

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contours of the second-adjacent WUSR, Scranton, PA and W262AI, Forty Fort, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WUSR, Scranton, PA and W262AI, Forty Fort, PA, second adjacent channel facilities to this translator proposal, are protected from interference within their 60 dBu contours 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 (WUSR and W262AI) 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 contours (based on 73.333 F(50/50)) of WUSR, Scranton, PA and W262AI, Forty Fort, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WUSR and W262AI. Included as Figure 1 of this exhibit is a map showing that the 60.8 dBu coverage contours of WUSR and W262AI encompasses the proposed antenna site along with the entire proposed 100.8 dBu interference contour. As the proposed 100.8 dBu interference contour is 40 dBu greater than the 60.8 dBu contour of WUSR and W262AI 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 100.8 dBu interference contour for this proposal would be small. At any HAAT value, the 100.8 dBu contour distance for this proposal is 1.01 kilometers at 325 degrees from true north and smaller than this in all other directions.

4. This proposed translator is situated in a sparsely populated hilltop tower farm area 34 meters above ground on a radio communications tower. The area of potential interference is within 1.01 kilometers 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, forested, unpopulated tower farm area. This tower farm is gated, has dirt roads, and has restricted access with no residents. A "Google Maps" geographic satellite map has been provided as an attachment to show this unpopulated area within the 100.8 dBu contour of this proposal. A uniform circular 1.01 kilometers from the site is unpopulated on the map. 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.

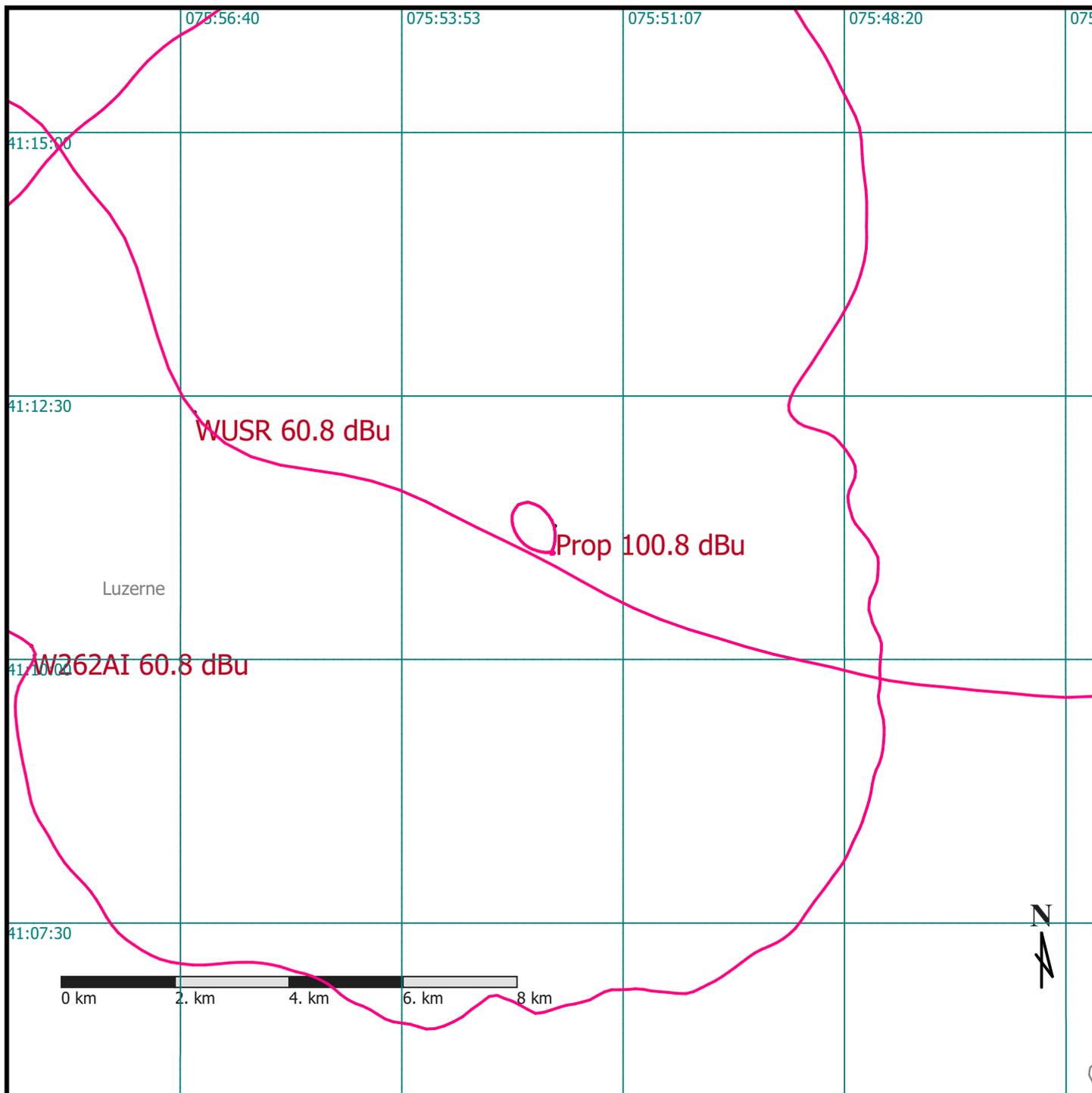
For the foregoing reasons this applicant submits that the predicted interference to WUSR, Scranton, PA and W262AI, Forty Fort, PA is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facilities, WUSR, Scranton, PA and W262AI, Forty Fort, PA.

By: Kevin Fitzgerald, Chief Engineer

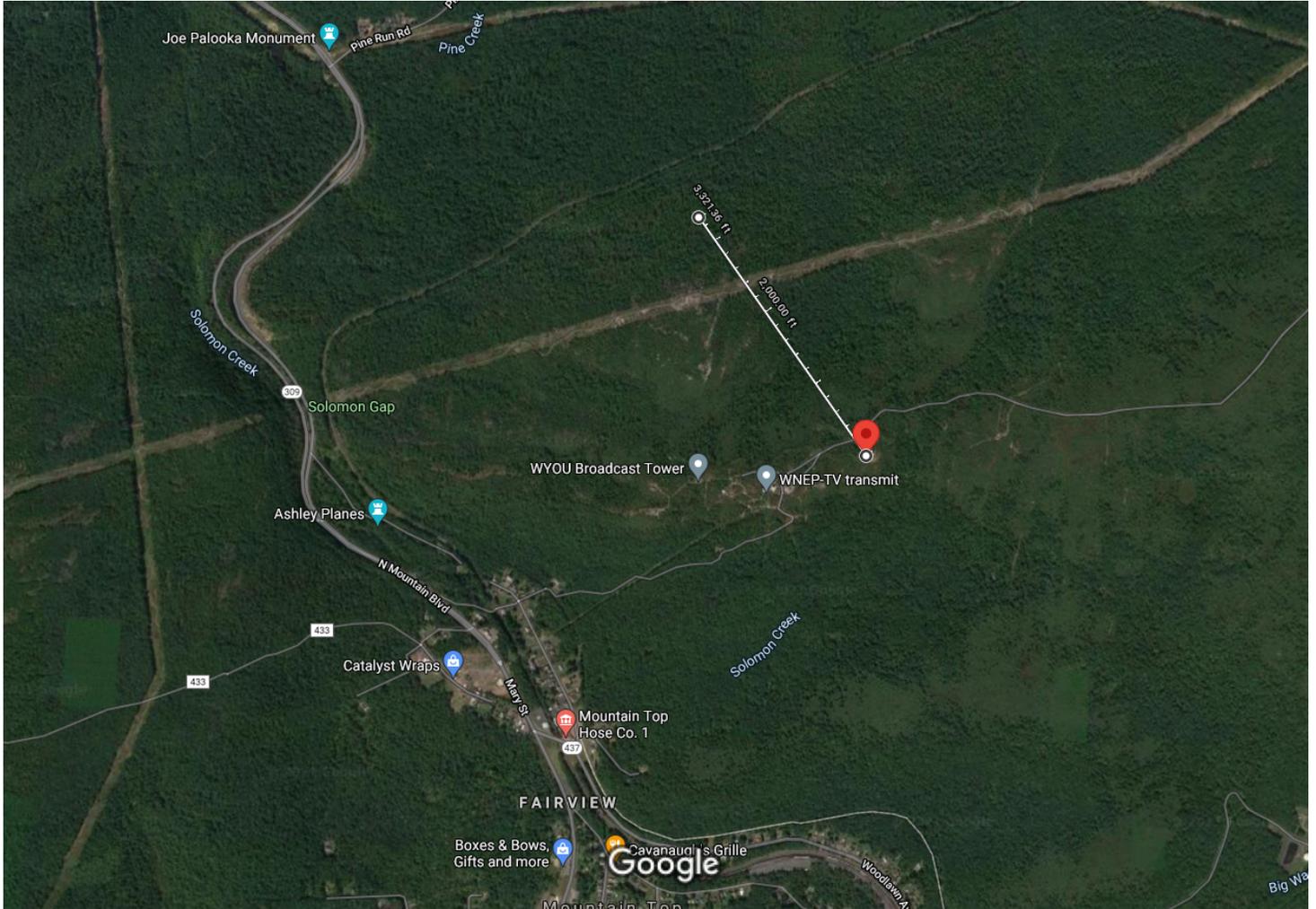
# Contour Analysis

Kevin Fitzgerald  
Job: W260DV Dallas Desired to Undesired.fmj  
Master Database: 2021\_Feb\_07.fmd  
Lat: N41:11:01 Lon: W075:52:01 NAD-83  
Scale: 1:100000  
Channel: 260 Class: DX  
Status: Licensed, Construction Permit, Application  
Channels:  
Range: 100 km, Clearance: -0.5km  
Comments: No Comments  
Description: W260DV, 99.9, Dallas, PA; Desired to Undesired Analysis

rfInvestigator Version 3.8.16  
by rfSoftware, Inc.  
Date: 5/20/2021 11:17:27 PM  
Key:  
City Grade  
Protected  
Co-Channel  
1st Adj  
2nd/3rd Adj

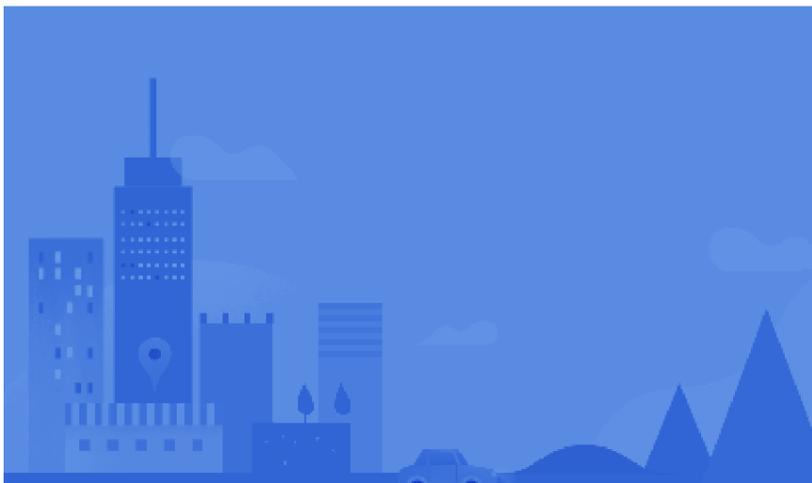


# Google Maps 41°11'01.3"N 75°52'00.7"W



Imagery ©2021 Maxar Technologies, PA Department of Conservation and Natural Resources-PAMAP/USGS, USDA Farm Service Agency, Map data ©2021

1000 ft



## 41°11'01.3"N 75°52'00.7"W

41.183694, -75.866861



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Mountain Top, PA 18707



54MM+F7 Mountain Top, Pennsylvania

Measure distance

Total distance: 3,321.36 ft (1.01 km)