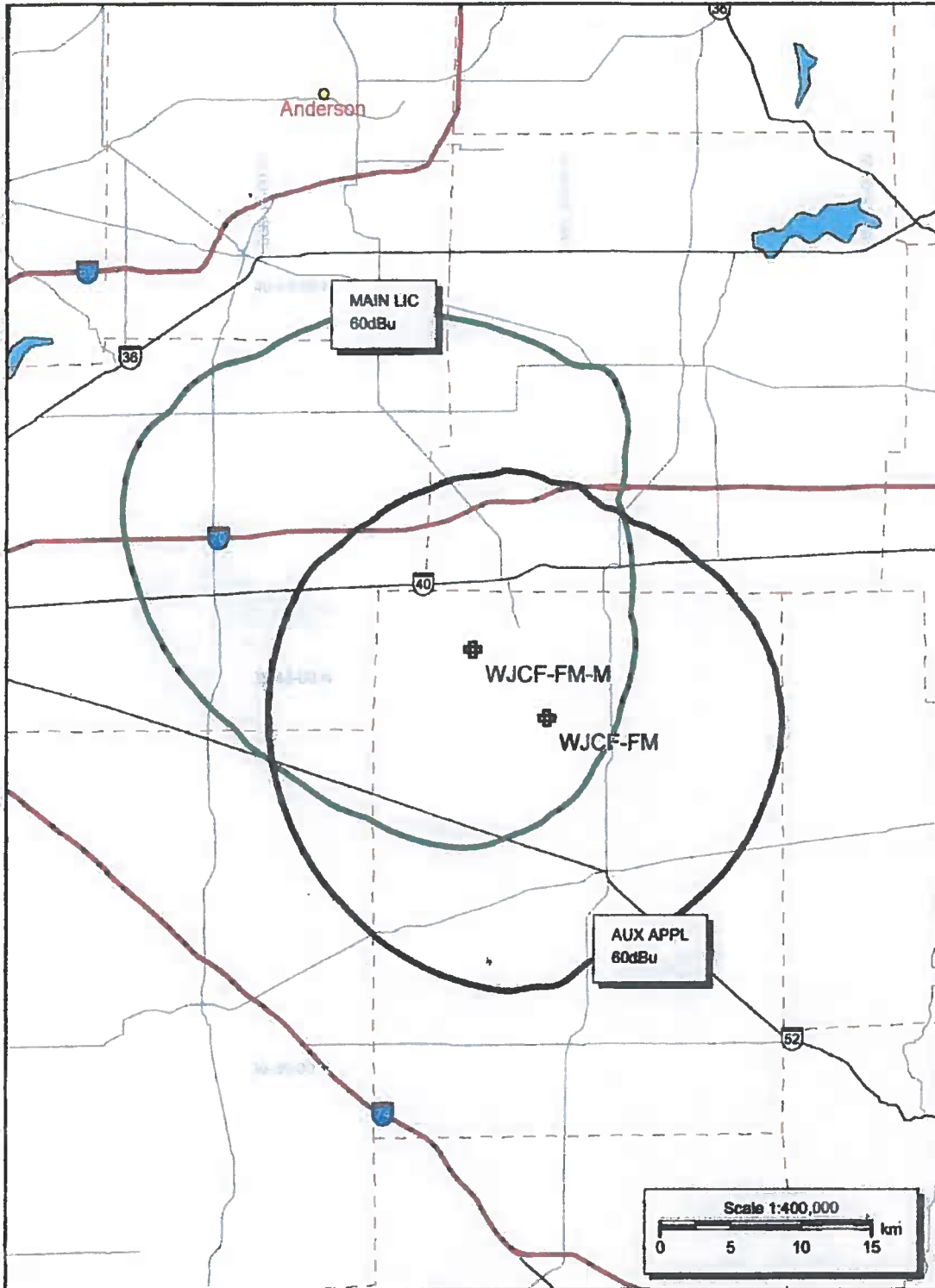
Section 73.1675(a)(1)(ii) of the Commission's rules requires that the 60dBu service contour of a station's auxiliary facilities may not extend beyond the 60dBu service contour of the station's main facilities.

WJCF-FM currently operates from a site located at 39° 45' 01" north latitude, 85° 33' 19" west longitude. NBMI proposes to operate auxiliary facilities for WJCF-FM from a site located at 39° 42' 22" north latitude, 85° 29' 41" west longitude approximately 7 km (4.4 miles) southeast of the licensed transmitter site. A coverage comparison map was prepared using the licensed values to derive the 60dBu contour for current operation at the existing main site, and compared that to the 60dBu contour obtained using the CDBS data in the application for the proposed auxiliary facilities. The attached coverage comparison map clearly demonstrates that the 60dBu contour for the proposed auxiliary facilities would extend well beyond that of WJCF's licensed main facilities, and thus not comply with 73.1675(a)(1)(ii).


James Stitt, CPBE, Pres
513-289-6277
towerjimsk@gmail.com

11/21/18

WJCF Main Vs. Aux Application



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23d day of November 2018, a copy of the foregoing Informal Objection was served by U.S. First Class Mail, postage prepaid, upon the following:

Martin Hensley
New Beginnings Movement, Incorporated
P.O. Box 846
Greenfield IN 46140



John Wells King