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Amendment to a New FM Translator Station Construction Permit Application

Approved by [OMB \(Office of Management and Budget\)](#) 3060-0027
September 2014

General Information

[FAQ \(/dataentry/api/download/faq\)](#) [Save & Quit](#)

* indicates required field

Attachments Draft Copy

Application Description

Description of the application(255 characters max.) is visible only to you and is not part of the submitted application. It will be displayed in your Applications workspace.

Amendment to change antenna to Clear 45 dbu of W221CF

Uploaded Attachments

* Are attachments (other than associated schedules) being filed with this application?

Yes No [« Clear](#)

Cancel

Save & Continue »

Application Sections

➔ General Information

✓ Fees, Waivers, and Exemptions

✓ Applicant Information

✓ Contact Representatives

✓ Alien Ownership

✓ Legal Certifications

✓ Channel and Facility Information

✓ Antenna Location Data

✓ Antenna Technical Data

✓ Technical Certifications

✗ Application Summary

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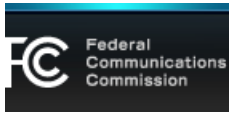
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Fees, Waivers and Exemptions

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Fees

* Is the applicant exempt from FCC application Fees?

Answer: Yes

* Indicate reason for fee exemption:

AMENDMENT

* Is the applicant exempt from FCC regulatory Fees?

Waivers

* Does this filing request a waiver of the Commission's rule(s)?

Yes No [« Clear](#)

Application Sections
<input checked="" type="checkbox"/> General Information
→ Fees, Waivers, and Exemptions
<input checked="" type="checkbox"/> Applicant Information
<input checked="" type="checkbox"/> Contact Representatives
<input checked="" type="checkbox"/> Alien Ownership
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Certify

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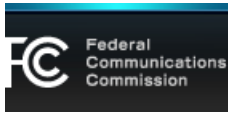
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Applicant Information

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Applicant Name and Type

* Applicant Type:

* Company Name:

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<input checked="" type="checkbox"/> Antenna Technical Data
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Applicant Information

Attention To:

* Country:

PO Box:

Either PO Box or Address Line 1 is required.

* Address Line 1:

Address Line 2:

* City:

* State:

* Zip Code:

* Phone:

* Email:

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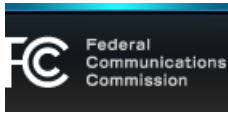
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Contact Representatives

[FAQ \(/dataentry/api/download/faq\)](#) [Save & Quit](#)[Add Contact](#)

EDWARD A SCHOBER

Executive

[Delete](#)[Edit](#)

Address: PO Box PO BOX 367
HADDON HEIGHTS, NJ 08035
US

Phone: +1 (856) 546-8008**Email:** TED@WXVA.COM

Contact Type: Technical
Representative

Company: WINCHESTER
RADIO
BROADCASTERS,
LLC

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- Technical Certifications
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EDWARD A SCHOBER

CHIEF EXECUTIVE MANAGER

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Address: PO Box 367
HADDON HEIGHTS, NJ 08035
US

Phone: +1 (856) 546-8008**Email:** FCC@RADIOTECHNIQUES.COM

Contact Type: Legal
Representative

Company: Winchester
Radio
Broadcasters,
llc

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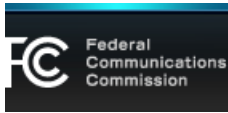
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Alien Ownership

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* 1) Is the applicant a foreign government or the representative of any foreign government as specified in Section 310(a) of the Communications Act?

Yes No [« Clear](#)

* 2) Is the applicant an alien or the representative of an alien? (Section 310(b)(1))

Yes No [« Clear](#)

* 3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))

Yes No [« Clear](#)

* 4) Is the applicant an entity of which more than one-fifth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any entity organized under the laws of a foreign country? (Section 310(b)(3))

Yes No [« Clear](#)

* 5) Is the applicant directly or indirectly controlled by any other entity of which more than one-fourth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(4))

Yes No [« Clear](#)

* 6) Has the applicant received a declaratory ruling(s) under Section 310(b)(4) of the Communications Act?

Yes No [« Clear](#)

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* 7) In connection with this application, is the applicant filing a foreign ownership Petition for Declaratory Ruling pursuant to Section 310(b)(4) of the Communications Act?

Yes No « Clear

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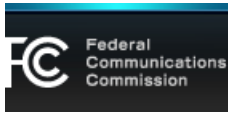
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Operational Compliance

* Applicant certifies that it is not the licensee or permittee of the commercial primary station being rebroadcast and that neither it nor any parties to the application have any interest in or connection with the commercial primary station being rebroadcast? See 47 C.F.R. Section 74.1232(d).

Yes No N/A [« Clear](#)

* Applicant certifies that the FM translator's (a) 1mV/m coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 1mV/m coverage contour is contained within the greater of either: (i) the 2 mV/m daytime contour of the commercial AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the commercial AM primary station's transmitter site.

Yes No N/A [« Clear](#)

Support Compliance

* The applicant, if for a commercial FM translator station with a coverage contour extending beyond the protected contour of the commercial primary station being rebroadcast, certifies that it has not received any support, before or after constructing, directly or indirectly, from the licensee/permittee of the primary station or any person with an interest in or connection with the licensee or permittee of the primary station, except for technical assistance as provided for under 47 C.F.R. Section 74.1232(e).

Yes No N/A [« Clear](#)

Rebroadcast Certification

* For applicants proposing translator rebroadcasts that are not the licensee of the primary station, the applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted.

Yes No N/A [« Clear](#)

Character Issues

* Applicant certifies that neither the applicant nor any party to the application has or had any interest in, or connection with:

(a) any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or

(b) any pending broadcast application in which character issues have been raised.

Yes No « Clear

Adverse Findings

* Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any laws related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.

Yes No « Clear

Program Service Certification

* Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.

Yes No « Clear

Local Public Notice

* Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.

Yes No N/A « Clear

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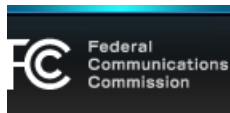
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Channel and Facility Information

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* indicates required field

[Attachments](#) [Draft Copy](#)

Proposed Community of License

Facility ID: 202519

* State: * City: * Channel: * Frequency:

Facility Type

Facility Type for Translator should be the same as that of the Primary Station.

* Please select a facility type:
 Commercial
 Noncommercial Educational[« Back](#)[Save & Continue »](#)Technical problems or trouble accessing the system? Submit a help request for assistance (<https://esupport.fcc.gov/request.htm>) or contact (877) 480-3201 or TTY: (717) 338-2824Federal Communications Commission
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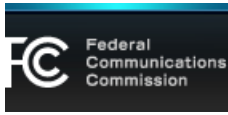
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Antenna Location Data

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Antenna Structure Registration

* Do you have an FCC Antenna Structure Registration (ASR (Antenna Structure Registration)) Number?

Yes No Filed with the FAA

Coordinates (NAD83 (North American Datum of 1983))

	DD	MM	SS.S	Direction
* Latitude (NAD83):	38	57	36.4	N+

	DDD	MM	SS.S	Direction
* Longitude (NAD83):	78	19	51.0	W-

* Structure Type:

* Overall Structure Height:
meters

* Support Structure Height:
meters

* Ground Elevation (AMSL (Above Mean Sea Level)):
meters

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→ Antenna Location Data
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<input checked="" type="checkbox"/> Technical Certifications
<input checked="" type="checkbox"/> Application Summary
<input type="button" value="Certify"/>

Antenna Data

Horizontal

Vertical

* Height of Radiation Center Above
Ground Level: meters meters* Height of Radiation Center Above
Mean Sea Level: ⓘ meters meters

* Effective Radiated Power:

 kW kW

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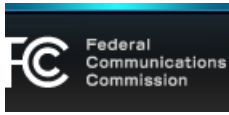
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[No Fear Act Data \(http://www.fcc.gov/encyclopedia/no-fear-act-data\)](http://www.fcc.gov/encyclopedia/no-fear-act-data)

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Amendment to a New FM Translator Station Construction Permit Application

Approved by [OMB \(Office of Management and Budget\)](#) 3060-0027
September 2014

Antenna Technical Data

[FAQ \(/dataentry/api/download/faq\)](#) [Save & Quit](#)

* indicates required field

[Attachments](#) [Draft Copy](#)

Antenna Type

* Please select an antenna type:

- Directional
- Non-Directional
- [« Clear](#)

Directional Antenna Relative Field Values

* Please provide the directional antenna measured field values as well as any additional azimuths:

Values entered must be between [.000 - 1.000] and must be entered for every degree listed from 0 to 350 in increments of 10.

Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	.100	90	1.00	180	.104	270	.178
10	.100	100	1.00	190	.051	280	.197
20	.100	110	1.00	200	0.042	290	.183
30	.311	120	1.00	210	.040	300	.146
40	.636	130	1.00	220	.035	310	.104
50	.877	140	1.00	230	.030	320	.100
60	.990	150	.910	240	.030	330	.100
70	1.00	160	.693	250	.078	340	.100
80	1.00	170	.368	260	.137	350	.100

Application Sections
<input checked="" type="checkbox"/> General Information
<input checked="" type="checkbox"/> Fees, Waivers, and Exemptions
<input checked="" type="checkbox"/> Applicant Information
<input checked="" type="checkbox"/> Contact Representatives
<input checked="" type="checkbox"/> Alien Ownership
<input checked="" type="checkbox"/> Legal Certifications
<input checked="" type="checkbox"/> Channel and Facility Information
<input checked="" type="checkbox"/> Antenna Location Data
→ Antenna Technical Data
<input checked="" type="checkbox"/> Technical Certifications
<input checked="" type="checkbox"/> Application Summary
Certify

Additional Azimuths (optional)

Degree	Value
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Primary Station

Enter the Primary Station's Facility ID, then click the Find button.

Facility ID:

Antenna Location Data

Facility ID: 4668
Call Sign: WXVA
Frequency: 610
Channel:
Service Code: AM

Delivery Method

* Please select the delivery method:

- Via Other
- FX
- Wired
- Direct-off-air
- Microwave
- Phone line
- Satellite
- Internet
- Other
-

* Please Specify:

Transmitting Antenna

* Manufacturer /
Make :

* Model:

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(<http://www.fcc.gov/encyclopedia>
/website-notices)

[Required Browser & Plug-ins](http://www.fcc.gov/encyclopedia/required-plugin-instances)
([http://www.fcc.gov/encyclopedia](http://www.fcc.gov/encyclopedia/required-plugin-instances)
/required-plugin-instances-players-and-readers)

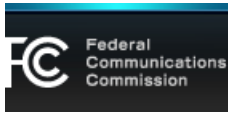
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Amendment to a New FM Translator Station Construction Permit Application

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Technical Certifications

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* indicates required field

Attachments Draft Copy

Environmental Effect

* Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? (See 47 C.F.R. Section 1.1306)

Yes No [« Clear](#)

Proposal Compliance

* Applicant certifies that the proposal is for a fill-in translator or booster.

Yes No [« Clear](#)

Please upload the required information.

* Applicant certifies that the proposal complies with Sections 74.1204, 74.1205, 74.1232, and 74.1234.

Yes No [« Clear](#)

Application Sections
<input checked="" type="checkbox"/> General Information
<input checked="" type="checkbox"/> Fees, Waivers, and Exemptions
<input checked="" type="checkbox"/> Applicant Information
<input checked="" type="checkbox"/> Contact Representatives
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<input checked="" type="checkbox"/> Antenna Technical Data
➔ Technical Certifications
<input checked="" type="checkbox"/> Application Summary
Certify

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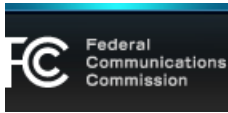
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Permit ApplicationApproved by [OMB \(Office of Management and Budget\)](#) 3060-0027
September 2014

Application Summary

[FAQ \(/dataentry/api/download/faq\)](#) [Save & Quit](#)[Attachments](#) [Draft Copy](#)

Please review your application before submitting.

You have provided information in all the categories listed under the Application Sections. Use the links under the Application Sections to go back and review your application. Make any corrections as necessary. Once you are confident that the application is ready for certification and submission, click on the "Continue to Certify" button below.

This application is incomplete or contains errors.

Please use the links under Application Sections to view and correct them.

✘ This application cannot be submitted as there is a prior pending amendment.

General Information

Application Purpose: Amendment to a New FM Translator Station Construction Permit Application

Attachments

You have 10 files that will be submitted with this application.

[View Attachments »](#)

Fees, Waivers, and Exemptions

Exempt from FCC Application Fees? Yes

Exempt from FCC Regulatory Fees?

Applicant Information

Name: WINCHESTER RADIO BROADCASTERS, LLC
Title:
Address: PO Box 367
HADDON HEIGHTS, NJ 08035
United States
Phone: +1 (856) 546-8008
Email: GOVT@WXVA.COM

Contact Representatives

Name: EDWARD A SCHOBER
Title: Executive
Address: PO Box PO BOX 367
HADDON HEIGHTS, NJ 08035
United States
Phone: +1 (856) 546-8008
Email: TED@WXVA.COM
[View All Contact Representatives \(2\) »](#)

Application Sections

- ✓ General Information
- ✓ Fees, Waivers, and Exemptions
- ✓ Applicant Information
- ✓ Contact Representatives
- ✓ Alien Ownership
- ✓ Legal Certifications
- ✓ Channel and Facility Information
- ✓ Antenna Location Data
- ✓ Antenna Technical Data
- ✓ Technical Certifications
- ➔ **Application Summary**
- Certify

Channel and Facility Information

Community of License City: FRONT
 ROYAL
 Community of License State: VA
 Channel: 221
 Facility Type: Commercial

Antenna Location Data**Antenna Technical Data**

ASR (Antenna Structure Registration) number:	Antenna Type:	Directional
ERP: (Effective Radiated Power) 0.25 kW,	Manufacturer:	SCA
0.25 kW	Model:	composite
Latitude (NAD83 (North American Datum of 1983)):		CA-2FMCP
38° 57' 36.4"		
N+		
Longitude (NAD83 (North American Datum of 1983)):		
078° 19'		
51.0" W-		

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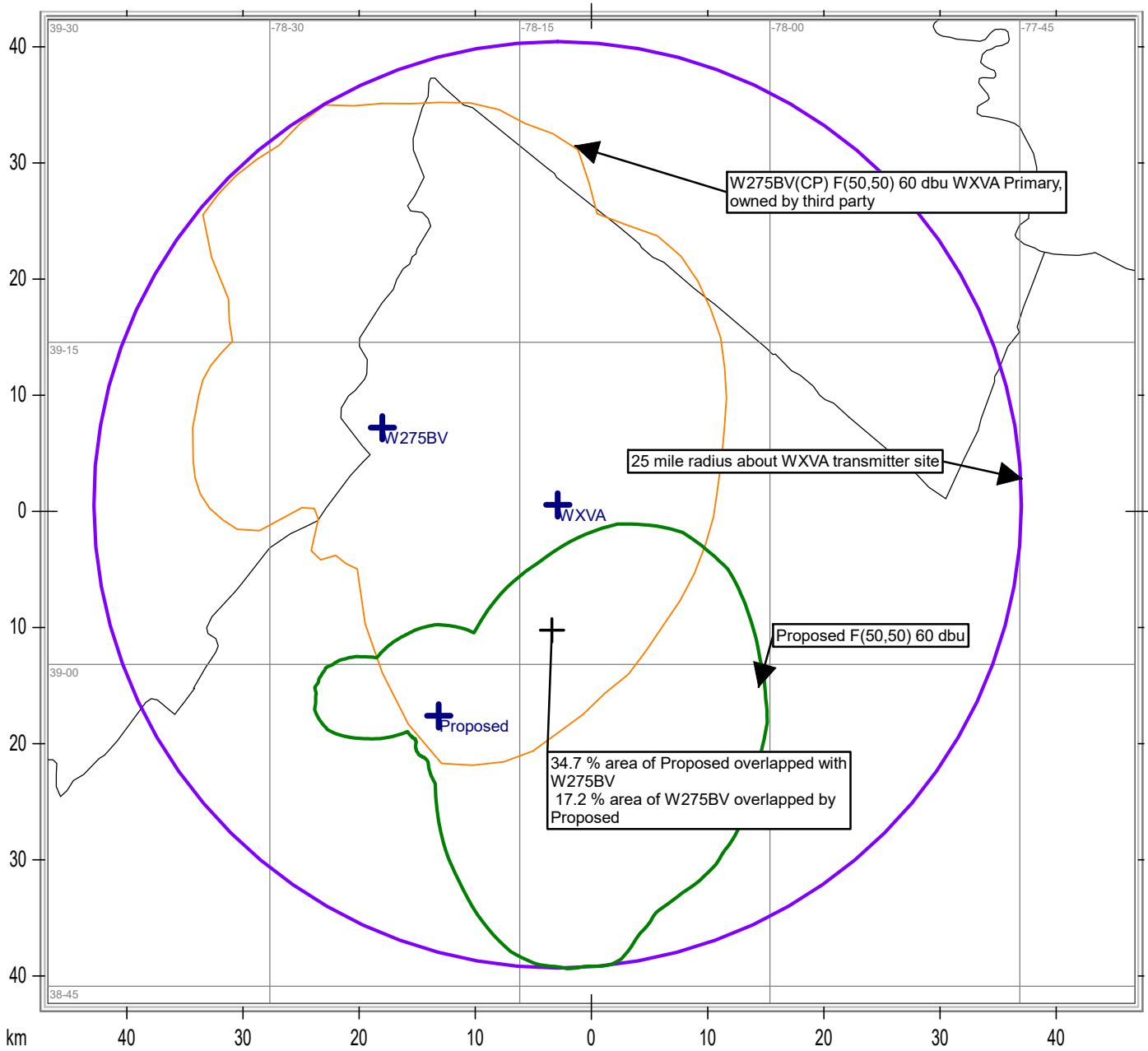
[2009 Recovery and Reinvestment Act](http://www.fcc.gov/foia)

Amendment New FM Translator application at Front Royal, VA

This October 2019 amendment modifies the:

- Legal Certifications – Basic Eligibility - Revised Exhibit 10 Eligibility map
- Antenna technical data - antenna type, pattern values were amended
- Technical Certifications – Revised Engineering Report and Figure 1, 2, and 4

Fill In Eligibility and Multiple Translator Map



txtFooterText

State Borders Lat/Lon Grid

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Engineering Report (Amended)
Exhibit 12 – Technical Statement
New FM Translator for WXVA, for Front Royal VA
October 2019

Abstract

This report supports a long form application and its amendment filed within Auction Window 100 for FM translators where the application BNPFT-20180125AHU was designated a singleton, and a long form application was timely filed. This amendment proposes to further change the directional antenna and show that under the new rules effective 15 August 2019, that the Tidewater Communications petition to deny is moot. A previous amendment showed that the original claimed listeners were entirely outside the W221CF 45 dbu contour. Tidewater subsequently supplemented its petition showing claimed listeners within the W221CF 45 dbu contour. This amendment further modifies the directional antenna so that there is no overlap between the proposed F(50,10) 25 dbu contour and the W221CF F(50,50) 45 dbu contour. With this situation, there is no location within the W221CF 45 dbu contour for which the proposed signal can fail to provide the 20 dbu D/U ratio that assures interference free reception.

Fill In Translator Eligibility

Exhibit 10 shows that this application is eligible to serve as a fill in translator for WXVA(AM), Winchester, VA. The licensee of WXVA(AM) is the applicant for the proposed translator.

Interference

This report is a narrative showing that the requirements of FCC Rules §74.1204 are met.

Co-Channel and First Adjacent

Exhibit 13 Figure 1 is a map showing compliance with co-channel and first adjacent contour overlap requirements.

Cochannel

Cochannel Class A Station WNUZ and FM translator W221CF F(50,50) 60 dbu contours are shown in red along with the proposed F(50,10) 40 dbu contour.

Cochannel Class B1 Station WCDX is shown with its 57dbu F(50,50) contour and the

proposed 37 dbu F(50,10) contour shown in rose.

Petition to Deny

The Tidewater Communications, licensee of W221CF filed a petition to deny against this application on the basis of reports of listeners to W221CF within the proposed 60 dbu contour of the proposed translator, allegedly failing to comply with §74.1204(f). The applicant has previously responded to this petition with a reply, citing that the purported listeners to W221CF are not within the area that W221CF is authorized to serve, and other arguments as to the validity of the complaints. The petitioner has filed an opposition to Winchester Radio Broadcaster's reply, asserting that the Winchester's contention of authorized service area is incorrect. Subsequently, on August 12, 2018 the construction permit (BNPFT-20150710ACY) for changes to significantly increase the coverage of W221CF expired. The requirement to protect potential listeners to the W221CF that might be able to hear W221CF from that expanded facility no longer existed.

On August 15 2019 the FCC's fundamentally changed §74.1204 became final. This application was amended shortly thereafter to include a revised Exhibit 13 Figure 4 that shows that none of the alleged listeners listed in the original Tidewater petition were within the W221CF 45 dbu contour and protected from interference.

Tidewater Communications subsequently supplemented its petition to deny with additional claimed listeners that were within the W221CF 45 dbu contour for which the instant proposal was purported to fail to meet the 20 dbu D/U protection ratio. This amendment modifies the proposed antenna such that for each of the listener locations in the petition supplement, the 20 db D/U ratio is maintained and exceeded. Figure 4 also illustrates that there is no overlap of the proposed F(50,10) 25 dbu contour and the W221CF F(50,50) 45 dbu contour, conclusively showing that there can be no listeners to W221CF which are predicted to receive prohibited interference.

The proposed facilities now unequivocally meet the requirements of §74.1204 of the rules with respect to W221CF, and the Tidewater petition should be denied.

First Adjacent

First adjacent Class A Station WNUN and Class B1 NCE Educational station WFWM F(50,50) 60 dbu contours and the proposed F(50,10) 54 dbu are shown in amber, and Noncommercial Educational Class B Station WGTS F(50,50) 60 dbu contour and the proposed F(50,10) 54 dbu contour are shown in amber no overlap.

Second and Third Adjacent

Exhibit 13 Figure 2 is a map showing the relative contour and spacing requirement for second and third adjacent stations and IF spaced stations. There is considerable spacing between the proposed facility interfering contour and the service contours except with respect to WZXH.

The F(50,50) 54 dbu contour of second adjacent channel class B station WINC-FM is shown along with the proposed F(50,10) 94 dbu contour indicating that the WINC-FM contour extends far beyond the proposed site. The WINC-FM F(50, 50) 80 dbu contour is also shown encompassing the proposed 94 dbu contour.

In a letter granting Jersey Shore Broadcasting Corporation's application BPFT-950830TD (September 26, 1996 1800B3-JDB) the FCC stated that the Ratio method is suitable for translator applicants to demonstrate lack of interference for application purposes.

Since the distance to this contour is below the minimum distances for the F(50,10) and F(50,50) curves the signal level existing on the ground in the vicinity of the translator was calculated using inverse distance, with an adjustment for ground reflections, as has been accepted by the FCC in recent applications.

Since the minimum WINK-FM signal level is 80 dbu, and the protection ratio is 40 db, the potential interfering contour is 120 dbu. Using inverse distance, it has been determined that the maximum distance from the tower to the 120 dbu contour is 110 meters. Exhibit 13

Figure 3 is a satellite photograph showing the proposed antenna tower with a circle of radius 110 meters about it. (the circle is slightly irregular because it is painted on the ground which slopes away from the tower quite steeply. This circle represents the absolute maximum distance that an interfering signal to WINC-FM might impinge on the ground. As is clear from the satellite picture, there are no structures within the area excepting the unmanned transmitter shelter and the tower. The antenna tower is an inclusion within a National Forest.

From this, it is clear that there is no potential for interference to WINC-FM.

IF spacing

IF Spaced FM Translator W275BV is the closest IF spaced station to the proposed translator. It is located 25.33 km from the proposed site. This exceeds the minimum required distance of 10 km in FCC rules §73.207(b)(1) for full power operation of an FM translator.

In conclusion, the proposed translator now meets all the overlap requirements of § 74.1204 of the FCC rules and regulations.

Multiple Translators

Figure 10 shows that W275BV, which also repeats WXVA has a F(50,50) 60 dbu contour that overlaps 39% of the proposed service area. W275BV is not owned by the applicant and therefore is not subject to §74.1232 of the FCC Rules.

Environment

Exhibit 17 is a study showing that the proposed translator is excluded from environmental processing according to § 1.1306 of the FCC rules. The RF exposure worksheet is included to show that there is no location on the ground where the radiation from the translator exceeds exposure standards for general public, and represents less than 13% of the allowable general population level. The antenna tower is fenced and very remote.

When work on the tower requires working in the vicinity of the antenna, operations will be

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Engineering Report (Amended)
Exhibit 12 – Technical Statement
New FM Translator for WXVA, for Front Royal VA
October 2019

suspended or power reduced when workers are on the tower and could be exposed to RF radiation levels above those permitted.

Conclusion

This amendment shows that this application is now compliant with all FCC rules. It proposes no changes to the requested facility except a different transmitting antenna. The Tidewater Petition has become moot due to the expiration of its Construction Permit for W221CF and the rule changes that became effective August 15th. The Common Frequency, Inc / Prometheus Informal objection was rejected on January 29, 2019 by the Commission's Memorandum Opinion and Order.

This application is now eligible for grant.

Engineer's Statement

This is to certify that this report has been prepared by myself. It is correct and accurate of my own knowledge, except where stated otherwise, and where that is so, the information is correct to the best of my knowledge and belief.

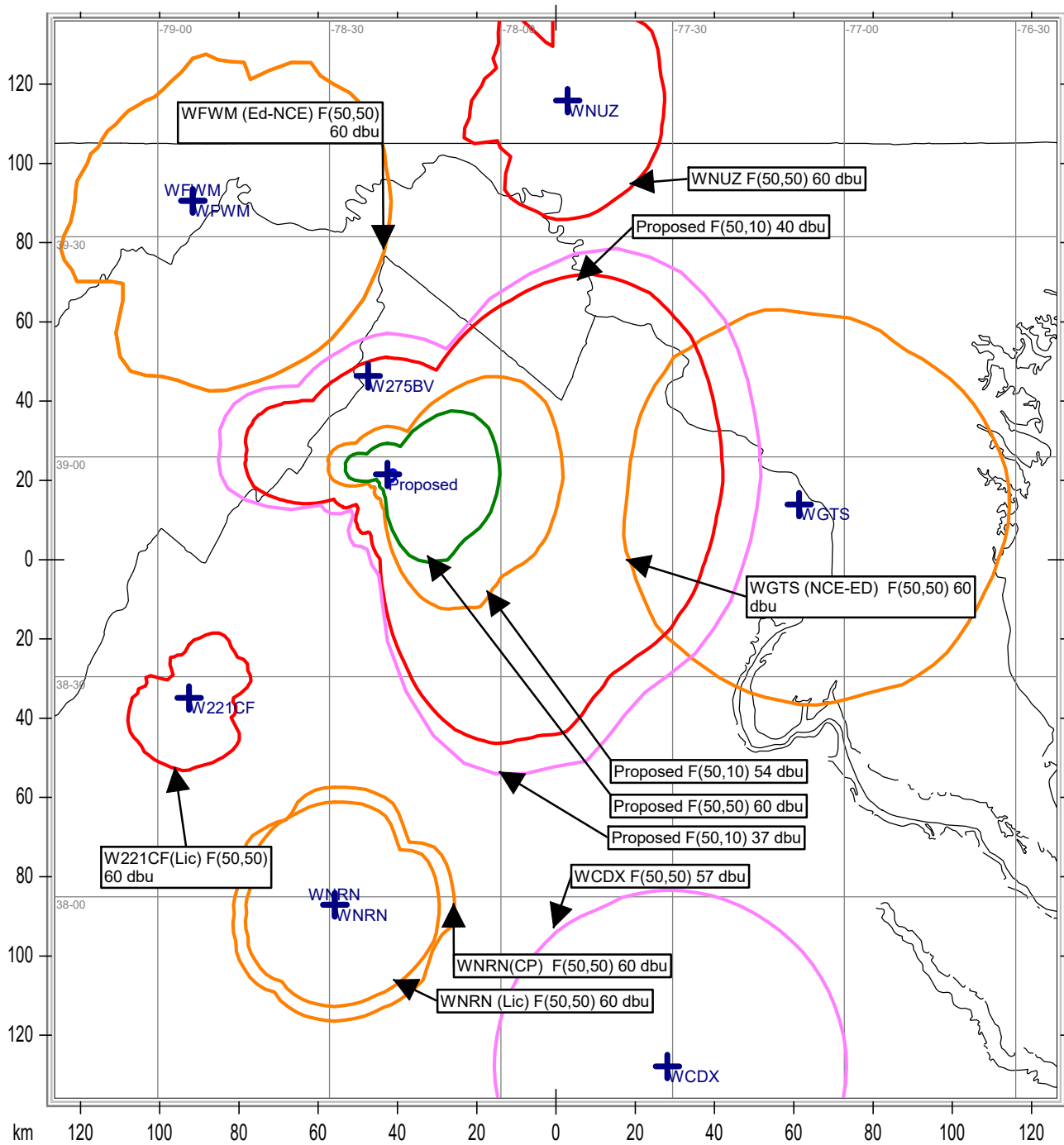
I further certify that I am a Licensed Professional Engineer in the State of New Jersey, and the Commonwealth of Pennsylvania with a BSEE degree from the Newark College of Engineering of NJIT, and that I am, and have been regularly engaged in the practice of radio engineering for nearly forty years with the firm of Radiotechniques Engineering, LLC, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, Senior member of the IEEE and SBE and hold a FCC General Radiotelephone Operator License. My qualifications are a matter of record with the FCC.



23 October 2019

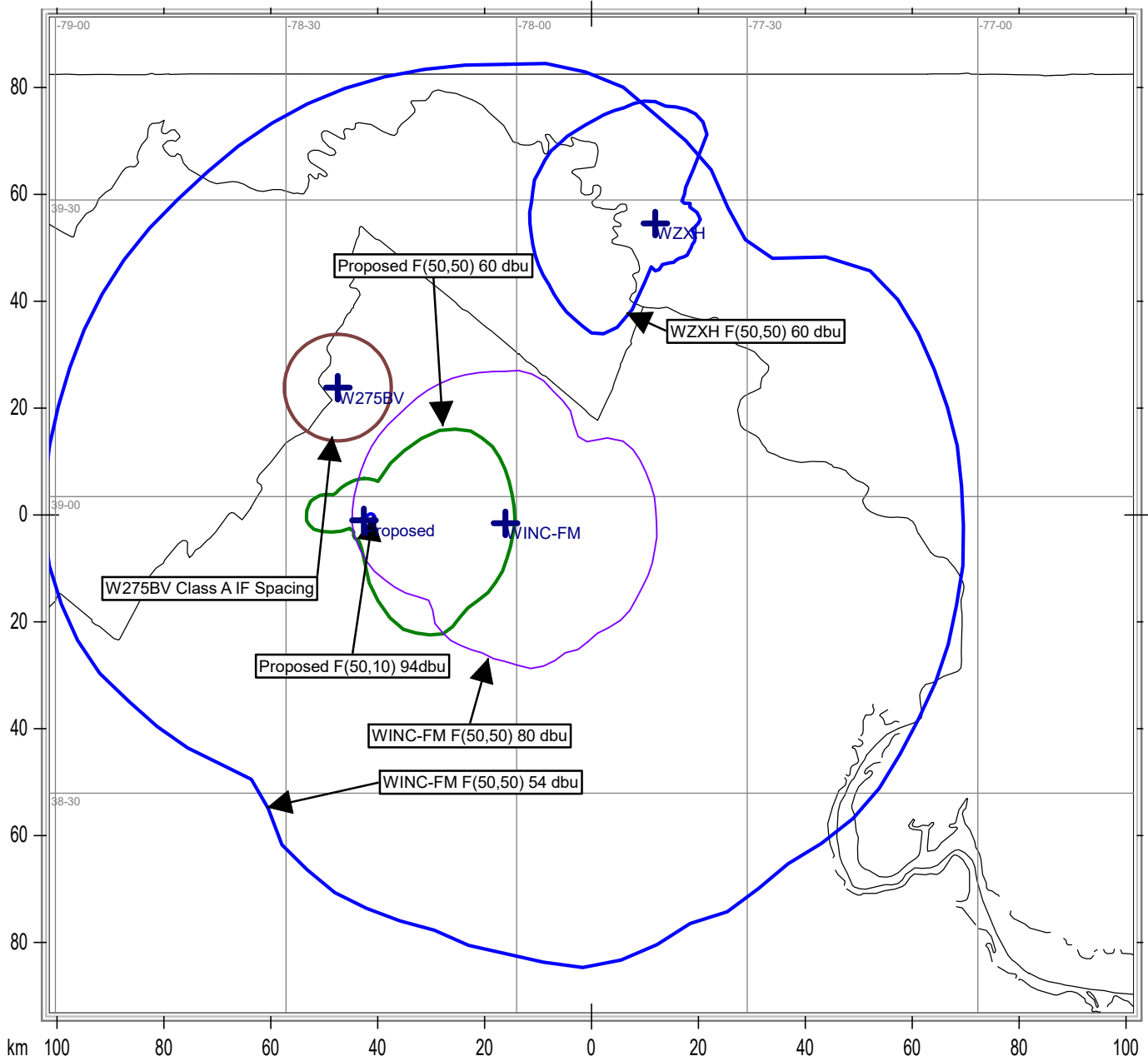
Edward A. Schober, PE

Cochannel and 1st Adjacent overlap map, Amended



State Borders Lat/Lon Grid

2nd 3rd Adjacent and IF Spacing Map



Showing no Violation of required D/U Ratio within W221CF 45 dbu nor at any of the Identified Protec

State Borders Lat/Lon Grid

Exhibit 13 Figure 3

Extent of 120 dbu Contour

Legend


 Circle Measure



Exhibit 13 Figure 3
Extent of interfering contour
New FM Translator, Front Royal, VA
Winchester Radio Broadcasters, LLC

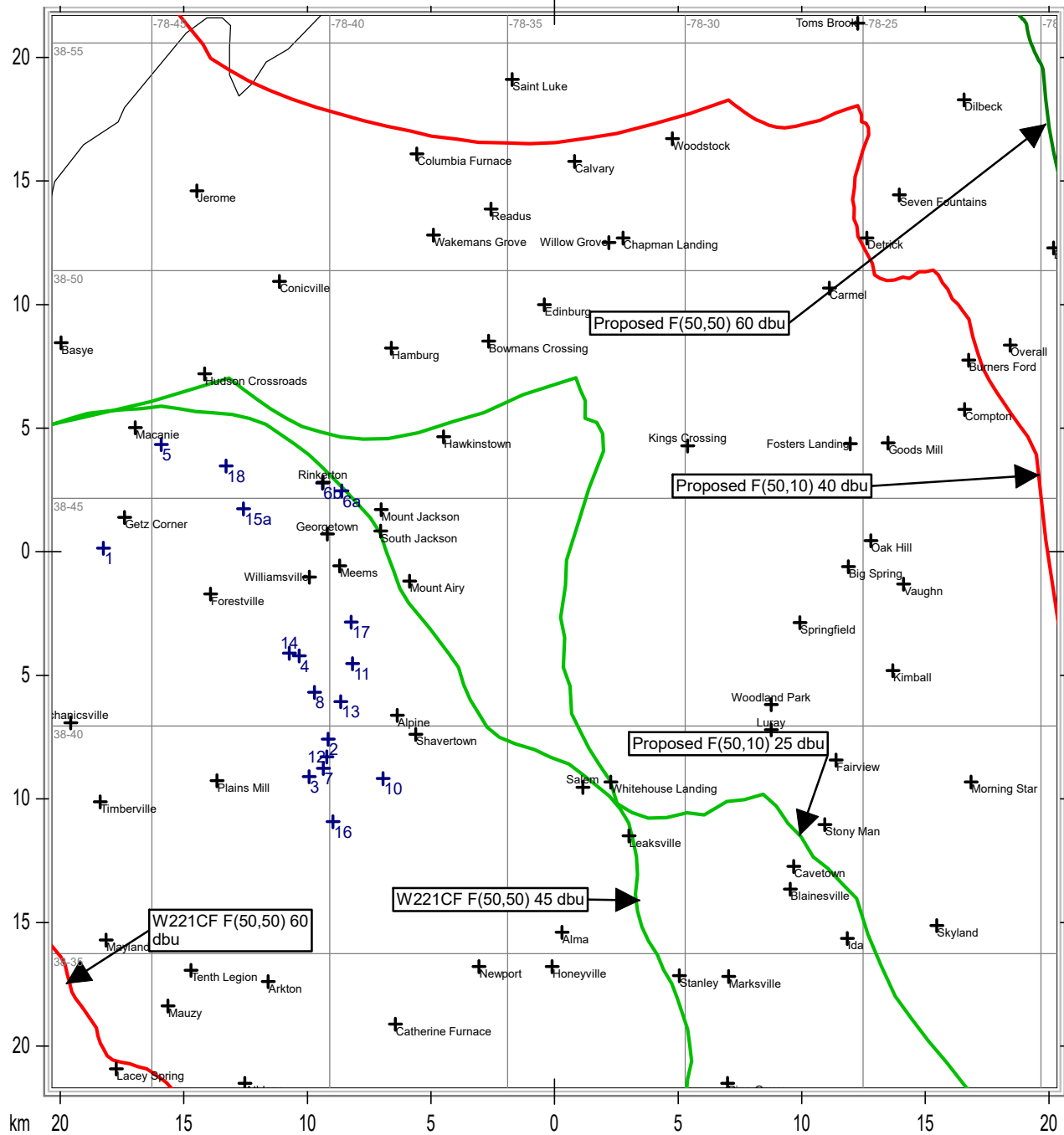
Google Earth

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100 m

Detail Interference Showing Re W221CF



Showing no Violation of required D/U Ratio within W221CF 45 dbu nor at any of the Identified Protec

State Borders Lat/Lon Grid

Exhibit 17

Environmental Statement

Long form for BNPFT-20180125AHU

Winchester Radio Broadcasters, LLC

April 2018

Section 106 Review

The proposed translator antenna will be mounted on an existing structure. The existing tower was built prior to March 16, 2001. The antenna collocation programmatic agreement generally permits collocation without consultation or review under Section 106 Subpart B of 36CFR Part 800. No further review is necessary as:

- The mounting of the antenna will not result in a substantial increase in the size of the antenna or tower structure.
- Prior to the collocation, the tower or structure has not been determined by the FCC to have an effect on one or more historic properties,
- The tower or structure is not the subject of a pending environmental review,
- The collocation licensee has not received a written or electronic notification that the FCC is in receipt of a complaint that the collocation has an adverse effect on one or more historic properties.

FCC Part 1.1306

- The site is not within an officially designated wilderness area or wildlife preserve.
- The mounting of the antenna will not effect endangered species.
- The site is not in a floodplain.
- The mounting of the antenna will not involve a significant change in surface features.
- The tower will not use high intensity white lights.
- The mounting of the antenna does not exceed human exposure limits. See below.
 - Compliance with RF safety requirements in accordance with FCC part 1.1306(8)b) as demonstrated below. The operation does not exceed human exposure limits
 - When workers on the tower will enter an area where occupational exposure limits may be exceeded the translator will cease transmitting or have power reduced so as to assure exposure limits are not exceeded

Exhibit 17
Environmental Statement
Long form for BNPFT-20180125AHU
Winchester Radio Broadcasters, LLC
April 2018

RF Worksheet #1 - FM (Including translators and boosters)

Effective Radiation Center Height		Line #
Enter the proposed "Height of radiation center above ground"	10 m	
or as listed in Line 1 of Worksheet 1A	10 m	(1)
Is the Antenna supporting structure located on the roof of a building	NO YES/NO	(2)
if Line 2 is "YES" enter the building height measured at the base of the antenna supporting structure in line 3		
If line 2 is "NO" enter "0" in Line 3	0 m	(3)
Subtract Line (3) from Line (1)	10 m	(4)
Subtract the value 2.0 from Line (4)	8 m	(5)

Total Effective Radiated Power

If "beam tilt" is utilized, list maximum values)

List Effective Radiated Power in the Horizontal Plane	0.25 kW	(6)
List Effective Radiated in the Vertical Plane	0.25 kW	(7)
Add lines 6 and 7 OR listed value from line 2 in Worksheet 1A	0.5 kW	(8)

PERCENTAGE OF FCC RF LIMIT(S) FOR MAXIMUM PERMISSIBLE EXPOSURE

Multiply line 8 by 3341	1670.5	(9)
Multiply the value listed in line 5 by itself	64.0	(10)
Divide line 9 by line 10	26.102	(11)
Multiply line 11 by .5	13.051 %	(12)

DETERMINATION OF COMPLIANCE WITH CONTROLLED/OCCUPATIONAL LIMIT

Does Line 12 exceed 100% NO YES/NO (13)

IF YOU ANSWERED "YES" IN LINE 13, THE WORKSHEETS MANY NOT BE USED IN THIS CASE.*

IF YOU ANSWERED "NO" IN LINE 13, THEN THE SITE SHOULD COMPLY WITH THE FCC CONTROLLED/OCCUPATIONAL RF EXPOSURE LIMITS FOR GROUND LEVEL EXPOSURE. #

DETERMINATION OF COMPLIANCE WITH UNCONTROLLED/GENERAL POPULATION LIMIT

Does Line 12 exceed 20% NO (14)

IF YOU ANSWERED "NO" IN LINE 14, THEN THE SITE SHOULD COMPLY WITH THE FCC'S UNCONTROLLED / GENERAL POPULATION RF EXPOSURE LIMITS FOR GROUND LEVEL EXPOSURE. NO FURTHER STUDY REQUIRED