

Part 1 - Channel Study

REFERENCE		CH# 206B1- 89.1 MHz, Pwr= 9.5 kW DA, HAAT= 158.0 M, COR= 757 M							DISPLAY DATES		
42 07 07.0 N.		Average Protected F(50-50)= 38.8 km							DATA 04-30-18		
78 10 43.0 W.		Standard Directional							SEARCH 05-01-18		
CH CITY	CALL	TYPE	ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
206B1 Friendship	WCOV-FM!	LIC	CN NY	0.0 0.0	0.00 BLED19900112KB	42 07 07.0 78 10 43.0	7.000 150	94.4 737	33.4 Family Life Ministries, In	-130.9 -132.1	
209A Alfred	WALF	LIC	CN NY	64.7 245.0	35.71 BLED19820910AI	42 15 17.0 77 47 13.0	0.200 -6	1.0 577	6.7 Alfred University	-4.3*<	25.2
206B1 Welland	CKYY-FM	OP	DHN ON	320.7 140.0	128.35 9691	43 00 27.0 79 10 40.0	4.250 131	40.6 307	17.1 R.B. Communications Ltd.	55.6 -1.9<	
206D Mansfield	W206BV!	LIC	V PA	108.2 289.0	100.98 BLFT20110614ABY	41 49 48.0 77 01 24.0	0.010 91	19.2 585	5.8 Pensacola Christian Colleg	48.8 -0.6<	
206B Tidioute	WGIP	CP	DCX PA	234.8 53.9	129.31 BPED20161121ACO	41 26 31.0 79 26 40.0	50.000 119	79.8 569	27.4 Calvary Chapel Of Russell	10.1	1.0
206B Paris	CBLA-FM-2<	OP	DHN ON	305.2 123.7	224.81 6052	43 15 39.0 80 26 38.0	10.400 249	134.9 539	55.9 CBC/ Radio-Canada	223.0R	1.8M
206B Paris	CBLA-FM-2<	AX	DHN ON	305.2 123.7	224.81 6052	43 15 39.0 80 26 38.0	5.810 249	122.6 539	50.6 CBC/ Radio-Canada CBLA-FM-	223.0R	1.8M
206B1 Brockport	WBSU	LIC	DCN NY	8.5 188.6	122.89 BLED19890526KA	43 12 45.0 77 57 17.0	7.300 53	71.0 209	16.2 State University Of New Yo	12.0	3.1
208A Arcade	WCOF	LIC	CX NY	344.5 164.4	39.52 BLED20050210ARA	42 27 41.0 78 18 26.0	1.000 181	1.8 725	22.4 Family Life Ministries, In	4.3	14.0
207A Geneseo	WGSU	LIC	HN NY	21.2 201.4	80.96 BLED638	42 47 51.0 77 49 13.0	1.800 3	20.7 256	13.9 State University Of New Yo	17.9	4.6
204B1 Hornell	WSQA	LIC	DCN NY	69.7 250.0	48.07 BLED19991012AAM	42 16 02.0 77 37 55.0	4.500 151	2.5 689	25.9 Wskg Public Telecommunicat	7.1	18.3
205B1 Canandaigua	WCIY	LIC	CX NY	41.3 221.8	93.19 BLED20060307BUI	42 44 44.0 77 25 34.0	0.680 324	33.8 714	22.7 Family Life Ministries, In	17.7	9.0
206A Tidioute	WGIP	LIC	CX PA	244.9 64.1	112.82 BLED20121214ABR	41 40 59.0 79 24 25.0	0.100 -126	18.6 351	5.6 Calvary Chapel Of Russell	60.4	15.3
206B1 State College	WRXV	LIC	CX PA	172.7 352.8	134.26 BLED20170130AAT	40 55 10.0 77 58 28.0	0.600 332	38.2 814	11.5 Invisible Allies Ministrie	55.4	17.4
207B1 Silver Creek	WCOM-FM	LIC	DC NY	308.7 128.1	82.35 BLED20120807ACV	42 34 41.0 78 57 47.0	8.000 83	25.3 346	17.1 Family Life Ministries, In	26.3	18.9
206D Lockport	W206BZ!	LIC	C NY	340.8 160.4	121.63 BLFT20121029AAT	43 09 04.0 78 40 21.0	0.027 45	12.9 207	4.0 Priority Radio, Inc.	75.3	24.3
209B Jamestown	WNJA	LIC	CN NY	264.2 83.6	75.88 BLED19910729KR	42 02 48.0 79 05 26.0	6.000 230	3.5 711	36.9 Western New York Public Br	39.6	36.2
206A Auburn	WDWN	LIC	DCN NY	55.0 236.1	162.74 BLED19950403KC	42 56 40.0 76 32 33.0	3.000 27	70.2 243	20.7 Cayuga County Community Co	53.2	38.4
205A Lakewood	WYRR	LIC	DEX NY	274.3 93.5	94.33 BLED20100218AAJ	42 10 33.0 79 19 02.0	0.420 102	13.2 563	9.5 Family Worship Center Chur	50.8	39.1
205B Toronto	CIRV-FM<	OP	DHN ON	330.5 149.6	196.32 3429	43 38 56.0 79 22 54.0	4.180 315	40.6 433	37.0 CIRC Radio Incorporated	149.0R	47.3M
205A Fredonia	WCVF-FM	LIC	CN NY	291.7 110.9	102.49 BLED19811019AQ	42 27 08.0 79 20 14.0	0.130 -35	8.6 237	6.0 Board Of Trustees Of State	62.5	49.3
208D Corning	W208BC!	LIC	C NY	88.0 268.7	91.05 BLFT20010830AAR	42 08 31.0 77 04 40.0	0.010 126	0.2 558	6.5 Family Worship Center Chur	54.9	81.1
205D Elmira	W205BR!	LIC	DV NY	89.1 270.0	114.55 BMLFT20060616ABL	42 07 36.0 76 47 36.0	0.006 158	4.8 540	3.1 Pensacola Christian Colleg	73.6	57.0

CH CITY	CALL	TYPE	ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr (kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
203A Youngsville	WYVL	LIC	DCX PA	255.3 74.6	92.86 BLED20151202EYN	41 54 07.0 79 15 41.0	2.500 130	2.3 612	26.3 Calvary Chapel Of Russell	58.5	63.7
207D Lock Haven	W207BM!	LIC	C PA	151.9 332.4	122.24 BLFT20060929AAL	41 08 45.8 77 29 30.0	0.010 56	4.4 402	3.2 Family Worship Center Churh	77.9	60.0
207A Webster	WMHN	LIC	CN NY	25.6 206.1	137.14 BLED19880309KA	43 13 45.0 77 26 52.0	1.000 44	14.2 155	10.2 Mars Hill Broadcasting Co.	79.4	62.6
208A Mansfield	WNTN	LIC	CX PA	110.4 291.2	97.95 BLED20051025ABM	41 48 23.0 77 04 25.0	0.115 -85	0.8 401	5.8 Wnte-fm-mansfield Universi	64.0	88.8
207B Binghamton	WSKG-FM	LIC	CX NY	91.2 272.7	184.81 BLED20040115ABK	42 03 40.0 75 56 46.0	11.500 317	81.9 712	55.6 Wskg Public Telecommunicat	67.4	75.5
204B Buffalo	WBFO	LIC	DCX NY	334.2 153.8	109.46 BLED20080424ACE	43 00 12.0 78 45 56.0	50.000 117	4.0 305	38.5 Western New York Public Br	73.2	67.9
06 1C Altoona	WKBS-TV	CP	CY PA	187.3 7.1	173.64 0000034187	40 34 03.5 78 26 26.1	3.100 305	36.8 828	58.2	95.0R	78.7M
6 -- Altoona	WKBS-TV-A	CHA	Y PA	187.3 7.1	173.64 DTVBL13929	40 34 03.4 78 26 26.1	0.579 305	36.8 828	43.3	80.1R	93.6M

Terrain database is GLOBE 30 Sec, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM

Contour distances are on direct line to and from reference station. Reference Zone= - Zone 1, Co to 3rd adjacent.

Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)

"*"affixed to 'IN' or 'OUT' values = site inside restricted contour.

< = Station meets FCC minimum distance spacing for its class.

< = Contour Overlap

Reference station has protected zone issue: Canada

Part 2 - Request for Waiver of 47 C.F.R. Section 73.509

Family Life Ministries, Inc. ("FLM") desires to increase the power and service area of station WCOV-FM, Friendship, NY. This proposal is engineered so as to NOT CAUSE interference to any existing station, known application or allocation. However, the proposed increased service area would RECEIVE interference from the following second adjacent facility (see Exhibit 18-A for a contour map of the interference area):

Facility ID	Status	Call Sign	City of License
973	Lic	WALF	Alfred, NY

Again, this proposal will not cause interference to the above application as WCOV-FM's proposed interfering 100dBu contour will not overlap the WALF protected 60 dBu contour. WCOV-FM's proposed protected contour would, however, receive prohibited overlap from the license listed above. The area of "overlap received" from the above referenced facility will be approximately:

Call Sign (or File #)	Square km	Total area of proposed 60 dBu
WALF	3.1	4138.4 sq km

The grant of this waiver request will provide new service to an estimated 3,250 persons, an increase of 3.7%. It will allow WCOV-FM to increase its overall coverage area by 201.7 square kilometers, an increase of 5.1%. This waiver request is nearly identical to the requests made by the licensees of WCPE(FM) and WCCE(FM) in Educational Information Corporation, 6 FCC Rcd 2207 (1991). WCPE(FM) requested a waiver in its application to permit *de minimus* overlap "received," and WCCE(FM) requested a waiver in its application to permit *de minimus* overlap "caused." In recognition of the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, the Commission granted both waiver requests. The instant request fully satisfies the criteria established by the Commission for waiver of Section 73.509 of the Commission's rules as it pertains to overlap received*.

Significant service will be maintained and enhanced by the proposed expansion of WCOV-FM, and the overlap area is very small and well within the scope of the Commission's waiver policy. Clearly, this benefit heavily outweighs the potential for interference in an area that constitutes less than 0.1% (total) of the station's proposed service area. Accordingly FLM respectfully submits that a waiver of Section 73.509(a) of the Commission's rules is justified in this instance.

* FLM wishes to emphasize that its request is not at all similar to the second waiver request made by WCPE in Educational Information Corporation, 1997 FCC LEXIS 2636 (May 20, 1997). Unlike here, WCPE was seeking a waiver of overlap "caused" in that second case.

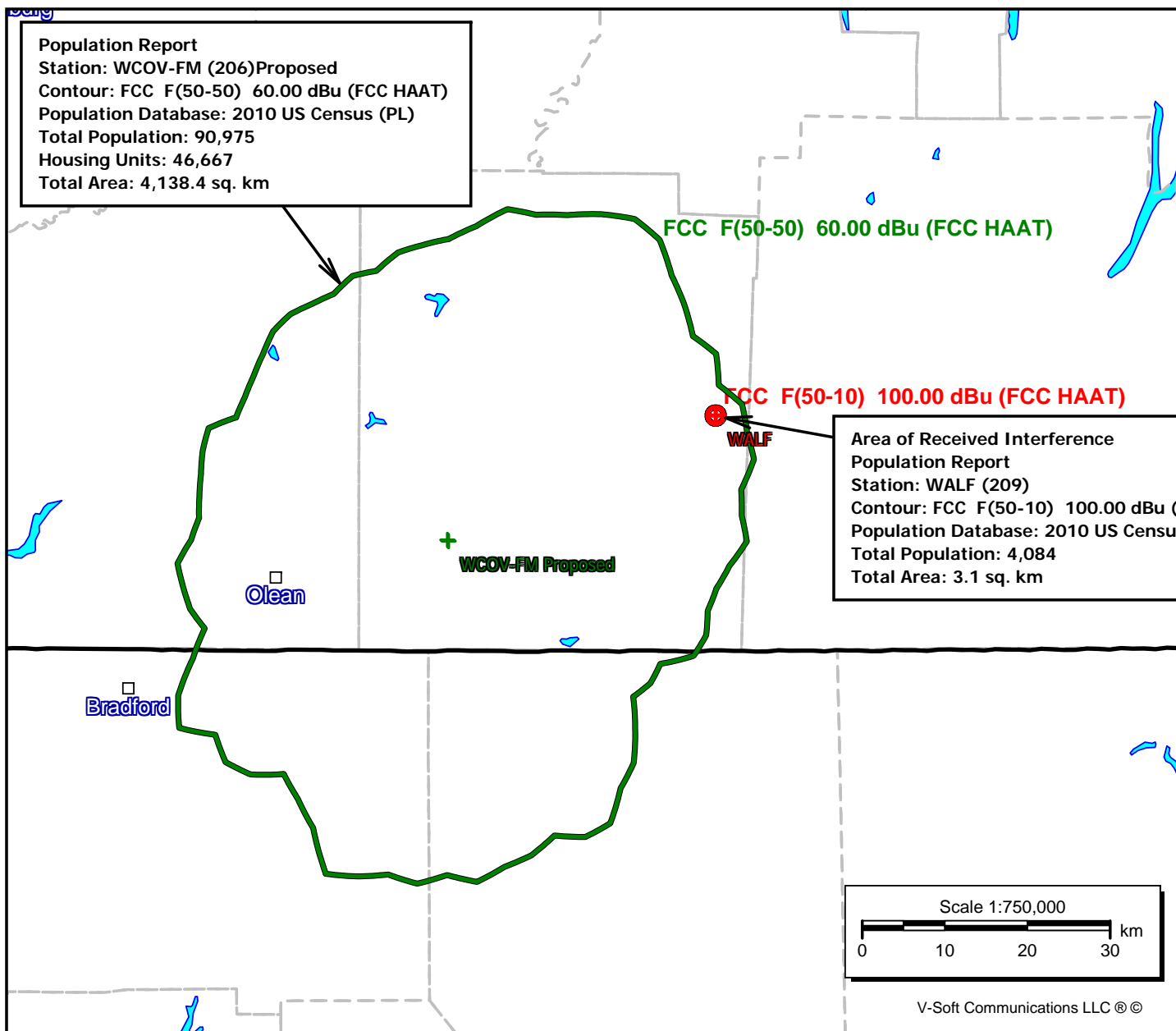
- WCOV-FM Proposed (206)
- WALF (209)

Exhibit 18-A Area of Received Interference from WALF 209A

WCOV-FM Proposed
BLED19900112KB
Latitude: 42-07-07 N
Longitude: 078-10-43 W
ERP: 9.50 kW
Channel: 206
Frequency: 89.1 MHz
AMSL Height: 757.0 m
Elevation: 701.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

WALF
BLED19820910AI
Latitude: 42-15-17 N
Longitude: 077-47-13 W
ERP: 0.20 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 577.0 m
Elevation: 561.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Population Report
Station: WCOV-FM (206) Proposed
Contour: FCC F(50-50) 60.00 dBu (FCC HAAT)
Population Database: 2010 US Census (PL)
Total Population: 90,975
Housing Units: 46,667
Total Area: 4,138.4 sq. km



Area of Received Interference
Population Report
Station: WALF (209)
Contour: FCC F(50-10) 100.00 dBu (FCC HAAT)
Population Database: 2010 US Census (PL)
Total Population: 4,084
Total Area: 3.1 sq. km