

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contour of the second-adjacent W235AA, Wilkes-Barre, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. W235AA, Wilkes-Barre, PA, second adjacent channel facility to this translator proposal, is protected from interference within its 60 dBu contour 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 (W235AA) 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 60 dBu contour (based on 73.333 F(50/50)) of W235AA, Wilkes-Barre, PA. Enclosed as an attachment is W237BI 95.3 Mountain Top Desired to Undesired showing the pertinent interference contour to be used for this analysis. As the proposed 126 dBu interference contour is 40 dBu greater than the 86 dBu contour of W235AA then this contour is an appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 126 dBu interference contour of this proposed translator.
3. Given this translator's requested effective radiated power of 77 watts, Directional; the predicted 126 dBu interference contour for this proposal would be very small. At any HAAT value, the 126 dBu contour distance for this proposal is 0.03 kilometers towards 220 degrees and smaller than this in all other directions.
4. This proposed translator site is situated in a very sparsely populated rural hilltop tower farm area. W237BI 95.3 Mountain Top 74.1204(d) Geo

Map, an attachment to this exhibit, clearly shows how rural the area is within the 126 dBu interference contour of this proposal with no dwellings at all located within this contour. This map overstates the 126 dBu contour as it is drawn as if a non-directional antenna were employed operating at 77 watts ERP at the same location as the proposed directional antenna. 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 W235AA, Wilkes-Barre, 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, W235AA, Wilkes-Barre, PA.

By: Kevin Fitzgerald, Chief Engineer