

#### SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 57 dBu contour of the third-adjacent WHGL-FM, Canton, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WHGL-FM, Canton, PA, third adjacent channel facility to this translator proposal, is protected from interference within its 57 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 (WHGL-FM) 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 57 dBu contour (based on 73.333 F(50/50)) of WHGL-FM, Canton, 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 WHGL-FM. Included as an attachment (WVIA 99.7 Mainesburg, PA Desired to Undesired Ratios Map) is a map showing that the 86 dBu coverage contour of WHGL-FM encompasses the proposed antenna site along with the entire proposed 126 dBu interference contour. As the proposed 126 dBu interference contour is 40 dBu greater than the 86 dBu contour of WHGL-FM then this contour is the 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 6.5 watts, non-directional; the predicted 126 dBu interference contour for this proposal would be exceedingly small. At any HAAT value, the maximum

126 dBu contour distance for this proposal is 0.009 kilometers in all directions.

4. This proposed translator site is situated in a very sparsely populated rural hilltop area. WVIA 99.7 Mainesburg, PA 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 contour actually would not reach the ground as .009 kilometers is 9 meters and this antenna is proposed to be mounted 32 meters above ground, an unpopulated map exhibit is being provided anyway). 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 WHGL-FM, Canton, 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, WHGL-FM, Canton, PA.

By: Kevin Fitzgerald, Technical Consultant