Narrative on Raleigh Waiver

Third adjacent KKZ of Orland, IN, protection is proposed as a Raleigh" waiver. Under a policy established by the FCC in the 1991 decision, Educational Information Corporation, 6 FCC Rcd 2207, the FCC indicated that it would be inclined to grant waivers of second or third adjacent channel overlap situations where "the benefit of increased noncommercial educational service so heavily outweighs the potential for interference in very small areas." The FCC explained that overlap of a CP applicant's 60 dBu service contour with the 100 dBu interfering contour of an existing second or third adjacent licensee might mean that the CP applicant's signal would not be available in the very small area around the transmitter of the other licensee, but there would not be complete loss of radio service since the other licensee's signal would still be available in that interference area. As its first exercise of this new policy, the FCC granted a waiver where the overlap area comprised 0.84% of the applicant's service area.

The relevant areas and populations are:

Facility	**Area km2**	**Percentage of Area Difference**	**Population**	**Percentage of Population Difference**
Present WQKO 60 dBu F(50,50)	1696		66,169	
Proposed WQKO 60 dBu F(50,50)	1782		68,753	
Difference	86	100.000%	2,584	100.00 %
Area of interference	0.73	0.849 %	0	0 %

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Polygon Population Report

Population Database: 2000 US Census (SF1)

Total Population: 0
Polygon Area: 0.73 sq. km
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The complete lack of population is confirmed by noting that no red "+" designated population centroids are present in the black area of interference between the interfering contour of WCKZ and the protected contour of the proposed facility.

At well less than 1 percent, these overlap areas and populations are *de minimus* and thus fall within the criteria for a "Raleigh" waiver. The attached maps demonstrate that no prohibited interference occurs within the protected contour of either of these applications.