

WMEX at Edgartown, MA - Application for Minor Modification of Construction Permit

Exhibit 17 - TECHNICAL STATEMENT

Summary

This proposed minor CP modification proposes to increase ERP from 0.4 kW (H&V) to 1.0 kW (V-only.)

Section 73.509 Allocation Study

The proposed facility was studied with respect to all nearby possible interferees and interferors. Figures below depict the applicable service and interfering contours of all pertinent stations and permits. Contours which are not permitted to overlap under 73.509 are depicted in same colors. For example, the 54 dBu F(50,10) interfering contour from proposed WMEX on Channel 204 and the 60 dBu F(50,50) service contours of first adjacents WPMW and WWTA (both channel 203) are all depicted in orange.

As illustrated, no prohibited overlap is created or received by the proposed facility, except as noted below.

Request for Appropriate Waiver of Section 73.509

The proposed 60 dBu service contour would receive interference from the facilities authorized (but as yet unbuilt) for WJMF at Smithfield, RI (File No. BMPED-20090824AGX) the over the islands of Naushon and Pasque in the relatively remote Elizabeth Islands chain in Buzzards Bay off the south coast of Massachusetts. The area of overlap is 38.75 km, as shown below. Because virtually all of the land area of these two islands is unpopulated, the population contained within the contour union is zero persons.

The applicant hereby requests an appropriate waiver and submits that a grant of such a waiver would be in the public interest. The population served within the proposed WMEX 60 dBu service contour would increase to 36,702 from the present 22,043. This is a 66.5% increase with an additional 14,659 persons served. Yet not one single person would receive interference.

The applicant further submits that the difference between overlap over water, for which waivers are routinely granted, and overlap over small unpopulated portions of remote islands, may be considered essentially de minimus and insignificant.

TV Channel 6 Protection

The only full power TV or Class A LPTV station on Channel 6 within 235 km. of the proposed WMEX is WEDY-DT at New Haven, CT at 192.2 km. WEDY-DT is thus an affected station under 73.525. However, the proposed 56.6 dBu undesired signal from the proposed WMEX on Channel 204 does not approach the 47 dBu desired signal from WEDY-DT at any point. It is, in fact, considerably distant.

Environmental Considerations

The applicant proposes to mount its antenna on an existing tower with the center of radiation 57 meters above ground level. Therefore, this proposal will have no environmental impact other than RFR exposure. Compliance with RFR exposure rules was established using the RF worksheets #1 and 1A of Form 340 Instructions. Co-located WMVY (6 kW total) and WCAI (CP for 25 kW total) were included.

The tower is inaccessible to the general public and marked with appropriate warning signs. Applicant will reduce power or cease operation as necessary to protect workers having access to the tower from RFR exposure in excess of FCC guidelines.

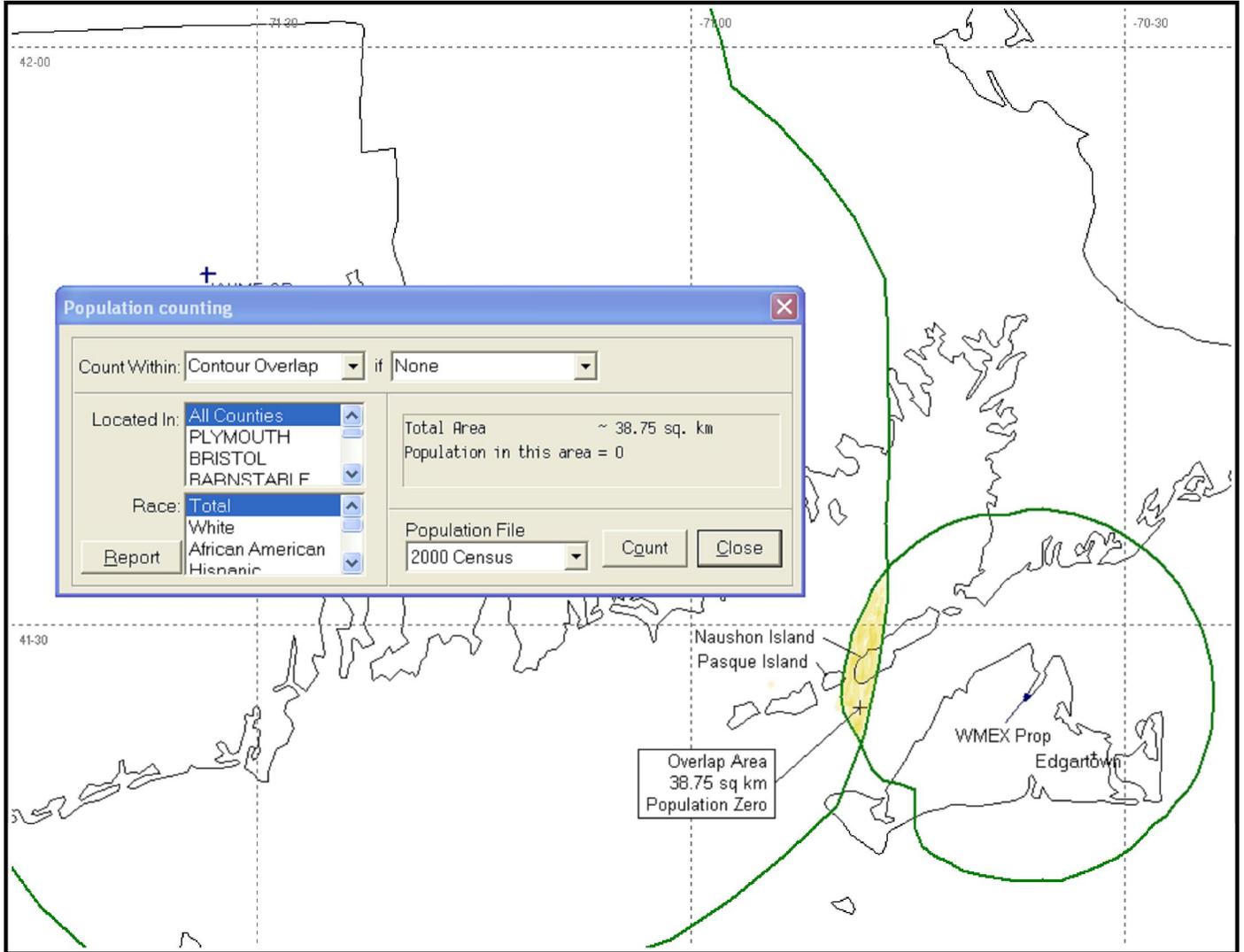
Respectfully submitted,



Dennis Jackson
President
May 12, 2011

Request for Waiver of Section 73.509 Overlap

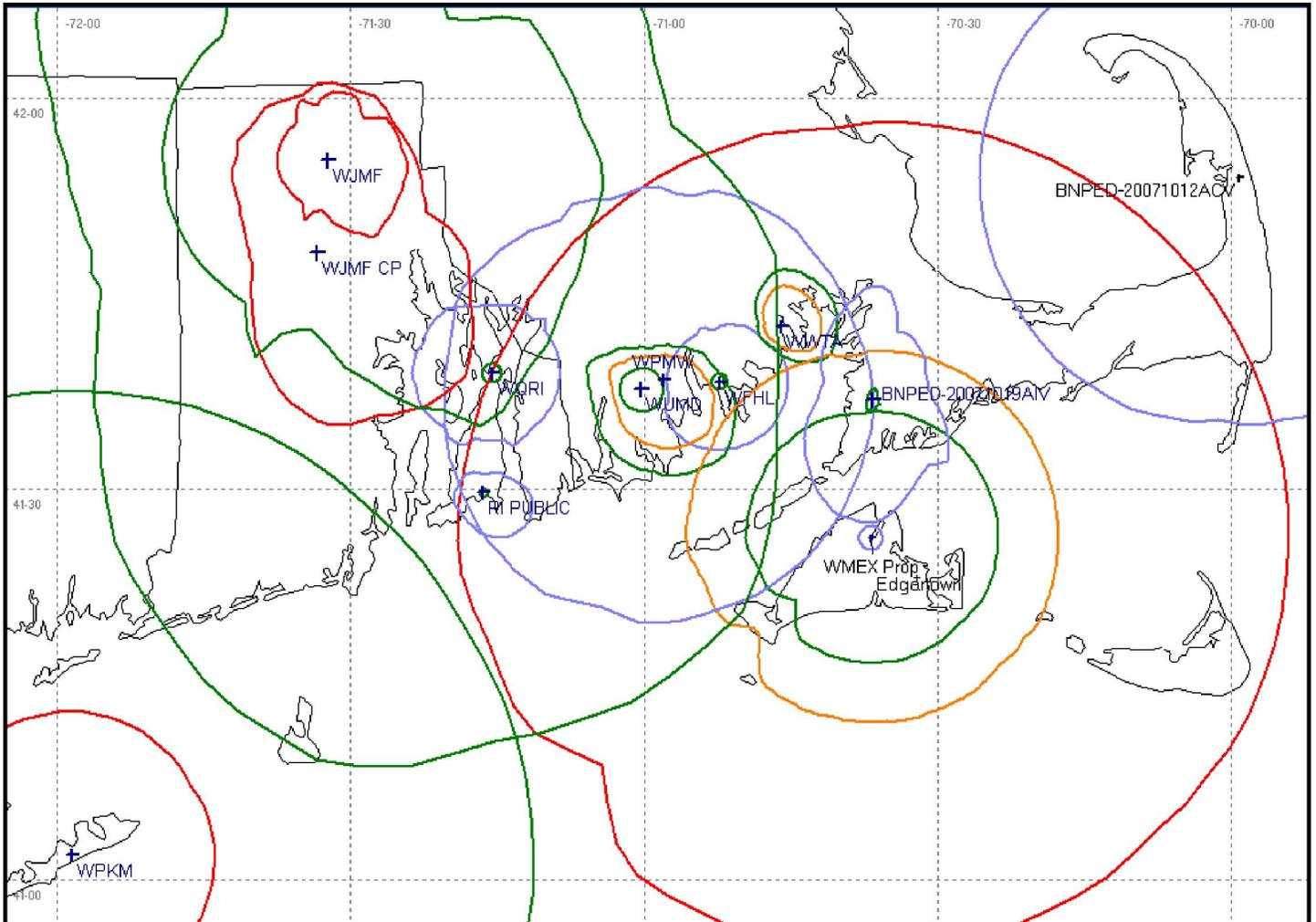
Overlap Received From WJMF CP Lies Over Water and Unpopulated Island Areas



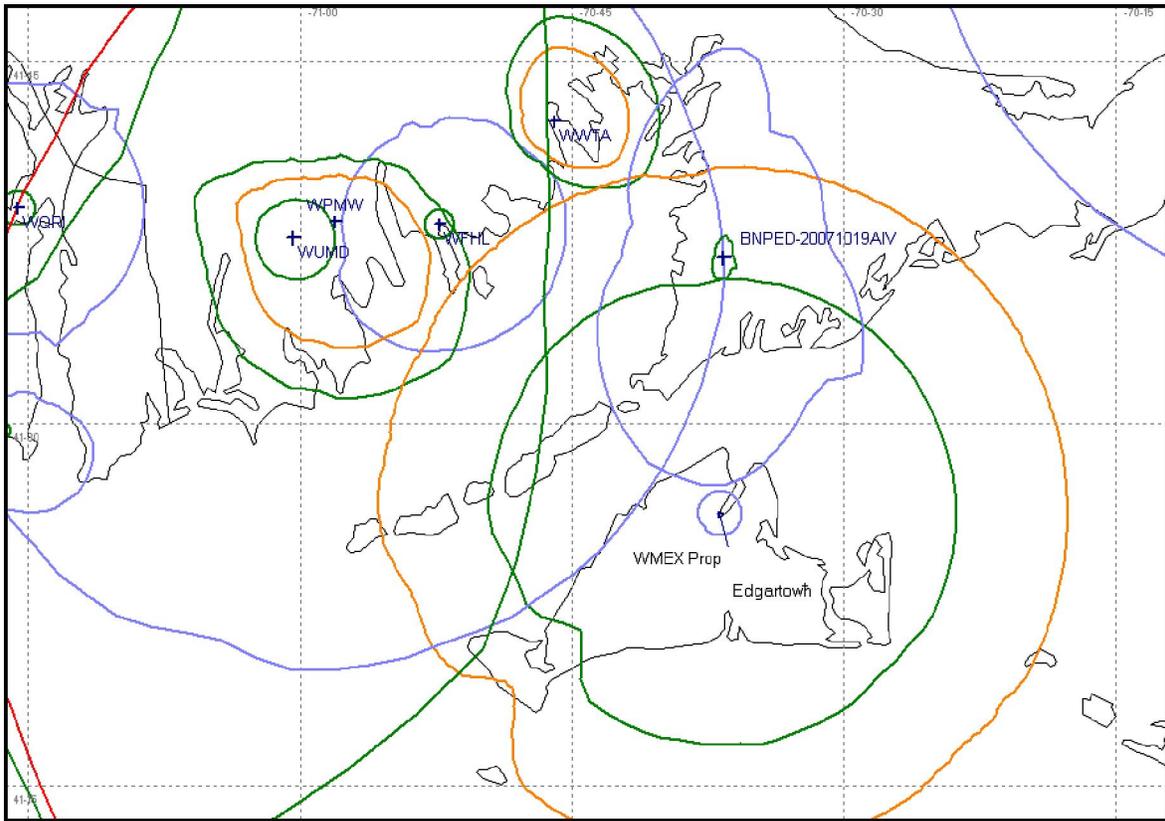
Allocation Study and Closeup - Same color may not overlap.

Green: Proposed WMEX 60 dBu F(50,50) Service Contour
Orange: Proposed WMEX 54 dBu F(50,10) Interfering Contour
Red: Proposed WMEX 40 dBu F(50,10) Interfering Contour
Blue: Proposed WMEX 100 dBu F(50,10) Interfering Contour

Section 73.509 Study - Overview



Closeup Detail



Detail of Protection from BNPED-20071019AIV at East Falmouth, MA

