

## **Exhibit 15**

### **Foothills Public Radio, Inc.**

#### **Form 340 Application for New NCE FM at North Salem, New York**

**Channel 211 (90.1 mHz.) / 0.100 kW Directional Antenna / -31 meters HAAT**

### **ENGINEERING STATEMENT**

#### **Section 73.509 Allocation Study**

The proposed facility was studied with respect to all possible interferees and interferors. Figures 1 and 2 depict the applicable service and interfering contours of all pertinent stations, permits, and applications. Contours which are not permitted to overlap under 73.509 are depicted in same colors. For example, the 60 dBu F(50,50) service contour from the proposed new NCE FM and the 40 dBu F(50,10) interfering contour of co-channel WXHD are both depicted in green. As illustrated, no prohibited overlap will be created by the proposed facility. The RadioSoft ComStudy program was employed to create the allocation study and map.

#### **TV Channel 6 Protection**

The only full power TV or Class A LPTV stations on Channel 6 within 196 km. of the proposed Channel 211 NCE FM are WEDY-DT at New Haven, CT and WRGB at Schenectady, NY. WEDY-DT is 57.3 km distant, and WRGB is 149.1 km. distant, and both are affected stations under 73.525. WNYZ-LP at New York, NY is 71.07 km distant, as well.

As shown in Figure 3, the interfering contour from the proposed new NCE FM facility falls outside the 47 dBu service contour of any of these three TV Channel 6 facilities. Hence, the interfering NCE FM contour is 67.3 dBu F(50,10). This is 47 dBu + 20.3 dB (from 73.599 Figure 1.)

As a precaution, though not required to protect any TV Channel 6 station, the proposed facility will employ vertical-only ERP and the interfering contour is located entirely outside of any city with a population of 50,000 or more. Therefore, the formula in 73.558(c)(4)(i) was employed to reduce the proposed NCE ERP by a factor of 40 for purposes of determining the population and area affected by the interference (e.g. study was performed at 2.5 Watts.)

## Environmental Considerations

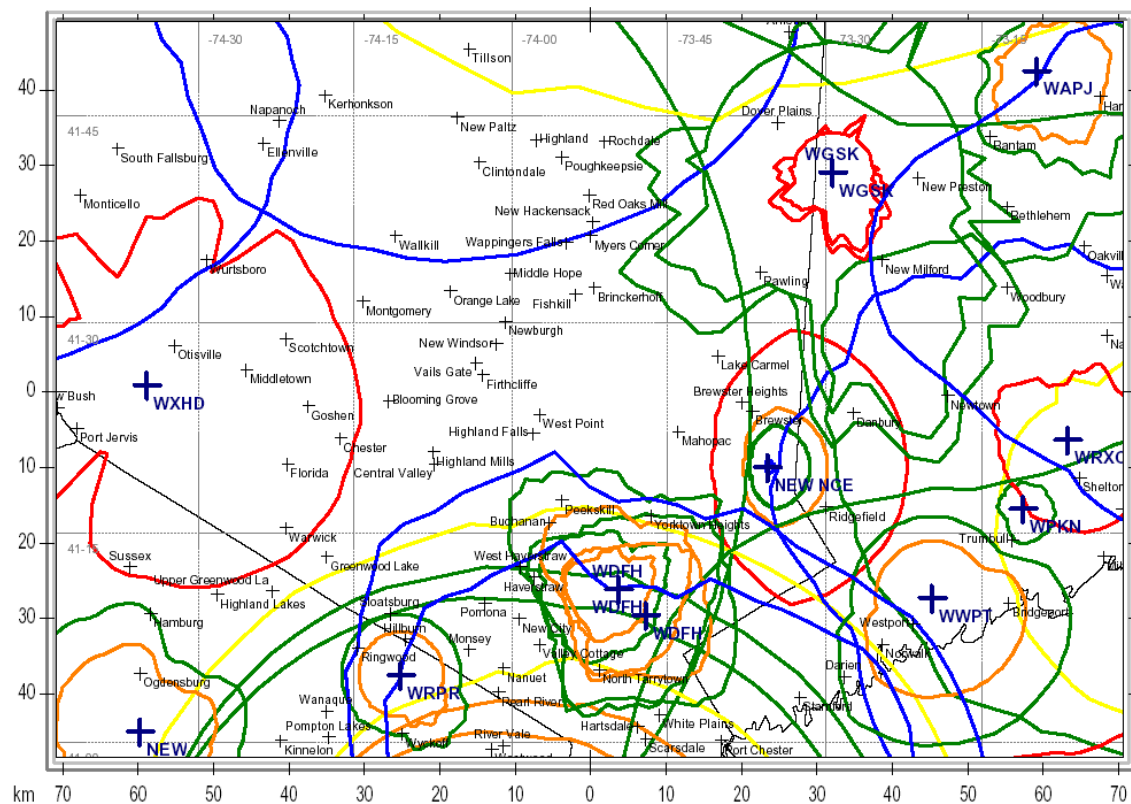
The applicant proposes to mount its antenna on an existing wooden telephone pole with the center of radiation 10 meters above ground level without increasing the overall height. Therefore, this proposal will have no environmental impact other than RFR exposure.

Compliance with RFR exposure rules was established using the RF worksheets in Worksheet #7 of Form 340 Instructions.

The pole is enclosed within a fenced in area that is inaccessible to the general public. The applicant will reduce power or cease operation as necessary in cooperation with other users of the tower to protect persons having access to the site, tower, or antenna from RFR exposure in excess of FCC guidelines.

### **Figure 1 – Allocation Study**

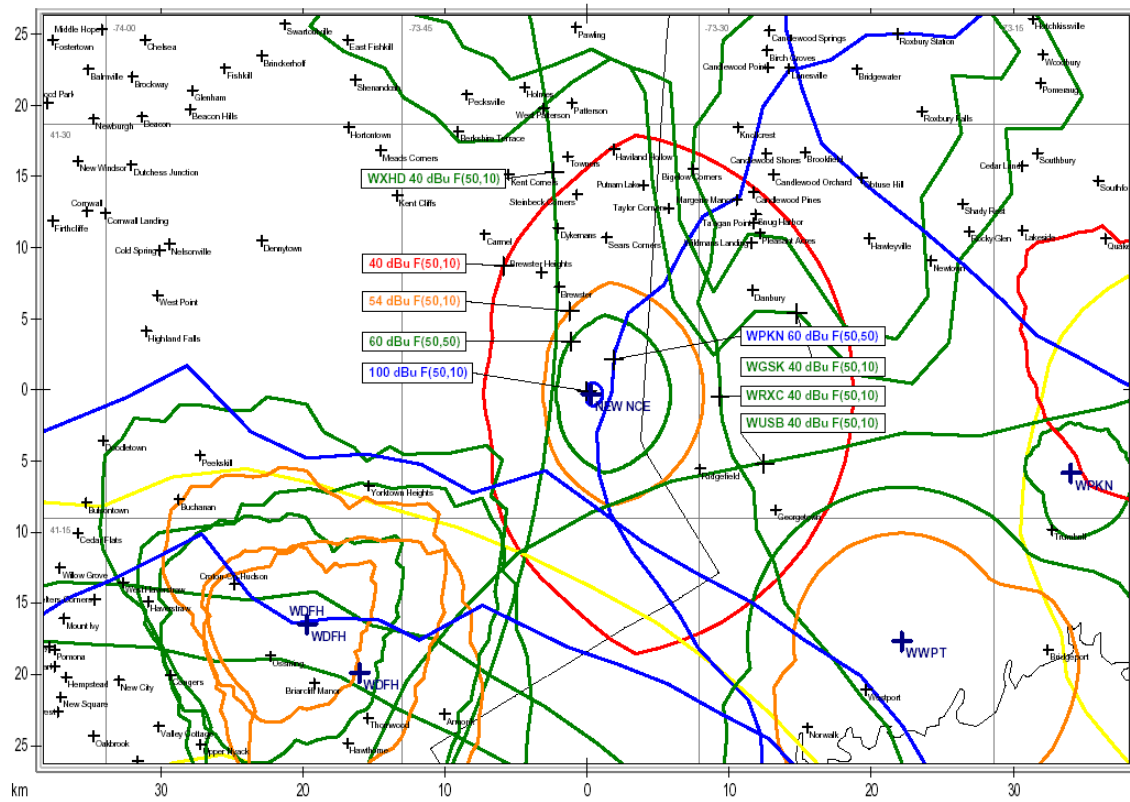
Proposed North Salem, NY Channel 211 NCE Allocation Study



Proposed Contour Cannot Overlap Same Color (Corresponding Color of Station Considered)

**Figure 2 – Closeup Allocation Study for WXHD, WPKN, WGSK and WRXC**

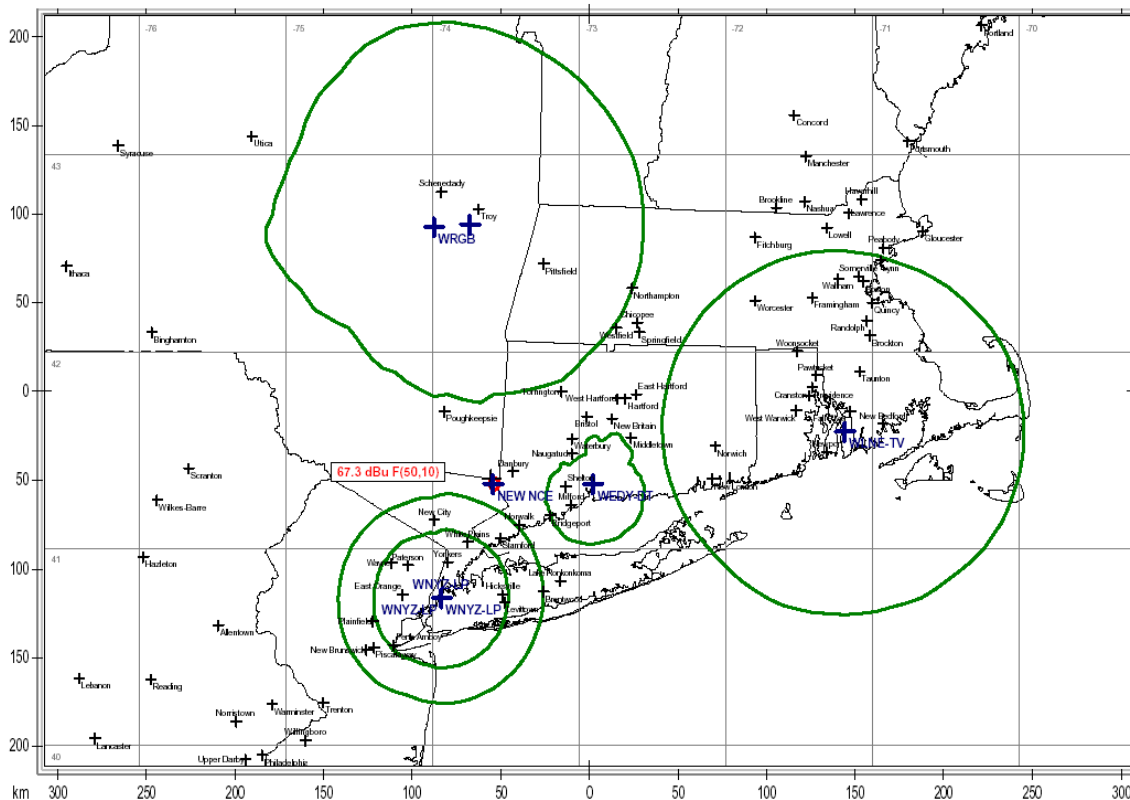
Proposed North Salem, NY Channel 211 NCE Allocation Study



Proposed Contour (Labelled) Cannot Overlap Same Color (Corresponding Color of Station Considered)

**Figure 3 – TV Channel 6 Study**

Proposed North Salem, NY Channel 211 NCE Channel 6 Study



Channel 6 TV 47 dBu F(50,50) Service Contours Shown In Green