

**June 2011
New FM Channel 224A
Lawrence Park, PA
Waiver of §73.316(b)(1)**

The proposed facility is short-spaced to a Canadian station on Channel 224B at London, Ontario. In order to provide protection to the London station in accordance with the requirements of the US-Canada Working Arrangement, it is necessary to utilize a directional antenna pattern with a maximum-to-minimum ratio of 19 dB. The allocation study included in this application demonstrates that this power limitation is sufficient to provide the necessary protection to London.

First Channel Communications respectfully requests waiver of the 15 dB maximum-to-minimum ratio in §73.316(b)(1) of the Commission's Rules, to permit the use of a directional antenna pattern with a maximum-to-minimum ratio of 19 dB. It should be noted that the proposed facility is not short-spaced to any domestic facility, and that the proposed directional antenna pattern (and the requested waiver) are not being used to protect any domestic short-spaced station under §73.215. Indeed, the US-Canada Working Arrangement (see Section 3.6) expressly contemplates the use of directional antennas with as much as a 20 dB maximum-to-minimum ratio.