

EXHIBIT E-19

CHANNEL 220A

Introduction: Engineering Exhibit E -19 will clarify what steps have been taken to avoid any significant Channel 6 interference.

Procedure: 47 CFR 73.599, Figure 1 shows the FM to TV-6 (U/D) for “Just Perceptible” interference. Since the applicant chooses to use vertical only polarity, distances to the appropriate FM field strength contours were determined by using the formula listed in section 73.525(e)(4)(ii), $(H + V/A)$ is no greater than P . Substituting the appropriate values, $(4 \text{ kW} / 40 = 0.100 \text{ kW})$. The equivalent permitted horizontal power is 100 watts since the area is outside a city with a population of 50,000 persons.

Exhibits: In the Exhibit below, TV-6 contour arcs are shown for the 51 dBu to 56 dBu (F50, 50) contours of WLNS TV-6. In the center of the exhibit, the proposed station's (F50, 10) interfering contours are drawn. For simplicity an only the 71.5 dBu (F50, 10) contour was drawn, showing the predicted interference area. The actual interfering contours range between 73.2 dBu and 71.5 dBu, so the interference area will be slightly smaller than shown. A population spray overlay confirms the population count based on latest census data.

Conclusion: This proposal qualifies for an exemption under 47 CFR 73.525 (c) because the population based on the centroid retrieval method is only 1450. The Commission may properly grant this application since it is well below the statutory limit of 3000.

