

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

VALDOSTA ALLIANCE INC	}	W FAG-LP 89.7 FM Valdosta, GA
	}	Facility ID No. 782543
	}	Application File No. 301497
	}	
	}	
	}	
	}	
	}	Re: Application LMS File No. 301497

To: Marlene H. Dortch, Secretary
Attn: Chief, Media Bureau
Audio Division
Enforcement Bureau

**PETITION FOR RECONSIDERATION
“FOR IMMEDIATE ACTION FOR THE PUBLIC INTEREST TO SAVE BILINGUAL
COMMUNITY- EDUCATIONAL RADIO W FAG 89.7 FM WAIVER TO SET FACILITY ERP
TO 250 WATTS”**

Valdosta Alliance Inc (“VAI”) and Supra 89.7 FM, seeks reconsideration of the denial of its Minor Modification Application filed on **August 3, 2026**, seeking due the Public Interest to increase ERP to 250 watts to be able to combat persistent and strong interference inside of its protected primary contour of 4 or 7 miles radio, which is preventing the people in the community from listening the Education Bilingual Community radio service W FAG-LP 89.7 FM, a licensed to the city of Valdosta, Georgia. Specifically, the application contained a waiver request and engineer study of supporting the change requested as viable and executable.

This petition for Reconsideration is timely filed and also, filed pursuant **Congress mandate The Local Community Act 2010 (LCRA)** approved by the congress LCRA and **Notice of Proposed Rulemaking (FCC 99-6) in MM Docket No. 99-25** of the creation LPFM service, where the FCC proposed and agreed to Congress to create one service with primary frequency usage status to operate at a maximum effective radiated power and antenna height of 1000 watts and 60 meters which would produce a service area with a radius of about 8.8 miles”.

BACKGROUND

On August 3, 2026, VAI filed a Petition to change ERP to 250 watts in order to reduce the of constant, intentional and malicious interference cause to its facility W FAG-LP 89.7 FM, called “**FOR IMMEDIATE ACTION FOR THE PUBLIC INTEREST TO SAVE BILINGUAL COMMUNITY- EDUCATIONAL RADIO W FAG 89.7 FM WAIVER TO SET FACILITY ERP**

TO 250 WATTS”, no as Media Bureau titled it “LETTER TO FEDERAL COMMISSION BREDAN CARR” **Exhibit 1**

Let put this matter in perspective and reconsideration, for almost 20 years the Federal Communication Commission under pressure of National Broadcaster Association (NBA) has oppressed, degraded, **tided**, discriminated and suppressed the LOW POWER RADIO SERVICE called (“LPFM”), while LPTV can hold minium power 15 Kilowatts (**10% of FULL POWER FM**), LPFM been condemned to have a minimal 100 watts a tiny 0.01 percent or less of the Full Power FM station of 100 kilowatts power. Under such condition LPFM can not fulfill the CONGRESS purpose of creation of this important service to fulfill Local Community need and serve the Public Interest.

LPFM is here to integrate communities, while Full Power FM is there just to promote and make business. WFAG-LP 89.7 FM -Valdosta and its fellows LPFM stations around the country are here to serve the people.

Since 2009, FCC have failed to created or equipped LPFM with the right tool to success and serve to their community providing vital information, news, educational program, weather alerts, gospel teaching and support to their comminutes by not being able to reach people houses due the constrained ERP 100 watts of power. **More over and sad, its that those insignificant 100 watts are target with intentional interference created, provoked by some paid engineers used by NBA to destroy and discredit on media ouletts this modest and vital WFAG-LP 89.7 FM service.**

LPFM service must be restored to the Congress intention and the level that FCC promised to congress chamber on 2009 to create LPFM, where it is allow a **primary service of “1,000 watts”, from the rage of 1 kilowatts to 10 watts”**. Since then, FCC has diminished LPFM to 10 percent of the original power of 1000 watts or 250 watts of the congress will and mandate.

For 3 year our LPFM community radio service have been subject of strong and persistent interference by malicious source of RF signal intended to disrupt or displace our radio station form our clear channel 89.7 FM , in the same way the did to us before in the frequency of 1 103.7 FM. All of this under cover up a misleading phenomenon called “Skip Trop or Ducting”.

According the bully engineer Paul Walker Jr“ [SomeRadioGuy](#)” in its comment in social media Radiodiscussions refering to WFAG 89.7 FM ,“**They went on air originally at 103.7 and got “blasted out” by WRUF Gainesville, FL**” It means our community service was intentionally displaced.

WFAG-LP 89.7 FM repeatedly has denounced this grotesque malicious interference to Commission and media outlets. Also, this conspiracy against LPFM service by opening using pirate radio station in the same frequency to disrupt our Education Community radio station, a unique one in the whole United States.

DISCUSSION

On October 1, 2026, under vague arguments Media Bureau denied our application **FOR IMMEDIATE ACTION FOR THE PUBLIC INTEREST TO SAVE BILINGUAL COMMUNITY- EDUCATIONAL RADIO WFAG 89.7 FM WAIVER TO SET FACILITY ERP TO 250 WATTS”**.

The dismissal letter falsely stated that WFAG failed to support the interference that have been reported to Media Bureau from May 2 2024 to present..Also, complained and reported the to Enforcement Bureau. At the same time, the Commission has failed to identified and track to source of interface denounced and repeatedly reported by VIA- WFAG 89.7 FM. All of this under the false misinterpretation of the Commission rules, that LPFM must accept interference from full power fm or be displaced. All those allegation are false, contradiction to the FCC rules, LCRA and the CONGRESS intention of creation of LPFM.. Just support it inaction. **Exhibit 2** (PETITION/WAIVER TO SET ERP 250)

Media Bureau rely in its decision to deny our petition for WAIVER under a VAGUE rule of Section 73. 809, falsely asserting that that LPFM can not complaint against FULL FM POWER station, that LPFM can be displaced, or even worse that LPFM have to accept interference from those channel as their capriciously perverted will.

All license station must be protected equally without discrimination. No LPFM have to accept interference form any full power station. As it have been propagated to sub value this important community service called LPFM. Displacement of ANY LPFM is illegal, abusive, also against FCC owns rules and the Congress mandate.

WFAG-LP was already displaced from its original channel 103.7 FM, WFAG-LP got not protection the Commission. Today, we implore the FCC to act firmly in favor of our Waiver Request. Until now, the Commission have failed to comply with law **H. R. 3731 section 4 (6)(a)**

“(A) DISPLACEMENT.—The Commission shall ensure that LPFM stations will not be displaced by the granting of licenses to full-power FM stations for use of the spectrum used by LPFM stations. The dismissall letter of VAI waiver request contrary to law and regulation by suggestinng DISPLACEMENT our community service **“To provide maximum flexibility to stay on the air, the Rules provide that LPFM stations may change to any channel as a minor change upon a technical showing of reduced interference”**, see dismissal letter.



SUPRA 89.7FM · 4h

§73.809. this rules does not give open letter to any Full Power station or justification to displace any existent LPFM, simple because, they want to upgrade or maliciously, intentionally want disrupt any LPFM station. this asseveration is incorrect. "§73.809. If anything the LPFM displacement by full-service rule is much more favorable to the secondary service compared to the similar rule for the displacement of FM translators." Because this text ambiguous can be misused to displace LPFM as can money talk.



Reply

Edited



Even a application for LPFM must be respect according LCRA and the congress as already exist. There is misconception inside the Media Bureua that LPFM is a secondary service meaning the can be displace or must have to accept interference. This twisted interpretation is abusive and contradict FCC rules and LCRA and Congress ordinance to create the LPFM service,

It's the FCC responsibility to empowered LPFM serve every where, whenever the condition is possible, regardless NBA pressure and gun machine(conspiracy) to kill LPFM service.

Its FCC responsibility to protect WFAG-LP 89.7 FM 4 miles contour License service from any interference, no matter I come from any illegal displacement intention or malicious broadcast created to fake any "Skip Tropo or Ducting generated for any engineer paid for any full power station." Whatever source of interference is affecting our community radio service since 2024, almost 3 year. NO MORE DISPLACEMENT. FCC must protect any protected contour of any radio station no matter is Full FM or LPFM service.

Most of time, this interference is stronger and constant from 6 pm to 8 am, when FCC or any enforcement office is not working to detect Full Power FM are operation at high power level out of their license limit to target LPFM, this the pattern national wide, claiming it is caused by ducting.

250 WATTS power is necessary to strengthen the signal to protected our primary contour.

By allowing 250 Watts power the FCC do not break any rules. For 20 years FCC has failed to enacted LCRA and Congress order of the creation of the LPFM service. No primary service has been created until now. LPFM service has been deprive of its primary service of at least 1000 Watts promised by FCC to Congress.

Its time to enact LCRA and Congress order, which created LPFM service.

FCC must serve not only the powerful National Broadcasting Association (NBA) interest, and its full ambition and greediness against LPFM, but also, must serve the Public Interest and for the undeserved poor communities just serviced by local community radios LPFM.

Our petition do not contrary of any Commission rules, there is a precedent back to 2000 during Hurricane Katrina, where a LPFM (WQRZ(LP) in Bay St. Louis, Miss) was to operate ERP 1000 watts, it meaning that the FCC, for the first time, active the PRIMARY SERVICE of LPFM, at the maximum power it promised /agreed with CONGRESS to be implemented.

This primary service has never been implemented for LPFM service as full license.

LPFM service and WFAG-LP 89.7 FM deserve transparency and equal rules, hold the same opportunity that Full Power FM station has. Our Education Bilingual Community Radio has been settled to fail from the beginning. We has been persistent to avoid discussion and confrontation.

VAI and WFAG-LP 89.7 FM just want to serve our community with dedication. This important community radio service is vital for the community of Valdosta and Lowndes County.

We ask the commission, to properly act and enact the Public interest to allowed this vital Education Bilingual Community radio, WFAG-LP to be able to block those interference inside our primary protected contour. Otherwise, we have to call our congressmen to advocate for our cause, in order to get rid off this intention interference that are blocking r Valdosta -Lowndess County residents from listening our station.

WFAG-LP 89.7 FM petition and waiver request must be awarded not only by serving the Public Interest as it have being established “**better serves the public interest**”, but also and more powerful following the **Congress mandate(LCRA) and the own FCC agreement/promise to create a real LPFM service to serve local communities and Pubic interest**, which has been disregarded with the dismissal decision to deny our petition. **Exhibit 3 (Engineering study)**

Increase ERP 250 is the only tool, in order, to fight this grotesque and malicious interference caused by those protected source of conspiracy that have been diminishing our community service intentionally.

At the present, this petition for reconsideration test the FCC stand, to continue backing the enemies of the LPFM, the one who falsely complaint that spectrum is pollute and noisy, just to put guard rail to LPFM service. But at the same time, never complaint when the FCC create new allotment, or allow them to upgrade More over, new complaint when widows are open to grant them with new translator.

The big question now is, Does the FCC really stand or work for the public interest?

WAIVER REQUEST IMPORTANT NOTE:

This Emergency Waiver Request filed August 3, 2026 is no just warrant, but vital to be able to reduce, combat and eliminate this illegal and intentional interference affecting our primary contour, if the COMMISSION failed to awarded and reconsider, its simple WFAG-LP will be condemn to disapear o render the license in the coming months. This interference is so serious that VAI and WFAG-LP 89.7 FM can not, even, apply for a translator in the coming window set for Nov 4 -Nov 17 2026 (next month) due such interference affecting our primary contour.

WWFAG-LP 89.7 FM is the only local radio station in South Georgia, provide local news, critical information during emergency time, as Hurricane Season and local news no covered by traditional-commercial outlets. The community strongly need a clear and powerful signal reaching their houses, without any interference whatever those source coming from.

CONCLUSION

In view of the foregoing, it is respectfully requested that reconsideration is in order. We respectfully ask the COMMISSION to act justly and reconsidered its decision and awarded WFAG-89.7 FM request filed on August 3, 2026 for PUBLIC INTEREST. This community radio service serve to the public interest by providing news, weather alert, education programs, gospel and entertainment to the undeserved community of Lowndes County and Valdosta. We just want to serve our community with a clear signal with no interference. At the present, The people of our community of Valdosta are deprive and blocked from listening the station due such persistent amd illegal interference caused by those unknown source that even FCC have failed to investigated, track or punished, even though we repeatedly reported to Media Bureau and Enforcement Bureau.

The waiver should be granted and the Commission should grant the application seeking to change ERP 250 to strengthen our signal and be able to combat the interference caused inside of our primary contour of 5 or 7 miles

Respectfully submitted,

VALDOSTA ALLIANCE INC.

A handwritten signature in blue ink, appearing to read 'Paula Greer', with a large, stylized initial 'P'.

Paula Greer
General Manager
438 University Drive
Valdosta GA 31602
(229) 474-1538

Date: October 12, 2026

EXHIBIT 1



Federal Communications Commission
Washington, D.C. 20554

October 1, 2026

In Reply Refer to:
1800B3-CEG

Valdosta Alliance Inc
Attn: Paula Greer
438 University Dr.
Valdosta, GA 31602

Re: Valdosta Alliance Inc.
WFLAG-LP, Valdosta, GA
Facility ID No. 782543
Application File No. 301497

Waiver Request

Dear Applicant:

We have before us the above-referenced application (Application) to modify the license of low power FM (LPFM) station WFLAG-LP, Valdosta, Georgia (Station), filed by Valdosta Alliance Inc. (Valdosta) on August 3, 2026. Valdosta requests a waiver of the universal LPFM power limit of 100 watts effective radiated power (ERP) set out in section 73.811 of the Commission's rules (Rules) (Waiver Request).¹ For the reasons set forth below, we deny the Waiver Request and dismiss the Application.

The Rules may be waived for good cause shown.² When an applicant seeks waiver of a rule, it must plead with particularity the facts and circumstances which warrant such action.³ The Commission must give waiver requests "a hard look," but an applicant for waiver "faces a high hurdle even at the starting gate"⁴ and must support its waiver request with a compelling showing.⁵ Waiver is appropriate only if both (1) special circumstances warrant a deviation from the general rule, and (2) such deviation better serves the public interest.⁶

Valdosta requests a waiver of section 73.811 to operate the Station at 250 watts instead of the 100 watt limit. Valdosta argues that waiver of the LPFM maximum power rule is warranted because it has

¹ Application, Attach. entitled "TECHNICAL ENGINEERING STUDY.pdf"; 47 CFR § 73.811 ("LPFM stations will be authorized to operate with maximum facilities of 100 watts ERP at 30 meters HAAT. An LPFM station with a HAAT that exceeds 30 meters will not be permitted to operate with an ERP greater than that which would result in a 60 dBu contour of 5.6 kilometers. In no event will an ERP less than one watt be authorized. No facility will be authorized in excess of one watt ERP at 450 meters HAAT.").

² 47 CFR § 1.3.

³ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157, para. 2 (D.C. Cir. 1969) (*WAIT Radio*).

⁴ *WAIT Radio*, 418 F.2d at 1157, para. 2.

⁵ *Greater Media Radio Co., Inc.*, Memorandum Opinion and Order, 15 FCC Rcd 7090, 7094, para. 9 (1999) (*Greater Media*).

⁶ *NetworkIP, LLC v. FCC*, 548 F.3d 116, 125-128 (D.C. Cir. 2008) (citing *Northeast Cellular Telephone Co.*, 897 F.2d 1164, 1166 (1990)).

been experiencing interference from other broadcast stations.⁷ Without a waiver, Valdosta states that it will likely not be able to continue to operate due to interference.⁸ Valdosta notes that there is a pending rulemaking, initiated by REC Network, to increase the allowable maximum power for LPFM stations from 100 watts to 250 watts (“Simple 250” Proceeding).⁹ Finally, Valdosta states that the proposed waiver will not cause interference insofar as its proposed 40 dBu signal strength contour will not overlap the 60 dBu contour of any co-channel station, its 54 dBu contour will not overlap any first-adjacent station’s 60 dBu contour, and its 100 dBu contour will not overlap any second-adjacent station’s 60 dBu contour.¹⁰

Valdosta has not demonstrated any special circumstances justifying waiver. First and foremost, the factors it cites in support of the Waiver Request—existing interference from co-channel full service station WUSF(FM), Tampa, Florida, and lack of contour overlap at the proposed increased power limit—could be claimed by numerous LPFM stations and therefore constitute a general policy change rather than an individualized “safety valve” for a particular station.¹¹ It would be inappropriate to make such a policy decision potentially affecting many LPFM stations in the context of an individual waiver request in a licensing proceeding.¹² Regarding interference to the Station, the Commission has made clear since the inception of the LPFM service that “operating LPFM stations will not be protected against interference from subsequently authorized full-service facility modifications, upgrades, or new FM stations.”¹³ To provide maximum flexibility to stay on the air, the Rules provide that LPFM stations may change to any channel as a minor change upon a technical showing of reduced interference.¹⁴ The Waiver Request seeks additional flexibility regarding maximum power without special circumstances justifying such an expansion of the flexibility already provided to LPFM stations. In addition, Valdosta’s reliance on contour protection would create precedent for widely-applicable exceptions to the LPFM spacing rules in favor of a contour protection framework currently applicable to other services. For these reasons, we

⁷ Waiver Request at 1; *see also* Application, Attachs. entitled “LETTER TO FEDERAL COMMUNICATION COMMISSION BRENDAN CARR official right one.pdf” and “request of minor modification upgrade Antenna System to reduce effect of Ducting mater.pdf.”

⁸ Waiver Request at 1.

⁹ Waiver Request at 1 (referring to rulemaking docket RM-11909).

¹⁰ Waiver Request at 2-5 (apparently applying the contour protection requirements for FM translator stations set out in 47 CFR § 73.1204).

¹¹ *See WAIT Radio*, 418 F.2d at 1157, para. 2 (“The agency’s discretion to proceed in difficult areas through general rules is intimately linked to the existence of a safety valve procedure for consideration of an application for exemption based on special circumstances.”).

¹² *See, e.g., Birmingham Christian Radio, Inc. and Radio South Inc.*, Memorandum Opinion and Order, 18 FCC Rcd 7909, 7915, para. 19 (2003) (finding that arguments challenging market definitions are more appropriately addressed in a rulemaking proceeding); *Sunburst Media LP and Clear Channel Broadcasting Licenses, Inc.*, Memorandum Opinion and Order, 17 FCC Rcd 1366, 1368, para. 6 (2002) (“[I]t has long been Commission practice to make decisions that alter fundamental components of broadly applicable regulatory schemes in the context of rulemaking proceedings, not adjudications”); *Great Empire Broadcasting, Inc.* 14 FCC Rcd 11145, 11148, para. 8 (1999) (“It is generally inappropriate to address arguments for a change in rules where third parties, including those with substantial stakes in the outcome, have had no opportunity to participate, and in which we, as a result, have not had the benefit of a full and well-counseled record.”) (internal citations omitted). Although a petition for rulemaking has been filed to request such a rule change, it would be premature to grant a waiver relying on such a proceeding, especially since the Commission has not taken any action on the petition.

¹³ *Creation of Low Power Radio Service*, Report and Order, 15 FCC Rcd 2205, 2231, para. 65 (2000).

¹⁴ 47 CFR § 73.870(a)(1); *see generally* *Creation of a Low Power Radio Service*, Fifth Report and Order, Fourth Further Notice of Proposed Rulemaking and Fourth Order on Reconsideration, 27 FCC Rcd 3315, 3317, para. 2 (2012).

deny the Waiver Request and dismiss the Application for failure to comply with the 100 watt ERP power limit set out in section 73.811 of the Rules.

For the reasons stated above, IT IS ORDERED that Valdosta Alliance Inc's request for waiver IS DENIED and the modification application filed on August 3, 2026 (Application File No. 301497), IS DISMISSED.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert Shuldiner", with a long horizontal flourish extending to the right.

Albert Shuldiner
Chief, Audio Division
Media Bureau

EXHIBIT 2



438 University Drive, Valdosta Ga 31602 (229) 474-1538 <https://www.supra897.com>

The South Georgia Bilingual Community Radio Station!

August 3, 2026

To: Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attn: BRENDAN CARR, Chairman

From: Valdosta Alliance Inc
WFAG-LP 89.7 FM
Facility ID: 782543

FOR IMMEDIATE ACTION FOR THE PUBLIC INTEREST
TO SAVE BILINGUAL COMMUNITY- EDUCATIONAL RADIO WFAG 89.7 FM
WAIVER TO SET FACILITY ERP TO 250 WATTS

For 3 years our community educational radio project WFAG 89.7 FM, facility ID # 782543 has been fighting, dealing with serious suspicious phenomenon of an apparent “Ducting” or illegal broadcasting (PIRATE RADIO), that has preventing our community radio project to serve, flourish, prosper or develop to its maximum potential, due to those intentional interference coming from all angle, causing a displacement of our original allotment on 103.7 FM.

This matter had been properly reported to the Commission, which has allowed our facility to make some modifications to improve the signal. Also, by making it possible it moved to another frequency, a clear and open channel, 89.7 FM.

Today, we are sitting in the same spot as before. Our frequency/Channel **89.7 FM**, since April 2025, also have been **polluted/infested/disrupted** by the same type of intentional interferences, in the same way it happened, in our previous frequency of 103.7 FM in 2024.

The Commission has exceptional power to deal and rule in this situation and bring the right solution, for the Public Interest of the communities of South Georgia, Lowndes County, city of Valdosta. This community-educational Radio project WFAG 89.7 FM is the only outlet that serves the undeserved people of Valdosta, who rely on it for news, information, weather alerts, gospel- christian teachings and entertainment in their daily life. Even though Valdosta has the privilege of having more than 12 licensed traditional media, full power radio stations, no one of them offer local news or information about issues in the community. Also, Valdosta Alliance Inc

and 89.7 FM offers training in communication and journalism to form the future community leaders of the city of Valdosta.

WFAG 89.7 FM plays a vital role providing weather alerts, news and information due the city of Valdosta being a hot spot of Thunderstorm and Hurricane, which affected the city during the whole year. People are being restricted from receiving this important and vital service offered by the radio station.

These abnormal interferences are there 24/7 and persistent during the whole year, affecting our primary contour of 4-7 miles, degrading, muting, disrupting and creating noisy signals, preventing residents from listening to the station programming. More than Mother Nature or Ducting or E-Skip, we are more likely to believe to that in some way it is a human form of manipulation, intended to fake a ducting phenomenon, which is more likely to happen in other bands, such as AM or short-wave bands.

Last year 2025, this interference called “DUCTING” came apparently from **WUSF 89.7 FM** of Tampa Florida. Even though Tropo or E-skip should be temporary, it persisted the whole year.

This year, our broadcast signal has been nullified, muted by **WGBH 89.7 FM** supposedly from Boston, Massachusetts taking over our broadcast signal completely just 1-2 miles away from the transmitter site in our primary contour.

This phenomenon does not fall into the category of what many people called Tropo or E-skip, due not only to its characteristics, but because it does not behave according to the weather conditions that were supposed to generate it. No engineer consulted is capable of demonstrating that those sources of interference really come from those facilities mentioned above.

Moreover, we have been fighting with all kinds of illegal broadcasting invading our channel (PIRATE RADIO).

For 3 years, we have struggled to survive. First, we got displaced from our original channel of 103.7 FM, forced to move under this suspicious phenomenon called “DUCTING”, that looks more like a sophisticated conspiracy, where all co-channel (WRUF 103.7 FM Gainesville FL and WULS- 103.7 FM Douglas GA), secondary channel and third channel increase its power to disrupt our community radio service under such justification called ducting.

[SUPRA 89.7FM](#) “You don't have to hire me. This is right up there with "the sky is blue". Tropo and E-Skip happens. It's unpredictable...There's nothing you can do about it. **An LPFM station is simply not powerful enough to do much about it.**” This is just 100% nature.”, [Michelle Bradley](#)

“There's nothing you can do about it.” says Michelle Bradley from REC NETWORK.

“It's just band conditions and nothing can be done about it.” [Robert Williams](#)

“It's not ducting, it's e skip. Perfectly natural phenomenon” [Nick Dee](#)

“[SUPRA](#), this time of year, most of these distant signals are brought in by troposphere-enhanced reception and some are caused by sporadic E-skip. It's totally normal”, [Ossipee Public Media, Inc.](#)

As many of those prestigious engineers coincided, that is real and there is nothing WFAG-LP 89.7 can do about it. Then, the Commission must act to find a solution for this real issue affecting our facility, A REAL MATTER disrupting our community service inside our 60 dBu primary contour.

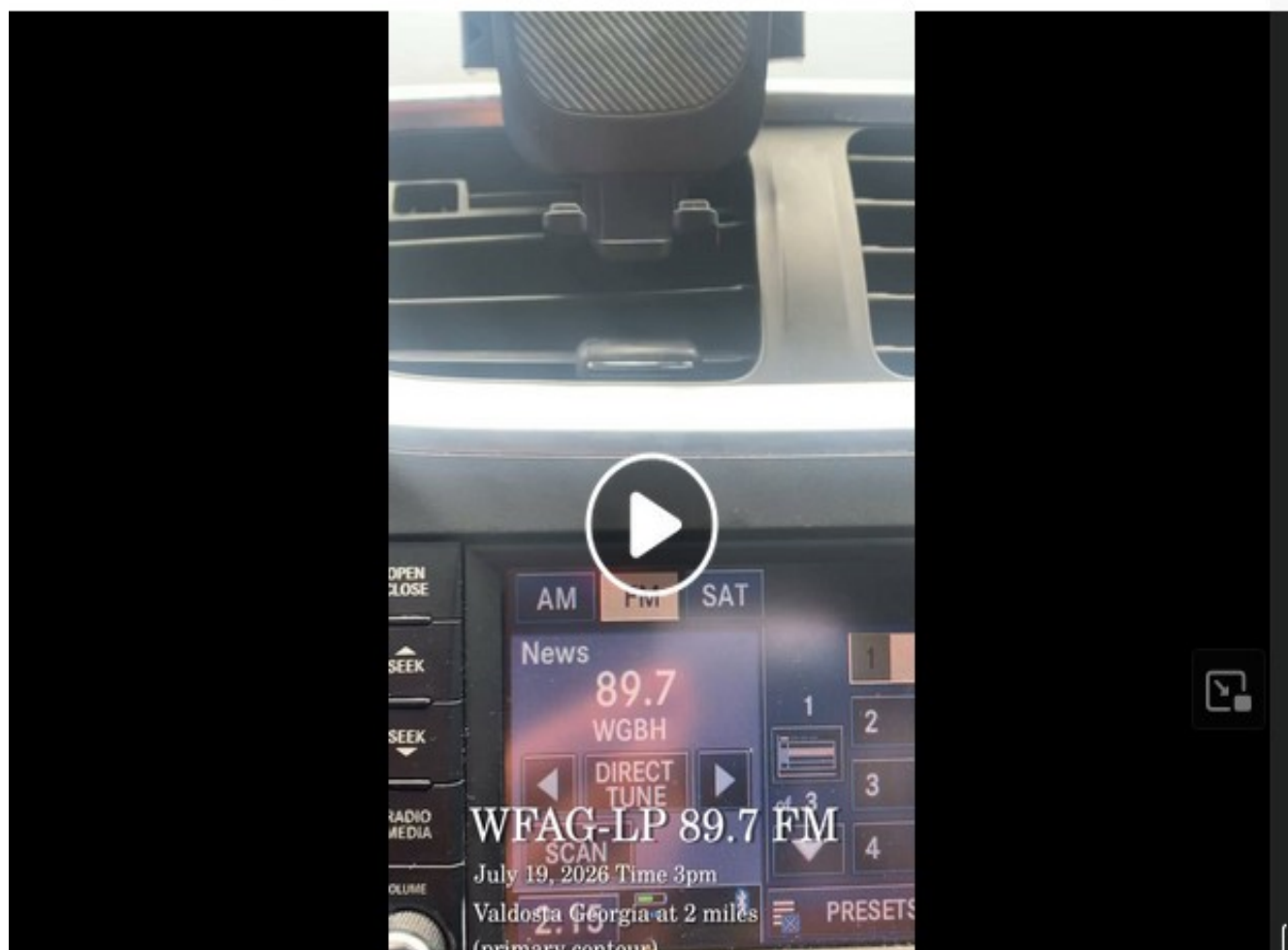
SUPRA 89.7FM's Post



Broadcast Engineers

SUPRA 89.7FM · Top contributor · July 20 at 2:53 PM · 🌐

For the last couple days our radio community service SUPRA 89.7 FM (Valdosta, Georgia) has been degraded o target by strong interference caused by WGBH 89.7, apparently coming from Boston Massachusetts. It happens in our primary contour. Last year was WUSF 89.7, Tampa. Really, something does not sound right! This malicious signal suppressed our broadcast signal (2 miles away from the transmitter). What to expect next? A signal coming from Canada or BBC of London?



***Broadcast engineers** Url: <https://www.facebook.com/reel/2583646312066190>
Posted: July 20 2026 2:53 pm.

If there is nothing this community- educational radio project WFAG-LP 89.7 FM can do to solve this matter interference caused, whether by any reason caused by intentional interference or natural cause of TROPO PROPAGATION or E-SKIP, the FCC has the power and responsibility to save for the **Public Interest** this important radio service for the community of Valdosta and Lowndes County by allowing WFAG-LP 89.7 FM operate on virtue of exceptional on a permit of ERP of 250 Watts, according the Engineering Study presented, demonstrating the viability of the change to be able to save this radio community project.

Under the above condition explained, WFAG-LP 89.7 FM can not strive, survive or serve the community that it was intended to properly serve, according to the FCC license.



Paula Greer
General Manager
Valdosta Alliance Inc.

WAIVER REQUEST TO INCREASE, FOR THE PUBLIC INTEREST, THE EFFECTIVE RADIATED POWER (ERP) TO 250 WATTS

For the Public Interest, there is only one solution to solve the matter, as just it was stated above, and the Commission has the responsibility to address it, to avoid this Community-Educational Radio Project WFAG-LP 89.7 FM from disappearing or be forced to shut down. **This Waiver is a formal request for the change for the petition submitted**

Several pending and viable proposal intended to improve the LPFM radio service have been filed before the FCC pending for approval. They shows that its possible and just, to keep alive this important radio service to small communities around the country by increasing the ERP of LPFM radio from 100 to 250 Watts. Ex. REC Network's "Simple 250" Petition for Rulemaking, assigned as RM-11909, supported by The National Federation of Community Broadcasters.

From the beginning WFAG 89.7 FM have explored and done all the modifications to improve our signal to combat theses undesirable, suspicious, disruptive interference called "DUCTING". Also, by accepting a involuntary displacement from the commercial band 103.7 FM, to avoid confrontation, complains with other full power radio stations such WUSF 89.7 FM- Tampa FL, WGBH 89.7 FM, Boston MA, WRUF 103.7 FM, Gainesville, FL and WULS-FM 103.7 MHz, Broxton of Georgia.

WFAG-LP on the new frequency 89.7 FM improved the station signal, but later, one or two month later, the "interferences" suddenly appeared more stronger than ever, which suggested it was intentionally provoked by human forces. No by the Nature.

As Michalle Bradley, LPFM advocator said that there is nothing WFAG 89.7 FM can do to solve this matter under ERP 100 Watts, quoting " **There's nothing you can do about it. An LPFM station is simply not powerful enough to do much about it. This is just 100% nature.**"

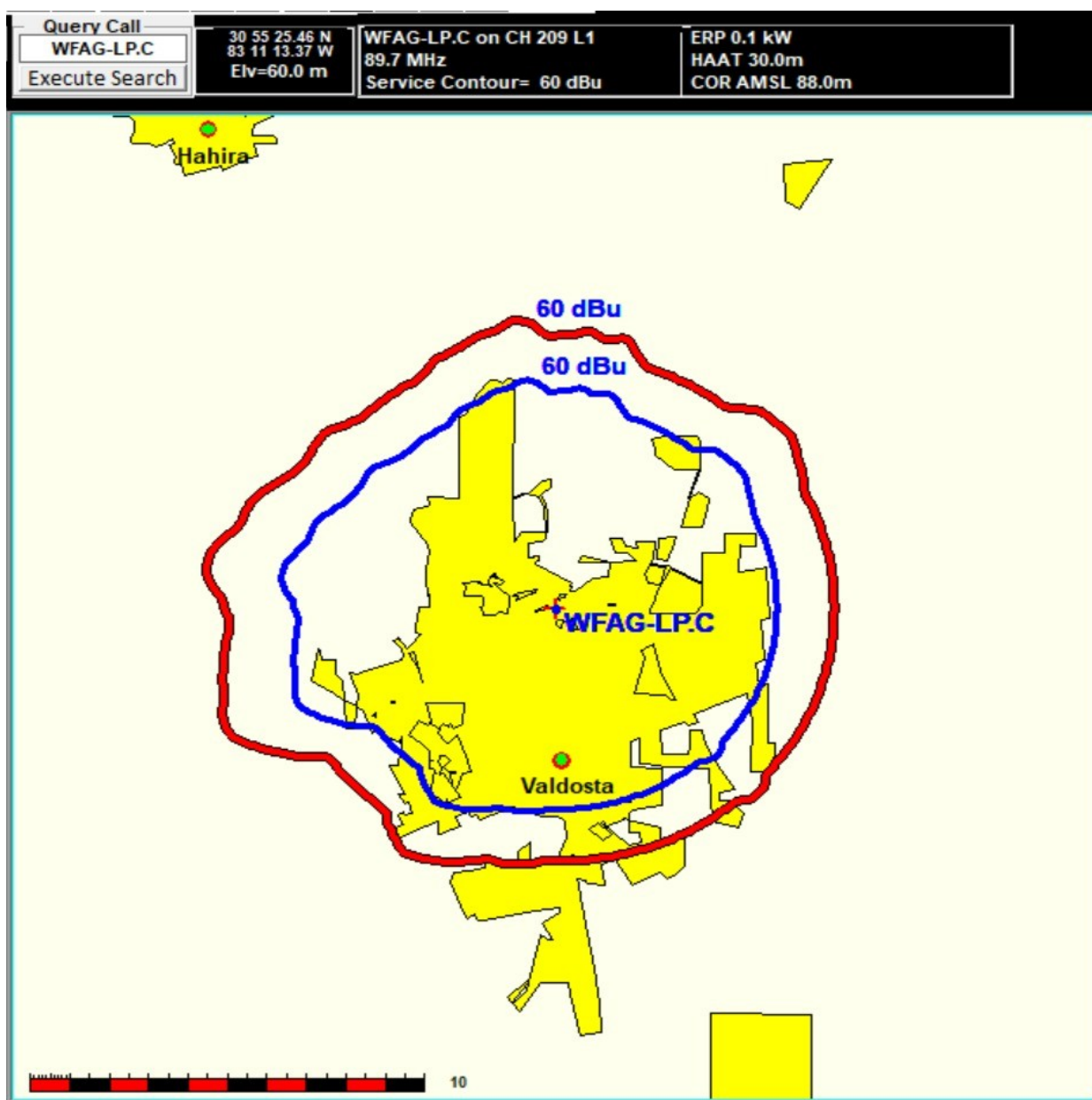
We are now imploring, begging to the Commission to fairly act, for the Public Interest, to allow WFAG 89.7 FM, facility # 782543 operate, UNDER SPECIAL CONDITION, to increase the level power to ERP 250 WATTS. It is the only way this community project can survive under such conditions presented for a right and proper solution.

Engineering study shows no interference will occur by executing this important change proposed.

Engineering Statement

The proposed facility is submitted for Station WFAG-LP, pursuant to applicable FCC rules. The purpose change is to mitigate existing reception deficiencies/interference/ductin within the primary station's service area caused by terrain-induced signal degradation and docking interference from Co-WUSF, WGBH and other suspicious signals polluting 89.7 FM channel.

The proposed operation has been evaluated for compliance with all applicable FCC contour protection requirements. As demonstrated in the table below, the proposed facility satisfies the required separations.



REFERENCE 30 52 15.00 N.
 83 16 49.00 W.
 CH# 209L1 - 89.7 MHz, Pwr= 0.25 kw, HAAT= 30.0 M, COR= 88 M
 Average Protected F(50-50)= 7.09 km
 Omni-directional
 PROPOSED
 Valdosta Alliance Inc
 DISPLAY DATES
 DATA 06-26-26
 SEARCH 07-23-26

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
209L1 WFAG-LP Valdosta		CP _CN GA		0.0 0.0	0.00 0000284725	30 52 15.00 83 16 49.00	0.100 30	88	---Reference--- Valdosta Alliance Inc		
209L1 WFAG-LP Valdosta		LIC _CN GA		0.0 0.0	0.00 0000267286	30 52 15.00 83 16 49.00	0.100 22	88	---Reference--- Valdosta Alliance Inc		
209C0 WMUM-FM« Cochran		LIC _EN GA		0.8 180.8	177.31 BLED20080429AAG	32 28 11.60 83 15 16.60	100.000 304	174.1 409	73.8 Georgia Public Telecommuni	121.5R	55.8M
211C1 WXVS« Waycross		LIC DEN GA		59.7 240.1	77.90 BMLD20080131AJH	31 13 17.80 82 34 23.50	79.000 280	6.6 329	56.9 Georgia Public Telecommuni	72.5R	5.4M
209C3 WVFS« Tallahassee		LIC _VN FL		243.9 63.4	108.05 BLED20101207ADA	30 26 22.70 84 17 28.60	7.000 55	77.4 82	19.9 Florida State University	77.5R	30.6M
208C3 WGSF« Mayo		LIC _EN FL		171.0 351.1	93.03 BLED19910201KD	30 02 30.80 83 07 44.40	20.000 76	53.0 94	33.3 Family worship Center Chur	66.5R	26.5M
207C1 WBJY« Americus		LIC _VN GA		332.6 152.3	96.23 BLED20020305AAP	31 38 22.60 83 44 57.60	65.000 187	7.0 296	58.1 American Family Associatio	72.5R	23.7M
210A WABW-FM« Pelham		LIC DCN GA		290.8 110.3	84.00 0000281719	31 08 08.70 84 06 15.70	0.920 100	27.4 183	18.5 Georgia Public Telecommuni	55.5R	28.5M
6 -- WABW-TV-A Pelham		CHA _Y GA		290.7 110.3	83.97 DTVBL23917	31 08 05.67 84 06 15.65	10.500 379	133.0 462	---	133.0R	-49.0M
06 3E WABW-TV Pelham		LI _HY GA		290.8 110.3	84.00 0000016505	31 08 08.70 84 06 15.70	10.500 378	133.0 461	---	133.0R	-49.0M

Terrain database is FCC NGDC 30 Sec , R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM
 In & Out distances between contours are shown at closest points. Reference zone= - ZN2, Co to 2nd 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)
 "*"affixed to 'IN' or 'OUT' values = site inside restricted contour.
 « = Station meets FCC minimum distance spacing for its class.

FMCommander Contour-to-Contour - HAAT Method=0 ©V-Soft Communications®

File Print Settings Class Channel < Down > Up Find Views WatchDog Help About

FCC NGDC 30 Sec

N. Lat. 30 52 15.00 W. Lng. 83 16 49.00

Contours are detailed CH 209.89.7 MHz L1

wflag-lp.c.vsf WFAG-LP.C 07-23-26

LFPH to 2nd

Call	Type	Ch	Location		Azi	Dist	In	Out
WFAG-LP	CP	209L1	Valdosta	GA	0.0	0.00	---	
WFAG-LP	LIC	209L1	Valdosta	GA	0.0	0.00	---	
WMUM-FM	LIC	209C0	Cochran	GA	0.8	177.31	-4.3	78.5
WXVS	LIC-D	211C1	Waycross	GA	59.7	77.90	63.7	19.2
WVFS	LIC	209C3	Tallahassee	FL	243.9	108.05	21.5	57.5
WGSG	LIC	208C3	Mayo	FL	171.0	93.03	33.3	49.7
WBJY	LIC	207C1	Americus	GA	332.6	96.23	81.8	37.1
WABW-FM	LIC-D	210A	Pelham	GA	290.8	84.00	47.8	53.5

End of Screen List, Cardinal Radials = 12

Contour Overlap and Interference Protection Analysis

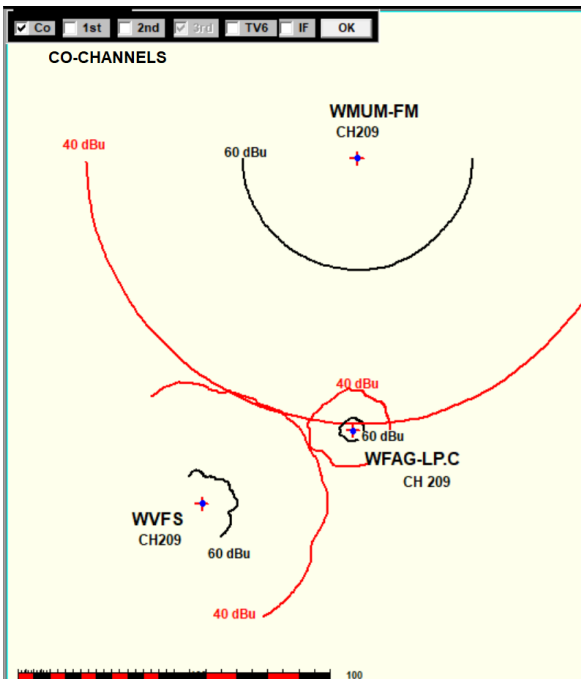
The proposed facility, operating with an effective radiated power (ERP) of 250 watts, fully complies with the applicable interference protection requirements of the Commission's Rules. An engineering analysis was performed to evaluate the proposed facility with respect to all potentially affected co-channel, first-adjacent, second-adjacent, and third-adjacent channel facilities. The analysis demonstrates that the proposed operation provides the required protection to each station in accordance with the applicable spacing and contour overlap criteria.

With respect to TV Channel 6 operations, if a Letter of Consent (LOC) has previously been obtained and submitted as part of this application or a related filing, the proposed facility is authorized to operate pursuant to that consent. The accompanying engineering exhibits further demonstrate that the proposed facility satisfies the required protection standards.

The attached contour-to-contour maps illustrate the relationship between the proposed facility's predicted service and interfering contours and the protected contours of all affected stations. These maps confirm that no prohibited contour overlap occurs and that the proposed facility maintains the required separation and interference protection to all co-channel, first-adjacent, second-adjacent, and third-adjacent channel facilities. Accordingly, the proposed 250-watt operation complies with the Commission's technical requirements and will not cause objectionable interference to any protected broadcast facility.

Co-Channel Protection:

The proposed **40 dBu** interfering contour does not overlap the **60 dBu** protected service contours of **WMUM-FM** and **WVFS**. Therefore, all co-channel stations are adequately protected.

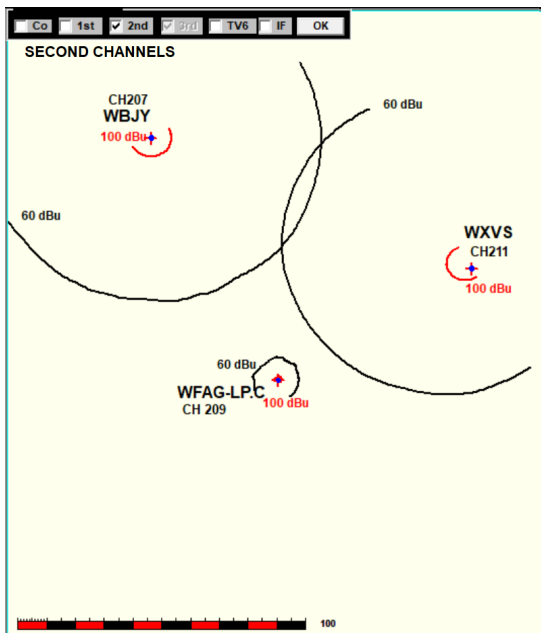
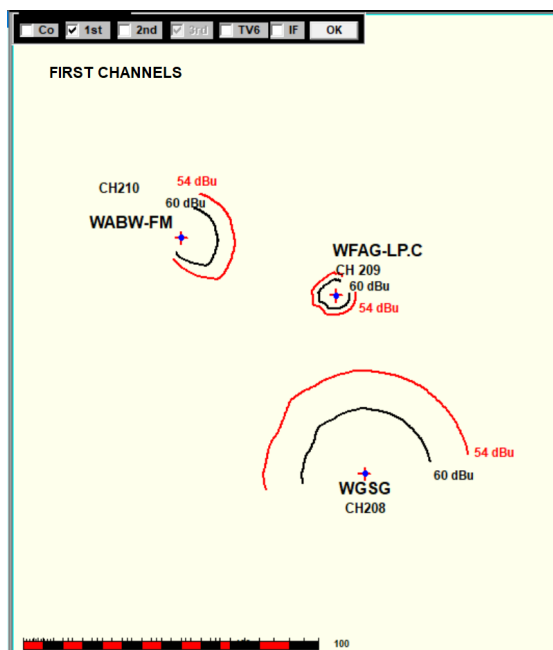


Second-Adjacent Channel Protection:

The proposed **100 dBu** interfering contour does not overlap the **60 dBu** protected service contours

First-Channel Protection:

The proposed **54 dBu** interfering contour does not overlap the **60 dBu** protected service contours of **WABW-FM** and **WGSG**. Therefore, First-channel stations are adequately protected.





December 15, 2025

**FEDERAL COMMUNICATION COMMISSION
ENFORCEMENT BUREAU**
Washington DC 20554

**COMPLAINT OF INTERFERENCE FROM UNLICENSED BROADCASTING
(PIRATE RADIO) ON 89.7 FM FREQUENCY, LAKELAND GEORGIA**

Valdosta Alliance, a licensed holder station WFAG-LP- Valdosta Georgia, is opening this complaint for the Enforcement Bureau investigation and action against unlicensed FM broadcast stations operating on frequency 89.7 FM. There are two PIRATE RADIO that are disrupting our signal since May 2025. It started happening, just one month later, we started broadcasting on the new frequency of 89.7 FM.

Those illegal signals are being generated and rebroadcast from some part of the northeast and southwest area of South Georgia, one of them faking to be coming for WUSF , Tampa Florida. The other one, that has been fully identified faking to a NPR station, is broadcasting from the city of Lakeland, located at 15 miles away from our radio transmitter site.

We have filed several complaints asking the FCC to address this matter. At the beginning, We were forced to move from channel 103.7 to 89.7 FM to avoid this matter, even though we were pretty sure that there were an intentionally, with malice intended to disrupt our community radio project LPFM.

After our complaint against **WUSF 89.7 FM Tampa Florida, on May 19, 2025**, our signal improved considerably. But recently, This unwanted signal started again.

On Wednesday 3th 2025 this unlicensed broadcasting from Lakeland GA, were strongly blocking our signal in most part of our primary contour, making it impossible residents of our city of Valdosta , Lowndes County to be able to listen the station during the day, specially at night after 6pm.

During the last 2 years, our community radio project have not rest or peace mind conducting this project, continuously fighting this unwanted, intentionally and malicious illegal broadcasting, coming

from somewhere of the following cities Lakeland and the other one from some area between the following the cities of Jennings, Fruitland, Fargo Florida.

This matter of Inteference that in the begining was called "DUCTING", in other to not take real action, has caused irreparable economical damages and instability in our signal, losing our audience in most parts of the city of Valdosta-Lowndes County.

Those illegal broadcasts (PIRATE RADIOS) replace our signal 3 or 4 miles from the transmitter site. One of the stations that seems to be rebroadcast was the signal of WUSF from Tampa Florida. This one that we have not been able to identify It yet, but we are working on that. This one operated in the southwest area, between the cities of of Jennings FL, jasper FL, fruitland GA, Fargo GA

Due to those interference no local business or institution is willing to sponsor the community station, because the bad signal of the station is replaced by illegal broadcasting (PIRATE RADIO). We have no stability in the air. Sometimes is preferable to shutdown the transmitter. The pirate radio takes cover of our signal completely. Our few listeners complain about this grotesque interferences.

In August 2025, we decided to publicly denounce the inference in the local newspaper Valdosta Times. **See Attachments.** (1) Also find complaint against WUSF.(2)

On Saturday Dec 13 2025 at 8pm, working in the area of Lakeland, we notice that PIRATE RADIO was broadcasting in the area, and the signal was so strong. The same signal that is blocking our signal in south east area of our primary contour.

They identified the station as a Online Talk Station, they were placing commensal along with some PSA, trying to fake a NPR station Like VERIZON, referring of price, discount and more.

This illegal broadcasting is not been broadcasting or generated from any license station oof the below licensed radio station. They just are faking to be a Public Radio or NPR.

W209CD	KML/Fill/Text	209 D	FX	89.7 MHz	LIC	ATLANTA GA US
0000118010	152214			0.01 kW	0. m	RADIO BY GRACE, INC.

DISTANCE: (228 mi)

WMUM-FM	KML/Fill/Text	209 C0	FM	89.7 MHz	LIC	H COCHRAN GA US BLED-
20080429AAG	23939		100. kW	304.1 m		GEORGIA PUBLIC
TELECOMMUNICATIONS COMMISSION						

DISTANCE: (128 mi)

WWQE	KML/Fill/Text	209 A	FM	89.7 MHz	LIC	ELBERTON GA US BLED-
20140203AOY	175775		1.15 kW	95. m		THE POWER FOUNDATION

(DISTANCE: 270 mi)

W209CG	KML/Fill/Text	209 D	FX	89.7 MHz	LIC	TALLAPOOSA GA US
0000118015	150669		0.01 kW	170.3 m		RADIO BY GRACE, INC.

DISTANCE: (285 mi)

WTXR	KML/Fill/Text	209 A	FM	89.7 MHz	LIC	TOCCOA FALLS GA US
BLED-20010125ABQ	77327		0.4 kW	42. m		RADIO TRAINING NETWORK, INC

DISTANCE: (316 mi)

WFAG-LP KML/ Fill/ Text 209 LP1 FL 89.7 MHz LIC VALDOSTA
GA US 0000267286 782543 0.1 kW 22. m VALDOSTA ALLIANCE INC

On Sunday, Dec 14, 2025 at 430pm, we hunted for the pirate radio and located it in the city of LAKELAND. The station was identified as **LCN 89.7 FM**. *"Internet radio station of Lakeland"*. The station at times covered around 405 miles in all directions from Lakeland GA. No license has been awarded by the FCC for such broadcasting. No records have been found in support of this illegal broadcasting.

They place commercials in the non-commercial band, and they aired Alex Jones Talk Show regularly.

LCN 89.7 FM, "INTERNET TALK STATION", LAKELAND GEORGIA.

Additional information found online:

<https://www.facebook.com/lcnradio>

Phone # (386) 243-9728

We hope this illegal broadcasting (PIRATE RADIO) can be shutdown as soon as possible.



PAULA GREER

General Manager

VALDOSTA ALLIANCE INC.

WFAG-LP 89.7 FM

438 University Drive

Valdosta, Ga 33602

(229) 474-1538

VALDOSTA TIMES NEWSPAPER COPY



Submitted photo

A car in downtown Valdosta displays a logo for SUPRA 89.7, a Spanish-language radio station in Valdosta.

Radio station targeted by interference

STAFF REPORTS

VALDOSTA — Valdosta Alliance Inc. reports that its radio station 89.7 FM, is being interfered with by illegal broadcasts, seeking to minimize the impact of the community radio project in Valdosta and Lowndes County.

"Evil people are behind these illegal broadcasts," said the Valdosta Alliance.

Valdosta Alliance Inc. (alias VAI) is an independent Valdosta Radio organization, that powered radio station SUPRA 89.7, serving Hispanic audiences in South Georgia.

The nonprofit organization said that since it began its programming in 2024, the station has been systematically subjected to undesirable interference, which led it to change frequency from 103.7 to 89.7 FM. However, the station is once again experiencing the same type of interference on the new 89.7 FM frequency, according to a press release from the alliance late last week.

"This felony cannot be tolerated or allowed," the VAI said in the press release.

The organization is working hard to track and locate these illegal sources of broadcasting, as any unauthorized broadcasting is therefore illegal, according to FCC regulations, the VAI said.

"89.7 FM is the official radio station of the Hispanic community in Valdosta, providing news, entertainment, cultural, and Christian programs to promote the Christian faith," the press release said. "This radio service is vital for Latino community as a source of information and weather alerts."

"Being clear, 89.7 FM does not represent a real competition to any existing media outlet in Valdosta-Lowndes County," said VAI.

St., Valdosta, GA
29) 244-3400

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
Applications of WUSF	)	File Number: 0000273973
For Full Power FM Digital Notification	)	Facility ID: 69122
Asymmetric Power on Digital Sidebands	)	
	)	

**Verified Petition to Deny of
Valdosta Alliance Inc WFAG 89.7**

VALDOSTA ALLIANCE INC
WFAG 89.7 FM
Paula Greer
438 University Drive
Valdosta GA 31602
(229) 474-1538 (phone)
valdostaalliance@gmail.com

Valdosta Alliance Inc (VAI) submit this petition to deny in response to the applications of WUSF for Full Power FM Digital Notification Asymmetric Power on Digital Sidebands before the Federal Communications Commission's (Commission) for approval.

VAI represents WFAG 89.7, the only Community Radio Service in South Georgia and Lowndes County to serve the minority group of the Hispanic Community. Since we started the project this service has been pounded with suspicious interference intended to destroy and undermine our educational community radio project.

We has the right to exist and serve to our community.

On May 20, 2025 we notified to **WUSE, CHRIS SAMPSON, Broadcast Operations and its legal counsel John M. Burgett, Esq. jburgett@wiley.law**, regarding the concern of interference coming from WUSF 89.7 FM, Tampa Florida, instead of solving the matter, WUSF 30 days later moved quickly to request full license to operate its experimental broadcasting, ignoring our complaint of Interference. Exhibit 1

But more astonishing, WUSF in its petition lie to FCC, falsely ensuring that no complaints were received with the experimental digital broadcasting . WUSF intentionally lied to the FCC.
Exhibit 3

To evaluate this Petition to Deny the Commission's public interest analysis embodies a "ensuring a diversity of information sources and services to the public."

WFAG is a vital service for Latino Community in South Georgia, Valdosta providing educational programs, news, entertainment and cristian values and teaching.

Even though WFAG is a secondary service, do not grant any Full FM Radio Station to disrupt other services intentionally.

WUSF has neglected our complaint and maliciously moved to obtain full license to start operation of its digital service ignoring our complaint and the damage it has been causing to our facility. See Engineering In Support of an Asymmetric Power on Digital Sidebands. Exhibit 2

Be clear with this Petition Deny we pray to the Commission to hold the issuance of the license until FCC runs a whole inspection and clear it, clarifying that no fault is causing this grotesque interference to our facility WFAG.

We want to ensure that WUSF is in total compliance to their licensed parameters and also to determine what is the real source of the interference affecting our Community Radio Service.

Conclusion

Our community radio station WFAG has been pondered by indescribable and intentional interference, Applicants and its engineers lie to Commission under oath that experiential broadcast caused no interference to other stations, no complaint was received. Also, failing to address our WFAG's concern and complaint of interference, the Commission should deny or hold the WUSF's Full Power FM Digital Notification Asymmetric Power on Digital Sidebands until its facility gets fully inspected. In other hand, WUSF's should return, as it was promised to the insertion level "in the event of interference complaints, the Applicant will return the WUSF(FM) digital operation to the notified - 14dbc symmetrical sideband insertion power level"

Respectfully submitted,



Paula Greer
Valdosta Alliance Inc

June 20, 2025

CERTIFICATE OF SERVICE

I, PAULA GREER, hereby certify this 20th day of June 2025 that I have caused a copy of the foregoing document to be served by electronic mail upon the following:

Jennifer Condon
VP, Business and Finance
University of South Florida Board of
Trustees 4202 E. Fowler
Avenue
WRB101
Tampa, FL 33620
londrigan@usf.edu

John M. Burgett, Esq.
Wiley Rein LLP 2050 M Street, N.W.
Washington, DC 20036
jburgett@wiley.law

William J. Getz
Consulting Engineer
Carl T. Jones Corporation 7901 Yarnwood Ct
Springfield, VA 22153
wgetz@ctjc.com

James Bradshaw
Audio Division
Media Bureau
Federal Communications Commission
Washington, D.C. 20554
james.bradshaw@fcc.gov



Paula Greer
Valdosta Alliance General Manager

EXHIBIT 1



438 University Drive, Valdosta GA 31602 (978) 474-1538 email: valdostaalliance@gmail.com

May 19 2025

ATTN: **JOHN M. BURGETT (WILEY REIN LLP)**

Legal Representative WUSF

4202 E. FOWLER AVENUE.TVB100 TAMPA, FL 33620-6860

Email: jburgett@wileyrein.com

Cc: MAX SITERO, *DIRECTOR OF ENGINEERING*

Email: msitero1@wusf.org

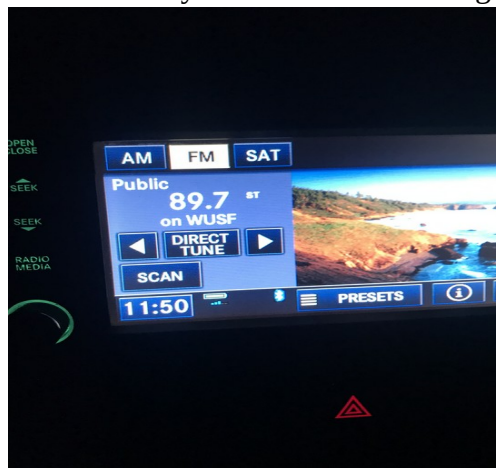
RE: NOTICE OF WUSF'S INTERFERENCE Facility ID:69122

Dear BURGETT:

My name is Paula Greer, manager of Valdosta Alliance Inc. We operate a licensed LPFM station in the city of Valdosta, WFAG-LP 89.7 FM to serve the Hispanic community. We want to call your attention, looking for help to solve a strong interference caused by your station WUSF 89.7 FM, Tampa Florida.

On April 3, 2025 we were granted FCC authorization to change frequency from 103.7 to 89.7 FM in order to reduce interference caused by full FM stations, WRUF 103.7, Gainesville Fl and WULS, Douglas GA. Everything was working fine, no problem all.

On 05/16/2025, just several days ago, we have been experiencing heavy interference that is not normal as if your station WUSF has increased the power. The interference caused by your station is so strong that our station displays "**Public 89.7 on WUSF**", "WUSF" in the dash of the radios, including in our transmitter side location. Our Listeners can barely hear the station through the city.



We have been searching WUSE, 89.7 data on the FCC website and found that no changes have been submitted to upgrade the power of your station. It subjects us that something wrong is causing your signal to be out of your coverage contour. According to our engineering support, we are not supposed to receive any interference from your station.

No weather conditions play any role in this matter, the weather conditions have been nice in both cities, Tampa and South Georgia, Valdosta.

We hope you can diligently help us to address this matter in a timely manner. **Our Hispanic community needs this radio service, it is the only media to rely on to get information and programming in their own languages.**

Truly yours!



PAULA GREER
General Manager
Valdosta Alliance inc.

Attached:

- 1) snapshot of the weather
- 2) short video of the interferences
- 3) Engeneering study for WFAG

WEATHER CONDICTION MAY 17-18 2025



Valdosta Alliance Inc.

We are submitting this modification request only to change our operating channel from 279 to 209. This change significantly reduces interference from co-channel 279 (WRUF-FM) and co-channel 297. By transitioning to channel 209, the interference impact is minimized, as it will only be received from a single co channel station, WMUM-FM.

Additionally, while there is a prohibited margin separation between the proposed facility and WABW TV-6, we have obtained a consent letter from WABW TV-6, ensuring compliance with FCC regulation §73.825.

The proposed application remain at same location, heigh, power and the only changes are from channel 279 to 209 and use 2 dipole AKG-7 Circular polarized bays, The proposed modification fully complies with FCC regulations and meets all necessary criteria for approval.

Allocation Study Valdosta Alliance Inc

REFERENCE		DISPLAY DATES
30 52 15.00 N.	CLASS = L1	DATA 02-02-25
83 16 49.00 W.	Current Spacings to 2nd Adj.	SEARCH 02-02-25
----- Channel 209 - 89.7 MHz -----		

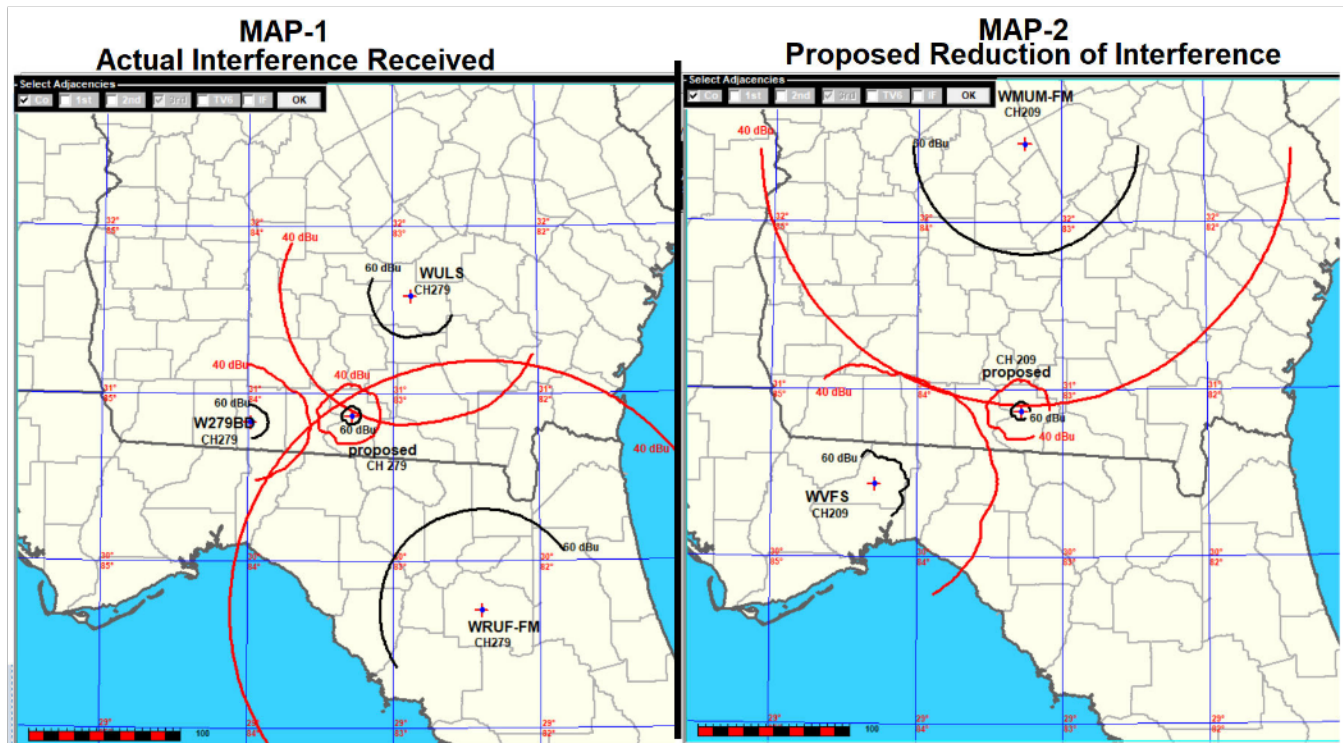
Call	Channel	Location		Azi	Dist	FCC	Margin

WABW-TV-ACHA	6 --	Pelham	GA	290.7	83.83	133.0	-49.2
WABW-TV LI	06 3E	Pelham	GA	290.8	83.87	133.0	-49.1
WXVS	LIC-D 211C1	Waycross	GA	59.7	77.82	72.5	5.3
WBJY	LIC 207C1	Americus	GA	332.6	96.40	72.5	23.9
NEW/WTDL CP	210C3	Perry	FL	199.1	90.60	66.5	24.1
WGSG	LIC 208C3	Mayo	FL	171.0	93.29	66.5	26.8
W06DI-D LI -D	06 --	Jasper	FL	126.5	117.31	91.0	26.3
WABW-FM CP -D	210A	Pelham	GA	290.8	83.87	55.5	28.4

REDUCTION OF INTERFERENCE:

The map below (Map-1) shows the interference received by the current licensed operation from co-channel WRUF-FM, where its 40 dBu contour completely overlaps our 60 dBu contour. Additionally, co-channel WULS extends well over our 60 dBu contour.

In contrast, the proposed channel 209 (Map-2) receives interference from only one co-channel station, WMUM-FM, representing a significant reduction in interference. Furthermore, the proposed channel does not cause interference to any station, except for a prohibited overlap with WABW TV-6, for which a consent letter is attached.



WABW-TV Channel 6 Protection Study:

Channel-Six TV Protection Study

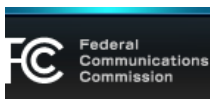
WABW-TV LI 06 3E Dom 10.500 kW 378 m HAAT THY Non-DA
Pelham GA 460.5 m COR AMSL -
Lat = 31 08 08.70, Lng = 84 06 15.70 - NAD 83
Dist = 83.87 km, Azi = 290.8°, Rev Azi = 110.3°

Cutoff Dist from Translator, Sec 73.525 = 133 km
Distance from reference to TV6 Grade A-B = -1.85 km
Cutoff Dist from LPFM, Sec. 73.825 = 91 km
Cutoff Dist = 133 km
WABW-TV Signal Contour at Reference location = 47.8 dBu
Add 6 dB to FM Contour value if within angle.

TV/FM D to U values.

47.0	67.3	55.0	66.3	63.0	67.9	71.0	72.7	79.0	79.0	87.0	85.6
48.0	67.0	56.0	66.4	64.0	68.4	72.0	73.5	80.0	79.8	88.0	86.4
49.0	66.6	57.0	66.5	65.0	68.8	73.0	74.2	81.0	80.6	89.0	87.3
50.0	66.3	58.0	66.6	66.0	69.4	74.0	75.0	82.0	81.4	90.0	88.2
51.0	66.2	59.0	66.8	67.0	70.0	75.0	75.8	83.0	82.2	91.0	88.2
52.0	66.2	60.0	67.0	68.0	70.6	76.0	76.6	84.0	83.0	92.0	88.2
53.0	66.1	61.0	67.3	69.0	71.3	77.0	77.4	85.0	83.9	93.0	88.2
54.0	66.2	62.0	67.5	70.0	72.0	78.0	78.2	86.0	84.7	94.0	88.2

EXHIBIT 2



Licensing and Management System

Approved by OMB (Office of Management and Budget) 3060-1034

June 2010

Full Power FM Digital Notification Application

Reference Copy

FAQ

File Number: **0000273973** | Submit Date: **06/20/2025** | Lead Call Sign: **WUSF** | Facility ID: **69122**FRN: **0008022147**Service: **Full Power FM** | Purpose: **Digital Notification** | Status: **Received** | Status Date: **06/20/2025** | Filing Status: **Active**

Application Sections	General Information
General Information	
Applicant Information	
Contact Representatives	
Digital Notification	
Certification	
Attachments	

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	Yes

Applicant Information

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Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
University of South Florida Board of Trustees	4202 E. Fowler Avenue WRB101 Tampa, FL 33620 United States	+1 (813) 974-8700	londrigan@usf.edu	GOE

Contact Representatives (3)

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Contact Name	Address	Phone	Email	Contact Type
John M. Burgett, Esq. Wiley Rein LLP	2050 M Street, N.W. Washington, DC 20036 United States	+1 (202) 719-4239	jburgett@wiley.law	Legal Representative
William J. Getz Consulting Engineer Carl T. Jones Corporation	7901 Yarnwood Ct Springfield, VA 22153 United States	+1 (703) 569-7704	wgetz@ctjc.com	Technical Representative

Contact Name	Address	Phone	Email	Contact Type
Chris Sampson <i>Ast. Director, Broadcast Operations</i> University of South Florida/WUSF	4202 E. FOWLER AVENUE TVB100 TAMPA, FL 33620 United States	+1 (813) 974-8700	cgsampson@WUSF.ORG	Technical Representative

Digital Notification

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Section	Question	Response
The date new or modified digital operation commenced or ceased	The date new or modified digital operation commenced or ceased:	09/19/2019
Asymmetric sideband operations (if applicable) commenced on	Asymmetric sideband operations (if applicable) commenced on:	03/06/2012
Licensee's Technical Representative:	First Name:	Christopher
	Last Name:	Sampson
	Phone:	(813) 974-8700
Effective Radiated Power	Analog (kW):	69.0
	Digital (kW):	4.13
	Digital upper sideband (kW):	1.38
	Digital sideband power relative to analog upper sideband (dBc):	-17
	Digital lower sideband (kW):	2.75
	Digital sideband power relative to analog lower sideband (dBc):	-14
Transmitter Output Power	Combined for low-level combined systems (kW):	19.18
	Analog for separate analog systems (kW):	
	Digital for separate digital systems (kW):	
	For FM stations employing asymmetric sideband operation, Licensee certifies that the proposed digital sideband power on each sideband conforms to the Maximum Permissible FM Digital ERP set forth in Table 1 to 47 CFR § 73.404(f), and further certifies that the total digital sideband power does not exceed the total power if the digital sideband operation were symmetric.	Y
	Licensee certifies its analog effective radiated power will remain as authorized after commencement of digital operations	Yes
	Licensee certifies that, except for digital power, its facilities conform to the iBiquity Digital Corporation hybrid specification	Yes
	Licensee certifies that its interim digital operations will not cause human exposure to levels of radio frequency radiation in excess of Section 1.1310 of the Commission's rules and is therefore categorically excluded from environmental processing pursuant to Section 1.1306(b)	Yes

Section	Question	Response
	Discontinuance of digital broadcasts / asymmetric sideband operation. Licensee states that it has discontinued digital broadcasts.	No
	If No, licensee states that it has discontinued asymmetric sideband operation.	No
	If Yes to either question, digital broadcasts or asymmetric sideband operation ceased on (date):	
	Increase in total Digital ERP above 14 dBc. The total Digital Effective Radiated Power (ERP) listed above is greater than -14 dBc (14 dB below the analog carrier).	Yes
	Decrease in total Digital ERP below -14 dBc. The total Digital ERP listed above is less than -14 dBc (14 dB below the analog carrier), and the previous total Digital ERP was greater than -14 dBc.	No
	If Yes, decreased Digital ERP operations commenced on (date):	
	The type of notification:	Symmetric to Asymmetric Digital Operation

Certification

[Back to Top ↑](#)

Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	

Section	Question	Response
Authorized Party to Sign	FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).	
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	Jennifer Condon <i>VP, Business and Finance</i> 06/20/2025

Attachments

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File Name	Uploaded By	Attachment Type	Description	Upload Status
WUSF Asymmetric Notice.pdf	Applicant		WUSF Asymmetric Notification	Done with Virus Scan and/or Conversion
WUSFFM Asymmetcial Digital Notification FCC Form 335FM Statement and Exhibit.pdf	Applicant		WUSF Asymmetrical Digital Sidebands Exhibit	Done with Virus Scan and/or Conversion

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EXHIBIT 3



**Statement of William J. Getz
In Support of an Asymmetric Power
on Digital Sidebands
FCC Form 335-FM Notification**

WUSF(FM), Tampa, FL

I am a Radio 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. This office has been authorized by the Applicant to prepare this statement and the associated exhibit in support of the WUSF(FM), Tampa, FL asymmetrical digital operations FCC Notification.

As demonstrated on the attached map, under the guidelines adopted by the Federal Communications Commission on January 27, 2010 in the Order on *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service* (MM Docket No. 99-325, DA 10-208), WUSF(FM) is permitted to operate with the asymmetrical digital sidebands power levels as indicated on the map due to relaxed lower first-adjacent channel protection requirements in comparison to the WUSF(FM) upper first-adjacent channel protection considerations.¹

The applicant has been operating WUSF(FM) with the asymmetrical digital power specified herein since March 6, 2012, pursuant to an experimental authorization originally granted in FCC File No. 20120301AEU, as extended. Therefore, this notification reports no change in the total Effective Radiated Power at the shared transmitter site and will cause no change to the established RFR environment and applicable RFR safety plans.

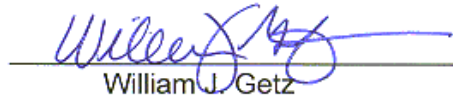
In the event of interference complaints, the Applicant will return the WUSF(FM) digital operation to the notified -14dbc symmetrical sideband insertion power level.

¹ The contours presented herein were calculated using the standard contour calculation methodology set forth in §73.313 of the Commission's Rules, using average terrain values derived from the 30-arc second terrain database.

STATEMENT OF WILLIAM J. GETZ
PAGE 2 OF 2

This statement and the supporting Exhibit were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: June 17, 2025



William J. Getz

Digital Power Allowance Contour Study Non-Superpower Station

- Lower First Adjacent 60 dBu Contours
- Upper First Adjacent 60 dBu Contours

- WUSF (209)
- WMFV (208)
- WFIT (208)
- WUCF-FM (210)

WUSF(FM) Licensed Class C1 Analog ERP = 69.0 kW (18.388 dBk)

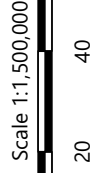
WUSF Maximum Digital Power Calculation Based on Contour Showing
Maximum Lower Digital Sideband Power (-14 dBc) = 2.747 kW (4.388 dBk)
Maximum Upper Digital Sideband Power (-17 dBc) = 1.377 kW (1.388 dBk)
WUSF Total Asymmetrical Digital ERP = 4.124 kW

Note:
-11 dBc Symmetrical HD Insertion Allows for -14 dBc HD Insertion per Sideband
-14 dBc Symmetrical HD Insertion Allows for -17 dBc HD Insertion per Sideband

Predicted 49.6 dBu F(50,10)
Interfering Contour
For Maximum -10 dBc HD Insertion
* See Note in Power Calculation Label.

Predicted 50.2 dBu F(50,10)
Interfering Contour
Relative to WMFV(FM)
Limits Station to -11 dBc
HD Insertion on Lower Sideband
* See Note in Power Calculation Label.

Predicted 54.5 dBu F(50,10)
Interfering Contour
Relative to WUCF-FM
Limits Station to -14 dBc
HD Insertion on Upper Sideband*
* See Note in Power Calculation Label.





BACKGROUND

WFAG- 89.7 FM • **Valdosta Alliance, Inc.**
438 University Drive, Valdosta, GA 31602
(229) 474-1538

WFAG-LP 89.7 FM is a local, noncommercial, community radio station that serves approximately 118,251 listeners through the airwaves signal and an unlimited audience nationally and internationally through live streaming at www.supra897.com and Tunein radio, Tunein app.

WFAG-LP 89.7 is owned by Valdosta Alliance Inc., a **501(c)3 nonprofit # 99-0762438**, and was incorporated in 2023 to bring alternative radio programming to the Valdosta city and Lowdes County area.

WFAG-LP 89.7 FM began broadcasting on LPFM airwaves on February 2 2024, when the FCC granted our license as community station, serving the greater Lowndes County and Valdosta city area with diverse, alternative Hispanic music, information, cultural program and christian content. Because of these diverse music offerings and cross-generational listening audience, 103.7 FM can be tailored to meet your marketing needs.

VALDOSTA ALLIANCE INC was founded with the mission to create a South Regional Radio Channel in underserved radio market where there was a lack of Spanish Language formats representing the population in Lowndes County and the city of Valdosta.

Community radio and social gain Community radio stations are uniquely placed to make a difference to society. We can deliver skills, boost community pride, boost the community's image and standing, and improve the delivery of services to those who need them most. We can reach the isolated, the forgotten and the marginalised. We can offer individuals life-changing opportunities and offer the whole community a social hub.

We are here to make difference by working we the community in Lowndes County and the city of Valdosta with a population of 118,251.

Through the process of executing our non-profit company strategy we discovered there is a need for a Radio Operator to focus and reposition the US Hispanic Radio Landscape to scale audience, leverage the growth of the Latino population and Spending Power, which can be a great tool for our supporter to reach this growing and important segment of the population.

Valdosta Alliance's incorporation status was granted on July 25, 2023 by The Office of Georgia Secretary of State .

MISSION

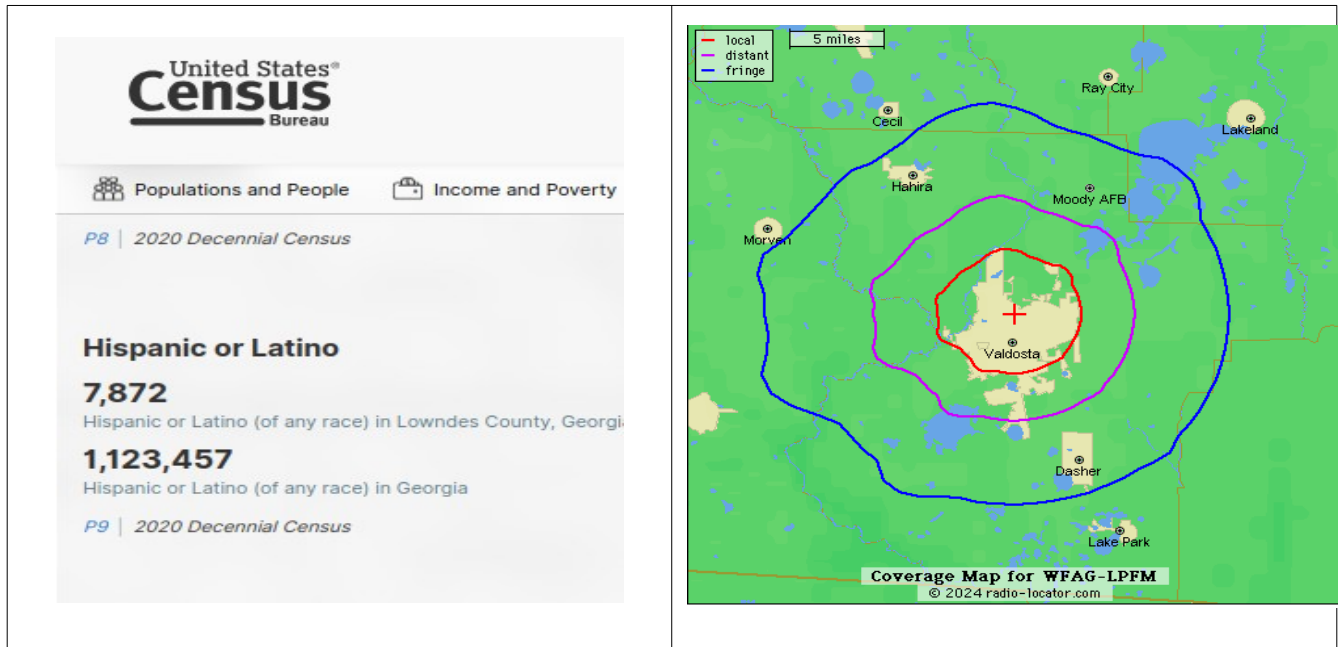
To grow radio as an amplifying tool expanding and enhancing local cultural expression through opportunities for greater community participation.

WFAG-LP has a multi-tiered mission of bringing the community together through:

- Radio broadcasting
- Promoting Hispanic culture
- Volunteer training and education
- Promotes community participation in the city development process and social focus to make Valdosta and Lowndes county better.

COVERAGE AND POPULATION

According 2023 Census information Hispanics are the ethnic group of faster growing in Lowndes County-Valdosta.



PROGRAMMING AND SHOWS

THE TOP NEWS by “*JUAN DE LOS PALOTES*”. MONDAY- FRIDAY, 6-5 AM

GOOD MORNING VALDOSTA, MONDAY- FRIDAY, 6-9 AM La Dama de Hierro, Paula Greer

LA HORA INTERACTIVA, 12pm - 7pm hosted by DJ Franciso

EL TEMPLO DE ADORACION DE VALDOSTA, 12am - 6am. “ALBANZAS AL REY”

SUPRA ROMANTICAS, Saturday 6am -12pm hosted by Albert Gutierrez

EL PODER DE LA PALABRA , Saturday 5pm- 6pm hosted by Pastor Rafael y Maria Rosario

LUZ Y VIDA, Saturday 6 to 7 hosted by Profeta Lesley Vidal

SOLO MERENGUE, Sunday 6 a 8pm hosted by Nelson Castillo

LA BIBLIOTECA INFORMA Sabados 8 a9 am Miguel Vicente, Public Libraries Director

VALDOSTA ALLIANCE INC.

438 University Drive
Valdosta, GA 31602
(229) 474-1538

EXHIBIT 3

WAIVER REQUEST TO INCREASE, FOR THE PUBLIC INTEREST, THE EFFECTIVE RADIATED POWER (ERP) TO 250 WATTS

For the Public Interest, there is only one solution to solve the matter, as just it was stated above, and the Commission has the responsibility to address it, to avoid this Community-Educational Radio Project WFAG-LP 89.7 FM from disappearing or be forced to shut down. **This Waiver is a formal request for the change for the petition submitted**

Several pending and viable proposal intended to improve the LPFM radio service have been filed before the FCC pending for approval. They shows that its possible and just, to keep alive this important radio service to small communities around the country by increasing the ERP of LPFM radio from 100 to 250 Watts. Ex. REC Network's "Simple 250" Petition for Rulemaking, assigned as RM-11909, supported by The National Federation of Community Broadcasters.

From the beginning WFAG 89.7 FM have explored and done all the modifications to improve our signal to combat theses undesirable, suspicious, disruptive interference called "DUCTING". Also, by accepting a involuntary displacement from the commercial band 103.7 FM, to avoid confrontation, complains with other full power radio stations such WUSF 89.7 FM- Tampa FL, WGBH 89.7 FM, Boston MA, WRUF 103.7 FM, Gainesville, FL and WULS-FM 103.7 MHz, Broxton of Georgia.

WFAG-LP on the new frequency 89.7 FM improved the station signal, but later, one or two month later, the "interferences" suddenly appeared more stronger than ever, which suggested it was intentionally provoked by human forces. No by the Nature.

As **Michalle Bradley, LPFM advocator** said that there is nothing WFAG 89.7 FM can do to solve this matter under ERP 100 Watts, quoting "**There's nothing you can do about it. An LPFM station is simply not powerful enough to do much about it. This is just 100% nature.**"

We are now imploring, begging to the Commission to fairly act, for the Public Interest, to allow WFAG 89.7 FM, facility # 782543 operate, UNDER SPECIAL CONDITION, to increase the level power to ERP 250 WATTS. It is the only way this community project can survive under such conditions presented for a right and proper solution.

Engineering study shows no interference will occur by executing this important change proposed.

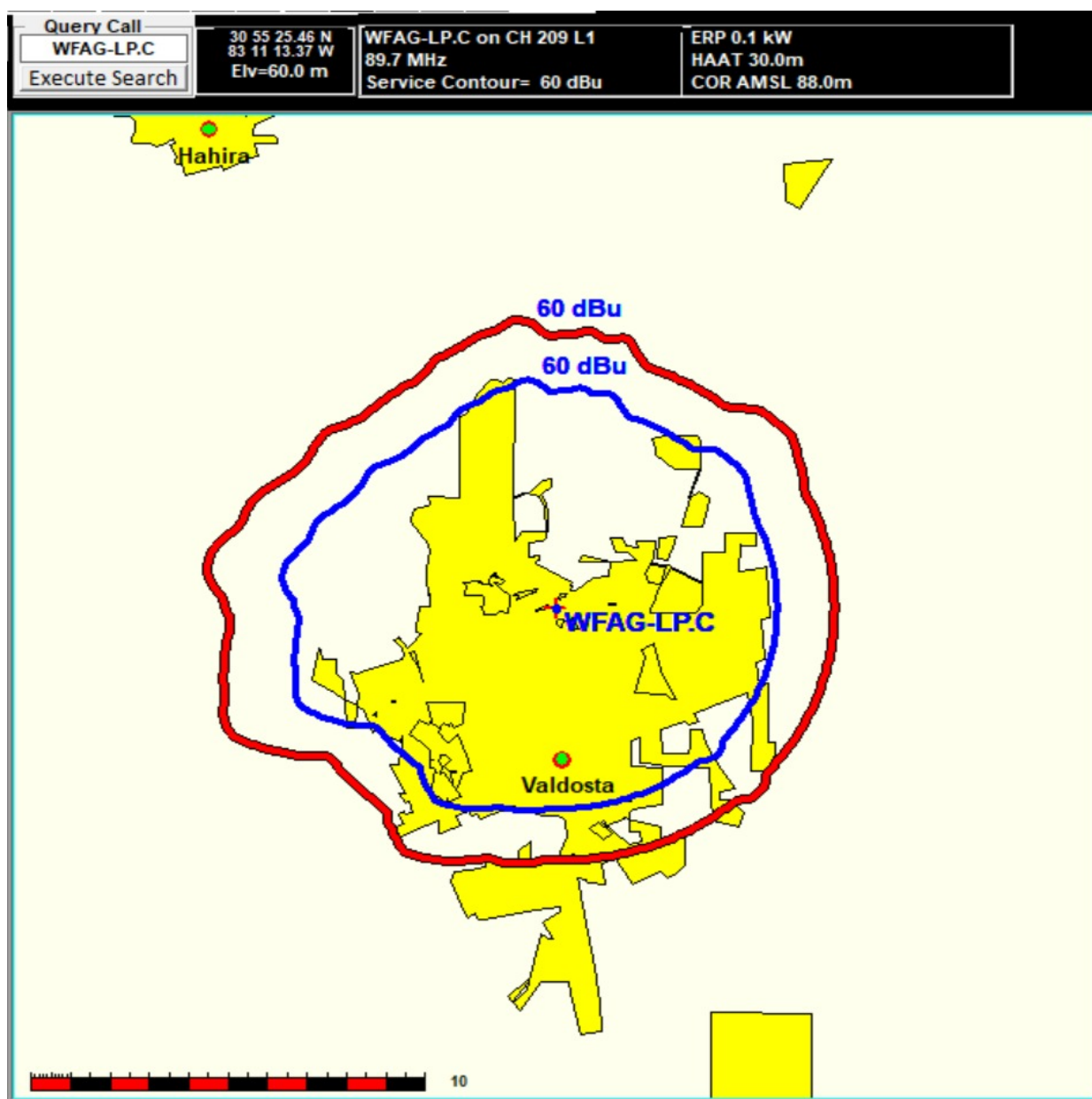


Paula Greer
General Manager
Valdosta Alliance Inc.

Engineering Statement

The proposed facility is submitted for Station WFAG-LP, pursuant to applicable FCC rules. The purpose change is to mitigate existing reception deficiencies/interference/ductinh within the primary station's service area caused by terrain-induced signal degradation and docking interference from Co-WUSF, WGBH and other suspicious signals polluting 89.7 FM channel.

The proposed operation has been evaluated for compliance with all applicable FCC contour protection requirements. As demonstrated in the table below, the proposed facility satisfies the required separations.



REFERENCE 30 52 15.00 N.
 83 16 49.00 W.
 CH# 209L1 - 89.7 MHz, Pwr= 0.25 kw, HAAT= 30.0 M, COR= 88 M
 Average Protected F(50-50)= 7.09 km
 Omni-directional
 PROPOSED
 Valdosta Alliance Inc
 DISPLAY DATES
 DATA 06-26-26
 SEARCH 07-23-26

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
209L1 WFAG-LP Valdosta		CP _CN GA		0.0 0.0	0.00 0000284725	30 52 15.00 83 16 49.00	0.100 30		---Reference--- Valdosta Alliance Inc		
209L1 WFAG-LP Valdosta		LIC _CN GA		0.0 0.0	0.00 0000267286	30 52 15.00 83 16 49.00	0.100 22	88	---Reference--- Valdosta Alliance Inc		
209C0 WMUM-FM« Cochran		LIC _EN GA		0.8 180.8	177.31 BLED20080429AAG	32 28 11.60 83 15 16.60	100.000 304	174.1 409	73.8 Georgia Public Telecommuni	121.5R 55.8M	
211C1 WXVS« Waycross		LIC DEN GA		59.7 240.1	77.90 BMLD20080131AJH	31 13 17.80 82 34 23.50	79.000 280	6.6 329	56.9 Georgia Public Telecommuni	72.5R 5.4M	
209C3 WVFS« Tallahassee		LIC _VN FL		243.9 63.4	108.05 BLED20101207ADA	30 26 22.70 84 17 28.60	7.000 55	77.4 82	19.9 Florida State University	77.5R 30.6M	
208C3 WGSF« Mayo		LIC _EN FL		171.0 351.1	93.03 BLED19910201KD	30 02 30.80 83 07 44.40	20.000 76	53.0 94	33.3 Family worship Center Chur	66.5R 26.5M	
207C1 WBJY« Americus		LIC _VN GA		332.6 152.3	96.23 BLED20020305AAP	31 38 22.60 83 44 57.60	65.000 187	7.0 296	58.1 American Family Associatio	72.5R 23.7M	
210A WABW-FM« Pelham		LIC DCN GA		290.8 110.3	84.00 0000281719	31 08 08.70 84 06 15.70	0.920 100	27.4 183	18.5 Georgia Public Telecommuni	55.5R 28.5M	
6 -- WABW-TV-A Pelham		CHA _Y GA		290.7 110.3	83.97 DTVBL23917	31 08 05.67 84 06 15.65	10.500 379	133.0 462	---	133.0R	-49.0M
06 3E WABW-TV Pelham		LI _HY GA		290.8 110.3	84.00 0000016505	31 08 08.70 84 06 15.70	10.500 378	133.0 461	---	133.0R	-49.0M

Terrain database is FCC NGDC 30 Sec , R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM
 In & Out distances between contours are shown at closest points. Reference zone= - ZN2, Co to 2nd 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)
 "*"affixed to 'IN' or 'OUT' values = site inside restricted contour.
 « = Station meets FCC minimum distance spacing for its class.

FMCommander Contour-to-Contour - HAAT Method=0 ©V-Soft Communications®

File Print Settings Class Channel < Down > Up Find Views WatchDog Help About

FCC NGDC 30 Sec

N. Lat. 30 52 15.00 W. Lng. 83 16 49.00

Contours are detailed CH 209, 89.7 MHz, L1

wflag-lp.c.vsf WFAG-LP.C 07-23-26

LFPH to 2nd

Call	Type	Ch	Location		Azi	Dist	In	Out
WFAG-LP	CP	209L1	Valdosta	GA	0.0	0.00	---	
WFAG-LP	LIC	209L1	Valdosta	GA	0.0	0.00	---	
WMUM-FM	LIC	209C0	Cochran	GA	0.8	177.31	-4.3	78.5
WXVS	LIC-D	211C1	Waycross	GA	59.7	77.90	63.7	19.2
WVFS	LIC	209C3	Tallahassee	FL	243.9	108.05	21.5	57.5
WGSG	LIC	208C3	Mayo	FL	171.0	93.03	33.3	49.7
WBJY	LIC	207C1	Americus	GA	332.6	96.23	81.8	37.1
WABW-FM	LIC-D	210A	Pelham	GA	290.8	84.00	47.8	53.5

End of Screen List, Cardinal Radials = 12

Contour Overlap and Interference Protection Analysis

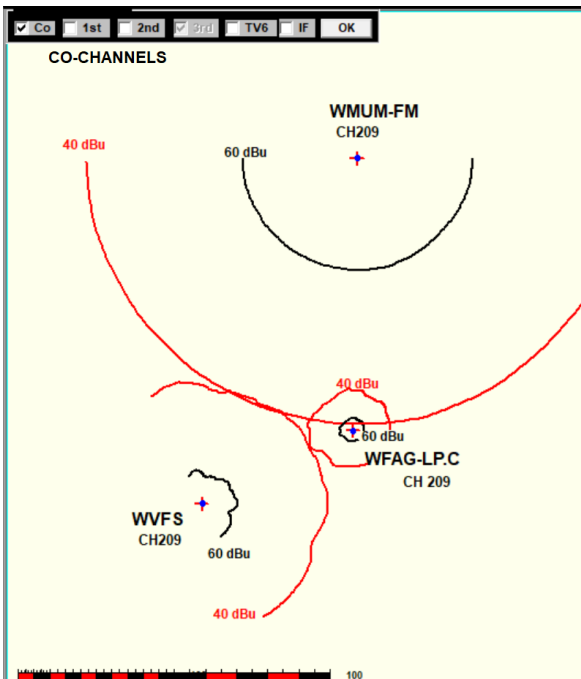
The proposed facility, operating with an effective radiated power (ERP) of 250 watts, fully complies with the applicable interference protection requirements of the Commission's Rules. An engineering analysis was performed to evaluate the proposed facility with respect to all potentially affected co-channel, first-adjacent, second-adjacent, and third-adjacent channel facilities. The analysis demonstrates that the proposed operation provides the required protection to each station in accordance with the applicable spacing and contour overlap criteria.

With respect to TV Channel 6 operations, if a Letter of Consent (LOC) has previously been obtained and submitted as part of this application or a related filing, the proposed facility is authorized to operate pursuant to that consent. The accompanying engineering exhibits further demonstrate that the proposed facility satisfies the required protection standards.

The attached contour-to-contour maps illustrate the relationship between the proposed facility's predicted service and interfering contours and the protected contours of all affected stations. These maps confirm that no prohibited contour overlap occurs and that the proposed facility maintains the required separation and interference protection to all co-channel, first-adjacent, second-adjacent, and third-adjacent channel facilities. Accordingly, the proposed 250-watt operation complies with the Commission's technical requirements and will not cause objectionable interference to any protected broadcast facility.

Co-Channel Protection:

The proposed **40 dBu** interfering contour does not overlap the **60 dBu** protected service contours of **WMUM-FM** and **WVFS**. Therefore, all co-channel stations are adequately protected.



Second-Adjacent Channel Protection:

The proposed **100 dBu** interfering contour does not overlap the **60 dBu** protected service contours

First-Channel Protection:

The proposed **54 dBu** interfering contour does not overlap the **60 dBu** protected service contours of **WABW-FM** and **WGSG**. Therefore, First-channel stations are adequately protected.

