EXHIBIT D-1

CONTOUR OVERLAP AND
LONGLEY-RICE INTERFERENCE STUDIES

PROPOSED W25AA
CHANNEL 25 - ONANCOCK, VIRGINIA

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit D-2. The study is based on contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except to two stations: WTVR-DT, Channel 25 in Richmond, Virginia; and, WTVE-DT, Channel 25 in Red Lion, Pennsylvania.

We then conducted a detailed interference study using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to WTVR-DT and WTVE-DT. The software utilizes a 2-square kilometer cell size (except where noted), calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed W25AA) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit D-3. They conclude that the facility proposed herein causes no interference to any of the facilities of concern.

EXHIBIT D-1

As a result, waiver of Section 74.706 of the Commission's Rules with respect to interference to WTVR-DT and WTVE-DT is requested and believed to be justified based on the aforementioned Longley-Rice studies.