

SECTION 74.1204(d) STUDY

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

In support thereof this Applicant states the following:

1. WQRW, Wellsville, NY, 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 contours (WQRW) 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 WQRW, Wellsville, NY. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WQRW. Included as an attachment (W226AP Hornell Arkport Desired to Undesired) is a map showing that the 62.8 dBu coverage contour of WQRW encompasses the proposed antenna site along with the entire proposed 102.8 dBu interference contour. As the proposed 102.8 dBu interference contour is 40 dBu greater than the 62.8 dBu contour of WQRW then this contour is the appropriate interference contours 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 250 watts, Directional; the predicted 102.8 dBu interference contour for this proposal would be small. At any HAAT value, the 102.8 dBu contour

distance for this proposal is 0.803 kilometers (803 meters) at 170 degrees from true north and smaller than this in all other directions.

4. This proposed translator is situated in a sparsely populated hilltop area 17 meters above ground on a radio communications tower. The area of potential interference is within 803 meters at most from the antenna, and less because of the directional pattern of the proposed antenna. Based on the proposed antenna pattern, the entire area of interference is in a rural, unpopulated area. A "Google Maps" geographic satellite map has been provided as an attachment to show this unpopulated area within the 102.8 dBu contour of this proposal. 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 WQRW, Wellsville, NY 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 facilities, WQRW, Wellsville, NY.

By: Kevin Fitzgerald, Technical Consultant