W221CI

GOOSE CREEK, SOUTH CAROLINA

ENGINEERING NARRATIVE

This translator has not been a part of the 250 mile window under DA-1491. The primary station is the HD2 channel on WJNI, channel 292A at Ladson, South Carolina.

This application qualifies as a minor change because there is no change in channel and the authorized 60 dBu and proposed 60 dBu contours overlap as shown on the attached contour map.

Using a non-directional antenna, the power has been reduced to 84 watts to prevent the translator 60 dBu from exceeding the 60 dBu of primary station WJNI.

As shown on the attached Channel Study, this application meets protection requirements to all stations except for WKCL, channel 218C1, Ladson and WCKN, channel 223C1, Moncks Corner, South Carolina..

The WKCL signal at the proposed site is 177.5 dBu, and the translator interfering contour is 137.5 dBu. The distance from the proposed translator antenna to the interfering contour is 0 meters (the translator antenna will be on the WKCL tower). The proposed antenna will be 108 meters above ground level.

The WCKN signal is 77.8 dbu at the proposed site, and the interferring contour is 117.8 dBu. The interfering contour is 83.6 meters from the proposed translator antenna, or 24 meters AGL.

There is no building on adjacent property that will be inside the interfering contour to either WKCL or WCKN, therefore, there is no population inside the interference area.

For purposes of §74.1204(d), there is no interference area that is open to, occupied or traversed by the general public. (See Living Way Ministries, Inc., 17FCC Rcd 17054 (2002), recondenied FCC 08-242, released October 10, 2008, especially the section "Guidance for Future Applicants to Demonstrate Lack of Population" at paras, 7-13.)

Based on the foregoing, a waiver for interference to WKCL and WCKN is requested under §74.1204(d).

To prevent any spurious response that might be caused by the WKCL signal entering the proposed translator, a professionally designed and fabricated filter will be installed in the output of the translator transmitter to provide a high degree of suppression on the WKCL frequency.

In addition to this narrative, attachments in this exhibit include a Channel Study, a map of the present and proposed 60 dBu contours and a map of the relevant translator and primary FM station contours.