

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contours of the second adjacent WUSR, Scranton, PA and W262AI, Forty Fort, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WUSR, Scranton, PA and W262AI, Forty Fort, PA, 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 contour (WUSR and W262AI) 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 contours (based on 73.333 F(50/50)) of WUSR, Scranton, PA and W262AI, Forty Fort, 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 WUSR and W262AI. Included as an attachment (W260AY 99.9 Glen Lyon, PA Desired to Undesired Ratios Map) is a map showing that the 60.6 dBu coverage contour of WUSR and the 87 dBu contour of W262AI encompassing the proposed antenna site along with the entire proposed 100.6 dBu interference contour. The proposed 100.6 dBu interference contour is 40 dBu greater than the 60.6 dBu contour of WUSR. This 100.6 dBu contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 100.6 dBu interference contour of this proposed translator. No further study of the contour associated with W262AI (127 dBu contour) is needed as it is a much smaller contour.

3. Given this translator's requested effective radiated power of 250 watts, directional; the predicted 100.6 dBu interference contour for this proposal would be small. At any HAAT value, the maximum 100.6 dBu contour distance for this proposal is 1.03 kilometers towards 290 degrees true north and less than this in all other directions.

4. This proposed translator site is situated in a very sparsely populated mountain top tower farm area. W260AY 99.9 Glen Lyon, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 100.6 dBu interference contour of this proposal with no dwellings or public roads 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 WUSR, Scranton, PA and W262AI, Forty Fort, 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, WUSR, Scranton, PA and W262AI, Forty Fort, PA.

By: Kevin Fitzgerald, Chief Engineer