Exhibit 17 – Statement D
Application for Construction Permit
WZHF Capitol Heights, Maryland (FCC Facility ID 73306)
1390 kHz 9 kW – D 1 kW – N DA-2
Prepared November 2013 for
Way Broadcasting Licensee, LLC

Daytime Allocation and Interference Considerations

The locations of the protected and interfering contours of the licensed and proposed WZHF facility and pertinent nearby stations operating on the same channel, and within three channels above and below the proposed frequency of use, were predicted using the same methodology and FCC Figure M-3 (R-3) conductivity data in conjunction with available measured conductivity data (provided in the Appendices of **Exhibit 13**). The results of these studies are shown in the attached Figures of **Exhibit 17**.

In particular, the locations of the pertinent contours for *co-channel* stations are shown on **Exhibit 17 – Figure 13**. As depicted, no prohibited daytime groundwave co-channel contour overlap will be caused under this proposal. Contour overlap is predicted to occur between the licensed and proposed WZHF daytime operation and those of co-channel Stations:

- WKLP in Keyser, West Virginia (Facility ID 62340), and
- WLAN in Lancaster, Pennsylvania (Facility ID 52260).

However, as shown in the attached **Exhibit 17 – Figures 13A, B, C, D** and **E**, the extent of existing contour overlap is reduced under this proposal. Specifically, **Exhibit 17 - Figures 13 A** and **B** show a detailed view of the 0.025 mV/m and 0.5 mV/m contours for the licensed and proposed WZHF facilities with respect to those of co-channel WKLP.

- As shown **Exhibit 17 - Figures 13A** and **B**, the licensed WKLP 0.025 mV/m contour *does not overlap* the licensed or proposed 0.5 mV/m contours of WZHF.
- As shown on **Exhibit 17 - Figure 13A**, the overlap between the *proposed* WZHF 0.025 mV/m contour and the WKLP 0.5 mV/m contour is calculated to be approximately 1767 square kilometers (containing 55,299 persons).
- As shown on **Exhibit 17 - Figure 13B**, the overlap between the *licensed* WZHF 0.025 mV/m contour and the WKLP 0.5 mV/m contour is calculated to be approximately 2090 square kilometers (containing 61,892 persons).

Therefore, the overlap *caused* by the proposed WZHF facility to WKLP (i.e.: the overlap between WZHF 0.025 mV/m contour with the WKLP 0.5 mV/m contour) is demonstrated to be reduced from that presently authorized (by approximately 323 square kilometers and 6593 persons) by the facilities proposed in this application. Further, there is no received prohibited contour overlap to WZHF (as licensed or proposed) from WKLP.

Similarly, **Exhibit 17 - Figures 13C, D,** and **E** shows a detailed view of the 0.025 mV/m and 0.5 mV/m contours for the licensed and proposed WZHF facilities with respect to those same contours for co-channel WLAN.

- As shown on **Exhibit 17 - Figure 13C**, the *received* land area overlap from the WLAN 0.025 mV/m contour to the proposed WZHF 0.5 mV/m contour is calculated to be approximately 205 square kilometers, within which resides 78,404 persons.

- As shown on **Exhibit 17 - Figure 13D**, the *received* land area overlap between WLAN 0.025 mV/m contour and the licensed WZHF 0.5 mV/m contour is calculated to be approximately 252 square kilometers, within which 112,137 persons reside.

- As shown in the close-up view of **Exhibit 17 - Figure 13E**, the licensed and proposed WZHF 0.025 mV/m contours *do not overlap* the WLAN 0.5 mV/m contour.

Therefore, the *received* overlap between the proposed WZHF 0.5 mV/m contour with the predicted WLAN 0.025 mV/m contour is demonstrated to be reduced from that presently authorized (by approximately 47 square kilometers and 33,733 persons) by the facilities proposed in this application. Additionally, no overlap is predicted to be caused to WLAN by either the licensed or proposed facilities of WZHF.

The first adjacent case is shown in an overview format on **Exhibit 17 - Figure 14**. As shown, no prohibited daytime groundwave first-adjacent channel contour overlap will be caused under this proposal with the exception of two special cases - contour overlap is predicted to occur between the licensed and proposed WZHF daytime operation and those of first-adjacent channel Stations:

- WWIN in Baltimore, Maryland (Facility ID 54709), and
- WPCE in Portsmouth, Virginia (Facility ID 72813).

However, as shown in the attached **Exhibit 17 – Figures 14A, B, C, D** and **E**, the extent of existing contour overlap is reduced under this application proposal. Specifically, **Exhibit 17 - Figures 14 A, B, C** and D shows a detailed view of the 0.25 mV/m and 0.5 mV/m contours for the licensed and proposed WZHF facilities with respect to those of first-adjacent channel WWIN, while **Exhibit 17 - Figure 14E** addresses the first-adjacent WPCE overlap matter.

First, regarding WWIN:

- As shown **Exhibit 17 - Figure 14A**, the overlap between the *proposed* WZHF 0.5 mV/m contour and the WWIN 0.25 mV/m contour is calculated to be approximately 475.5 square kilometers, within which reside 295,750 persons.
- As shown on **Exhibit 17 - Figure 14B**, the overlap between the *licensed* WZHF 0.5 mV/m contour and the WWIN 0.25 mV/m contour is calculated to be approximately 681.75 square kilometers, within which 352,395 persons reside.

Therefore, the *received* contour overlap to WZHF from WWIN (the overlap between WZHF 0.5 mV/m contour with the WWIN 0.25 mV/m contour) is demonstrated to be reduced from that presently authorized (by approximately 206.25 square kilometers and 56,645 persons) by the facilities proposed in this application.

- As shown **Exhibit 17 - Figure 14C**, the overlap caused between the *proposed* WZHF 0.25 mV/m contour and the WWIN 0.5 mV/m contour is calculated to be approximately 405.75 square kilometers, within which 243,375 persons are estimated to reside.
- As shown on **Exhibit 17 - Figure 14D**, the overlap caused between the *licensed* WZHF 0.25 mV/m contour and the WWIN 0.5 mV/m contour is calculated to be approximately 1181 square kilometers, within which 557,567 persons reside.

Therefore, the predicted contour overlap caused to WWIN from WZHF (i.e.: the overlap between WZHF 0.25 mV/m contour with the WWIN 0.5 mV/m contour) is demonstrated to be reduced from that presently authorized (by approximately 775.25 square kilometers and 314,192 persons) by the facilities proposed in this application.

Regarding WPCE, due to the long salt water path across the Chesapeake Bay, contour overlap exists between the existing WZHF and WPCE facilities, however under this proposal, it is reduced. As shown **Exhibit 17 - Figure 14E**, the land area overlap between the *licensed* WZHF 0.25 mV/m contour and the WPCE 0.5 mV/m contour is calculated to be approximately 19.25 square kilometers (within which reside 255 persons), while the amount predicted to occur under this application proposal becomes approximately 13.75 square kilometers, within which no persons reside. Thus this application provides a net 5.5 square kilometer (and 255 person) reduction on prohibited overlap between these two facilities.

The second adjacent case is illustrated in **Exhibit 17 - Figure 15** while the third adjacent case is illustrated in **Exhibit 17 - Figure 16**. As shown, there are no instances of predicted, existing, or proposed prohibited contour overlap between the licensed and proposed WZHF operation for second and third adjacent channel stations.

Based upon the preceding, it can be shown that no new prohibited contour overlaps are created under this proposal and that existing contour overlaps are reduced by 1357 square kilometers and 411,418 persons.

Other Interference Considerations

This site proposed in this application is located over 470 km from the Canadian border and over 2300 km from the Mexican border. It is believed that this proposal will not have a material impact on any facility operating in Canada, Mexico or any other country. No prohibited contour overlap occurs with respect to stations in either Mexico or Canada.

The proposed WZHF operation would not have an adverse impact on any known and identified "quiet zones" in that the nearest facility, the Green Bank NRAO Quite Zone, is located more than 145 km distant.

The nearest FCC Monitoring Station is located at Laurel Maryland, 33.48 km from the proposed site. Section 73.1030(c)(3) suggests that all stations within 80 km with 25 kW or more of average ERP toward the monitoring station seek advance coordination with the Commission. An examination of the proposed WZHF daytime standard pattern (which is higher powered than the WZHF nighttime proposal) shows that a relative field of approximately 266 mV/m is developed in the azimuth toward the Laurel Monitoring Station (11.12°T). That field level is approximately equivalent to 0.8 kW, which falls below the suggested coordination level. Further, an estimation of the field at the monitoring station developed by the proposed WZHF operation, considering measured and theoretical soil conductivity, is approximately 0.79 mV/m, which is well below the 10 mV/m threshold level set forth in Section 73.1030(c)(2) of the Commission's Rules.

Other than the proposed diplex host, WJFK, there are no other AM broadcast stations located within 3.2 km of the proposed site according to information contained within the Commission's engineering database. As discussed in **Exhibit 13**, WUST has also proposed the use of this site in a pending application, making this a triplexed AM facility when all three stations are in operation at this site. Accordingly, appropriate measures will be taken with respect to all facilities currently located or proposed to be located at this site to ensure that no undesired interaction or unacceptable levels of spurious emissions will occur as a result of the proposed multi-user operation.

Such measures will include the installation and adjustment of filters and traps and the observation of possible intermodulation and harmonic products on suitable receiving equipment. A firm agreement will be reached between all parties fixing responsibility for the installation and maintenance of suitable filtering and suppression equipment to prevent undesired interaction and intermodulation interference.

According to information contained within the Commission's engineering database, the main and auxiliary FM facilities of Station WPGC-FM, Morningside, MD, are located with 1.42 km of this site; however, given the vast difference in frequency, no undesired impact is expected to occur. Based on a similar database search, there are no TV broadcast stations located within 10 km of this site. No airports or established helicopter landing facilities are located within 5 km of the proposed site.

Based upon the above, it is believed that the proposed relocation of WZHF, as described herein, complies with existing FCC rules and policies regarding daytime allocation matters and general interference considerations.