

Exhibit 28

Contour Protection Study

A review of allotments and assignments on Channel 244, on the three immediately upper adjacent, the three immediately lower adjacent and on IF channels showed that the proposed minor change increasing the power of WDCD-FM to 6.0 kW ERP would not meet the requirements of 47 C.F.R. §73.207. The channel study is as follows:

FM Study for: WDCDFM FCC Database Date: 2/24/2001 42-52-44

Location: CLIFTON PARK, NY Channel Class: A 73-51-47

[*] by HAAT indicates calculated as missing in database.

[^] by HAAT indicates value taken from 1999 VAX file.

Call Status	City, State Proponent	Chan /Class File Number	Freq	kW HAAT	Latitude Longitude	Dist. Azim.	Required Clear (km)	

>>>>>>>> Study For Channel 244 96.7 MHz <<<<<<<<<								
WTSAFM LIC	BRATTLEBORO, VT Facility No. 67765	244 A BLH-910821KF	96.7	5.20 41^	42-53-21 72-36-47	102.1 88.9	115 -12.9 +10.1	SHORT CLOSE
							Use of 73.215 for short spacing requires: 92	
WOUR LIC	UTICA, NY Facility No. 4681	245 B BLH-900501KC	96.9	19.5 241^	43-08-46 75-10-40	111.22 285.9	113 -1.78 +15.2	SHORT CLEAR
							Use of 73.215 for short spacing requires: 96	
WAJZ LIC	VOORHEESVILLE, NY Facility No. 35537	242 A BMLH-930820KA	96.3	.500 341^	42-37-01 74-00-46	31.58 202.9	31 +0.58	CLOSE
ALLOC VAC	SPECULATOR, NY Facility No. 94786	243 A Docket-98-12	96.5	0	43-29-50 74-21-44	79.8 329.6	72 +7.8	CLOSE
WMYY LIC	SCHOHARIE, NY Facility No. 8677	247 A BLH-901204KE	97.3	.810 270^	42-37-51 74-16-01	43.0 230.3	31 +12.0	CLOSE
WTICFM LIC	HARTFORD, CT Facility No. 66465	243 B BMLH-890803KA	96.5	20.0 247^	41-46-27 72-48-20	150.5 144.3	113 +37.5	CLEAR

While co-channel station WTSA-FM in Brattlesboro, VT (244A) and first-adjacent-channel station WOUR in Utica, NY (245B) do not meet the spacing requirements of §73.207, they do meet the requirements of §73.215 for contour protection. A contour protection study was made to demonstrate that no prohibited contour overlap will be created as a result of the proposed minor change power increase by WDCD-FM.

In the case of WTSA-FM, there is significant terrain between that station and WDCD-FM such that the 40 dBu F(50,10) (interfering) contour distances are in actuality much shorter than indicated by §73.333 Figure 1a. To determine these contour distances, the Point-to-Point Contour Prediction Model contained in FCC 98-117 was used as the best-available method. Exhibits 28-1

Exhibit 28
Contour Protection Study
Page 2

through 28-23 show terrain profile and F(50,10) field strength graphs for WTSA-FM from 210 degrees through 320 degrees True. Exhibits 28-24 through 28-28 show terrain profile and F(50,10) field strength graphs for the proposed WDCD-FM facility from 80 degrees through 100 degrees True. For the purposes of this study, WTSA-FM was assumed to be operating from its licensed site with 6 kW ERP at an antenna height above average terrain (HAAT) of 100 meters. The 60 dBu (protected) contours of each station were calculated using §73.333 Figure 1. Antenna height above average terrain on each radial was obtained from the FCC's online terrain calculator at <http://www.fcc.gov/mmb/asd/bickel/haat.html#START>.

In the case of WOUR, §73.333 Figures 1 and 1a respectively were used to predict the distances to the protected and interfering contours of WOUR and WDCD-FM. For the purposes of this study, WOUR was assumed to be operating with 50 kW ERP at a HAAT of 150 meters. Antenna height above average terrain on each radial was obtained from the FCC's online terrain calculator at <http://www.fcc.gov/mmb/asd/bickel/haat.html#START>.

Exhibit 28-29 contains a contour protection map showing arcs of the protected and interfering contours of WDCD-FM, WTSA-FM and WOUR as determined in accordance with the above methods. The map clearly shows no prohibited overlap and that all three stations will operate fully within the provisions of §73.215.