

#### SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contour of the third-adjacent W236BB, Tunkhannock, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. W236BB, Tunkhannock, PA, third adjacent channel facility to this translator proposal, is protected from interference within its 60 dBu contour 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 contour (W236BB) 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 W236BB, Tunkhannock, PA (co-located on the same tower). This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to W236BB. Included as an attachment (W230BL 94.5 Russell Hill/Mehoopany, PA Desired to Undesired Ratios Map) is a map showing that the 100 dBu coverage contour of W236BB encompass the proposed antenna site along with the entire proposed 140 dBu interference contour. The proposed 140 dBu interference contour is 40 dBu greater than the 100 dBu contour of W236BB. This 140 dBu contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 140 dBu interference contour of this proposed translator.
3. Given this translator's requested effective radiated power of 17 watts, directional; the predicted 140 dBu interference contour for this proposal would be very small. At any HAAT value, the maximum 140 dBu

contour distance for this proposal is 0.00289 kilometers (2.89 meters) towards 90 degrees and smaller in other directions.

4. This proposed translator site is situated in a sparsely populated area. Because the 140 dBu contour only radiates a maximum of 2.89 meters the entire 140 dBu contour is located above ground on the proposed tower near the proposed antenna. 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 W236BB, Tunkhannock, 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 facility, W236BB, Tunkhannock, PA.

By: Kevin Fitzgerald, Chief Engineer