

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).

Educational Media Foundation

5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

Exhibit 15-A

Seguin, TX

Proposed Site Spacing

REFERENCE		DISPLAY DATES
39 56 49.0 N.	CLASS = A Int = A	DATA 07-15-10
84 11 29.0 W.	Current Spacings to 3rd Adj.	SEARCH 07-16-10
----- Channel 245 - 96.9 MHz -----		

Call		Channel	Location		Azi	Dist	FCC	Margin
WOKL	CP -Z	245A	Troy	OH	0.0	0.0	115.0	-115.0
WOKL	LIC-Z	245A	Troy	OH	0.2	9.0	115.0	-106.0
WBNS-FM	LIC	246B	Columbus	OH	88.1	99.5	113.0	-13.5
WFTK	LIC	243B	Lebanon	OH	189.9	66.9	69.0	-2.1
WCSM-FM	LIC	244A	Celina	OH	338.0	72.6	72.0	0.56
WCSM-FM	APP	244A	Celina	OH	337.8	72.8	72.0	0.8
WMMX	LIC	299B	Dayton	OH	183.6	25.0	15.0	10.0
WTGR	LIC-Z	248A	Union City	OH	298.0	58.6	31.0	27.6
WLVQ	LIC	242B	Columbus	OH	88.1	99.5	69.0	30.5
WGKS	LIC	245C2	Paris	KY	184.0	202.7	166.0	36.7
WLHK	LIC	246B	Shelbyville	IN	259.4	160.4	113.0	47.4
WYGY	LIC	247A	Fort Thomas	KY	199.0	87.7	31.0	56.7
WMQX	LIC	244A	Alexandria	IN	282.0	129.0	72.0	57.0
WLRD	LIC	245A	Willard	OH	49.2	174.3	115.0	59.4
WVNU	LIC	248A	Greenfield	OH	129.7	93.5	31.0	62.5
WYGY	CP	247C3	Fort Thomas	KY	195.1	106.1	42.0	64.1