

TECHNICAL EXHIBIT
APPLICATION FOR MINOR CHANGE
STATION WSCP-FM (FACILITY ID 1047)
PULASKI, NEW YORK

AUGUST 21, 2002

CH 269A 5 KW 109 M

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Table of Contents

	Technical Narrative
Figure 1	Coverage Map
Figure 2	Allocation Study
Figure 3	Sketch of Antenna
Figure 4	Antenna Pattern

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Technical Narrative

This Technical Exhibit supports an application for a minor change modification of construction permit (CP) to station WSCP-FM at Pulaski, New York (Facility ID 1047). The station is currently authorized to operate on channel 269A (101.7 MHz) with a non-directional antenna system (BLH-19880518KA). The effective radiated power (ERP) is 2.5 kilowatts (kW), horizontal and vertical polarization (H&V). The antenna height above average terrain (HAAT) is 111 meters. The transmitter site coordinates are 43-36-32, 75-58-23 (NAD-27).

Station WSCP-FM has a CP (BPH-20011003AAF) to increase the ERP and reduce the antenna HAAT at its current site. Although there is no change in site, there is a small change in the site coordinates due to tower registration. The FCC tower registration number for the existing structure is 1004665 and the coordinates are 43-36-28, 75-58-23 (NAD-27). A non-directional antenna system is specified with an ERP of 5.2 kW (H&V). The antenna HAAT is 100 meters.

Proposed Facilities

Station WSCP-FM proposes to modify its CP by specifying use of its current ERI model 1105-2, 2-bay non-directional antenna system. The center of radiation for the present antenna system is 37.5 meters (123 feet) above ground level (AGL), and 383.4 meters

(1258 feet) above mean sea level (AMSL). Using a 3 second digitized terrain database, the proposed antenna HAAT will be 109 meters. The proposed ERP is 5 kW (H&V). There is no proposed change in transmitter site (43-36-28, 75-58-23), tower registration (1004665), frequency (Ch.269, 101.7 MHz), class (A), antenna pattern (ND), or city of license (Pulaski, NY).

The WSCP-FM transmitter site is about 59 kilometers from the closest point of the Canadian border. It is believed the proposed WSCP-FM operation complies with the US/Canada FM Agreement. If necessary, the FCC is respectfully requested to coordinate the proposed WSCP-FM operation with Canada.

The WSCP-FM site is more than 2600 kilometers from the closest point of the Mexican border. The closest FCC monitoring station is at Canandaigua, New York, approximately 130 kilometers to the southwest. The closest point of the National Radio Quiet Zone (VA/WV) is more than 500 kilometers to the southwest. The closest point of the Table Mountain Radio Quiet Zone (CO) is more than 2400 kilometers to the west. The closest radio astronomy site operating on TV channel 37 is at Hancock, New Hampshire, approximately 331 kilometers to the east. These separations are considered sufficient to not be a concern for coordination purposes.

Predicted Coverage

Figure 1 is a map showing the predicted 70 dBu (3.16 mV/m) and 60 dBu (1 mV/m) contours for the proposed WSCP-FM operation. The map shows the Pulaski city limits. As shown, the predicted 70 dBu contour encompasses all of the Pulaski limits.

Allocation Study

Figure 2 contains a tabulation of actual and required separation distances with respect to other pertinent stations as specified in Section 73.207(b) of the Commission's Rules. The FCC's FM database was used as the basis for the separation study. The study

indicates that there is one short-spacing. It is with station CFRC-FM on channel 270A at Kingston, Ontario, Canada. Figure 2 includes a map showing the predicted interfering [48 dBu f(50,10)] and protected [54 dBu f(50,50)] contours for the proposed WSCP-FM operation (5 kW-ND, 109 m) and the assumed maximum Class A operation for CFRC-FM (6 kW-ND, 100 m). Using a desired-to-undesired (D/U) interference ratio of 6 dB as specified in the US/Canada FM agreement, the actual area of interference has been calculated. As shown on Figure 2 no calculated interference would be caused to CFRC-FM service in Canada. It is believed the proposed WSCP-FM operation complies with the US/Canada FM agreement. If necessary, the FCC is requested to forward the proposed WSCP-FM operation for Canadian coordination and concurrence.

Radiofrequency Electromagnetic Field Exposure

The proposed WSCP-FM facility was evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The present WSCP-FM antenna is a 2-bay full wave spaced ERI system. The FM antenna center of radiation is located 37.5 meters above ground level (see Figure 3). A relative field value of 0.53 is assumed for the FM antenna's downward radiation (see Figure 4). Using the assumed relative field value along with the combined ERP of 10 kW (5 kW horizontal polarization & 5 kW vertical polarization), the calculated power density at a point 2 meters above ground level is approximately 0.0745 mW/cm² or 37% of the FCC's recommended limit of 0.2 mW/cm² for FM channels, applicable to general population/uncontrolled exposure areas. The calculated power density is less than 8% of the FCC's limit for a "controlled" environment.

No other known AM, FM or TV stations are located at the WSCP-FM site. Access to the transmission system will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RF protective clothing and/or RF exposure monitors or scheduling work when the station is at reduced

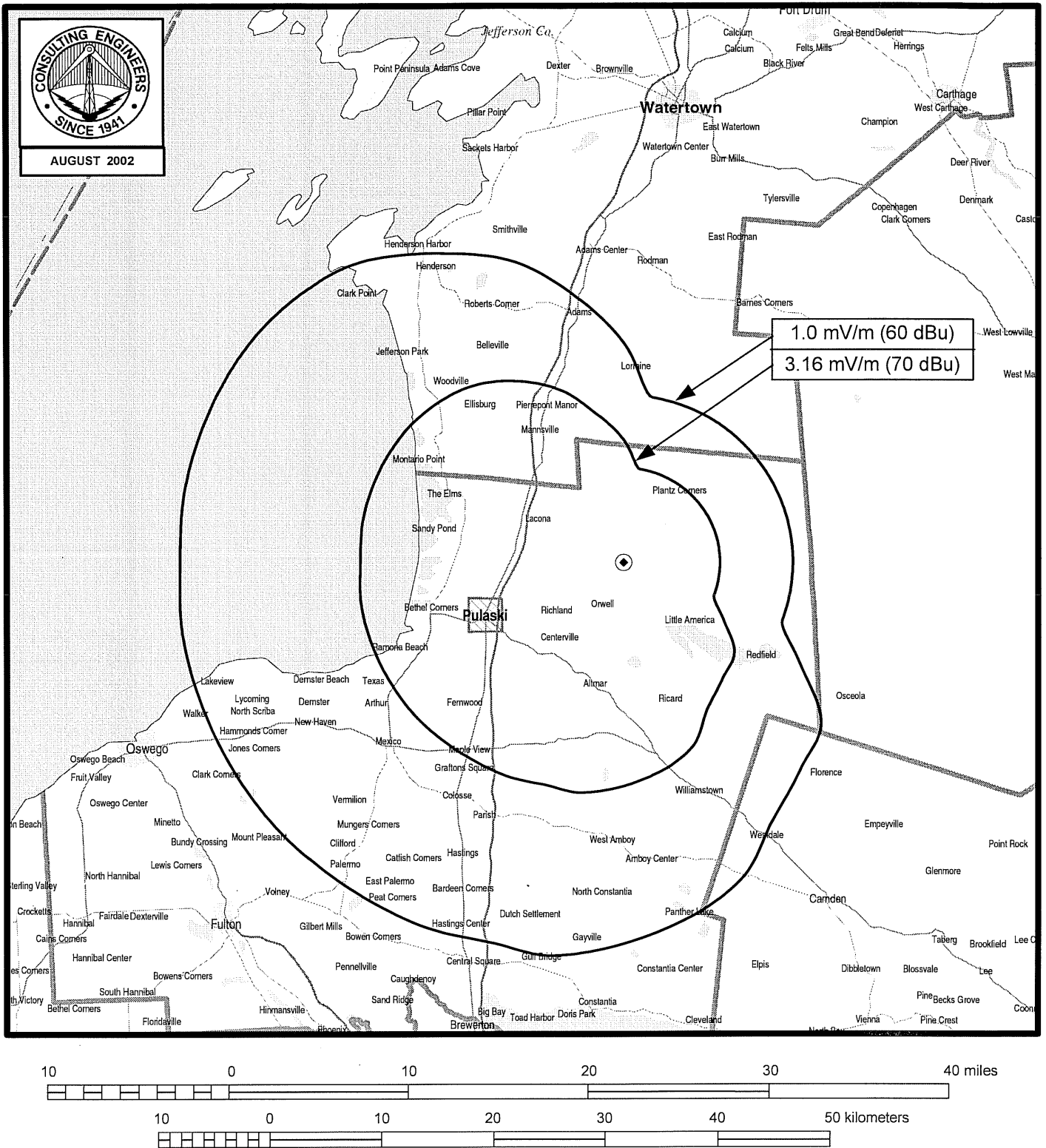
power or shut down. The proposed WSCP-FM operation appears to be otherwise categorically excluded from environmental processing.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

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August 21, 2002



PREDICTED COVERAGE CONTOURS

STATION WSCP-FM
PULASKI, NEW YORK
CH 269A 5 KW 109 M

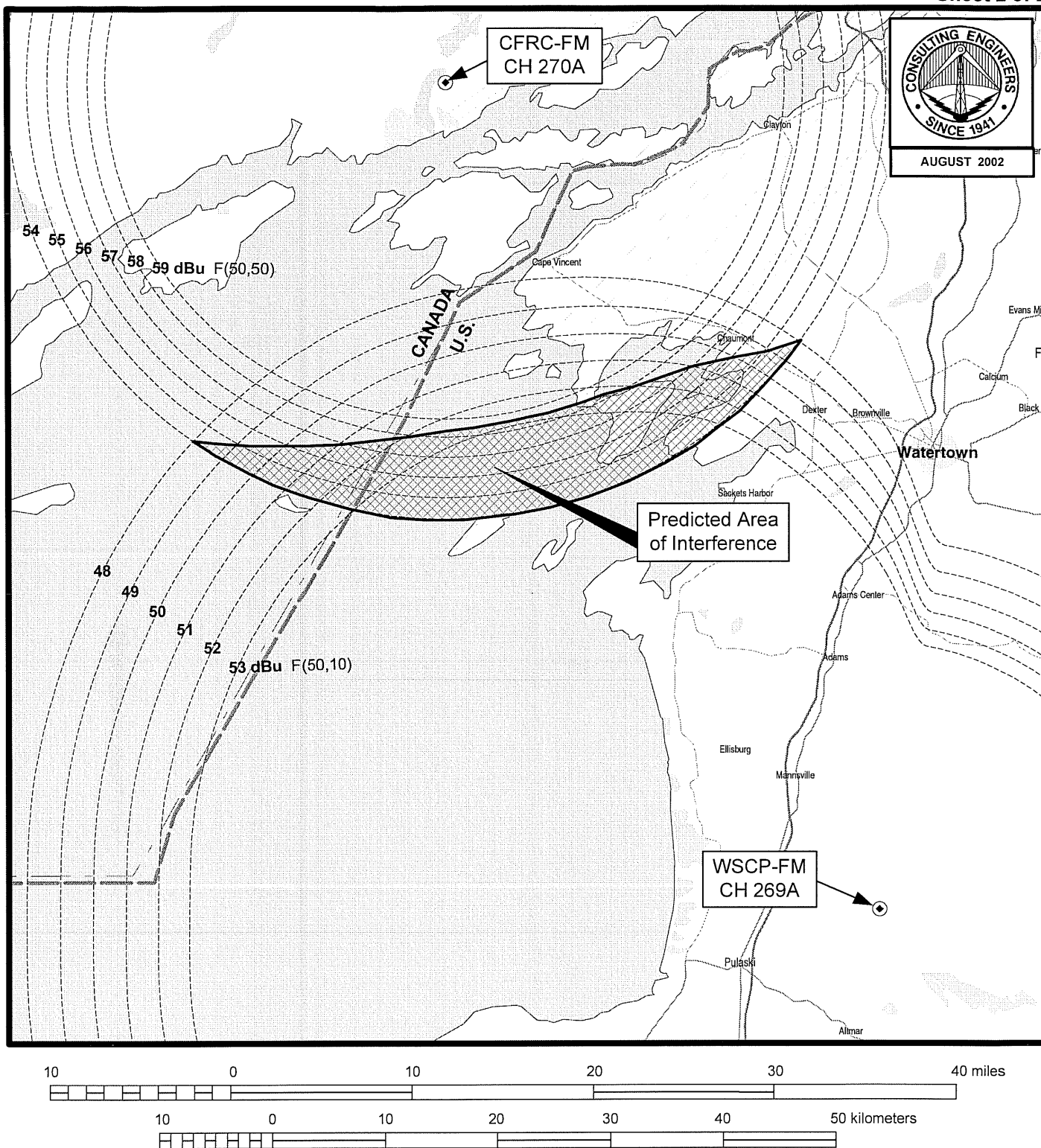
du Treil, Lundin & Rackley, Inc. Sarasota, Florida

CDBS FM SEPARATION STUDY

Job Title: WSCP-FM, Pulaski, New York
Channel: 269 A

Separation Buffer: 65 km
Coordinates: 43-36-28 075-58-23

<u>Call</u> <u>FID</u>	<u>City</u> <u>St</u> <u>Status</u>	<u>File</u> <u>Num</u>	<u>Chan.</u> <u>Freq.</u>	<u>ERP-kW</u> <u>HAAT-m</u>	<u>DA</u> <u>ID</u>	<u>Latitude</u> <u>Longitude</u>	<u>73.</u> <u>215</u>	<u>Bear.</u> <u>deg.</u>	<u>Dist.</u> <u>(km)</u>	<u>FCC Req.</u> <u>(km)</u>
WJNY 53729	WATERTOWN NY LIC C	BLED 19860904KC	215C3 90.9	7.10 137	ND	43-51-44 075-43-40	N	34.8	34.49	12.0 Clear
WBRV-FM 65411	BOONVILLE NY LIC C	BMLH 19920618KB	267A 101.3	5.50 104	ND	43-26-53 075-20-48	N	109.2	53.66	31.0 Clear
WXHC 20318	HOMER NY LIC C	BLH 19940912KB	268A 101.5	1.30 151	ND	42-41-12 076-11-54	N	190.2	103.96	72.0 Clear
WRCD 15821	CANTON NY LIC C	BLH 19960520KA	268A 101.5	2.40 111	ND	44-32-01 075-05-50	N	33.9	124.52	72.0 Clear
WRCD 15821	CANTON NY CP C	BPH 19990504IB	268A 101.5	5.50 104	ND	44-32-10 075-05-46	N	33.9	124.80	72.0 Clear
WRCD 15821	CANTON NY CP C	BPH 20001024ABH	268C2 101.5	50.0 138	DA 36848	44-35-56 074-46-24	N	40.6	146.13	106.0 Clear
WFLK 40804	GENEVA NY LIC C	BMLH 19960118KB	269A 101.7	5.40 38	ND	42-51-34 077-00-29	N	225.6	118.24	115.0 Close
WLTB 71400	JOHNSON NY CP C	CIT BPH 20000411ACN	269A 101.7	1.70 186	ND	42-03-45 075-56-37	N	179.2	171.68	115.0 Clear
WLTB 71400	JOHNSON NY LIC C	CIT BLH 20010529ABK	269A 101.7	1.25 213	ND	42-03-45 075-56-37	N	179.2	171.68	115.0 Clear
Vacant 95507	FORT-COULON QU C		269B 101.7			45-45-41 076-35-01	N	348.8	244.17	210.0 Clear
CFRC-FM 95063	KINGSTON ON C		270A 101.9	3.00 81	ND	44-16-11 076-27-15	N	332.5	83.08 -14.92	98.0 Short
(Complies with US/Canada FM agreement, see sheet 2 of Figure 2)										
WJIV 73138	CHERRY VALL NY LIC C	BLH 19941219KF	270B 101.9	11.50 312	ND	42-47-36 074-41-41	Y	130.7	137.77	113.0 Clear
WZUN 60253	PHOENIX NY LIC C	BLH 19990819KC	271A 102.1	6.00 81	ND	43-06-04 076-16-58	N	204.1	61.64	31.0 Clear
Vacant 94684	BELLEVILLE ON C		272B 102.3			44-10-00 077-22-48	N	299.3	128.99	69.0 Clear



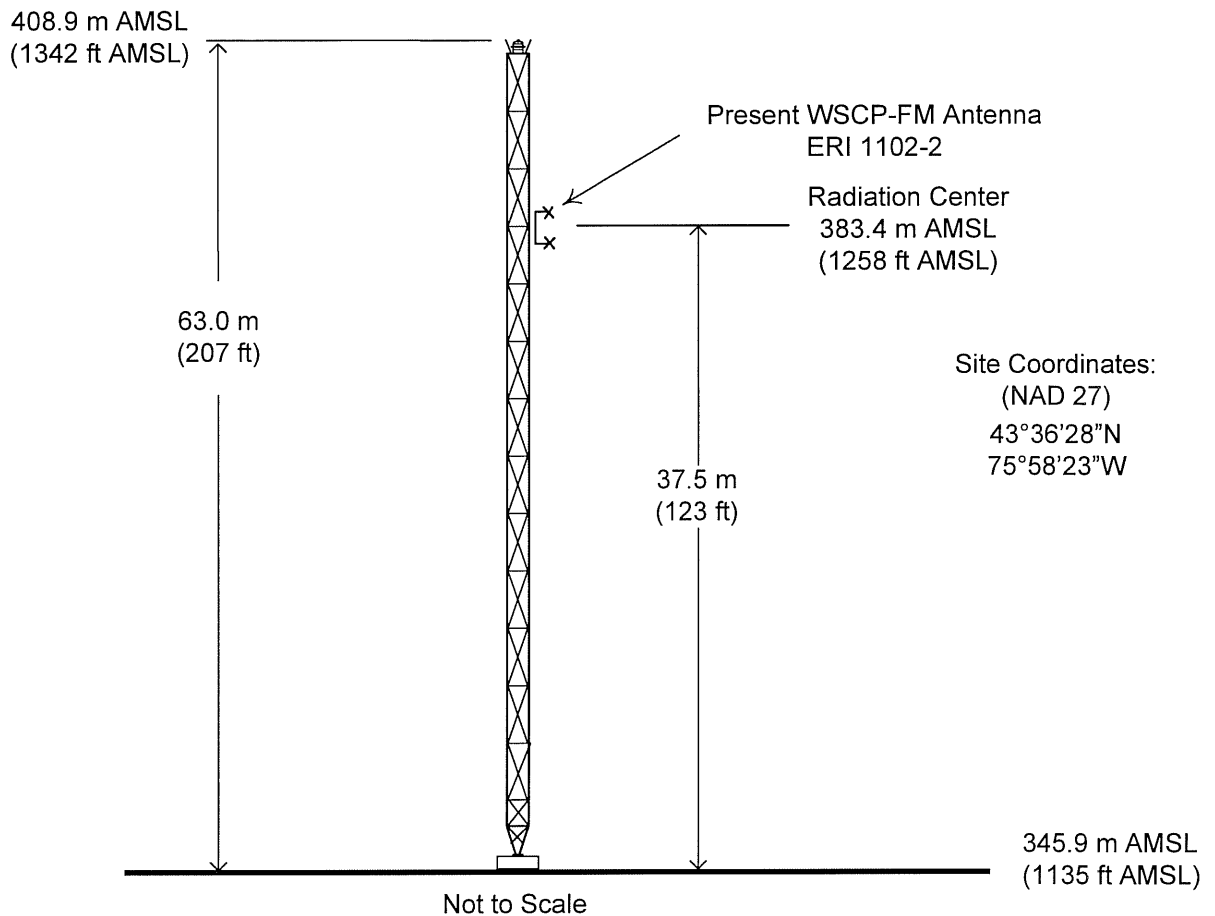
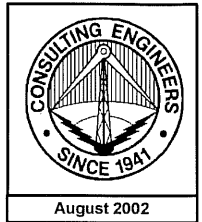
PREDICTED CANADIAN INTERFERENCE SHOWING

STATION WSCP-FM
PULASKI, NEW YORK
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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3

FCC Tower ID: 1004665



PROPOSED ANTENNA AND SUPPORTING STRUCTURE

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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

