

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contours of the third-adjacent W297AF and W291AP, Scranton, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. W297AF and W291AP, Scranton, PA, third 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 (W297AF and W291AP) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contours.

2. This translator's antenna location is located within the 60 dBu contours (based on 73.333 F(50/50)) of W297AF and W291AP, 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 W297AF and W291AP. Included as an attachment (W297AL 106.7 Dunmore, PA Desired to Undesired Ratios Map) is a map showing that the 60 dBu coverage contours of W297AF and W291AP (W291AP could have used a smaller contour, the 60 dBu contour was used as it is the same as the contour used for W297AF) encompasses the proposed antenna site. Much of the 100 dBu contour of the proposed is outside of the 60 dBu of W297AF, the entire contour is shown because the entire area of this site is unpopulated with no dwellings. As the proposed 100 dBu interference contour is 40 dBu greater than the 60 dBu contours of W297AF and W291AP then this contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 100 dBu interference contour of this proposed translator.

3. Given this translator's requested effective radiated power of 65 watts, directional; the predicted 100 dBu interference contour for this proposal would be small. At any HAAT value, the maximum 100 dBu contour distance for this proposal is 0.57 kilometers at 315 degrees from true north and smaller than this in all other directions.

4. This proposed translator site is situated in a very sparsely populated rural tower farm area. W297AL 106.7 Dunmore, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 100 dBu interference contour of this proposal with no dwellings 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 W297AF and W291AP, 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, W297AF and W291AP, Scranton, PA.

By: Kevin Fitzgerald, Director of Engineering