

W232CB Facility ID: 31140
Construction Permit Application
February 28, 2013

Overlap Study

There is prohibited overlap of the proposed 94 dbu F(50:10) interfering contour with respect to second adjacent stations WIAD in Bethesda MA and WKYS in Washington DC. Section 74.1204(d) states that "The provisions of this section concerning prohibited overlap will not apply where the area of such overlap lies entirely over water. In addition, 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 other factors as may be applicable."

We will demonstrate that a lack of population and/or other factors allow this proposal to be compliant with 74.1204. The process commonly called "Living Way", as recently described in FCC 08-242 in connection with BPFT-19981001TA, allows for the use of U/D Analysis, also known as "signal strength ratio methodology." In this instant case the facilities of WIAD and WKYS are second adjacent channels to this proposal which are to be afforded protection from signals 40 dB stronger.

As indicated in Figure 3, the predicted WIAD F(50:50) 66.05dbu and WKYS F(50:50) 64.20dbu contours each intersect the proposed W232CB transmitter site. The predicted actual interfering contour from this proposal is therefore 106.06 dbu with respect to WIAD and 104.2 dbu with respect to WKYS. Using straight line methodology and without regard to the antenna elevation pattern, the worst case 104.2dbu interfering contour extends 335 meters from the antenna in all directions. As indicated in Figure 4, there are no residences or public areas within this contour. Thus, no actual interference is predicted to occur to the general public.

This application is in compliance with Section 74.1204 in all other respects. An overlap study is presented in tabular form below that demonstrates no other prohibited overlap is predicted to occur from this proposal.

Comstudy 2.2 Search of Channel 232 (94.3 MHz Class D) at 39-16-01.6N, 77-19-10.4 W

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Clr
W232CB	MD	FREDERICK	94.3	232	45	D	LIC	30.15	-26.60 dB
W232CB	MD	FREDERICK	94.3	232	25	D	CP	19.05	-23.93 dB
WIAD	MD	BETHESDA	94.7	234	20500	B	LIC	38.47	-12.67 dB
WKYS	DC	WASHINGTON	93.9	230	24500	B	LIC	41.74	-10.75 dB
WIAD	MD	BETHESDA	94.7	234	50000	B	LIC	36.83	-9.65 dB
WKYS	DC	WASHINGTON	93.9	230	25000	B	LIC	41.74	-6.71 dB
WQCM	PA	GREENCASTLE	94.3	232	3500	A	LIC	65.74	3.94 dB
WKYS	DC	WASHINGTON	93.9	230	5800	B	LIC	44.07	6.01 dB
WKYS	DC	WASHINGTON	93.9	230	245	B	CP	41.74	9.25 dB
WWXX	VA	BUCKLAND	94.3	232	2000	A	LIC	73.45	10.72 dB
WDAC	PA	LANCASTER	94.5	233	19000	B	LIC	116.14	17.41 dB
WQZK-FM	WV	KEYSER	94.1	231	13000	B	LIC	141.92	19.91 dB
WAVA-FM	VA	ARLINGTON	105.1	286	19500	B	LIC	36.83	21.8 db
WDAC	PA	LANCASTER	94.5	233	13500	B	LIC	116.11	23.49 dB
WINX-FM	MD	ST. MICHAELS	94.3	232	4600	A	LIC	130.3	25.88 dB

Figure 3

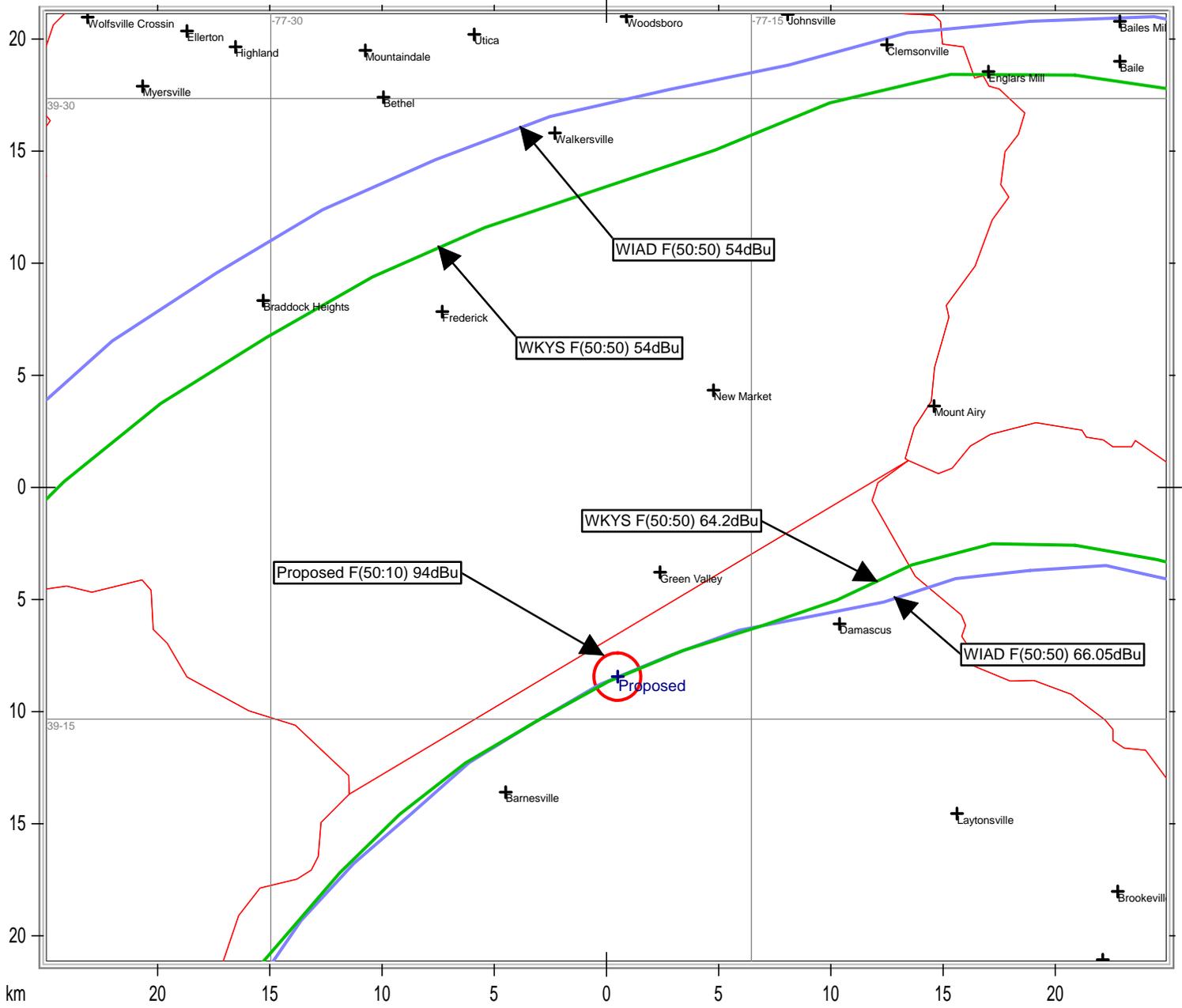


Figure 4



W232CB Proposed Worst Case 104.4dbu Interfering Contour