

Technical Report Supporting a New NCE-FM Construction Permit Application

Pursuant to 47 C.F.R. Section 73:

for
Lewes, Delaware
CH219A (91.7 MHz)
(Facility ID: 762133)

as filed by
Bible Broadcasting Network, Inc.

This Application is being filed in response to
***PUBLIC NOTICE: DA 21-885**; issued*
July 23, 2021; “Media Bureau announces NCE-FM
new station filing procedures and requirements for
November 2 - 9, 2021, window”.

Table of Contents

Table of Contents

Explanation of Technical Report

Exhibit 1 - Service Contour Study: Present vs Proposed Operations

Exhibit 2 - Service Contour Study: Proposed Longley-Rice Method *(for illustrative purposes only)*

Exhibit 3 - Copy of Existing Antenna Structure Registration

Exhibit 4 - Vertical Plan of Antenna System and Support Tower

Exhibit 5 - HAAT Calculation & Miscellaneous Coordinate Information

Exhibit 6 - Tabulation of Proposed Non-Commercial Allocation

Exhibit(s) 7(a-b) - §73.509 Contour Protection Studies Toward Select Station(s)

Exhibit 8 - Tabulation of Proposed Commercial Allocation

Supplemental Appendixes:

RF Appendix 1 - Radio Frequency Radiation Compliance Showing

Explanation of Technical Report

1

EXPLANATION OF PROPOSAL: This New NCE-FM Construction Permit Application and accompanying Technical Report supports a request for a new noncommercial FM (NCE-FM) station pursuant to ***PUBLIC NOTICE: DA 21-885***; issued July 23, 2021; “Media Bureau announces NCE-FM new station filing procedures and requirements for November 2 - 9, 2021, window”. This FCC Schedule 340-NCE-FM filing requests a new facility for CH219A(91.7 MHz) - Lewes, DE with operating parameters of 0.420 kW ERP (Circular Polarization) utilizing a non-directional antenna.

FACILITY COMPLIANCE SHOWINGS: A map of the proposed 60 dBμ service contour has been included in ***Exhibit 1***. This exhibit demonstrates NCE-FM grade service of 1.0 mV/m, or 60 dBμ F(50:50), to visually at least more than 50% of the community of license.

A Longley-Rice coverage map of the proposed operation has been plotted in ***Exhibit 2***. The applicant acknowledges this map has been provided for illustrative purposes only.

The proposed facility will be located on the tower bearing Antenna Structure Registration Number 1063554. In support of this filing, a copy of the current ASRN has been included in ***Exhibit 3***. A depiction of the tower and antenna configuration has been included in ***Exhibit 4***. Further notification to the FAA or ASR governing authorities is not required as this proposal will not increase the overall tower height. *The applicant certifies it has reasonable assurance in good faith that the above structure will be available to the applicant for the applicant’s intended purpose. As this reasonable assurance is not based on the applicant’s ownership of the structure, the applicant certifies that it has obtained such reasonable assurance by contacting the owner or person possessing control of the site or structure. The name of the person contacted, the person’s telephone number, and status of the contact as the tower owner, agent, or authorized representative is as follows:*

Name:	Warren Walls (owner)
Contact Telephone Number:	(302) 645-8903
Contact Status:	Owner

The applicant would like to note use of the NED 03 second terrain database for all allocation, contour and HAAT showings contained herein. A copy of the proposed HAAT calculation has been included in ***Exhibit 5***.

ALLOCATION COMPLIANCE SHOWINGS: The proposed full service NCE-FM site will meet all contour protection requirements of 47 C.F.R. Section 73.509 toward each allocation protection. A tabulation of the proposed NCE-FM allocation is found in ***Exhibit 6***. There are two (2) allocation concerns deemed close enough to require further study. Therefore, maps and/or tabulations of the relevant protected and interference contours toward these concerns have been supplied in ***Exhibit(s) 7(a-b)***. It is believed sufficient clearance exists precluding the need for further study. However, additional tabulations or maps will be supplied upon request. Regarding the commercial spacings portion of this CH219A proposal, the proposed full-service site will meet all Class A spacing requirements toward each relevant commercial allocation concern. A tabulation of the commercial spacings is found in ***Exhibit 8***.

The transmitter site is located more than 320 km from the common border of the United States and Canada or Mexico. As a result, full protection will be afforded all international concerns as noted in the **Exhibit 6** allocation study.

The transmitter site is located within the affected radius of multiple TV6 facilities. However, full protection will be afforded all TV6 concerns as noted in **Exhibit 6**.

The remainder of this report is responsive to the Rules of the Commission, and provides the data for the FCC's online master LMS (Licensing and Management System) form.

ENVIRONMENTAL COMPLIANCE SHOWINGS: The proposed facility complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments as set forth under §1.1310 and/or §1.1307(b)(3) of the Commission's rules and the guidelines for RF radiation protection as set forth in OET Bulletin No. 65 (Edition 97-01), and the accompanying Supplement A, (Edition 97-01). Compliance has been demonstrated in the attached **RF Appendix 1** of this filing. The facility is, or will be, properly marked with signs. Entry is, or will be, restricted by means of fencing with locked doors or gates. In addition, coordination with other users of the site will be secured to reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

Regarding compliance with the NEPA, Nationwide Programmatic Agreement and NHPA Section 106 for tower co-location, compliance with the Agreement is not required where no new tower construction is being proposed and the tower is not being substantially altered. Specifically, compliance is not necessary where only an antenna and feedline are being added to an existing structure. However, should the Commission determine compliance is necessary, upon notification to the applicant, the applicant will file FCC Form 621.

CERTIFICATION OF TECHNICAL CONSULTANT: *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty-two years of experience as a broadcast technical consultant before the Federal Communications Commission ("the FCC"); and am familiar with the Code of Federal Regulations Title 47 ("the Rules") as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*



Justin W. Asher
Technical Consultant
October 6, 2021

Proposed 60 dBμ F(50:50) Contour

Exhibit 1
Service Contour Study:
Present vs Proposed Operations

CH219A.P
Lewes, DE
Proposed Operation
Facility ID: 762133
Latitude: 38-43-30 N
Longitude: 075-10-57 W
ERP: 0.42 kW
Channel: 219A (91.7 MHz)
AMSL Height: 38.1 m
Horiz. Pattern: Omni

60 dBμ F(50:50) Contour
Total Population: 35,393
Total Area: 216.7 sq. km*
*Adjusted for Land Area
Only (No Water Area)

CH219A.P

Lewes

Henlopen Acres

Rehoboth Beach

Dewey Beach

NED 03 SEC Terrain Database
US Census 2010 PL Database
NAD 1983 Coordinate Datum

Terrain
0 20 m

Asher Broadcast Consulting LLC
justinasher@consultant.com
1 (202) 875-2986

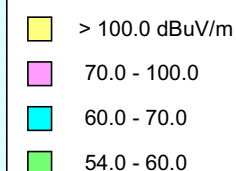
Scale 1:100,000
0 2 4 6 km

non-FCC-sanctioned coverage map
for illustrative purposes only

NED 03 SEC Terrain Database
US Census 2010 PL Database
NAD 1983 Coordinate Datum

Exhibit 2

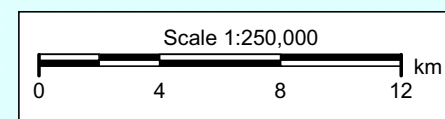
Service Contour Study: Proposed Longley-Rice Method



CH219A.P
Lewes, DE
Proposed Operation
Facility ID: 762133
Latitude: 38-43-30 N
Longitude: 075-10-57 W
ERP: 0.42 kW
Channel: 219A (91.7 MHz)
AMSL Height: 38.1 m
Horiz. Pattern: Omni
Prop Model: Longley-Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 9.1 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

60 dBμ Longley-Rice Contour
Total Population: 52,447

Asher Broadcast Consulting LLC
justinasher@consultant.com
1 (202) 875-2986



V-Soft Communications LLC ©

Exhibit 3

Copy of Existing Antenna Structure Registration

(public record copy)

Registration Detail

Reg Number	1063554	Status	Constructed
File Number	A0074163	Constructed	01/21/1999
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long	38-43-30.0 N 075-10-57.0 W	Address	RT 277 0.48 KM N OF RT 283
City, State	BELLTOWN , DE		
Zip	19958	County	SUSSEX
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
6.1	36.6
Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
42.7	36.6

Painting and Lighting Specifications

None

FAA Notification

FAA Study	99-AEA-0283-OE	FAA Issue Date	04/02/1999
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Owner & Contact Information

FRN

Owner Entity Type

Owner

BIBLE BROADCASTING NETWORK INC
Attention To: CARL REDEMANN
8030 ARROWRIDGE BLVD
CHARLOTTE , NC 28273

P: (704)523-5555
F:
E: CARL@BBNRADIO.ORG

Contact

P:
F:
E:

Last Action Status

Status	Constructed	Received	04/16/1999
Purpose	New	Entered	04/19/1999
Mode	Mail In (Manual)		

Related Applications

04/16/1999	A0074163 - New (NE)
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Comments

Comments

None

History

Date

03/15/2010

Event

Supersede - Internal Correction Applied

Pleadings

Pleading Type

None

Filer Name

Description

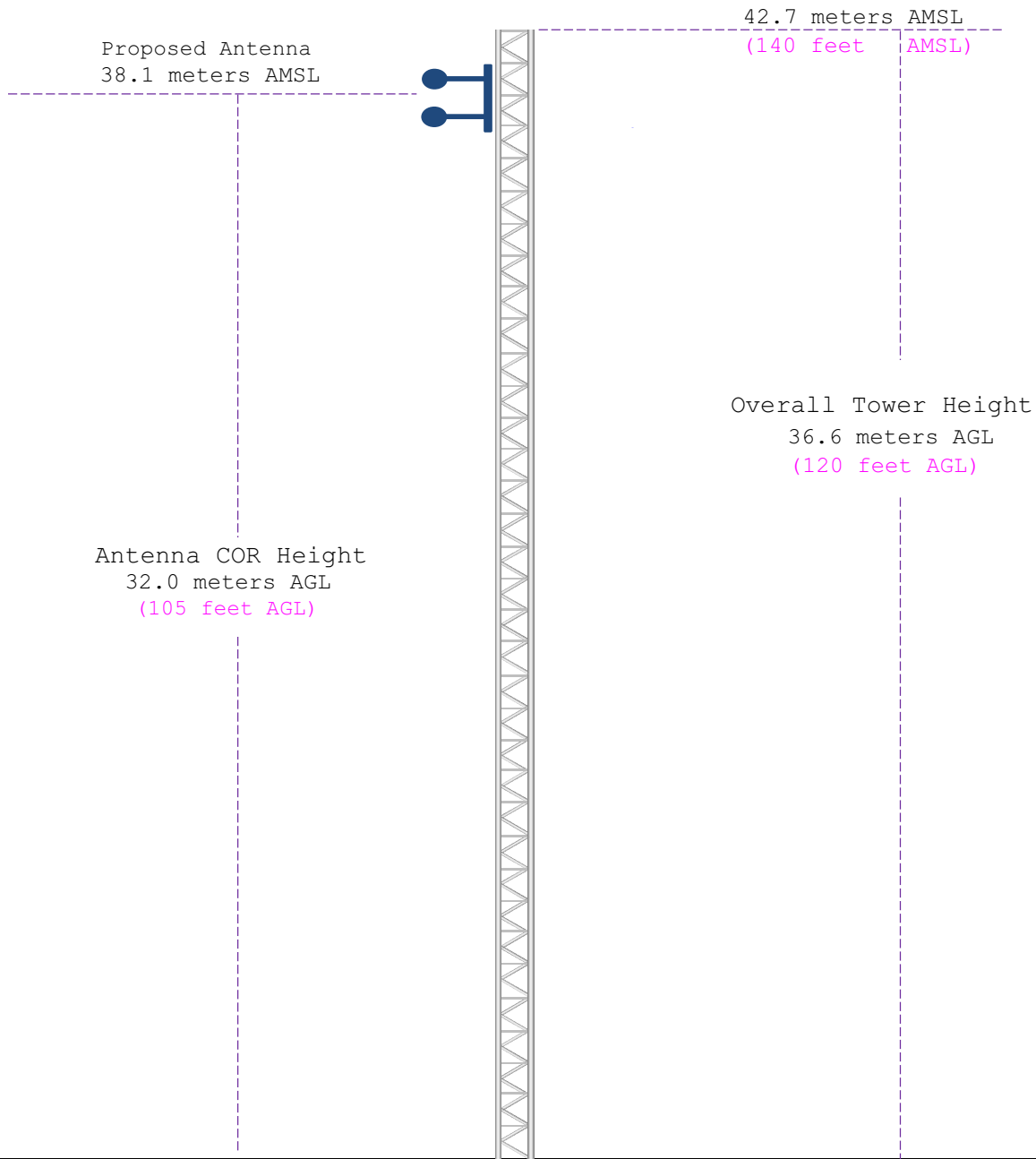
Date Entered

Automated Letters

None

Exhibit 4

Vertical Plan of Antenna System and Support Tower



Ground Elevation: 6.1 meters AMSL (20 feet AMSL)		
Address: On Route 277; 0.48 km north of Route 283.		
City: Belltown	Latitude (D M S) Longitude (D M S)	
County: Sussex	---- (NAD 1927)	
State: Delaware	Lat/Long 38-43-30.0 N 075-10-57.0 W (NAD 1983)	
Antenna Structure Registration 1063554	Drawing Is Not To Scale	Asher Broadcast Consulting, LLC justinasher@consultant.com 1(202)875-2986

Exhibit 5

HAAT and Miscellaneous Coordinate Information

HAAT Calculation (NAD 1983):

N. Lat. = 384330.0 W. Lng. = 751057.0
 HAAT and Distance to Contour,
 FCC, FM 2-10 Mi, 51 pts Method - NED 03 SEC

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	0.8	37.3	0.4200	-3.77	1.000	9.04
045	2.4	35.7	0.4200	-3.77	1.000	8.83
090	3.0	35.1	0.4200	-3.77	1.000	8.76
135	0.5	37.6	0.4200	-3.77	1.000	9.07
180	4.1	34.0	0.4200	-3.77	1.000	8.62
225	9.5	28.6	0.4200	-3.77	1.000	8.11
270	11.4	26.7	0.4200	-3.77	1.000	8.11
315	4.3	33.8	0.4200	-3.77	1.000	8.59

Ave El= 4.50 M HAAT= 33.60 M AMSL= 38.1

NAD 1983 to NAD 1927 Conversion:

Various Coordinate Conversion Calculations (NAD 1983):

Position Type	Lat Lon
Degrees Lat Long	38.7250000°, -075.1825000°
Degrees Minutes	38°43.50000', -075°10.95000'
Degrees Minutes Seconds	38°43'30.0000", -075°10'57.0000"
UTM	18S 484136mE 4286276mN
UTM centimeter	18S 484136.00mE 4286276.06mN
MGRS	18SVH8413686276
Grid North	-0.1°
GARS	210LT41
Maidenhead	FM28JR84CA40
GEOREF	GJQJ49054350

Exhibit 6

Tabulation of Proposed Allocation

Blue Text indicates contour protection studies toward select stations as included in ***Exhibit(s) 7(a-b)***.

Bible Broadcasting Network, Inc.											
REFERENCE	CH#	219A	-	91.7 MHz,	Pwr= 0.42 kW,	HAAT= 33.6 M,	COR= 38.1 M	DISPLAY DATES			
38 43 30.00 N.					Average Protected F(50-50)= 8.57 km			DATA 08-17-21			
75 10 57.00 W.					Omni-directional			SEARCH 08-17-21			
CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR (kW) HAAT (M)	INT (km) COR (M)	PRO (km) LICENSEE	*IN* (Overlap in km)	*OUT*
219A Dover	WRTX	LIC_VN DE		328.1 147.9	62.39 BLED19950418KB	39 12 03.40 75 33 53.70	0.580	53.4 104	15.8 Temple University Of The C	0.3	17.4
221A Fenwick Island	WLBW«	LIC_CN DE		173.6 353.7	33.80 BMLD20110201ADZ	38 25 20.40 75 08 21.70	3.000 143	2.6 147	28.2 Educational Media Foundati	30.5R	3.3M
06N-- Salisbury	WOWZ-LP«	APP_HN MD		194.0 14.0	38.76 0000071750	38 23 12.00 75 17 24.99	3.000	2.4 142	24.6	27.0R	11.8M
220A North Wildwood	WSMJ	LIC_ZVN NJ		38.2 218.4	45.94 BLED20130204AAR	39 02 58.00 74 51 13.00	0.750	21.2 75	14.2 Domestic Church Media Foun	15.8	19.2
06Z-- Salisbury	WOWZ-LP«	LI_N MD		194.0 14.0	38.76 BLTVL-20090326ADA	38 23 12.00 75 17 24.99	1.000	2.3 142	18.9	21.2R	17.6M
06Z-- Salisbury	WOWZ-LP«	APP_N MD		194.1 14.0	38.77 0000156813	38 23 12.11 75 17 26.69	1.000	2.3 142	18.9	21.2R	17.6M
06Z-- Salisbury	WDCO-LP/W«	CP_N MD		188.6 8.5	40.86 BPTVL-20140210ABX	38 21 41.50 75 15 09.09	2.000	2.5 120	20.6	23.1R	17.8M
216A Dover	WDDE	LIC_CN DE		318.9 138.7	42.71 BLED20110812ACN	39 00 50.00 75 30 28.00	2.100 72	1.8 78	18.8 Delaware First Media Corpo	32.3	22.4
217B Princess Anne	WESM	LIC_CN MD		217.4 37.1	71.85 BLED19870303KC	38 12 37.40 75 40 54.70	45.000 91	4.4 97	41.2 University Of Maryland, Ea	59.4	29.2
272A Cape May	WAIV«	LIC_CN NJ		46.9 227.2	43.74 BLH20160503AAG	38 59 34.40 74 48 46.60	6.000 57	54.3 58	14.7 Equity Communications, L.P	9.5R	34.2M
06 1C Philadelphia	WPVI-TV«	APP_HN PA		358.1 178.0	146.74 0000035671	40 02 39.00 75 14 25.01	56.000 332	2.4 404	101.5	104.0R	42.8M
06 1C Philadelphia	WPVI-TV«	STA_HN PA		358.1 178.0	146.74 0000034890	40 02 39.00 75 14 25.01	56.000 332	2.4 404	101.5	103.9R	42.8M
06 1C Philadelphia	WPVI-TV«	LI_CY PA		358.0 178.0	146.56 BLCDD-20111019ACJ	40 02 33.00 75 14 32.01	34.000 330	2.4 395	95.6	98.0R	48.6M
6 -- Philadelphia	WPVI-TV-A«	CHA_D_Y PA		358.0 178.0	146.58 DTVBL8616	40 02 33.40 75 14 31.66	34.000 330	2.4 395	95.6	98.0R	48.6M

Terrain database is NED 03 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
 Contour distances are on direct line to and from reference station. Reference zone= - Zone 1, Co to 3rd adjacent.
 All separation margins (if shown) include rounding.
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt (Y,N,X)
 "*"affixed to 'IN' or 'OUT' values = site inside restricted contour.
 « = Station meets FCC minimum distance spacing for its class.
 < = Contour Overlap

Exhibit 7a

Contour Protection Studies Toward Select Allocation Concern(s)

Bible Broadcasting Network, Inc.

FMCommander Single Allocation Study - 08-17-2021 - NED 03 SEC
CH219A.P's Overlaps (In= 0.25 km, Out= 17.39 km)

CH219A.P CH 219 A
Lat= 38 43 30.00, Lng= 75 10 57.00
0.42 kW 33.6 m HAAT, 38.1 m COR
Prot.= 60 dBu, Intef.= 40 dBu

WRTX CH 219 A BLED19950418KB
Lat= 39 12 03.40, Lng= 75 33 53.70
0.58 kW 0 m HAAT, 104 m COR
Prot.= 60 dBu, Intef.= 40 dBu

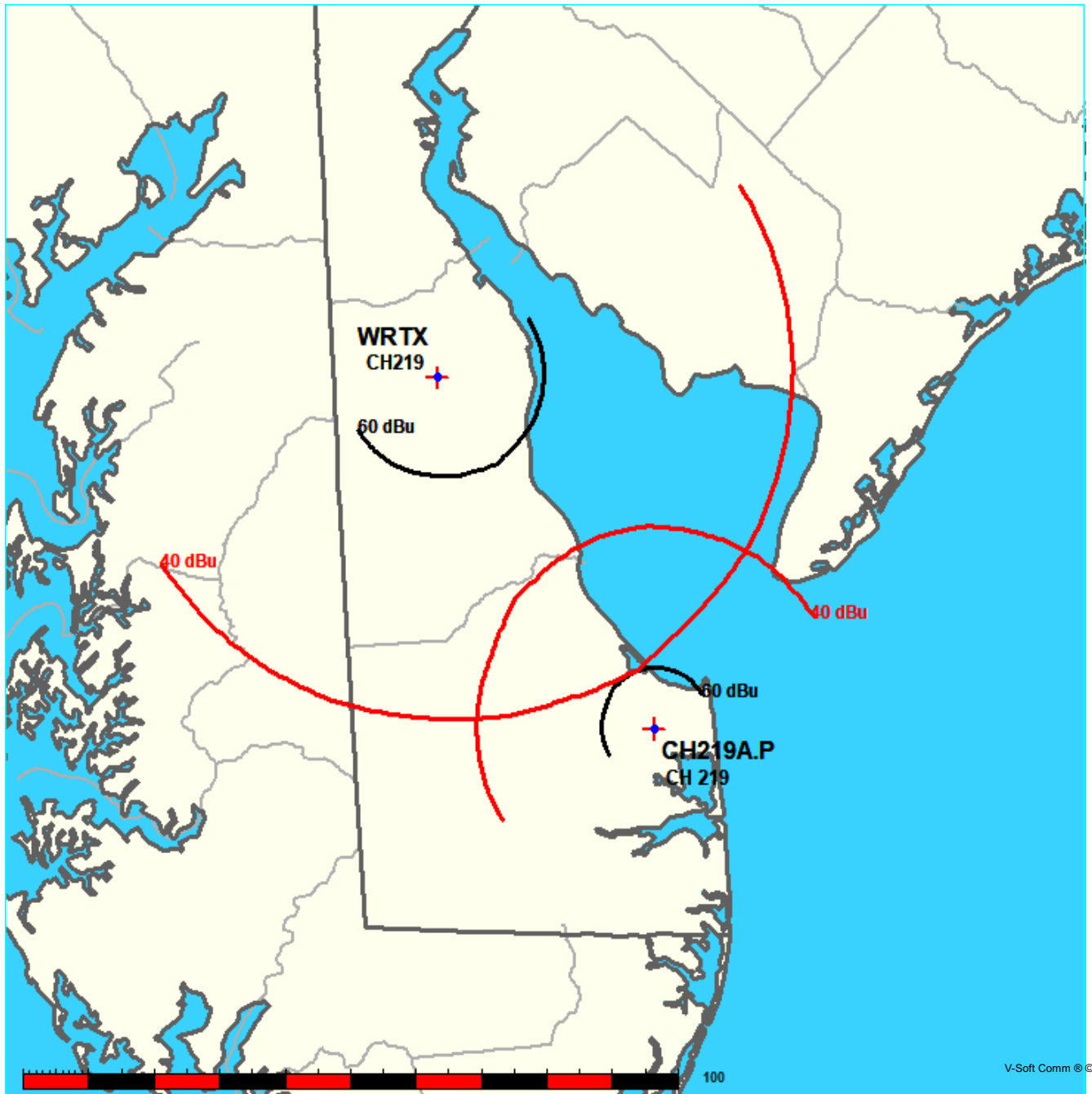


Exhibit 7a

Contour Protection Studies Toward Select Allocation Concern(s)

08-17-2021

Terrain Data: NED 03 SEC

FMOver Analysis

CH219A.P

WRTX BLED19950418KB

Channel = 219A
 Max ERP = 0.42 kW
 RCAMSL = 38.1 m
 N. Lat. 38 43 30.00
 W. Lng. 75 10 57.00
 Protected
 60 dBu

Channel = 219A
 Max ERP = 0.58 kW
 RCAMSL = 104 m
 N. Lat. 39 12 03.40
 W. Lng. 75 33 53.70
 Interfering
 40 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
287.0	000.4200	0028.9	008.1	153.3	000.5800	0095.7	056.5	38.67	
288.0	000.4200	0029.0	008.1	153.2	000.5800	0095.7	056.4	38.71	
289.0	000.4200	0029.2	008.1	153.1	000.5800	0095.7	056.3	38.75	
290.0	000.4200	0029.3	008.1	153.0	000.5800	0095.7	056.2	38.79	
291.0	000.4200	0029.6	008.1	152.9	000.5800	0095.7	056.1	38.82	
292.0	000.4200	0029.6	008.1	152.8	000.5800	0095.7	056.0	38.86	
293.0	000.4200	0029.8	008.1	152.7	000.5800	0095.7	056.0	38.89	
294.0	000.4200	0029.9	008.1	152.6	000.5800	0095.7	055.9	38.92	
295.0	000.4200	0030.2	008.1	152.5	000.5800	0095.7	055.8	38.96	
296.0	000.4200	0030.5	008.2	152.4	000.5800	0095.7	055.6	39.01	
297.0	000.4200	0030.2	008.1	152.2	000.5800	0095.7	055.6	39.03	
298.0	000.4200	0030.8	008.2	152.1	000.5800	0095.8	055.5	39.08	
299.0	000.4200	0031.1	008.2	152.0	000.5800	0095.8	055.3	39.13	
300.0	000.4200	0031.2	008.3	151.9	000.5800	0095.9	055.2	39.17	
301.0	000.4200	0031.4	008.3	151.8	000.5800	0095.9	055.1	39.21	
302.0	000.4200	0031.1	008.2	151.7	000.5800	0096.0	055.1	39.23	
303.0	000.4200	0031.0	008.2	151.5	000.5800	0096.1	055.0	39.26	
304.0	000.4200	0031.6	008.3	151.4	000.5800	0096.2	054.9	39.31	
305.0	000.4200	0031.8	008.3	151.3	000.5800	0096.3	054.8	39.35	
306.0	000.4200	0032.0	008.4	151.2	000.5800	0096.3	054.7	39.38	
307.0	000.4200	0032.3	008.4	151.1	000.5800	0096.3	054.6	39.42	
308.0	000.4200	0032.8	008.5	150.9	000.5800	0096.4	054.5	39.47	
309.0	000.4200	0032.9	008.5	150.8	000.5800	0096.5	054.5	39.51	
310.0	000.4200	0033.4	008.5	150.7	000.5800	0096.6	054.3	39.55	
311.0	000.4200	0033.6	008.6	150.5	000.5800	0096.6	054.3	39.58	
312.0	000.4200	0033.9	008.6	150.4	000.5800	0096.6	054.2	39.62	
313.0	000.4200	0034.3	008.7	150.3	000.5800	0096.6	054.1	39.65	
314.0	000.4200	0034.1	008.6	150.1	000.5800	0096.6	054.1	39.66	
315.0	000.4200	0033.8	008.6	150.0	000.5800	0096.6	054.1	39.66	
316.0	000.4200	0033.8	008.6	149.8	000.5800	0096.7	054.0	39.68	
317.0	000.4200	0034.0	008.6	149.6	000.5800	0096.9	054.0	39.72	
318.0	000.4200	0034.1	008.6	149.5	000.5800	0097.0	053.9	39.74	

Exhibit 7a

Contour Protection Studies Toward Select Allocation Concern(s)

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
319.0	000.4200	0033.9	008.6	149.3	000.5800	0097.0	053.9	39.75
320.0	000.4200	0033.7	008.6	149.2	000.5800	0097.0	053.9	39.75
321.0	000.4200	0033.8	008.6	149.0	000.5800	0097.1	053.9	39.77
322.0	000.4200	0034.2	008.6	148.9	000.5800	0097.1	053.8	39.80
323.0	000.4200	0034.5	008.7	148.7	000.5800	0097.2	053.8	39.82
324.0	000.4200	0034.3	008.7	148.5	000.5800	0097.3	053.8	39.83
325.0	000.4200	0034.4	008.7	148.4	000.5800	0097.4	053.7	39.84
326.0	000.4200	0034.5	008.7	148.2	000.5800	0097.5	053.7	39.86
327.0	000.4200	0034.7	008.7	148.1	000.5800	0097.7	053.7	39.88
328.0	000.4200	0034.8	008.7	147.9	000.5800	0097.9	053.7	39.90
329.0	000.4200	0035.0	008.7	147.7	000.5800	0098.0	053.7	39.92
330.0	000.4200	0035.0	008.7	147.6	000.5800	0098.1	053.7	39.93
331.0	000.4200	0035.0	008.8	147.4	000.5800	0098.2	053.7	39.93
332.0	000.4200	0035.1	008.8	147.3	000.5800	0098.3	053.7	39.94
333.0	000.4200	0035.3	008.8	147.1	000.5800	0098.4	053.7	39.95
334.0	000.4200	0035.7	008.8	146.9	000.5800	0098.4	053.6	39.96
335.0	000.4200	0035.7	008.8	146.8	000.5800	0098.5	053.6	39.96
336.0	000.4200	0035.7	008.8	146.6	000.5800	0098.5	053.7	39.95
337.0	000.4200	0035.7	008.8	146.4	000.5800	0098.6	053.7	39.95
338.0	000.4200	0035.8	008.8	146.3	000.5800	0098.7	053.7	39.95
339.0	000.4200	0035.7	008.8	146.1	000.5800	0098.8	053.7	39.94
340.0	000.4200	0035.9	008.9	145.9	000.5800	0098.9	053.8	39.95
341.0	000.4200	0036.2	008.9	145.8	000.5800	0099.0	053.8	39.95
342.0	000.4200	0036.3	008.9	145.6	000.5800	0099.1	053.8	39.95
343.0	000.4200	0036.4	008.9	145.4	000.5800	0099.2	053.8	39.94
344.0	000.4200	0036.6	008.9	145.3	000.5800	0099.3	053.8	39.94
345.0	000.4200	0036.6	008.9	145.1	000.5800	0099.4	053.9	39.93
346.0	000.4200	0036.7	009.0	145.0	000.5800	0099.5	053.9	39.91
347.0	000.4200	0036.7	009.0	144.8	000.5800	0099.5	054.0	39.90
348.0	000.4200	0036.7	009.0	144.7	000.5800	0099.5	054.1	39.87
349.0	000.4200	0036.7	009.0	144.5	000.5800	0099.4	054.1	39.85
350.0	000.4200	0036.7	009.0	144.3	000.5800	0099.4	054.2	39.82
351.0	000.4200	0036.8	009.0	144.2	000.5800	0099.4	054.2	39.79
352.0	000.4200	0036.9	009.0	144.0	000.5800	0099.3	054.3	39.77
353.0	000.4200	0037.0	009.0	143.9	000.5800	0099.2	054.4	39.73
354.0	000.4200	0037.1	009.0	143.7	000.5800	0099.0	054.4	39.70
355.0	000.4200	0037.2	009.0	143.6	000.5800	0098.9	054.5	39.66
356.0	000.4200	0037.3	009.0	143.4	000.5800	0098.8	054.6	39.63
357.0	000.4200	0037.4	009.0	143.3	000.5800	0098.8	054.6	39.60
358.0	000.4200	0037.5	009.1	143.2	000.5800	0098.7	054.7	39.56
359.0	000.4200	0037.5	009.1	143.0	000.5800	0098.6	054.8	39.52
000.0	000.4200	0037.3	009.0	142.9	000.5800	0098.6	054.9	39.48
001.0	000.4200	0037.2	009.0	142.8	000.5800	0098.5	055.0	39.44
002.0	000.4200	0037.2	009.0	142.7	000.5800	0098.5	055.1	39.39
003.0	000.4200	0037.1	009.0	142.5	000.5800	0098.4	055.2	39.35
004.0	000.4200	0037.1	009.0	142.4	000.5800	0098.3	055.3	39.30

Exhibit 7a

Contour Protection Studies Toward Select Allocation Concern(s)

08-17-2021

Terrain Data: NED 03 SEC

FMOver Analysis

WRTX BLED19950418KB

CH219A.P

Channel = 219A

Max ERP = 0.58 kW

RCAMSL = 104 m

N. Lat. 39 12 03.40

W. Lng. 75 33 53.70

Protected

60 dBu

Channel = 219A

Max ERP = 0.42 kW

RCAMSL = 38.1 m

N. Lat. 38 43 30.00

W. Lng. 75 10 57.00

Interfering

40 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
103.0	000.5800	0100.2	016.0	340.6	000.4200	0036.1	052.3	32.66	
104.0	000.5800	0100.0	016.0	340.4	000.4200	0036.1	052.1	32.70	
105.0	000.5800	0100.1	016.0	340.3	000.4200	0036.0	051.8	32.75	
106.0	000.5800	0100.1	016.0	340.1	000.4200	0035.9	051.6	32.80	
107.0	000.5800	0100.0	016.0	339.9	000.4200	0035.9	051.4	32.84	
108.0	000.5800	0099.8	016.0	339.7	000.4200	0035.8	051.2	32.88	
109.0	000.5800	0099.9	016.0	339.5	000.4200	0035.8	050.9	32.92	
110.0	000.5800	0100.0	016.0	339.3	000.4200	0035.7	050.7	32.97	
111.0	000.5800	0100.3	016.0	339.1	000.4200	0035.7	050.5	33.03	
112.0	000.5800	0100.3	016.0	338.9	000.4200	0035.7	050.3	33.08	
113.0	000.5800	0100.4	016.0	338.7	000.4200	0035.8	050.1	33.13	
114.0	000.5800	0100.6	016.1	338.5	000.4200	0035.8	049.9	33.18	
115.0	000.5800	0100.6	016.1	338.2	000.4200	0035.8	049.7	33.23	
116.0	000.5800	0100.7	016.1	338.0	000.4200	0035.8	049.5	33.28	
117.0	000.5800	0100.4	016.0	337.7	000.4200	0035.8	049.3	33.33	
118.0	000.5800	0100.3	016.0	337.5	000.4200	0035.8	049.1	33.36	
119.0	000.5800	0100.0	016.0	337.2	000.4200	0035.7	049.0	33.39	
120.0	000.5800	0099.5	016.0	336.9	000.4200	0035.7	048.9	33.42	
121.0	000.5800	0099.2	015.9	336.6	000.4200	0035.7	048.7	33.45	
122.0	000.5800	0099.1	015.9	336.3	000.4200	0035.7	048.6	33.48	
123.0	000.5800	0098.7	015.9	336.1	000.4200	0035.7	048.4	33.51	
124.0	000.5800	0098.4	015.9	335.8	000.4200	0035.7	048.3	33.54	
125.0	000.5800	0098.3	015.8	335.5	000.4200	0035.7	048.2	33.57	
126.0	000.5800	0098.3	015.8	335.2	000.4200	0035.7	048.1	33.61	
127.0	000.5800	0097.9	015.8	334.9	000.4200	0035.7	048.0	33.63	
128.0	000.5800	0097.6	015.8	334.6	000.4200	0035.7	047.9	33.65	
129.0	000.5800	0097.6	015.8	334.3	000.4200	0035.7	047.7	33.68	
130.0	000.5800	0097.5	015.8	334.0	000.4200	0035.7	047.6	33.70	
131.0	000.5800	0097.5	015.8	333.7	000.4200	0035.6	047.5	33.72	
132.0	000.5800	0097.5	015.8	333.3	000.4200	0035.4	047.4	33.71	
133.0	000.5800	0097.6	015.8	333.0	000.4200	0035.3	047.3	33.71	
134.0	000.5800	0097.6	015.8	332.7	000.4200	0035.2	047.2	33.72	
135.0	000.5800	0097.4	015.8	332.4	000.4200	0035.2	047.2	33.73	

Exhibit 7a
Contour Protection Studies Toward Select Allocation Concern(s)

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
136.0	000.5800	0097.2	015.7	332.1	000.4200	0035.1	047.1	33.74
137.0	000.5800	0096.9	015.7	331.7	000.4200	0035.1	047.1	33.74
138.0	000.5800	0097.0	015.7	331.4	000.4200	0035.0	047.0	33.75
139.0	000.5800	0097.2	015.7	331.1	000.4200	0035.1	046.9	33.78
140.0	000.5800	0097.6	015.8	330.8	000.4200	0035.0	046.8	33.79
141.0	000.5800	0098.1	015.8	330.5	000.4200	0035.0	046.7	33.81
142.0	000.5800	0098.1	015.8	330.1	000.4200	0035.0	046.7	33.83
143.0	000.5800	0098.6	015.9	329.8	000.4200	0035.0	046.6	33.84
144.0	000.5800	0099.3	015.9	329.5	000.4200	0035.0	046.5	33.86
145.0	000.5800	0099.5	016.0	329.1	000.4200	0035.0	046.5	33.87
146.0	000.5800	0098.9	015.9	328.8	000.4200	0034.9	046.5	33.85
147.0	000.5800	0098.4	015.9	328.4	000.4200	0034.9	046.5	33.84
148.0	000.5800	0097.8	015.8	328.1	000.4200	0034.8	046.6	33.82
149.0	000.5800	0097.1	015.7	327.7	000.4200	0034.8	046.7	33.79
150.0	000.5800	0096.6	015.7	327.4	000.4200	0034.8	046.7	33.77
151.0	000.5800	0096.3	015.7	327.1	000.4200	0034.7	046.8	33.75
152.0	000.5800	0095.8	015.6	326.8	000.4200	0034.6	046.8	33.71
153.0	000.5800	0095.7	015.6	326.4	000.4200	0034.5	046.9	33.69
154.0	000.5800	0095.4	015.6	326.1	000.4200	0034.5	047.0	33.67
155.0	000.5800	0094.8	015.5	325.8	000.4200	0034.5	047.1	33.64
156.0	000.5800	0094.1	015.4	325.5	000.4200	0034.4	047.2	33.60
157.0	000.5800	0093.2	015.4	325.2	000.4200	0034.4	047.3	33.57
158.0	000.5800	0092.9	015.3	324.9	000.4200	0034.4	047.4	33.54
159.0	000.5800	0092.5	015.3	324.6	000.4200	0034.3	047.5	33.51
160.0	000.5800	0092.7	015.3	324.2	000.4200	0034.3	047.5	33.49
161.0	000.5800	0092.8	015.3	323.9	000.4200	0034.4	047.6	33.48
162.0	000.5800	0092.4	015.3	323.6	000.4200	0034.4	047.7	33.47
163.0	000.5800	0092.3	015.3	323.3	000.4200	0034.5	047.8	33.46
164.0	000.5800	0092.3	015.3	323.0	000.4200	0034.5	047.9	33.43
165.0	000.5800	0092.5	015.3	322.7	000.4200	0034.4	048.0	33.40
166.0	000.5800	0092.4	015.3	322.5	000.4200	0034.4	048.1	33.37
167.0	000.5800	0092.2	015.3	322.2	000.4200	0034.3	048.2	33.33
168.0	000.5800	0092.1	015.3	321.9	000.4200	0034.2	048.4	33.27
169.0	000.5800	0091.8	015.2	321.6	000.4200	0034.0	048.5	33.22
170.0	000.5800	0091.4	015.2	321.4	000.4200	0033.9	048.7	33.15
171.0	000.5800	0091.1	015.2	321.1	000.4200	0033.8	048.8	33.11
172.0	000.5800	0090.8	015.1	320.9	000.4200	0033.8	049.0	33.07
173.0	000.5800	0090.6	015.1	320.6	000.4200	0033.8	049.1	33.03
174.0	000.5800	0090.5	015.1	320.4	000.4200	0033.8	049.3	32.99
175.0	000.5800	0090.3	015.1	320.1	000.4200	0033.7	049.4	32.95
176.0	000.5800	0090.1	015.1	319.9	000.4200	0033.7	049.6	32.90
177.0	000.5800	0089.8	015.0	319.7	000.4200	0033.7	049.8	32.86
178.0	000.5800	0089.7	015.0	319.4	000.4200	0033.7	050.0	32.82
179.0	000.5800	0089.4	015.0	319.2	000.4200	0033.8	050.2	32.79
180.0	000.5800	0089.2	015.0	319.0	000.4200	0033.9	050.3	32.76
181.0	000.5800	0089.1	015.0	318.8	000.4200	0034.0	050.5	32.73

Exhibit 7b
Contour Protection Studies Toward Select Allocation Concern(s)

Bible Broadcasting Network, Inc.

FMCommander Single Allocation Study - 08-17-2021 - NED 03 SEC
CH219A.P's Overlaps (In= 15.79 km, Out= 19.21 km)

CH219A.P CH 219 A
Lat= 38 43 30.00, Lng= 75 10 57.00
0.42 kW 33.6 m HAAT, 38.1 m COR
Prot.= 60 dBu, Intef.= 54 dBu

WSMJ CH 220 A 73.215 Z BLED20130204AAR
Lat= 39 02 58.00, Lng= 74 51 13.00
0.75 kW 0 m HAAT, 74.7 m COR
Prot.= 60 dBu, Intef.= 54 dBu

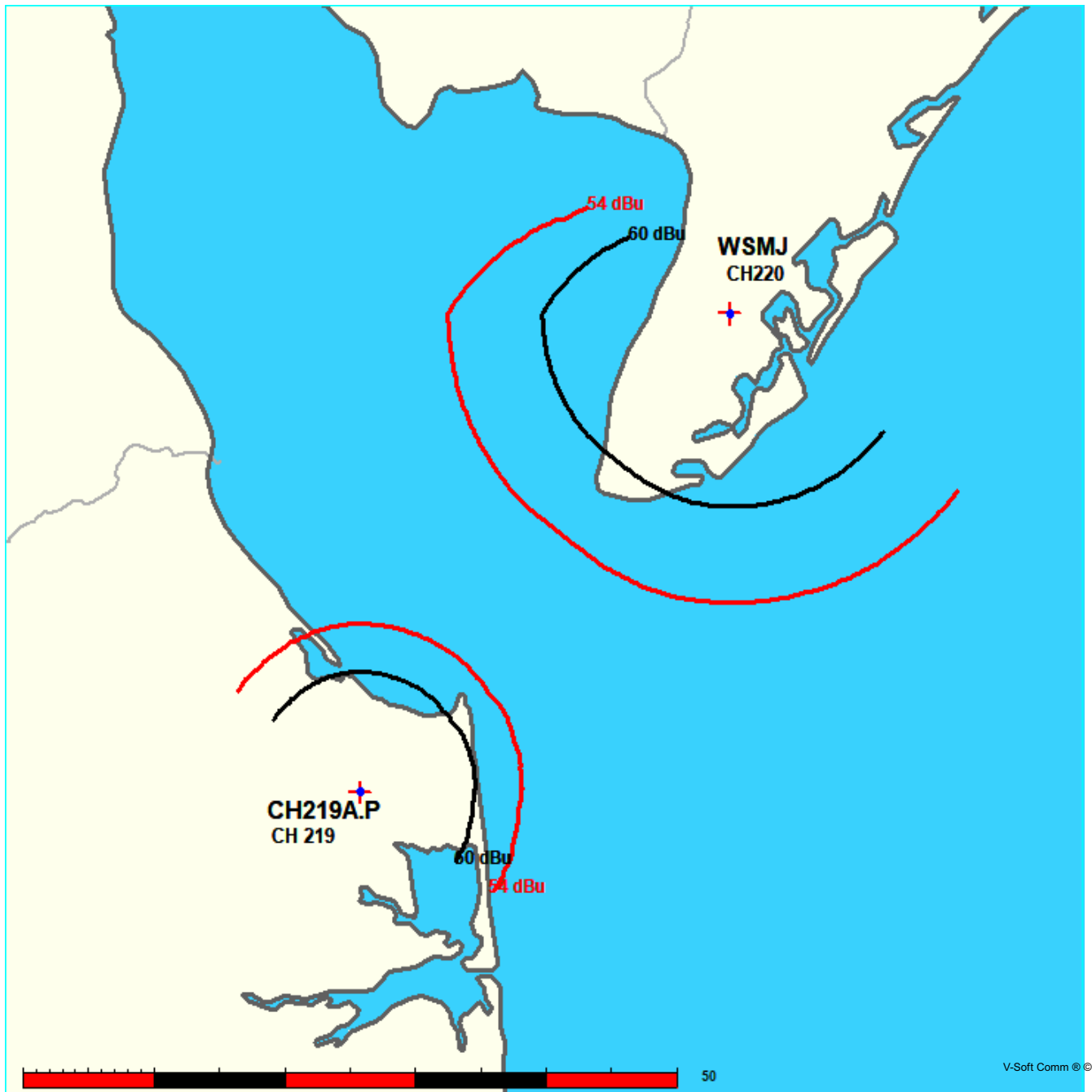


Exhibit 7b

Contour Protection Studies Toward Select Allocation Concern(s)

08-17-2021

Terrain Data: NED 03 SEC

FMOver Analysis

CH219A.P

WSMJ BLED20130204AAR

Channel = 219A
Max ERP = 0.42 kW
RCAMSL = 38.1 m
N. Lat. 38 43 30.00
W. Lng. 75 10 57.00
Protected
60 dBu

Channel = 220A
Max ERP = 0.75 kW
RCAMSL = 74.7 m
N. Lat. 39 02 58.00
W. Lng. 74 51 13.00
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
358.0	000.4200	0037.5	009.1	226.9	000.7500	0071.3	039.5	43.92	
359.0	000.4200	0037.5	009.1	226.7	000.7500	0071.2	039.3	43.96	
000.0	000.4200	0037.3	009.0	226.6	000.7500	0071.2	039.2	43.99	
001.0	000.4200	0037.2	009.0	226.4	000.7500	0071.1	039.1	44.03	
002.0	000.4200	0037.2	009.0	226.2	000.7500	0071.1	039.0	44.07	
003.0	000.4200	0037.1	009.0	226.0	000.7500	0071.1	038.9	44.11	
004.0	000.4200	0037.1	009.0	225.9	000.7500	0071.1	038.8	44.15	
005.0	000.4200	0037.1	009.0	225.7	000.7500	0071.0	038.7	44.19	
006.0	000.4200	0037.1	009.0	225.5	000.7500	0071.0	038.6	44.23	
007.0	000.4200	0037.1	009.0	225.3	000.7500	0071.0	038.5	44.27	
008.0	000.4200	0037.2	009.0	225.2	000.7500	0071.0	038.4	44.30	
009.0	000.4200	0037.2	009.0	225.0	000.7500	0071.0	038.3	44.34	
010.0	000.4200	0037.1	009.0	224.8	000.7500	0070.9	038.2	44.37	
011.0	000.4200	0037.1	009.0	224.6	000.7500	0071.0	038.2	44.41	
012.0	000.4200	0037.1	009.0	224.4	000.7500	0070.9	038.1	44.43	
013.0	000.4200	0037.0	009.0	224.2	000.7500	0070.9	038.0	44.46	
014.0	000.4200	0037.0	009.0	223.9	000.7500	0070.8	037.9	44.49	
015.0	000.4200	0036.9	009.0	223.7	000.7500	0070.8	037.9	44.51	
016.0	000.4200	0036.8	009.0	223.5	000.7500	0070.8	037.8	44.53	
017.0	000.4200	0036.8	009.0	223.3	000.7500	0070.7	037.7	44.56	
018.0	000.4200	0036.9	009.0	223.1	000.7500	0070.6	037.6	44.58	
019.0	000.4200	0036.8	009.0	222.9	000.7500	0070.6	037.6	44.60	
020.0	000.4200	0036.9	009.0	222.7	000.7500	0070.5	037.5	44.62	
021.0	000.4200	0036.9	009.0	222.4	000.7500	0070.5	037.5	44.64	
022.0	000.4200	0036.8	009.0	222.2	000.7500	0070.4	037.4	44.65	
023.0	000.4200	0036.8	009.0	222.0	000.7500	0070.4	037.4	44.67	
024.0	000.4200	0036.8	009.0	221.8	000.7500	0070.4	037.3	44.69	
025.0	000.4200	0036.8	009.0	221.5	000.7500	0070.3	037.3	44.70	
026.0	000.4200	0036.7	009.0	221.3	000.7500	0070.3	037.2	44.71	
027.0	000.4200	0036.7	009.0	221.1	000.7500	0070.3	037.2	44.72	
028.0	000.4200	0036.7	009.0	220.8	000.7500	0070.3	037.2	44.74	

Exhibit 7b

Contour Protection Studies Toward Select Allocation Concern(s)

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
029.0	000.4200	0036.8	009.0	220.6	000.7500	0070.3	037.1	44.75
030.0	000.4200	0036.7	009.0	220.3	000.7500	0070.3	037.1	44.77
031.0	000.4200	0036.8	009.0	220.1	000.7500	0070.3	037.1	44.78
032.0	000.4200	0036.8	009.0	219.9	000.7500	0070.3	037.0	44.79
033.0	000.4200	0036.7	009.0	219.6	000.7500	0070.3	037.0	44.79
034.0	000.4200	0036.6	009.0	219.4	000.7500	0070.3	037.0	44.79
035.0	000.4200	0036.7	009.0	219.1	000.7500	0070.3	037.0	44.80
036.0	000.4200	0036.7	009.0	218.9	000.7500	0070.3	037.0	44.81
037.0	000.4200	0036.6	009.0	218.7	000.7500	0070.3	037.0	44.81
038.0	000.4200	0036.6	009.0	218.4	000.7500	0070.4	037.0	44.82
039.0	000.4200	0036.5	008.9	218.2	000.7500	0070.4	037.0	44.81
040.0	000.4200	0036.5	008.9	217.9	000.7500	0070.4	037.0	44.82
041.0	000.4200	0036.5	008.9	217.7	000.7500	0070.5	037.0	44.82
042.0	000.4200	0036.2	008.9	217.5	000.7500	0070.5	037.1	44.80
043.0	000.4200	0036.0	008.9	217.2	000.7500	0070.4	037.1	44.78
044.0	000.4200	0035.8	008.8	217.0	000.7500	0070.4	037.2	44.76
045.0	000.4200	0035.7	008.8	216.8	000.7500	0070.4	037.2	44.74
046.0	000.4200	0035.6	008.8	216.5	000.7500	0070.4	037.2	44.73
047.0	000.4200	0035.6	008.8	216.3	000.7500	0070.4	037.3	44.72
048.0	000.4200	0035.7	008.8	216.1	000.7500	0070.4	037.3	44.71
049.0	000.4200	0035.8	008.8	215.8	000.7500	0070.5	037.3	44.70
050.0	000.4200	0035.8	008.8	215.6	000.7500	0070.5	037.3	44.69
051.0	000.4200	0035.6	008.8	215.4	000.7500	0070.5	037.4	44.67
052.0	000.4200	0035.5	008.8	215.2	000.7500	0070.6	037.5	44.65
053.0	000.4200	0035.5	008.8	214.9	000.7500	0070.6	037.5	44.64
054.0	000.4200	0035.4	008.8	214.7	000.7500	0070.6	037.6	44.61
055.0	000.4200	0035.6	008.8	214.5	000.7500	0070.6	037.6	44.60
056.0	000.4200	0035.9	008.9	214.2	000.7500	0070.6	037.6	44.59
057.0	000.4200	0036.4	008.9	214.0	000.7500	0070.6	037.6	44.58
058.0	000.4200	0036.3	008.9	213.8	000.7500	0070.6	037.7	44.56
059.0	000.4200	0036.3	008.9	213.6	000.7500	0070.6	037.8	44.53
060.0	000.4200	0036.5	008.9	213.3	000.7500	0070.6	037.8	44.51
061.0	000.4200	0036.6	009.0	213.1	000.7500	0070.7	037.9	44.50
062.0	000.4200	0036.6	008.9	212.9	000.7500	0070.7	037.9	44.47
063.0	000.4200	0036.5	008.9	212.7	000.7500	0070.8	038.0	44.44
064.0	000.4200	0036.4	008.9	212.5	000.7500	0070.8	038.1	44.40
065.0	000.4200	0036.2	008.9	212.3	000.7500	0070.8	038.2	44.36
066.0	000.4200	0036.1	008.9	212.2	000.7500	0070.8	038.3	44.32
067.0	000.4200	0036.1	008.9	212.0	000.7500	0070.8	038.4	44.29
068.0	000.4200	0036.1	008.9	211.8	000.7500	0070.8	038.5	44.26
069.0	000.4200	0036.1	008.9	211.6	000.7500	0070.8	038.6	44.22
070.0	000.4200	0035.9	008.9	211.4	000.7500	0070.8	038.7	44.17
071.0	000.4200	0035.7	008.8	211.3	000.7500	0070.9	038.8	44.12
072.0	000.4200	0035.7	008.8	211.1	000.7500	0070.9	038.9	44.09
073.0	000.4200	0035.7	008.8	210.9	000.7500	0070.9	039.0	44.05
074.0	000.4200	0035.7	008.8	210.8	000.7500	0070.9	039.1	44.01

Exhibit 7b

Contour Protection Studies Toward Select Allocation Concern(s)

08-17-2021

Terrain Data: NED 03 SEC

FMOver Analysis

WSMJ BLED20130204AAR

CH219A.P

Channel = 220A

Max ERP = 0.75 kW

RCAMSL = 74.7 m

N. Lat. 39 02 58.00

W. Lng. 74 51 13.00

Protected

60 dBu

Channel = 219A

Max ERP = 0.42 kW

RCAMSL = 38.1 m

N. Lat. 38 43 30.00

W. Lng. 75 10 57.00

Interfering

54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
173.0	000.7500	0074.6	014.6	054.4	000.4200	0035.5	037.2	36.85	
174.0	000.7500	0074.6	014.6	054.2	000.4200	0035.5	037.0	36.92	
175.0	000.7500	0074.5	014.6	054.0	000.4200	0035.4	036.7	36.99	
176.0	000.7500	0074.5	014.6	053.8	000.4200	0035.4	036.5	37.06	
177.0	000.7500	0074.5	014.6	053.6	000.4200	0035.4	036.3	37.14	
178.0	000.7500	0074.4	014.6	053.3	000.4200	0035.4	036.1	37.22	
179.0	000.7500	0074.5	014.6	053.1	000.4200	0035.5	035.9	37.31	
180.0	000.7500	0074.5	014.6	052.9	000.4200	0035.5	035.7	37.40	
181.0	000.7500	0074.5	014.6	052.6	000.4200	0035.5	035.5	37.47	
182.0	000.7500	0074.5	014.6	052.3	000.4200	0035.5	035.3	37.54	
183.0	000.7500	0074.5	014.6	052.1	000.4200	0035.5	035.1	37.61	
184.0	000.7500	0074.5	014.6	051.8	000.4200	0035.5	034.9	37.69	
185.0	000.7500	0074.4	014.6	051.5	000.4200	0035.6	034.7	37.77	
186.0	000.7500	0074.5	014.6	051.2	000.4200	0035.6	034.5	37.84	
187.0	000.7500	0074.5	014.6	050.9	000.4200	0035.6	034.4	37.92	
188.0	000.7500	0074.5	014.6	050.6	000.4200	0035.6	034.2	37.99	
189.0	000.7500	0074.5	014.6	050.3	000.4200	0035.7	034.0	38.07	
190.0	000.7500	0074.4	014.6	050.0	000.4200	0035.8	033.8	38.15	
191.0	000.7500	0074.4	014.6	049.6	000.4200	0035.8	033.7	38.22	
192.0	000.7500	0074.3	014.6	049.3	000.4200	0035.8	033.5	38.28	
193.0	000.7500	0074.3	014.6	048.9	000.4200	0035.8	033.4	38.33	
194.0	000.7500	0074.2	014.5	048.6	000.4200	0035.7	033.2	38.37	
195.0	000.7500	0074.1	014.5	048.2	000.4200	0035.8	033.1	38.43	
196.0	000.7500	0074.0	014.5	047.8	000.4200	0035.7	033.0	38.48	
197.0	000.7500	0073.9	014.5	047.4	000.4200	0035.7	032.9	38.51	
198.0	000.7500	0073.8	014.5	047.0	000.4200	0035.6	032.7	38.55	
199.0	000.7500	0073.7	014.5	046.6	000.4200	0035.6	032.6	38.58	
200.0	000.7500	0073.2	014.5	046.2	000.4200	0035.6	032.6	38.61	
201.0	000.7500	0072.9	014.4	045.8	000.4200	0035.6	032.5	38.65	
202.0	000.7500	0072.8	014.4	045.4	000.4200	0035.6	032.4	38.68	
203.0	000.7500	0072.5	014.4	045.0	000.4200	0035.7	032.3	38.74	
204.0	000.7500	0072.2	014.4	044.5	000.4200	0035.8	032.2	38.78	
205.0	000.7500	0072.3	014.4	044.1	000.4200	0035.8	032.1	38.82	

Exhibit 7b

Contour Protection Studies Toward Select Allocation Concern(s)

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
206.0	000.7500	0072.4	014.4	043.7	000.4200	0035.8	032.1	38.87
207.0	000.7500	0072.2	014.4	043.3	000.4200	0035.9	032.0	38.91
208.0	000.7500	0071.7	014.3	042.8	000.4200	0036.0	032.0	38.94
209.0	000.7500	0071.4	014.3	042.3	000.4200	0036.1	031.9	38.97
210.0	000.7500	0071.1	014.2	041.9	000.4200	0036.2	031.9	39.00
211.0	000.7500	0070.9	014.2	041.5	000.4200	0036.3	031.9	39.04
212.0	000.7500	0070.8	014.2	041.0	000.4200	0036.5	031.9	39.09
213.0	000.7500	0070.7	014.2	040.6	000.4200	0036.5	031.8	39.12
214.0	000.7500	0070.6	014.2	040.1	000.4200	0036.5	031.8	39.12
215.0	000.7500	0070.6	014.2	039.7	000.4200	0036.5	031.8	39.12
216.0	000.7500	0070.4	014.2	039.2	000.4200	0036.5	031.8	39.12
217.0	000.7500	0070.4	014.2	038.8	000.4200	0036.5	031.8	39.13
218.0	000.7500	0070.4	014.2	038.3	000.4200	0036.6	031.8	39.15
219.0	000.7500	0070.3	014.2	037.9	000.4200	0036.6	031.8	39.15
220.0	000.7500	0070.3	014.2	037.4	000.4200	0036.6	031.8	39.15
221.0	000.7500	0070.3	014.2	037.0	000.4200	0036.6	031.8	39.15
222.0	000.7500	0070.4	014.2	036.6	000.4200	0036.7	031.8	39.15
223.0	000.7500	0070.6	014.2	036.1	000.4200	0036.7	031.8	39.15
224.0	000.7500	0070.8	014.2	035.7	000.4200	0036.7	031.8	39.15
225.0	000.7500	0071.0	014.2	035.2	000.4200	0036.7	031.8	39.14
226.0	000.7500	0071.1	014.2	034.8	000.4200	0036.7	031.9	39.12
227.0	000.7500	0071.3	014.3	034.3	000.4200	0036.6	031.9	39.10
228.0	000.7500	0071.6	014.3	033.9	000.4200	0036.6	031.9	39.09
229.0	000.7500	0071.8	014.3	033.4	000.4200	0036.7	032.0	39.08
230.0	000.7500	0072.0	014.3	033.0	000.4200	0036.7	032.0	39.07
231.0	000.7500	0072.1	014.4	032.6	000.4200	0036.8	032.1	39.06
232.0	000.7500	0072.4	014.4	032.1	000.4200	0036.8	032.2	39.04
233.0	000.7500	0072.6	014.4	031.7	000.4200	0036.8	032.2	39.01
234.0	000.7500	0072.7	014.4	031.3	000.4200	0036.8	032.3	38.98
235.0	000.7500	0072.8	014.4	030.9	000.4200	0036.8	032.4	38.94
236.0	000.7500	0073.0	014.4	030.4	000.4200	0036.8	032.5	38.89
237.0	000.7500	0073.0	014.4	030.0	000.4200	0036.7	032.6	38.84
238.0	000.7500	0072.9	014.4	029.7	000.4200	0036.7	032.7	38.79
239.0	000.7500	0072.8	014.4	029.3	000.4200	0036.7	032.9	38.74
240.0	000.7500	0072.9	014.4	028.9	000.4200	0036.8	033.0	38.70
241.0	000.7500	0073.0	014.4	028.5	000.4200	0036.8	033.1	38.65
242.0	000.7500	0073.1	014.4	028.1	000.4200	0036.7	033.2	38.59
243.0	000.7500	0073.2	014.5	027.8	000.4200	0036.7	033.4	38.53
244.0	000.7500	0073.3	014.5	027.4	000.4200	0036.7	033.5	38.47
245.0	000.7500	0073.3	014.5	027.1	000.4200	0036.7	033.7	38.42
246.0	000.7500	0073.4	014.5	026.7	000.4200	0036.7	033.8	38.37
247.0	000.7500	0073.4	014.5	026.4	000.4200	0036.7	034.0	38.31
248.0	000.7500	0073.5	014.5	026.1	000.4200	0036.7	034.1	38.24
249.0	000.7500	0073.5	014.5	025.8	000.4200	0036.7	034.3	38.18

Exhibit 8

Tabulation of Proposed Commercial Spacings

Bible Broadcasting Network, Inc.

REFERENCE		DISPLAY DATES
38 43 30.00 N.	CLASS = A Int = A	DATA 08-17-21
75 10 57.00 W.	Current Spacings to 3rd Adj.	SEARCH 08-17-21
----- Channel 219 - 91.7 MHz -----		

Call	Channel	Location	Azi	Dist	FCC	Margin
WOWZ-LP	APP 06N--	Salisbury	MD 194.0	38.71	158.5	-119.8
WOWZ-LP	LI 06Z--	Salisbury	MD 194.0	38.71	158.5	-119.8
WOWZ-LP	APP 06Z--	Salisbury	MD 194.1	38.72	158.5	-119.8
WDCO-LP/W	CP 06Z--	Salisbury	MD 188.6	40.80	158.5	-117.7
WRTX	LIC 219A	Dover	DE 328.1	62.37	114.5	-52.1
WSMJ	LIC-Z 220A	North Wildwood	NJ 38.2	45.95	71.5	-25.6
WLFR	LIC 219A	Pomona	NJ 33.4	100.29	114.5	-14.2
WPVI-TV	LI 06 1C	Philadelphia	PA 358.0	146.36	158.5	-12.1
WPVI-TV-A	CHA-D 6 --	Philadelphia	PA 358.0	146.37	158.5	-12.1
WPVI-TV	STA 06 1C	Philadelphia	PA 358.1	146.53	158.5	-12.0
WPVI-TV	APP 06 1C	Philadelphia	PA 358.1	146.53	158.5	-12.0
WLBW	LIC 221A	Fenwick Island	DE 173.6	33.80	30.5	3.3
WESM	LIC 217B	Princess Anne	MD 217.4	71.84	68.5	3.3
WMPH	LIC-D 219A	Wilmington	DE 346.6	119.68	114.5	5.2
WDCN-LP	APP 06N--	Fairfax	VA 277.0	170.66	158.5	12.2
WDCN-LP	LI -D 06Z--	Fairfax	VA 277.0	170.66	158.5	12.2
WDCN-LP	APP-D 06Z--	Fairfax	VA 277.0	170.66	158.5	12.2
WDDE	LIC 216A	Dover	DE 318.9	42.72	30.5	12.2
WXHM	LIC-Z 220A	Middletown	DE 329.9	92.48	71.5	21.0
WZWG	LIC 219A	West Grove	PA 333.0	137.08	114.5	22.6
WZWG	CP -D 219A	West Grove	PA 333.0	137.08	114.5	22.6
WKDU	LIC-D 219A	Philadelphia	PA 359.7	137.12	114.5	22.6
WCUR	LIC-D 219A	West Chester	PA 345.4	140.73	114.5	26.2
WRTQ	LIC-D 217B1	Ocean City	NJ 28.1	75.10	47.5	27.6
WAIV	LIC 272A	Cape May	NJ 46.9	43.74	9.5	34.2

All separation margins include rounding