

Engineer's Exhibit

In Support of a Request for Waiver of Rule 73.215(e) WHDD-FM, Facility ID 173310

A minor change application for WHDD-FM, FID-173310, 220A, includes a request for waiver of rule 73.215(e) with regards to 3rd adjacent station WWYZ, FID-74205, 223B. The 73.215(e) spacing table requires 63km of separation between 3rd Adjacent class A and class B stations. The application proposes a location that is spaced 58.4km from WWYZ, a shortage of 4.6km.

The applicant offers the following facts in support of the waiver:

First; There is no prohibited overlap of protected and interfering contours. The clearance between the proposals 94dBu interfering contour and WWYZ's 54dBu protected contour is approximately 5km. See Exhibit A.

Second; The proposal will provide first NCE service to a larger area and population than WHDD-FM's current facility. In addition, the proposal will provide new second NCE service. Referring to Exhibit B; The red contour represents the present service area provided by WHDD-FM. This configuration provides First NCE Service to 5,196 persons. The blue contour represents the service area that will be provided by the proposed facility. This configuration will provide First NCE Service to 5,775 persons and Second NCE Service to 687 persons.

Third; The proposal will increase the coverage of the Community-of-License from 67% of the population and 35% of the area to 97% of the population and 89% of the area. See Exhibit C.

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Exhibit A

No overlap of prohibited contours

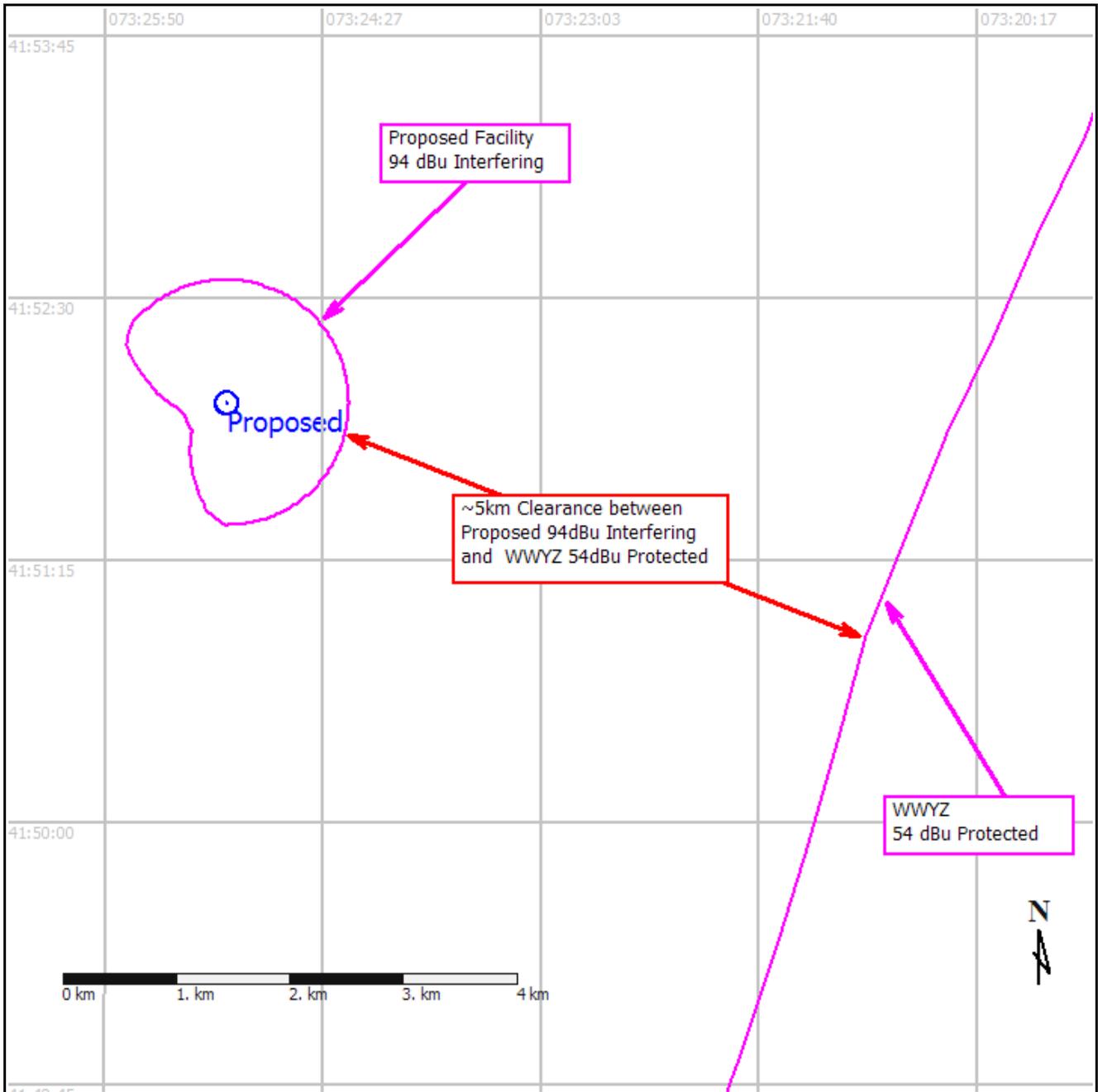
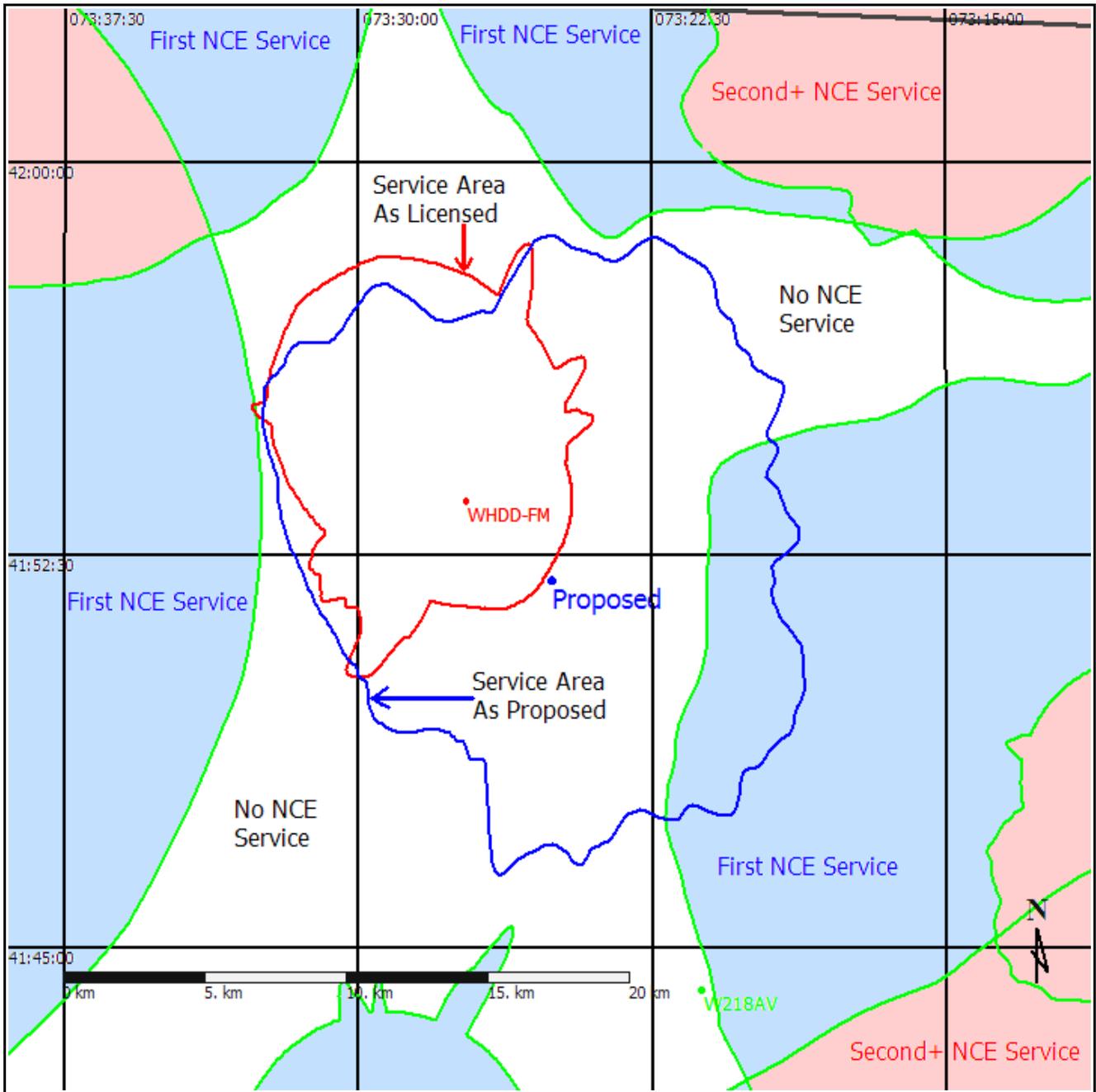


Exhibit B Increase in First and Second NCE Service



The white areas indicate regions of no NCE Service, the blue areas indicate regions of only first NCE Service and the red areas indicate regions of 2 or more NCE Servers.

Exhibit C

Increase in Community-of-License Coverage

