

**Compliance with 47 C.F.R. 73.215(e)**

The proposed facility is a class A that will serve Troy, Ohio on channel 245.

According to 47 C.F.R. 73.207(a),

*“Except for assignments made pursuant to Sec. 73.213 or 73.215, FM allotments and assignments must be separated from other allotments and assignments on the same channel (co-channel) and five pairs of adjacent channels by not less than the minimum distances specified in paragraphs (b) and (c) of this section.”*

The distance between the proposed facility meets the separation requirements of 47 C.F.R. 73.207(b) except for WBNS-FM, channel 246B, Columbus, Ohio and WFTK, channel 243B, Lebanon, Ohio.

This application proposes contour protection for WBNS-FM and WFTK according to the guidelines of 47 C.F.R. 73.215. The minimum separation requirement (according to 47 C.F.R. 73.215(e)) between a class A and a class B facility, which are separated by 200 kHz, is 96 km. Exhibit 15-A shows that WBNS-FM is separated from the proposed facility by 99.5 km. Also, the minimum separation requirement between a class A and a class B facility, which are separated by 400 kHz, is 63 km. Exhibit 15-A shows that WFTK is separated from the proposed facility by 66.9 km.

Therefore, the proposed facility is permitted to use contour protection toward the short-space facilities (See Exhibit 18 for compliance with contour protection requirements).

