

## Exhibit 15

### **Foothills Public Radio, Inc.**

#### **Form 340 Application for New NCE FM at Edgartown, Massachusetts**

**Channel 201 (88.1 mHz.) / 0.280 kW / 28 meters HAAT**

### **ENGINEERING STATEMENT**

#### Section 73.509 Allocation Study

The proposed facility was studied with respect to all nearby possible interferees and interferors. Figure 1 depicts the applicable service and interfering contours of all pertinent stations, permits, and applications. Contours which are not permitted to overlap under 73.509 are depicted in same colors. For example, the 60 dBu F(50,50) service contour from the proposed new NCE FM on Channel 201 and the 40 dBu F(50,10) interfering contour from co-channel WFHL are both depicted in green. As illustrated, no prohibited overlap will be created by the proposed facility. The RadioSoft ComStudy program was employed to create the allocation study and map.

#### TV Channel 6 Protection

The only full power TV or Class A LPTV stations on Channel 6 within 235 km. of the proposed Channel 204 NCE FM is WLNE-TV at New Bedford, MA (60.38 km) and WEDY-DT at New Haven, CT (199.5 km). Both are affected stations under 73.525. The proposed facility will employ vertical-only ERP and the interference area is located entirely outside of any city with a population of 50,000 or more. Therefore, the formula in 73.558(c)(4)(i) was employed to reduce the proposed NCE ERP by a factor of 40 for purposes of determining the population and area affected by the interference (i.e. study was performed at 7.0 Watts.)

Exhibits 2 and 3 show the relevant service contours of WLNE-TV Channel 6, and the pertinent interfering contours of the proposed new NCE FM. The affected area and population were ascertained using an approach that is more conservative than the locus of contour intersections technique. The interfering contour level of 58.7 dBu F(50,10) was ascertained by adding the -4.3 dB undesired to desired signal ratio from 73.599

Figure 1 that is applicable to the WLNE-TV 66 dBu service contour (the most conservative U/D ratio) to the 63 dBu service contour (the most conservative WLNE-TV service contour.)

The affected area and population count were determined utilizing the RadioSoft ComStudy program by counting the population within the proposed new NCE FM 58.7 dBu F(50,10) interfering contour. The affected population is 2,292 persons in an area of 70.4 sq. km. (Approximately 33% of this area is over water.) Since the area contains fewer than 3,000 persons, the proposal complies with 73.525(c).

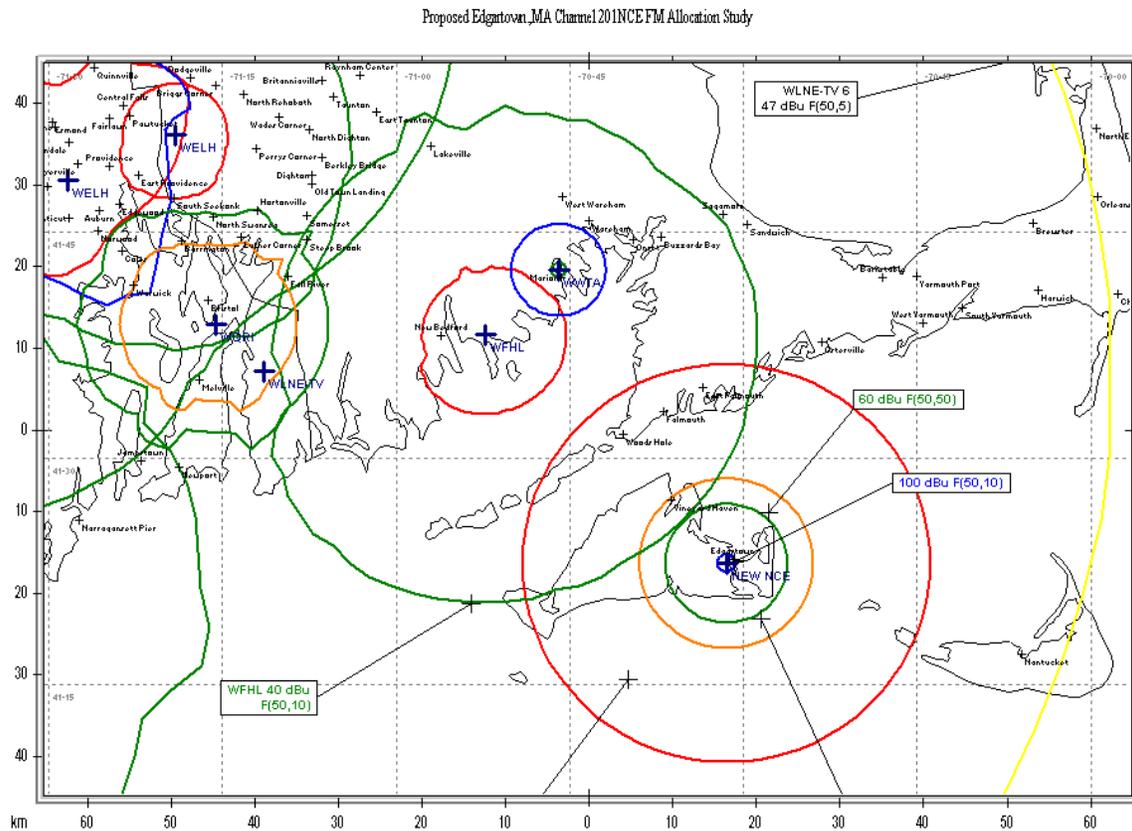
## Environmental Considerations

The applicant proposes to mount its antenna on an existing tower with the center of radiation 20 meters above ground level. Therefore, this proposal will have no environmental impact other than RFR exposure.

Compliance with RFR exposure rules was established using the RF worksheets in Worksheet #7 of Form 340 Instructions.

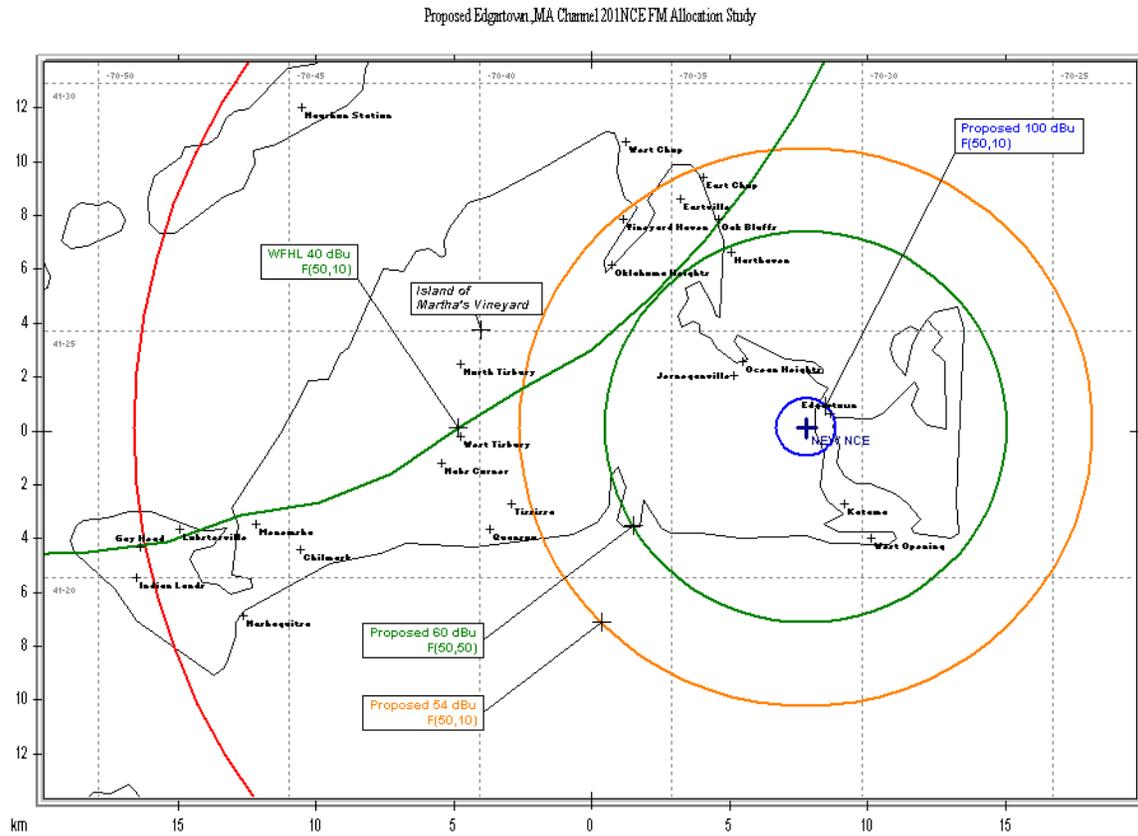
The tower is inaccessible to the general public and will be marked with appropriate warning signs. The applicant will reduce power or cease operation as necessary to protect workers having access to the tower from RFR exposure in excess of FCC guidelines.

**Figure 1 – Allocation Study**



Proposed Contour (Labelled) Cannot Overlap Same Color (Corresponding Contour of Station Considered)

**Figure 2 – Allocation Study – Closeup**



**Figure 3 – TV Channel 6 Study for WLNE-TV at New Bedford, MA**

