

STU-COMM, INC.

AFTON, VIRGINIA

TABLE OF ATTACHMENTS

ENGINEERING NARRATIVE

CHANNEL STUDY

ALLOCATION STUDY AL 3579, MIDLOTHIAN, VA (RESERVATION)

ALLOCATION STUDY WACL, CHANNEL 255B1, ELKTON, VA

ALLOCATION STUDY WWLB, CHANNEL 255B1, MIDLOTHIAN, VA

MAP OF THE WACL 102.5 dBu CONTOUR AND THE PROPOSED SITE

TOPOGRAPHIC SITE MAP

AERIAL PHOTOGRAPH

DECLARATION

STU-COMM, INC.

AFTON, VIRGINIA

NARRATIVE

This minor change application is filed to change the channel of W201CN to channel 255D, the fifty-fourth adjacent channel. The proposed non-directional antenna will be installed at the same height on the present tower.

Attachments to this exhibit include a channel study, an allocation study for the channel 255B1 reservation at Midlothian, Virginia; an allocation study for WACL, channel 255B1 at Elkton, Virginia; and an allocation study for WWLB, channel 255B1 at Midlothian, Virginia. Also attached are an aerial photograph and a portion of the USGS topographic map showing the site. The photograph and the map show the 102.6 dBu contour.

The proposed site is inside the protected contour of second-adjacent channel station WACL, channel 253B1. As shown on the attached map, the WACL 62.6 dBu contour passes through the proposed translator site. Using the U/D interference computation method, the interfering contour will be the proposed 102.6 dBu which extends 147 meters from the proposed tower. A waiver for this interference is requested under the provision of §74.1204(d) on the basis that no actual interference will occur due to a lack of population. As can be seen in the attached aerial photograph, the proposed 102.6 dBu contour extends 147 meters from the tower. The only buildings inside the contour are used to house communications equipment, and none have personnel in regular attendance. The only vehicular access to the site is through a locked gate and passage through private property.

Further to the above, any person inside the proposed 102.6 dBu contour would be either an electronic technician visiting one of the communications facilities on an irregular basis or a hiker passing by the electronic site on an irregular basis. The road cannot be classified as a highway or a heavily traveled road. Based on the foregoing, if a person were present inside the proposed 102.6 dBu contour, (1) they would not live there, (2) they would not work there on a regular basis, and (3) they would not travel there on a regular basis. Therefore, for purposes of §74.1204(d), there is no population inside the overlap area. (See Living Way Ministries, Inc., 17FCC Rcd 17054 (2002), reconsidered FCC 08-242, released October 10, 2008, especially the section "Guidance for Future Applicants to Demonstrate Lack of Population" at paras, 7-13.)

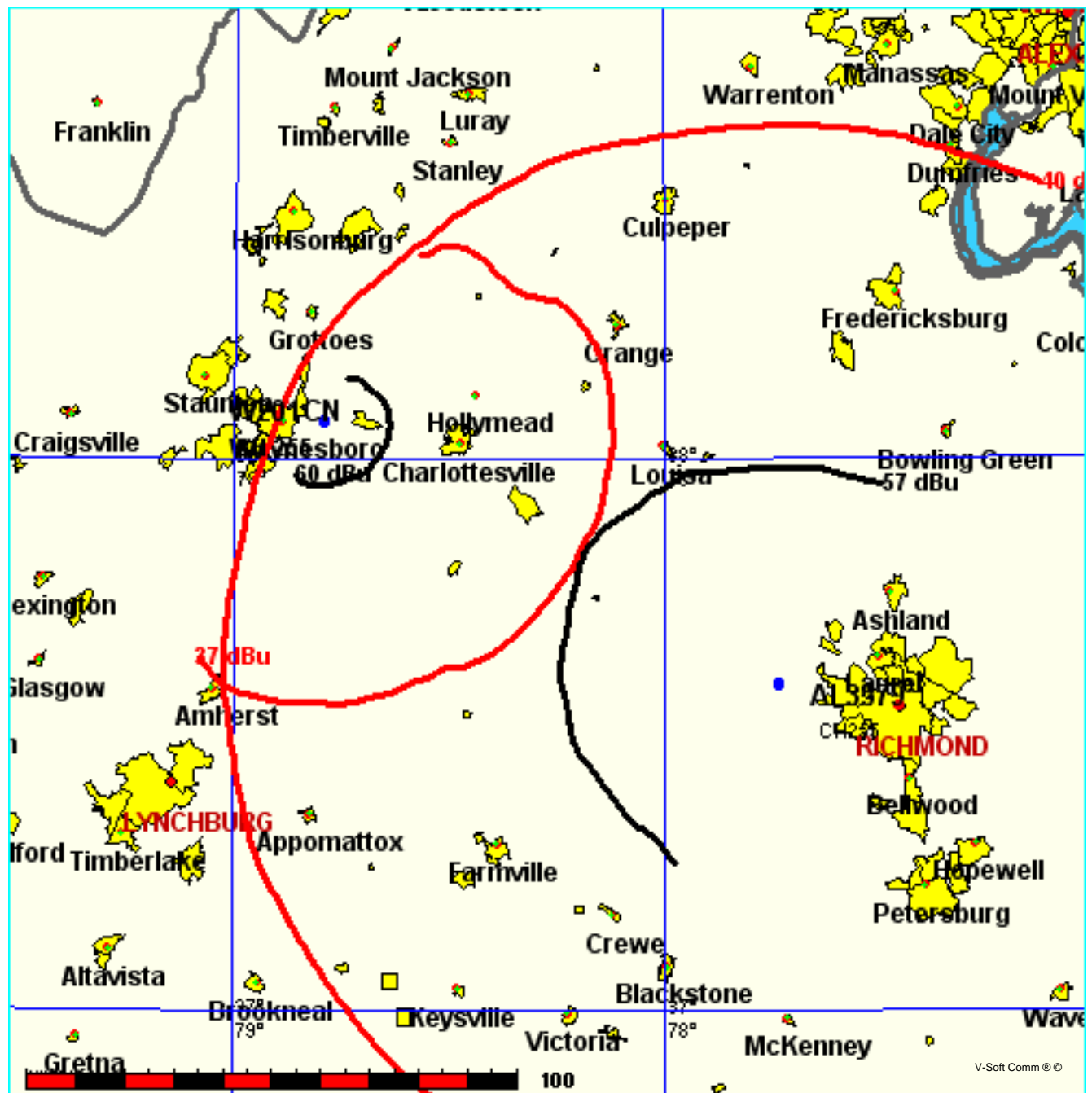
Michael C. Friend, an officer of the applicant corporation, has made an examination of the site and attests to the accuracy of the above statements. His declaration is attached.

NRAO at Greenbank has been notified of this application.

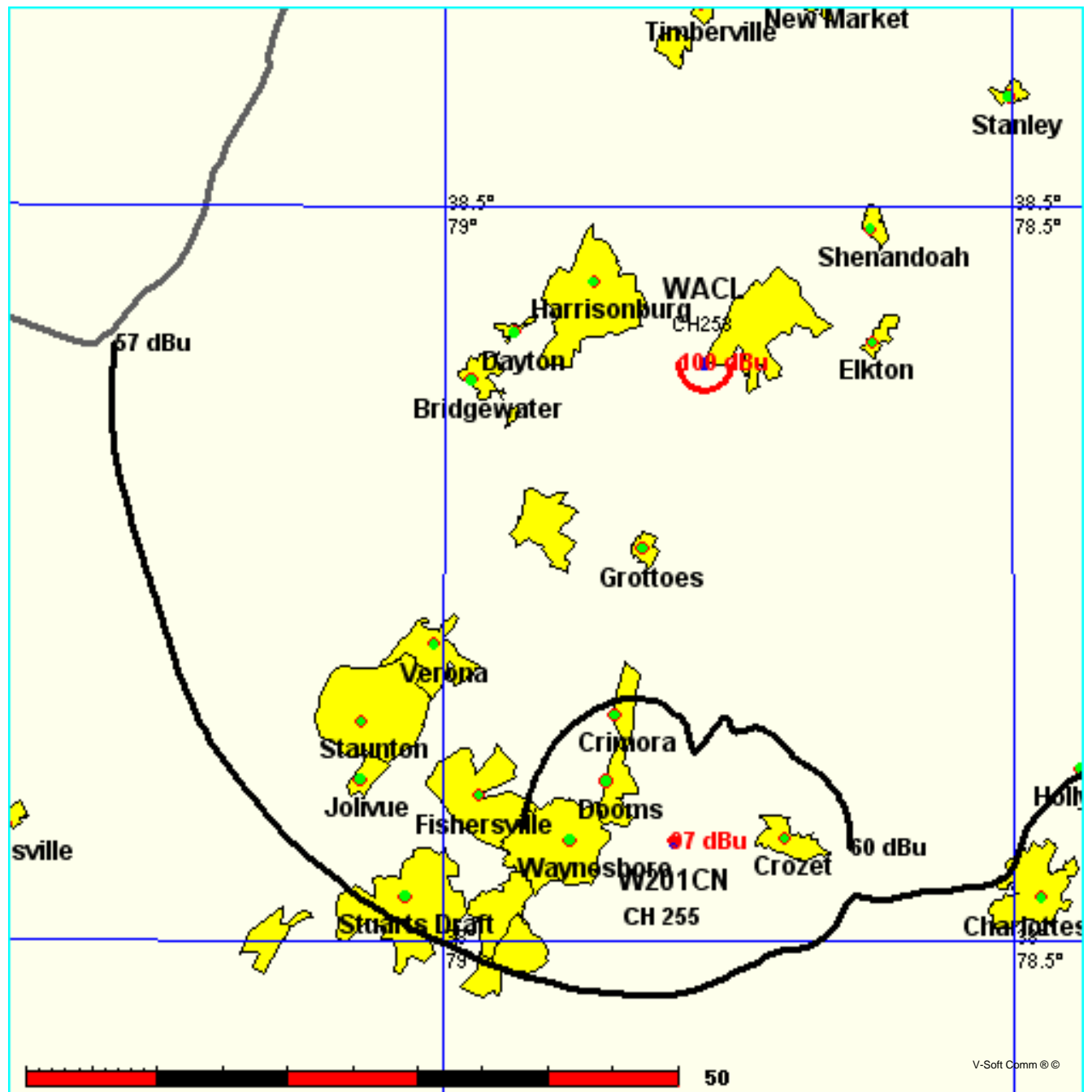
STU-COMM, INCORPORATED - AFTON, VIRGINIA CHANNEL STUDY - PROPOSED CHANNEL 255 TRANSLATOR CH# 255D - 98.9 MHz, Pwr= 0.008 kW, HAAT= 502.6 M, COR= 900 M Average Protected F(50-50)= 11.82 km Omni-directional											
REFERENCE										DISPLAY DATES	
38 04 00.0 N.										DATA 03-07-09	
78 47 53.0 W.										SEARCH 03-14-09	
CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR(kW)	INT(km)	PRO(km)	*IN*	*OUT*
CITY		STATE		<--	FILE #	LNG	HAAT(M)	COR(M)	LICENSEE	(Overlap in km)	
255B1	AL3579	RSV	___	119.6	106.6	37 35 23.0	25.000	115.7	46.7	-22.6*	1.0
Middleton		VA		300.2	RM10592	77 44 49.0	100	176			
253B1	WACL	LIC	_CN	3.8	36.3	38 23 36.0	0.900	2.0	47.9	24.9	-11.9*
Elkton		VA		183.8	BLH19890315KB	78 46 14.0	490	902	Capstar Tx Limited Partner		
256C	WSLQ	LIC	_CY	231.4	154.1	37 11 41.0	200.000	151.5	102.1	-7.4	38.0
Roanoke		VA		50.6	BMLH19830922AA	80 09 22.0	607	1184	Mel Wheeler, Inc.		
255B1	WWLB	LIC	ZCX	113.7	123.5	37 36 52.0	4.800	99.7	44.2	10.3	20.4
Middleton		VA		294.5	BLH20050308ABO	77 30 56.0	227	285	Milb-richmond Iv, LLC		
255B1	WDNE-FM	LIC	_CN	317.7	127.4	38 54 36.0	5.100	82.5	30.5	33.1	46.4
Elkins		WV		137.1	BLH19980401KE	79 47 18.0	221	1015	West Virginia Radio Corpor		
254D	W254AH	LIC	_VN	150.9	84.8	37 23 57.0	0.019	8.5	6.0	63.3	58.1
Farmville		VA		331.2	BLFT19960521TB	78 19 52.0	85	202	Positive Alternative Radio		

Terrain database is NGDC 30 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 = 1, Co to 3rd adjacent.
 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 protected contour.
 "<" = Contour Overlap
 Reference station has protected zone issue: WV Quiet Zone

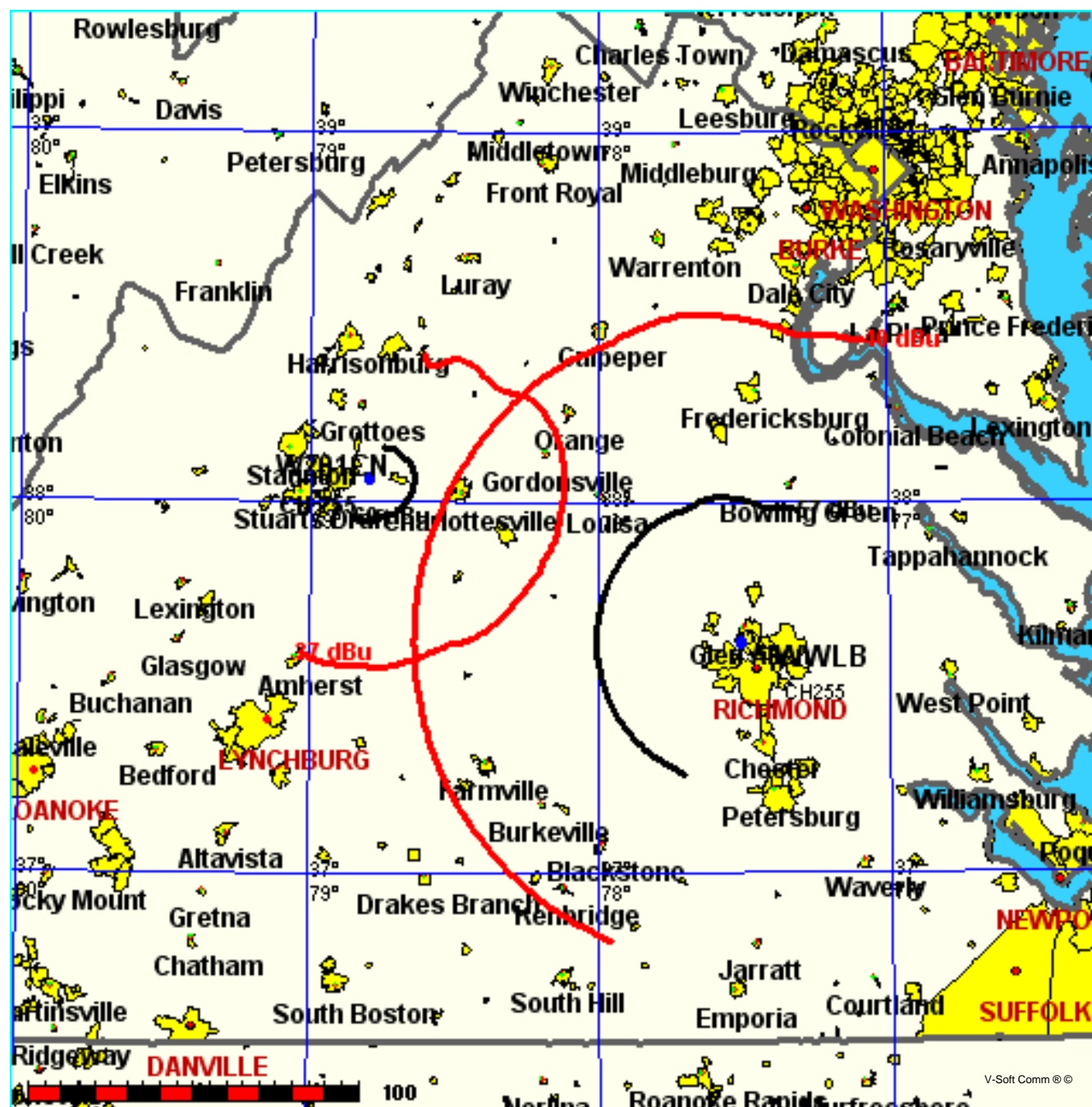
STUCOMM, INC. - AFTON, VIRGINIA
 PROPOSED CHANNEL 255 TRANSLATOR AND AL3579 AT MIDLOTHIAN,

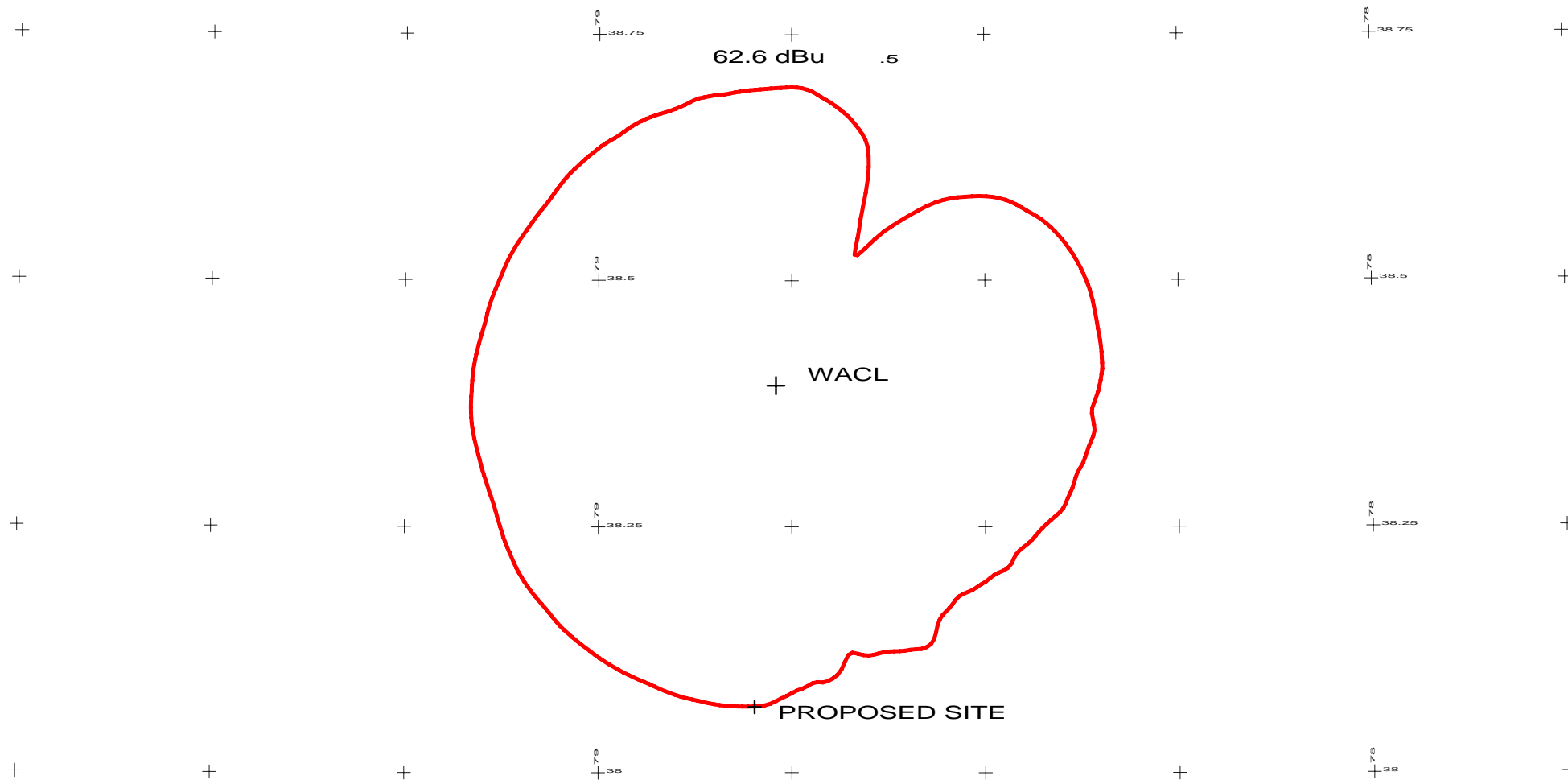


STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND WACL, ELKTON, VA



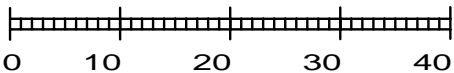
STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND WWLB, MIDLOTHIAN, VA





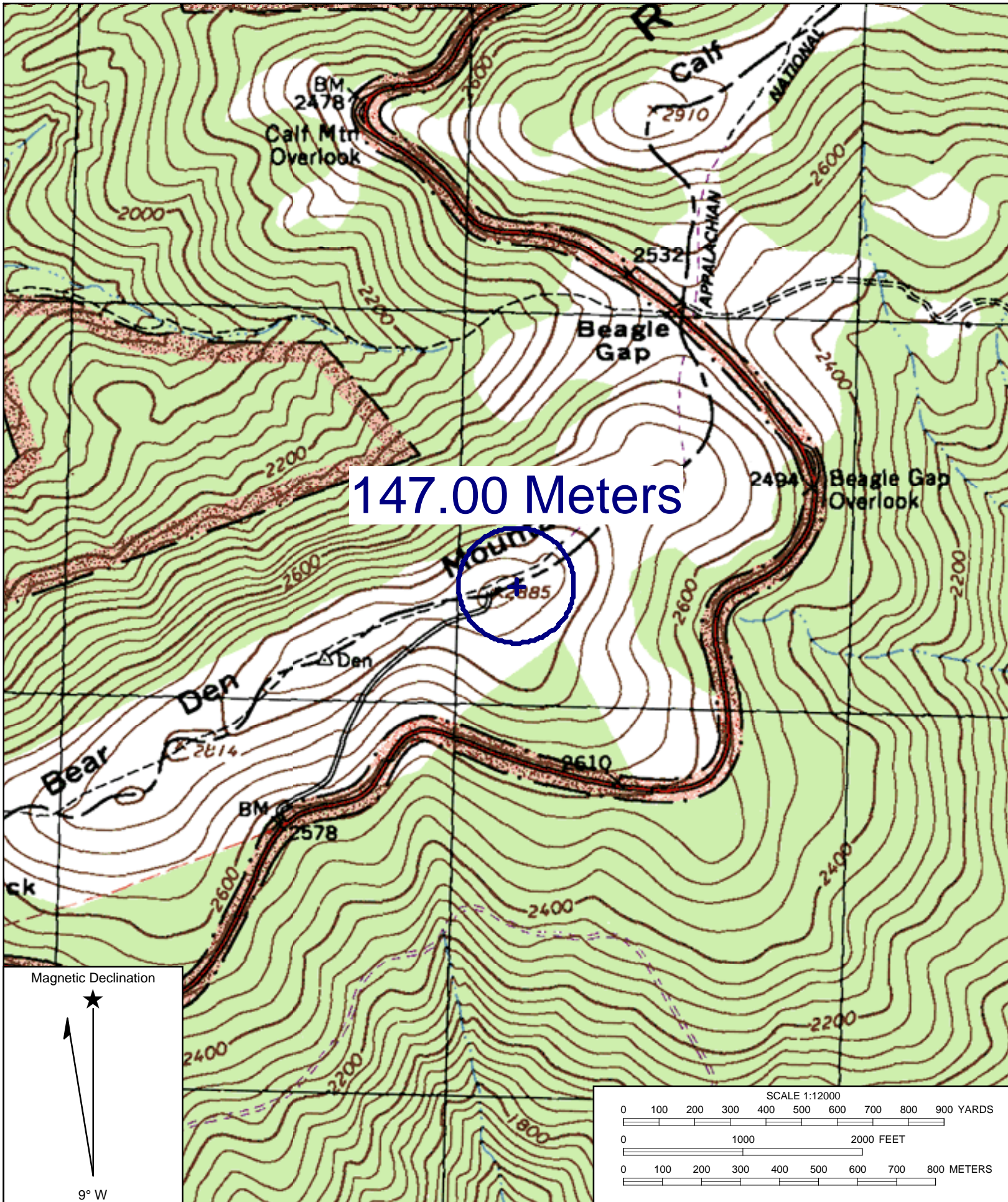
1:750,000

Scale in km



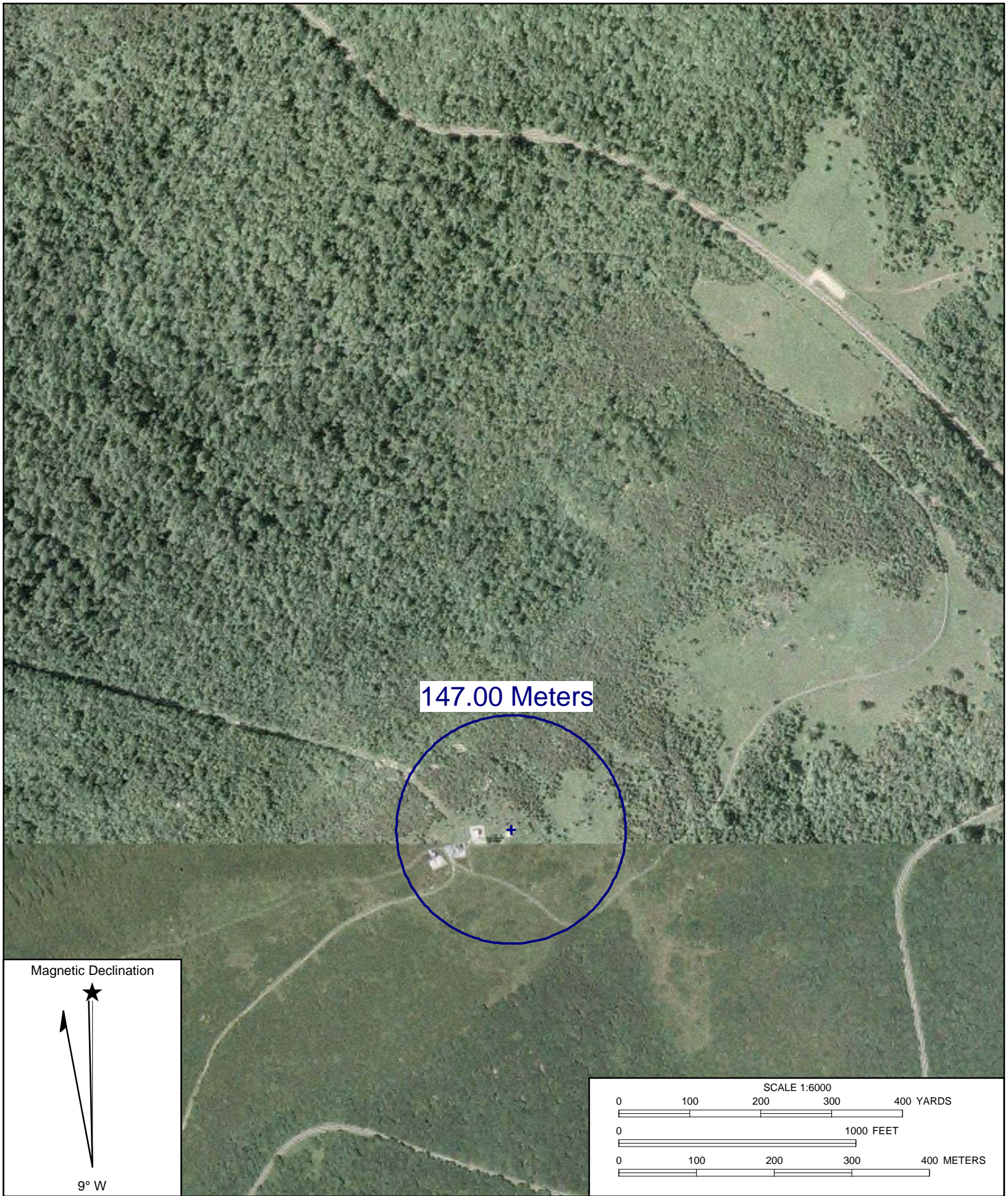
WACL 253B1 .9kW 902M AMSL
N. Lat. 38 23 36 W. Lng. 78 46 14

STUCOMM, INC., AFTON, VA
WACL SIGNAL AT PROPOSED SITE



Name: WAYNESBORO EAST
Date: 2/18/2009
Scale: 1 inch equals 1000 feet

Location: 038° 03' 58.59" N 078° 47' 54.43" W NAD27
Caption: The proposed 102.6 dBu contour. Tower location at 38-04-00N and 78-47-53.30W.



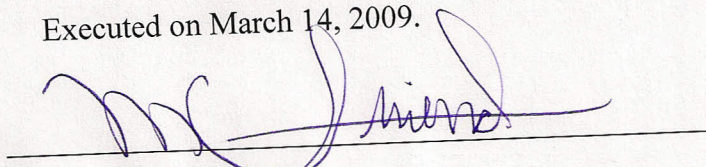
Name: WAYNESBORO EAST NE, VA
Date: 2/18/2009
Scale: 1 inch equals 500 feet

Location: 038° 04' 09.60" N 078° 47' 53.43" W NAD27
Caption: The proposed 102.6 dBu contour. Tower location at 38-04-00N and 78-47-53.30W.

DECLARATION

I declare, under penalty of perjury, that I have personally examined the proposed site that is the subject of this application and that the statements regarding the access road, the gates and the buildings are true to the best of my knowledge and belief.

Executed on March 14, 2009.



Michael C. Friend

President and General Manager
STU-COMM, Inc.