

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contour of the second-adjacent WGMF, Tunkhannock, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WGMF, Tunkhannock, PA, second adjacent channel facility to this translator proposal, is protected from interference within their 60 dBu contours 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 (WGMF) 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 60 dBu contour (based on 73.333 F(50/50)) of WGMF, Tunkhannock, 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 WGMF. Included as an attachment (W297AL Tunkhannock, PA Desired to Undesired Ratios Map) is a map showing that the 74 dBu coverage contours of WGMF (the current licensed site and the current operating STA produce nearly the same coverage, the 74 dBu coverage contour is the correct overlapping contour for either WGMF operation, STA or licensed) encompasses the proposed antenna site along with the entire proposed 114 dBu interference contour. As the proposed 114 dBu interference contour is 40 dBu greater than the 74 dBu contour of WGMF then this contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 114 dBu interference contour of this proposed translator.

3. Given this translator's requested effective radiated power of 7 watts, directional; the predicted 114 dBu interference contour for this proposal

would be exceedingly small. At any HAAT value, the maximum 114 dBu contour distance for this proposal is 0.04 kilometers at 220 degrees from true north and smaller than this in all other directions.

4. This proposed translator site is situated in a very sparsely populated rural tower farm area. W297AL Tunkhannock, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 114 dBu interference contour of this proposal with no dwellings located within this contour. This map overstates the 114 dBu contour as it is drawn as if a non-directional antenna were employed operating at 7 watts ERP at the same location as the proposed directional antenna. This was done only because the contours were so exceedingly small that they were difficult to draw. 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 WGMF, Tunkhannock, 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 facilities, WGMF, Tunkhannock, PA.

By: Kevin Fitzgerald, Director of Engineering