

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contour of the third-adjacent W280CV, Scranton, PA and the predicted interference to the 60 dBu contour of the second-adjacent WWRR, Scranton, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. W280CV, Scranton, PA and WWRR, Scranton, PA, third and second adjacent channel facilities to this translator proposal, are protected from interference within their 60 dBu contours from the associated interference contour (based on 47 CFR 74.1204(a)(1); using the FCC F(50/10) curves) which need be 40 dBu greater than the associated coverage contours (W280CV & WWRR) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.

2. This translator's antenna location is located within the 60 dBu contour (based on 73.333 F(50/50)) of W280CV, Scranton, PA and within the 60 dBu contour (based on 73.333 F(50/50)) of WWRR, Scranton, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to W280CV & WWRR. Included as an attachment (W283BE 104.5 Scranton, PA Desired to Undesired Ratios Map) is a map showing that the 80 dBu coverage contour of W280CV & the 80 dBu coverage contour of WWRR encompasses the proposed antenna site along with the entire proposed 120 dBu and 80 dBu interference contours (This proposal uses a tower next to the WWRR tower as its site, WWRR will be mounted above the proposed antenna very close by). As the proposed 120 dBu interference contour is

40 dBu greater than the 80 dBu contour of W280CV and WWRR then this contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this interference contour for this proposed translator.

3. Given this translator's requested effective radiated power of 246 watts Directional; the predicted 120 dBu interference contour for this proposal would be very small. At any HAAT value, the maximum 120 dBu contour distance for this proposal is 0.11 kilometers (110 meters) towards 160 degrees and smaller in all other directions. A uniform Non-directional 120 dBu contour is show for ease of drawing the exhibit.

4. This proposed translator site is situated in a sparsely populated tower farm area with preexisting towers and outbuildings housing electronic equipment. W283BE Scranton, PA 74.1204(d) Geo Map and W283BE Scranton, PA 74.1204(d) Sat Map are attachments to this exhibit, clearly showing how rural the area is within the 120 dBu interference contour of this proposal with no dwellings at all located within this contour. The rule in 47 CFR 74.1204(d) states "an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such factors as may be applicable." In this particular case, as shown in this exhibit, it is clearly evident that there is a "lack of population" as defined in 47 CFR 1204(d) thus allowing this translator to operate at this proposed location.

For the foregoing reasons this Applicant submits that the predicted interference to W280CV, Scranton, PA and WWRR, Scranton, PA is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facilities, W280CV, Scranton, PA and WWRR, Scranton, PA.

By: Kevin Fitzgerald, Chief Engineer