April 25, 2022

Ms. Marlene H. Dortch,
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Radio Broadcasting Services, Incorporated
Station W266CU
Middlebury, Vermont
FRN: 0007598147
Facility ID No. 154466
Request for Engineering STA
Filing Pursuant Public Notice, DA 22-82, released January 25, 2022

Dear Ms. Dortch:

Radio Broadcasting Services, Incorporated, by its attorneys, hereby requests that the Commission grant Engineering STA for the operation of FM Translator Station W266CU, Middlebury, Vermont (Facility No. 154466) with facilities at variance with the Station's operating license.

In support of the relief sought, a formal request and an Anti-Drug Certificate are attached hereto.

Upon receipt of filing information, the licensee will make payment of the application processing fee.

Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,

Barry A. Friedman

Enclosures

Federal Communications Commission
Washington, D.C. 20554

Approved by OMB
3060-0386 (July 2002)

FOR FCC USE ONLY

FOR COMMISSION USE ONLY
FILE NO.

Engineering STA

Read Instructions/FAQ before filling out form

Section I - General Information

1. Legal Name of the Applicant
RADIO BROADCASTING SERVICES, INCORPORATED

Mailing Address
288 SOUTH RIVER ROAD

City	State or Country (if foreign address)	Zip Code
BEDFORD	NH	03110

Telephone Number (include area code)	E-Mail Address (if available)
6036686400	

FCC Registration No	Call Sign	Facility ID Number
0007598147	W266CU	154466

2. Contact Representative (if other than licensee/permittee)
BARRY A. FRIEDMAN

Firm or Company Name
THOMPSON HINE LLP

Mailing Address
1919 M STREET, N.W.
SUITE 700

City	State or Country (if foreign address)	ZIP Code
WASHINGTON	DC	20036-

Telephone Number (include area code)	E-Mail Address (if available)
2023318800	Barry.Friedman@thompsonhine.com

3. Purpose:
- (●) Engineering STA
- ( ) Extension of Existing Engineering STA
- ( ) Legal STA
- ( ) Extension of Existing Legal STA

4. Service: FX

5. Community of License:
City: MIDDLEBURYState: VT

6. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):
( ) Governmental Entity ( ) Noncommercial Educational Licensee/Permittee ( ) Other
(●) N/A (Fee Required)

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

7.1. Channel: 266

7.2. Primary Station:

Facility Identifier	Call Sign	City	State
53612	WFAD	MIDDLEBURY	VT

7.3. Delivery Method (Select One):
(●) Off-air ( ) Microwave ( ) Satellite ( ) Via ( ) Other

	reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	
11.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1)the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.	[Exhibit 12]
12.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	◉ Yes ○ No

I certify that I have prepared Engineering Data on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name FRED W. VOLKEN	Relationship to Applicant (e.g., Consulting Engineer) ENGINEERING CONSULTANT	
Signature Fred W. Volken	Date (mm/dd/yyyy) 04/23/2022	
Mailing Address P.O. BOX 1506		
City SIERRA MADRE	State or Country (if foreign address) CA	Zip Code 91025-4506
Telephone Number (No dashes or parentheses, include area code) 6263551171	E-Mail Address (if available) FRED.VOLKEN@VERIZON.NET	

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing EDWARD FLANAGAN	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date (mm/dd/yyyy) 04/24/2022

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 12

Description: DESCRIPTION OF CIRCUMSTANCES

FM TRANSLATOR W266CU REBROADCASTS THE PROGRAMMING OF WFAD(AM), AND HAS BEEN OFF THE AIR FOR A PERIOD OF TIME AS A RESULT OF TECHNICAL PROBLEMS AT THE AM STATION. IT IS EXPECTED THAT WFAD(AM) WILL RESUME BROADCAST OPERATIONS SHORTLY, AT LOW POWER TEMPORARILY. W266CU IS CAPABLE OF RETURNING TO THE AIR, BUT THE LICENSEE REQUESTS SPECIAL TEMPORARY AUTHORITY TO OPERATE AT REDUCED POWER (30 WATTS TRANSMITTER POWER OUTPUT) UNTIL AN INTERFERENCE PROBLEM CAUSED BY THE FM TRANSLATOR CAN BE CORRECTED. THE NEED FOR THE LOW-POWER OPERATION IS NOT EXPECTED TO LAST MORE THAN A FEW WEEKS, AFTER WHICH W266CU WILL RESUME FULL-POWER SERVICE TO THE PUBLIC.

Attachment 12

7.4.	Antenna Location Coordinates: (NAD83) Latitude: Degrees 43 Minutes 59 Seconds 57.4 ◉ North ○ South Longitude: Degrees 73 Minutes 09 Seconds 33.0 ◉ West ○ East	
7.5.	Antenna Structure Registration Number: 1266747 ☐ Not Applicable ☐ Notification filed with FAA	
7.6.	Antenna Location Site Elevation Above Mean Sea Level:	105.2 meters
7.7.	Overall Tower Height Above Ground Level:	54.9 meters
7.8.	Height of Radiation Center Above Ground Level:	51.8 meters(H) 51.8 meters(V)
7.9.	Effective Radiated Power: (LICENSED VALUES)	0.25 kW(H) 0.25 kW(V)
7.10.	Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under CDBS Public Access (http://licensing.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search. ◉ Nondirectional ○ Directional "Off-the-shelf" ○ Directional composite Manufacturer SHI Model 6812C Rotation:degrees ☐ No Rotation	

Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0		10		20		30		40		50	
60		70		80		90		100		110	
120		130		140		150		160		170	
180		190		200		210		220		230	
240		250		260		270		280		290	
300		310		320		330		340		350	
Additional Azimuths											

8.	**For FM Boosters and Fill-in translators only.** Applicant certifies that the proposal is for a fill-in translator or booster station entirely within the primary station's protected contour.	◉ Yes ○ No ○ N/A See Explanation in [Exhibit 7];
9.	**Interference.** The proposed facility complies with all of the following applicable rule sections. Check all that apply: **Overlap Requirements.** ☑ a) 47 C.F.R. Section 74.1204 **Exhibit Required.** **Television Channel 6 Protection. (Ch 201 - 220 only)** ☐ b) 47 C.F.R. Section 74.1205 with respect to station(s) **Exhibit Required.**	◉ Yes ○ No See Explanation in [Exhibit 8] [Exhibit 9] [Exhibit 10]
10..	**Environmental Protection Act.** Applicant certifies that the proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.** By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will	◉ Yes ○ No See Explanation in [Exhibit 11]

ANTI-DRUG ABUSE ACT CERTIFICATION

The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a), or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, the applicant has relied on 47 C.F.R. § 1.2002(b).

Executed at Montpelier, Vermont, on the 20th day of April, 2022.

RADIO BROADCASTING SERVICS,
INCORPORATED

By: _____
Edward Flanagan
President