

STU-COMM, INC.

AFTON, VIRGINIA

TABLE OF ATTACHMENTS

ENGINEERING NARRATIVE

CHANNEL STUDY

ALLOCATION STUDY AL 3579, MIDLOTHIAN, VA (RESERVATION)

ALLOCATION STUDY WACL, CHANNEL 255B1, ELKTON, VA

ALLOCATION STUDY WWLB, CHANNEL 255B1, MIDLOTHIAN, VA

MAP OF THE WACL 102.5 dBu CONTOUR AND THE PROPOSED SITE

TOPOGRAPHIC SITE MAP

AERIAL PHOTOGRAPH

DECLARATION

STU-COMM, INC.

AFTON, VIRGINIA

NARRATIVE

This minor change application is filed to change the channel of W201CN to channel 255D, the fifty-fourth adjacent channel. The proposed non-directional antenna will be installed at the same height on the present tower.

Attachments to this exhibit include a channel study, an allocation study for the channel 255B1 reservation at Midlothian, Virginia; an allocation study for WACL, channel 255B1 at Elkton, Virginia; and an allocation study for WWLB, channel 255B1 at Midlothian, Virginia. Also attached are an aerial photograph and a portion of the USGS topographic map showing the site. The photograph and the map show the 102.6 dBu contour.

The proposed site is inside the protected contour of second-adjacent channel station WACL, channel 253B1. As shown on the attached map, the WACL 62.6 dBu contour passes through the proposed translator site. Using the U/D interference computation method, the interfering contour will be the proposed 102.6 dBu which extends 147 meters from the proposed tower. A waiver for this interference is requested under the provision of §74.1204(d) on the basis that no actual interference will occur due to a lack of population. As can be seen in the attached aerial photograph, the proposed 102.6 dBu contour extends 147 meters from the tower. The only buildings inside the contour are used to house communications equipment, and none have personnel in regular attendance. The only vehicular access to the site is through a locked gate and passage through private property.

Further to the above, any person inside the proposed 102.6 dBu contour would be either an electronic technician visiting one of the communications facilities on an irregular basis or a hiker passing by the electronic site on an irregular basis. The road cannot be classified as a highway or a heavily traveled road. Based on the foregoing, if a person were present inside the proposed 102.6 dBu contour, (1) they would not live there, (2) they would not work there on a regular basis, and (3) they would not travel there on a regular basis. Therefore, for purposes of §74.1204(d), there is no population inside the overlap area. (See Living Way Ministries, Inc., 17FCC Rcd 17054 (2002), reconsidered FCC 08-242, released October 10, 2008, especially the section "Guidance for Future Applicants to Demonstrate Lack of Population" at paras, 7-13.)

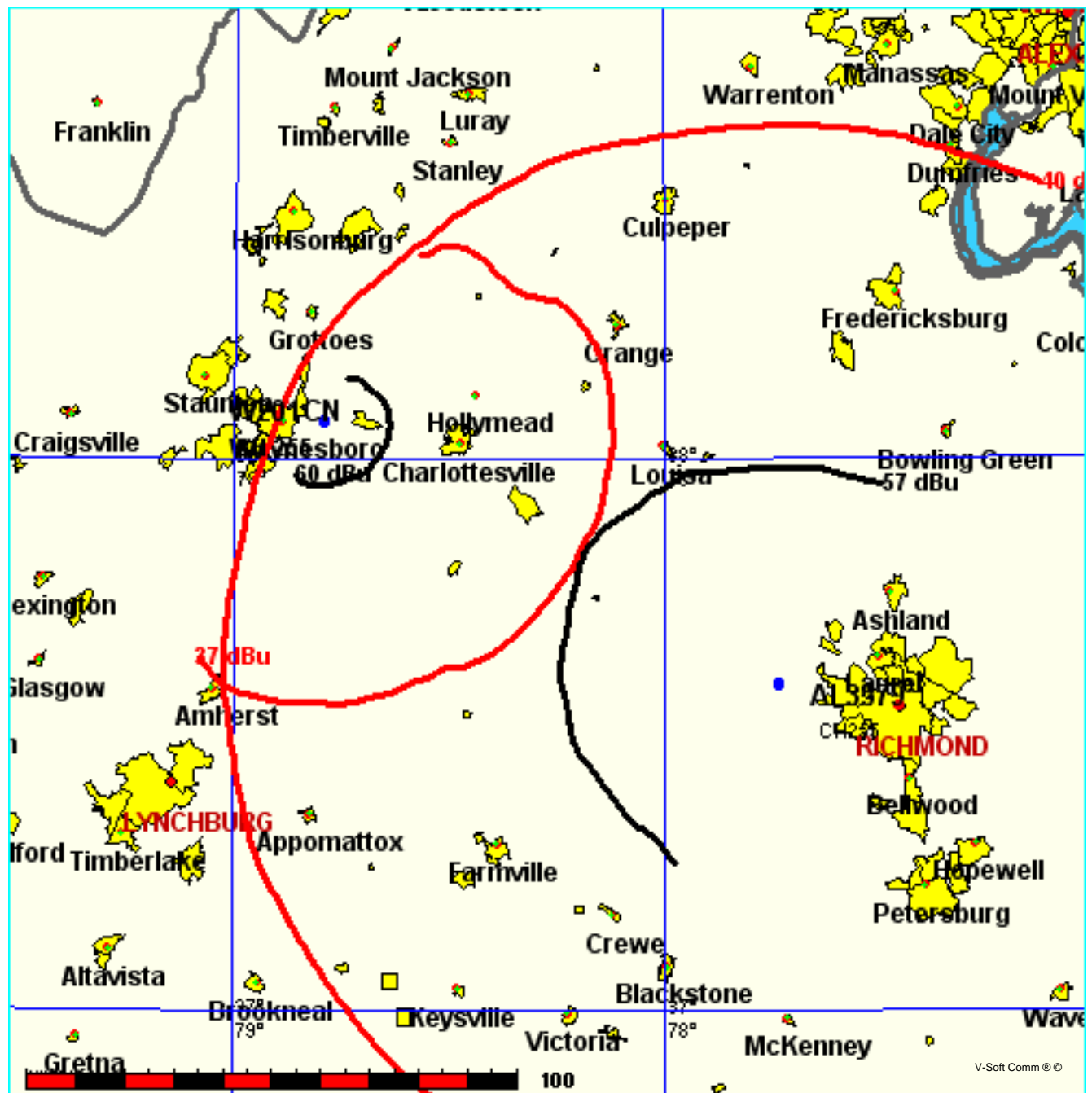
Michael C. Friend, an officer of the applicant corporation, has made an examination of the site and attests to the accuracy of the above statements. His declaration is attached.

NRAO at Greenbank has been notified of this application.

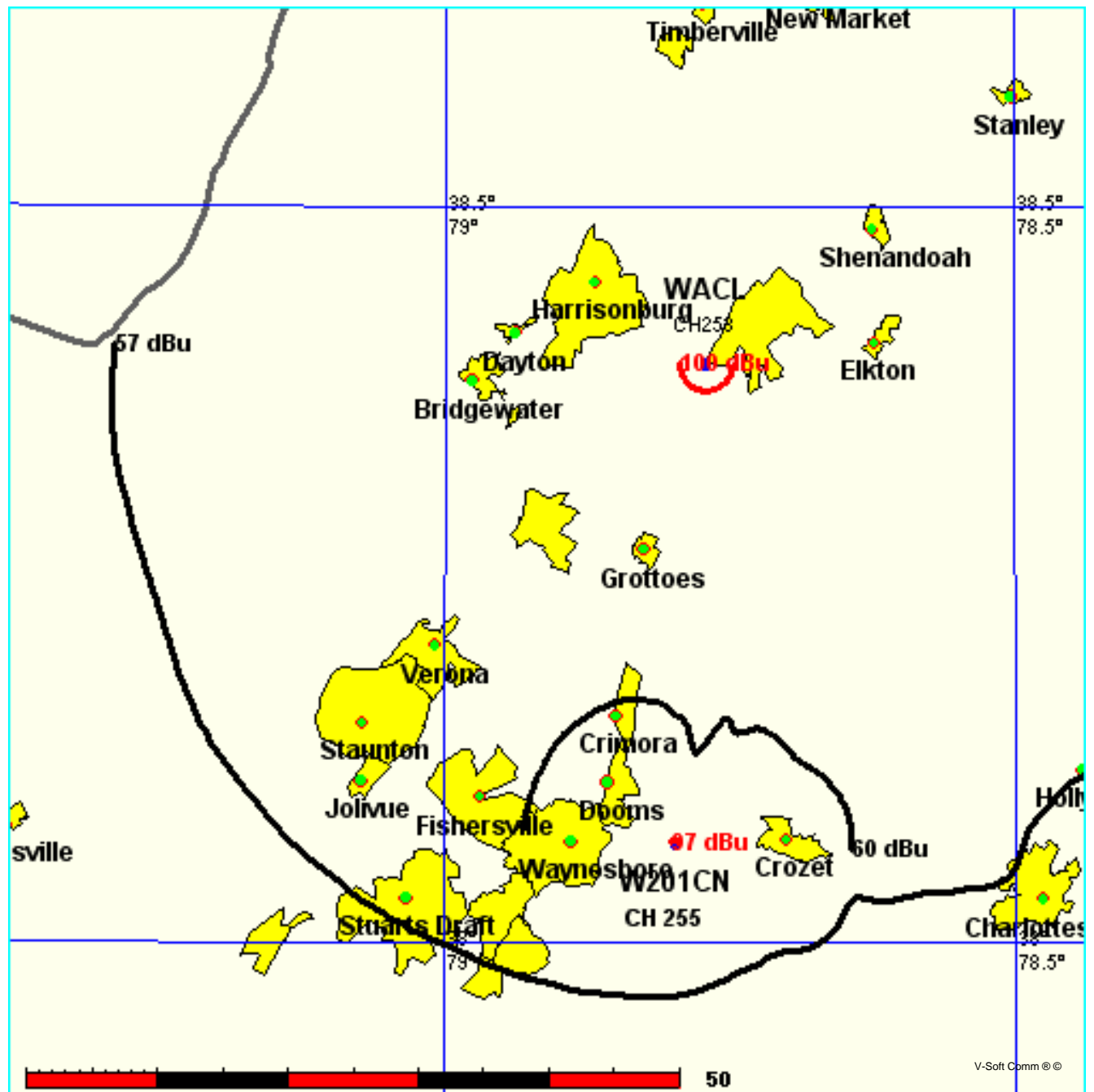
| STU-COMM, INCORPORATED - AFTON, VIRGINIA | | | | | | | | | | | |
|---|---------|-------|-----|-------|----------------|------------|---------|---------|----------------------------|-----------------|--------|
| CHANNEL STUDY - PROPOSED CHANNEL 255 TRANSLATOR | | | | | | | | | | | |
| CH# 255D - 98.9 MHz, Pwr= 0.008 kW, HAAT= 502.6 M, COR= 900 M | | | | | | | | | | | |
| Average Protected F(50-50)= 11.82 km | | | | | | | | | | | |
| Omni-directional | | | | | | | | | | | |
| DISPLAY DATES | | | | | | | | | | | |
| DATA 03-07-09 | | | | | | | | | | | |
| SEARCH 03-14-09 | | | | | | | | | | | |
| CH | CALL | TYPE | ANT | AZI | DIST | LAT | PWR(kW) | INT(km) | PRO(km) | *IN* | *OUT* |
| CITY | | STATE | | <-- | FILE # | LNG | HAAT(M) | COR(M) | LICENSEE | (Overlap in km) | |
| 255B1 | AL3579 | RSV | ___ | 119.6 | 106.6 | 37 35 23.0 | 25.000 | 115.7 | 46.7 | -22.6* | 1.0 |
| Middleton | | VA | | 300.2 | RM10592 | 77 44 49.0 | 100 | 176 | | | |
| 253B1 | WACL | LIC | _CN | 3.8 | 36.3 | 38 23 36.0 | 0.900 | 2.0 | 47.9 | 24.9 | -11.9* |
| Elkton | | VA | | 183.8 | BLH19890315KB | 78 46 14.0 | 490 | 902 | Capstar Tx Limited Partner | | |
| 256C | WSLQ | LIC | _CY | 231.4 | 154.1 | 37 11 41.0 | 200.000 | 151.5 | 102.1 | -7.4 | 38.0 |
| Roanoke | | VA | | 50.6 | BMLH19830922AA | 80 09 22.0 | 607 | 1184 | Mel Wheeler, Inc. | | |
| 255B1 | WWLB | LIC | ZCX | 113.7 | 123.5 | 37 36 52.0 | 4.800 | 99.7 | 44.2 | 10.3 | 20.4 |
| Middleton | | VA | | 294.5 | BLH20050308ABO | 77 30 56.0 | 227 | 285 | Milb-richmond Iv, LLC | | |
| 255B1 | WDNE-FM | LIC | _CN | 317.7 | 127.4 | 38 54 36.0 | 5.100 | 82.5 | 30.5 | 33.1 | 46.4 |
| Elkins | | WV | | 137.1 | BLH19980401KE | 79 47 18.0 | 221 | 1015 | West Virginia Radio Corpor | | |
| 254D | W254AH | LIC | _VN | 150.9 | 84.8 | 37 23 57.0 | 0.019 | 8.5 | 6.0 | 63.3 | 58.1 |
| Farmville | | VA | | 331.2 | BLFT19960521TB | 78 19 52.0 | 85 | 202 | Positive Alternative Radio | | |

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
Contour distances are on direct line to and from reference station. Reference zone = 1, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"***"affixed to 'IN' or 'OUT' values = site inside protected contour.
"<" = Contour Overlap
Reference station has protected zone issue: WV Quiet Zone

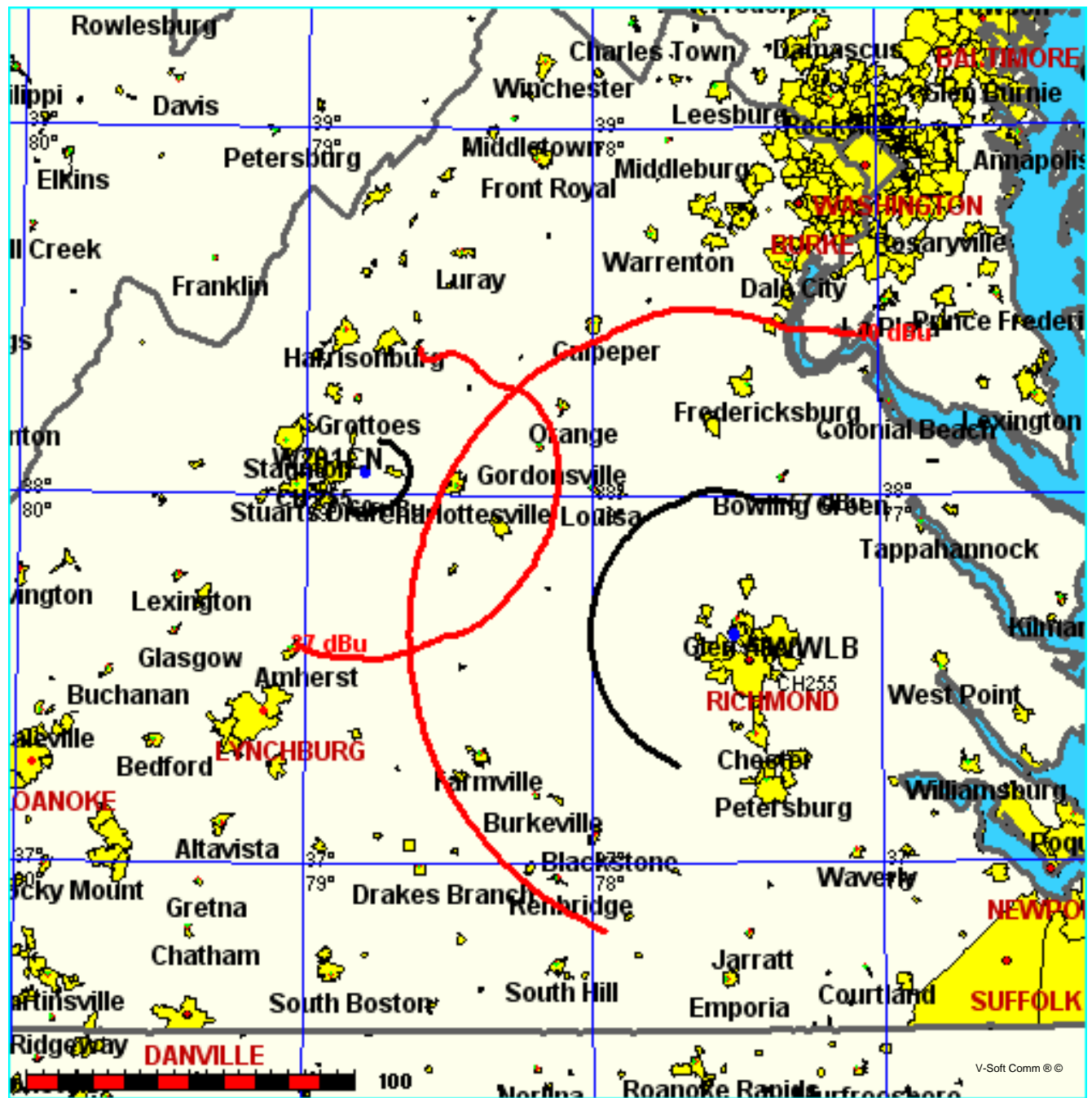
STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND AL3579 AT MIDLOTHIAN,

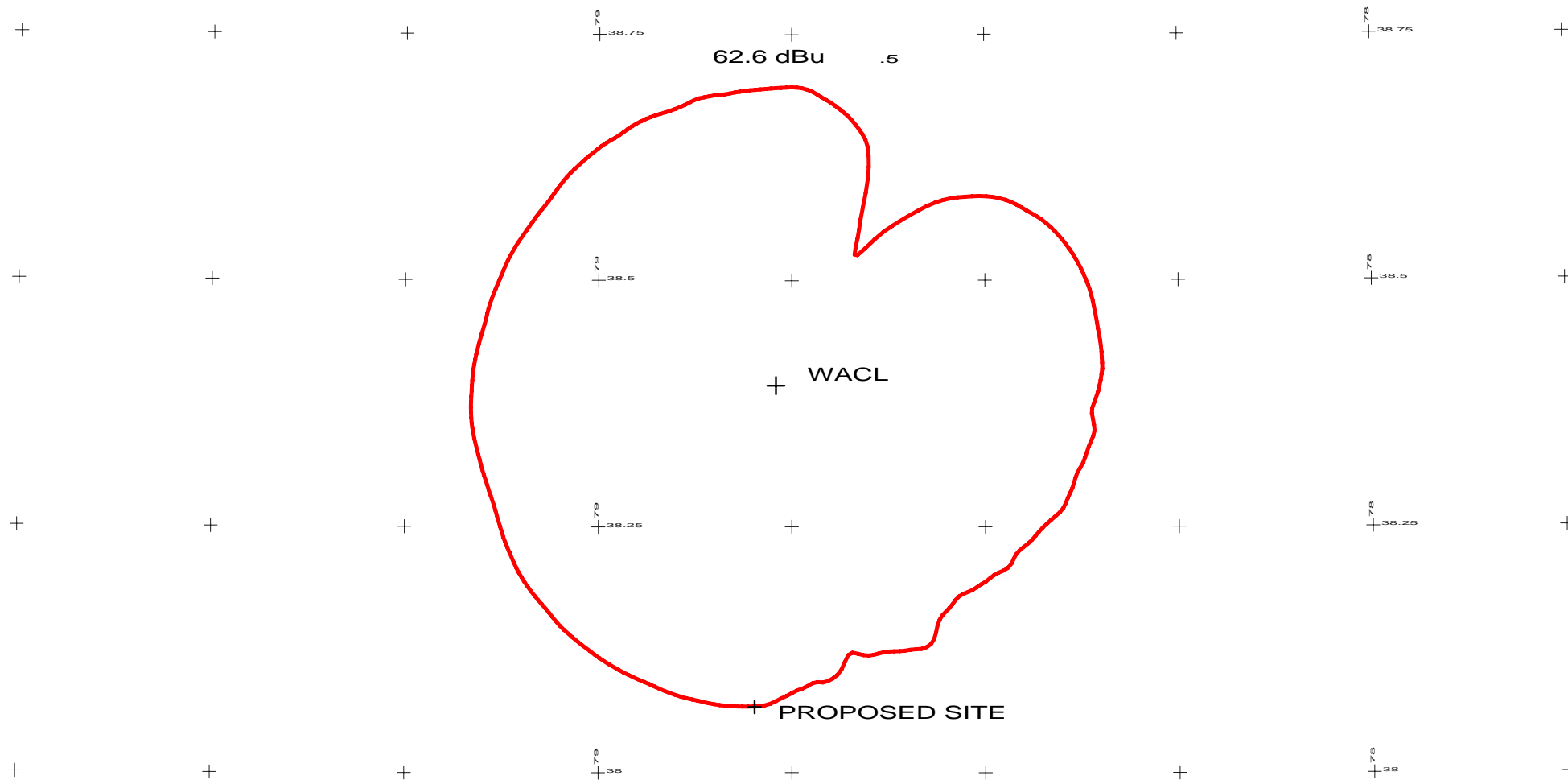


STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND WACL, ELKTON, VA



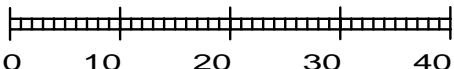
STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND WWLB, MIDLOTHIAN, VA





1:750,000

Scale in km

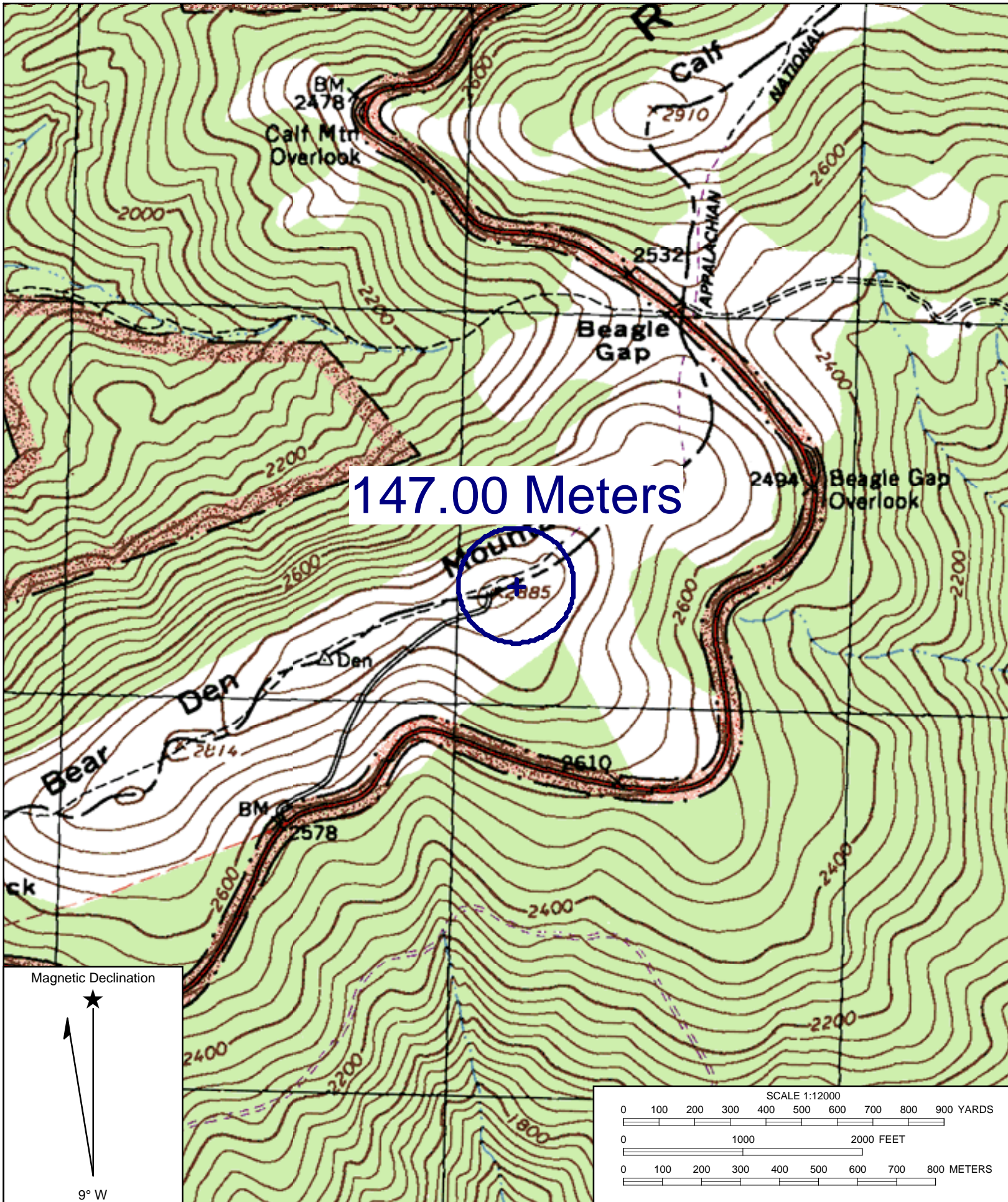


WACL 253B1 .9kW 902M AMSL

N. Lat. 38 23 36 W. Lng. 78 46 14

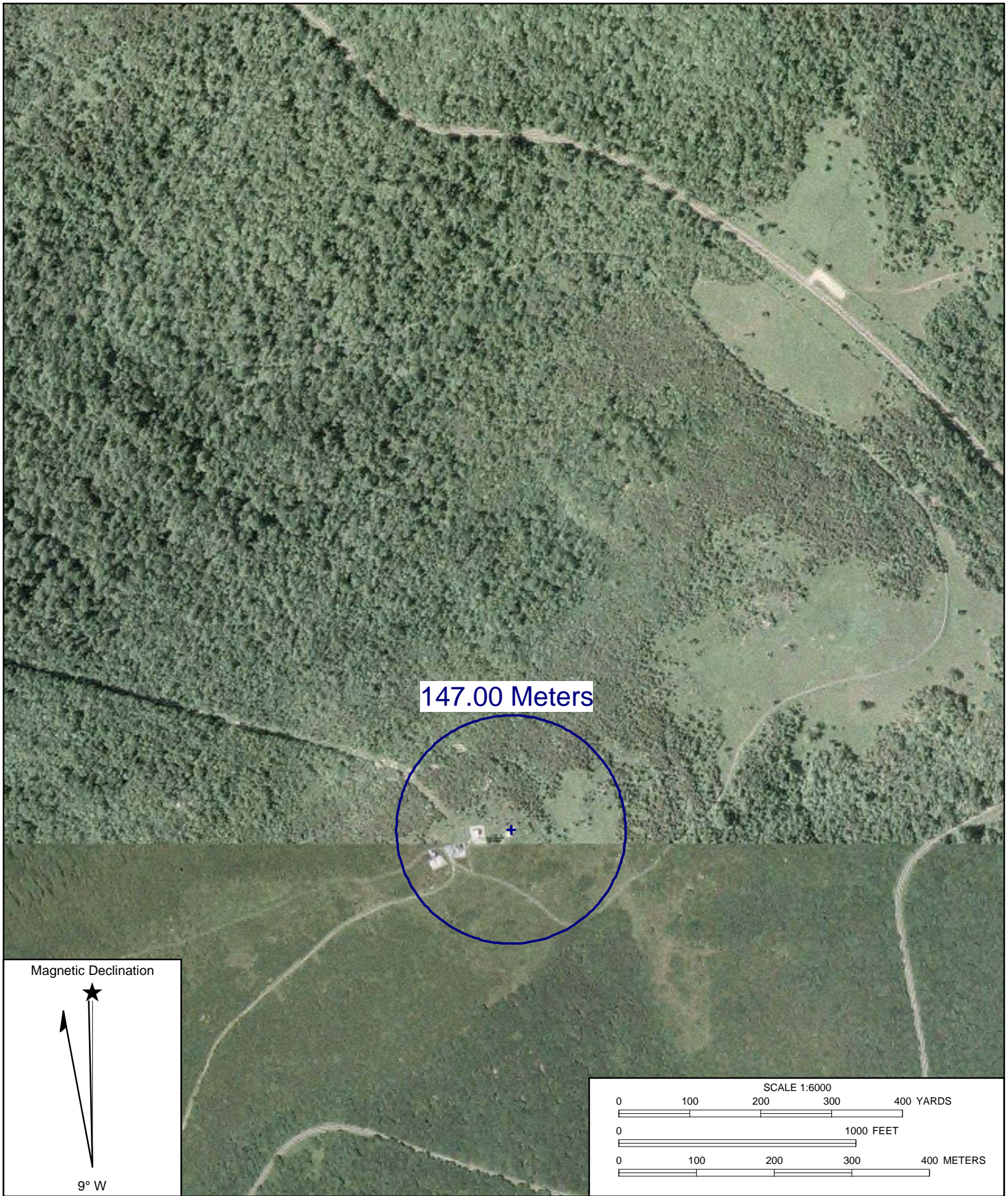
STUCOMM, INC., AFTON, VA

WACL SIGNAL AT PROPOSED SITE



Name: WAYNESBORO EAST
 Date: 2/18/2009
 Scale: 1 inch equals 1000 feet

Location: 038° 03' 58.59" N 078° 47' 54.43" W NAD27
 Caption: The proposed 102.6 dBu contour. Tower location at 38-04-00N and 78-47-53.30W.



147.00 Meters

Magnetic Declination



9° W

SCALE 1:6000

0 100 200 300 400 YARDS

0 1000 FEET

0 100 200 300 400 METERS

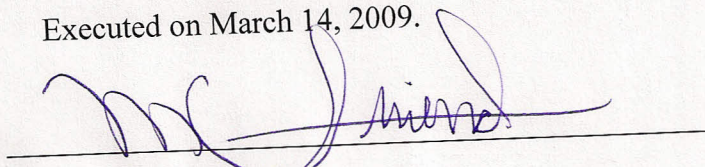
Name: WAYNESBORO EAST NE, VA
Date: 2/18/2009
Scale: 1 inch equals 500 feet

Location: 038° 04' 09.60" N 078° 47' 53.43" W NAD27
Caption: The proposed 102.6 dBu contour. Tower location at 38-04-00N and 78-47-53.30W.

DECLARATION

I declare, under penalty of perjury, that I have personally examined the proposed site that is the subject of this application and that the statements regarding the access road, the gates and the buildings are true to the best of my knowledge and belief.

Executed on March 14, 2009.



Michael C. Friend

President and General Manager
STU-COMM, Inc.