

EXHIBIT 8

CLARIFICATION OF APPLICANT'S COMPLIANCE WITH REQUIRED SPACINGS & DISCUSSION OF POTENTIAL INTERFERENCE ISSUES WITH THE BRITISH VIRGIN ISLANDS

As shown by the attached channel study, the Applicant meets all provisions of §73.807(c)(1), regarding required minimum spacings of an LPFM station located within the U.S. Virgin Islands (VI) and Puerto Rico. As such, the applicant expects that the FCC will approve this application, perhaps contingent on international processing. Our understanding is that this proposal may then be scrutinized by the International Telecommunication Union (ITU). The only international issue that the applicant anticipates may be channel relationships with the British Virgin Islands (BVI). FCC records show a BVI allocation on second-adjacent channel 247C, at 18:25:00N, 64:39:00W. This is 29.1km from this LPFM proposal on a bearing of 71.1° true. The closest international boundary (BVI) from this proposal is approximately 10.2km, which is over water. The closest foreign landfall from this proposal is approximately 18.7km, at Little Tobago Island in the BVI.

A very cursory examination of the Planning Standard for FM Sound Broadcasting at VHF - CCIR, 15 December 1989, which may guide the ITU processing, suggests that a -20db radiofrequency protection ratio may be employed for second adjacent channel processing. Part 1.2 of this document also lists 54dBu as the “minimum usable field strength” for stereophonic service in rural areas. Based on these assumptions, the interfering contour for the Applicant’s proposed LPFM station would be $54 + 20 = 74\text{dbu}$. If FCC convention is followed, this contour would be characterized at $f(50/10)$. For an LP100 station at full class power and height, the 74dBu $f(50/10)$ interfering contour would extend **2.6km** using the FCC curves. The CCIR curves appear to be “off the chart” on our software, but we’ve found that CCIR predictions are normally within a few percent of the FCC for 50/10 propagation predictions. In any case, *the resultant interfering LPFM contour would fall wholly within U.S. territory*. Clearly, no harmful interference would occur within BVI territory to any BVI station, as a result of this proposal.

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Additionally, it should be noted that the BVI does not appear to provide 2nd-adjacent channel protection to its own stations. FCC records show BVI allocations at channels 230B and 232C. These allocations are spaced a mere 1.8km from each other. This calls into question the necessity of even considering interference potentially caused to second-adjacent BVI stations, at all.

In light of all of the above facts, the Applicant believes that there are no domestic or international interference issues that should impede the rapid approval of this application.

Title: FLAG HILL, ST THOMAS, USVI
Study for:

Search Channel: 245 Class: lp100 Latitude: 181954 Longitude: 645439

Station	Location	Ch	Cl	Brg	Dist	Req	Diff	OK/Short
WCMA-FM	FAJARDO	243	B	268.7	93.47	92	1.47	Close(C)
WCMA-FM	FAJARDO	243	B	271.2	92.33	92	.33	Close(C)
WCMA-FM	FAJARDO	243	B	274.5	128.23	92/	.	OK
WNRT-FM	CAGUAS	245	D	267.	123.15	24/24	.	OK
WDGT	RIO GRANDE	247	A	266.8	99.81	42/	.	OK
880815M	RIO GRANDE	247	A	273.5	97.32	42/	.	OK
WVOZ-FM	CAROLINA	299	B	268.7	93.47	20/	.	OK

C:\Program Files\Fm32\LPFM USVI FLAG HILL CH 245.stf
Created: 6/15/01 3:11:52 AM

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