

#### SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu contour of the second-adjacent WISX, Philadelphia, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WISX, Philadelphia, PA second adjacent channel facility to this translator proposal, is protected from interference within its 54 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 contour (WISX) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.
2. This translator's antenna location is located within the 54 dBu contour (based on 73.333 F(50/50)) of WISX, Philadelphia, 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 WISX. Included as an attachment (W293BW Allentown Desired to Undesired) is a map showing that the 56.6 dBu coverage contour of WISX encompasses the proposed antenna site along with the entire proposed 96.6 dBu interference contour. As the proposed 96.6 dBu interference contour is 40 dBu greater than the 56.6 dBu contour of WISX then this contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this interference contour for this proposed translator.
3. Given this translator's requested effective radiated power of 10 watts, Directional; the predicted 96.6 dBu interference contour for this

proposal would be small. At any HAAT value, the maximum 96.6 dBu contour distance for this proposal is 0.328 kilometers.

4. This proposed translator antenna is to be situated 111 meters above ground on a very tall TV tower. Enclosed as W293BW Allentown Vertical Study, is a study showing the Vertical Pattern (downward radiation) of the proposed Nicom BKG77-2 Half-wave Spaced Antenna. Based on this study, no part of the 96.6 dBu contour ever reaches the ground level. As such, no interference would be caused at any location other than atop the actual TV tower. 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 WISX, Philadelphia, 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 facility, WISX, Philadelphia, PA.

By: Kevin Fitzgerald, Chief Engineer