

## **Exhibit 15**

### **Allocation Narrative**

The allocation situation for the proposed station is reported on the following pages. A complete explanation of how to read the printout is shown on the page after the tabulation. Summarizing the explanation, each group of lines represents an existing or proposed full service station. Entries which have a negative number in the columns marked \*IN\* or \*OUT\* could cause interference with the proposed station.

None of the stations listed in the printout has negative values in the \*IN\* and \*OUT\* columns unless otherwise indicated below. This indicates that no potential for interference occurs on the line directly between the proposed facility and any of those stations where both numbers are positive.

The proposed station has been exhaustively evaluated to certify the protection of each of the stations in the tabulation where the \*IN\* or \*OUT\* contour separation is significant. In each case, a digitally generated map is provided showing the appropriate protected (thin line) and interfering (thick line) contours. In cases where the map is also inconclusive, the value of the interfering signal is tabulated along the protected contour. It is shown to not exceed the mandated value at any point on the protected contour. That tabulation is also appended to the exhibit in those cases. Since there is no point on the protected contour where the interfering signal strength exceeds the mandated value, no contour overlap exists, and no area of interference is predicted.

#### **NCE Stations**

The first and third lines represent TV stations within the cutoff distance. They are addressed in Exhibit 18 TV6 Protection.

The second line is the facility being modified. Note that it is licensed.

The fourth line is WANM, a third adjacent station. No interference will be experienced by WANM as a result of the grant of this application, but a small area of the protected contour of the proposed station will experience interference from WANM. That area (the area inside the 100 dBu F(50,10) contour of WANM) is 18.80 sq. km.. The total protected contour area of the proposed station is 4206 sq. km., so the loss is only 0.446% of the total area. This clearly qualifies as a "de minimus" consideration given the increase this allows in the coverage area of the proposed station. See the FCC's 1991 decision, Educational Information Corporation, 6 FCC Rcd 2207 for further details on this established policy.

The remaining lines of the listing are not overlapping with the instant application. Maps, accompanied with FMOVER outputs, where appropriate, are sufficient to certify the clearance of all these other entries.

#### **IF Spacings**

No IF spacing stations were found in the search.

#### **Class Contour Distance**

The maximum proposed ERP is 100 kW, and the HAAT is 140.6 meters. The distance to the class contour, circled at the top of the page, is 57.2 km, which is less than the maximum of 72 km for a class C1 station. This is therefore an application for a class C1 station.

#### **Summary**

**This allocation study shows that no interference to any other existing or proposed station will be produced by granting the proposed station. The proposed station will itself sustain a slight area of interference. It can therefore immediately proceed to be granted.**

Csn International													
FL St Marks - Minor Change													
REFERENCE		CH# 216C1 - 91.1 MHz, Pwr= 100 kW, HAAT=140.6 M, COR= 172 M									DISPLAY DATES		
30 30 55.0 N.		Average Protected F(50-50)= 57.19 km									DATA 12-26-06		
83 52 17.0 W.											SEARCH 12-30-06		
CH	CALL	TYPE		AZI.	DIST	LAT.			Pwr(kw)	INT(km)	PRO(km)	*IN*	*OUT*
CITY		STATE		<--	FILE #	LNG.			HAAT(M)	COR(M)	LICENSEE	(Overlap in km)	
06Z3C	WCTV	LI	HY	339.0	18.42	30	40	13.0	97.700		129.8	141.8R	-123.3M
Thomasville		GA		159.0	BLCT19870630KF	83	56	26.0	619	667	Gray Television	Licensee,	
216C3	WUJC	LIC	VX	185.9	41.58	30	08	32.0	7.000	88.0	28.3	-87.05<	-96.89<
St. Marks		FL		5.9	BLED20050804ACX	83	54	58.0	93	100	Csn International		
06Z3	LMWABW	AP	DHN	339.0	18.42	30	40	13.0	3.800		59.6	71.5R	-53.1M
Pelham		GA		159.0	BPRM20060619ABE	83	56	26.0	474	525	Test		
213A	WANM	LIC	VN	256.9	41.37	30	25	49.0	1.600	1.6	13.3	-10.94*<	22.27
Tallahassee		FL		76.7	BLED19910701KB	84	17	27.0	42	76	Florida A & M University		
VERTICAL POLARIZATION ONLY													
218C1	WFSQ	LIC	CX	256.4	73.10	30	21	31.0	86.000	8.2	63.8	13.93	3.47
Tallahassee		FL		76.0	BLED20030912ABG	84	36	38.0	216	250	Florida State University		
214A	WFSL	LIC	CX	343.5	37.19	30	50	12.0	0.250	1.1	9.6	8.55	25.07
Thomasville		GA		163.4	BLED20030206ACF	83	58	57.0	53	110	Florida State University	B	
215A	WVVS-FM	LIC	HN	56.2	66.72	30	50	50.0	5.300	22.7	15.2	15.78	8.58
Valdosta		GA		236.5	BLED19790702AE	83	17	26.0	6	68	Valdosta State College		
Horizontally polarized only													

Terrain database is NGDC 30 SEC

ERP and HAAT are on direct line to and from reference station.

• affixed to TV6 Margin= no direct-line contour overlap.

"\*"affixed to 'IN' or 'Out' values = site inside protected contour. "<" = contour overlap

## HOW TO READ THE FM COMPUTER PRINT-OUT

The computer print-out should be self-explanatory for the most part. The parameters of the station being checked, (reference station) are printed in the heading. The 60 dBu protected contour is predicted from the Commission's F(50-50) table, while the 40, 54, 80 and 100 dBu contours are interference contours derived from the Commission's F(50-10) table. Contour distances are in kilometers and are predicted using spline interpolation from data points identical to those published in Report No. RS 76-01 by Gary C. Kalagian. Critical contour distances are determined using the Commission's TVFMINT FORTRAN subroutine. When interference contour distances are less than 16 kilometers the F(50-50) tables are used. If signal contour distances are less than 1.6 km the free-space equation is used.

The column listed "\* IN \*" is the sum of the reference station's 60 dBu protected contour and the data file station's interference contour subtracted from the distance between the stations. (All distances are derived by the method detailed in Sec. 73.208 of the Rules and Regulations as amended in Docket 80-90.) Therefore, the column is a measure of incoming interference. Negative distances in this column indicate the presence of interference. Listed antenna heights are the average heights of eight standard radials as found in the Commission's records unless otherwise noted, in which case the specific antenna heights along the azimuths between the reference station and the database station are used and visa versa. The column labeled "\* OUT \*" shows the distance of kilometers of overlap or clearance between the reference station's interference contour and the database station's protected contour. Negative distance figures in this column indicate outgoing interference.

For I.F., commercial, international and other spacing based relationships, the "IN" and "OUT" columns change their significance. The letter "R" stands for the minimum required distance in kilometers, while the letter "M" in the next column follows the available clear space separation in kilometers or "Margin". Minimum commercial separation distances were taken from Sec 73.207 of the rules as amended. This procedure is also used for all Canadian and Mexican spacing. Canadian separation distances were derived from the "Canadian/American Working Agreement".

Under the "BEARING" column, the first row of numbers indicate the bearings from true north of the data base stations in relationship with the reference station, while the numbers in the second row indicate the reverse bearings from the database station to the reference station.

The columns labeled "INT" and "PRO" hold the distance in kilometers of the appropriate interference contour and the protected contour of a data base station.

The first three letters of the "TYPE" column identify the current F.C.C. status of the stations. The fourth letter will be a "D" or "Z" (Sec. 73.215) if the facility is directional. The fifth letter will be an E, H or V depending on the type of antenna polarization. The sixth letter will be a 'Y' if the antenna uses beam tilt.

Csn International  
FL St Marks - WFSQ

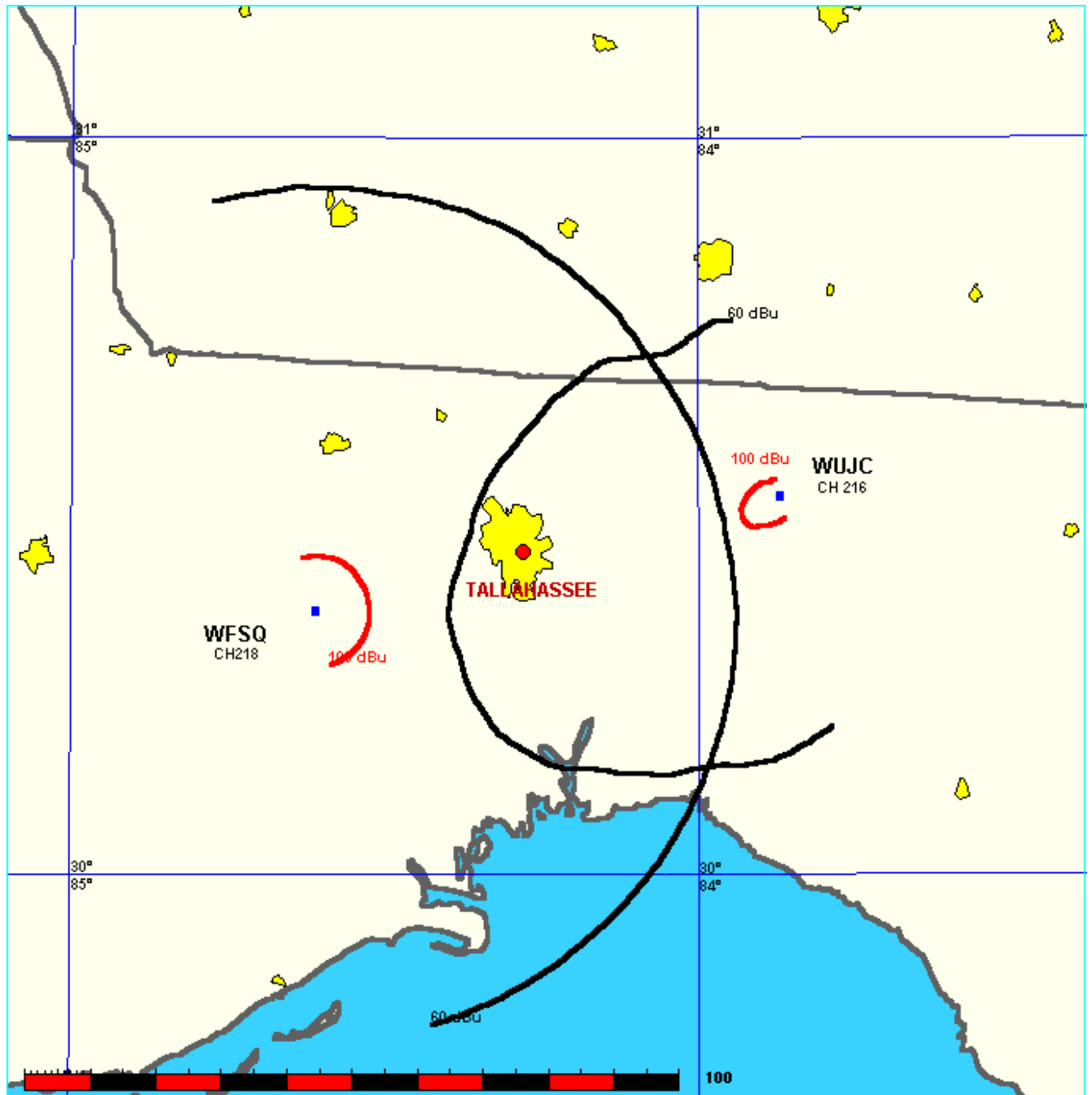
FMCommander Single Allocation Study  
12-30-2006

WUJC CH 216 C1  
100.0 kW 172 M COR DA  
Prot. = 60 dBu  
Intef. = 100 dBu

WFSQ CH 218 C1  
86.0 kW, 250 M COR  
Prot. = 60 dBu  
Intef. = 100 dBu

BLED20030912ABG

Scale = 1:1,500



Csn International  
FL St Marks - WFSL

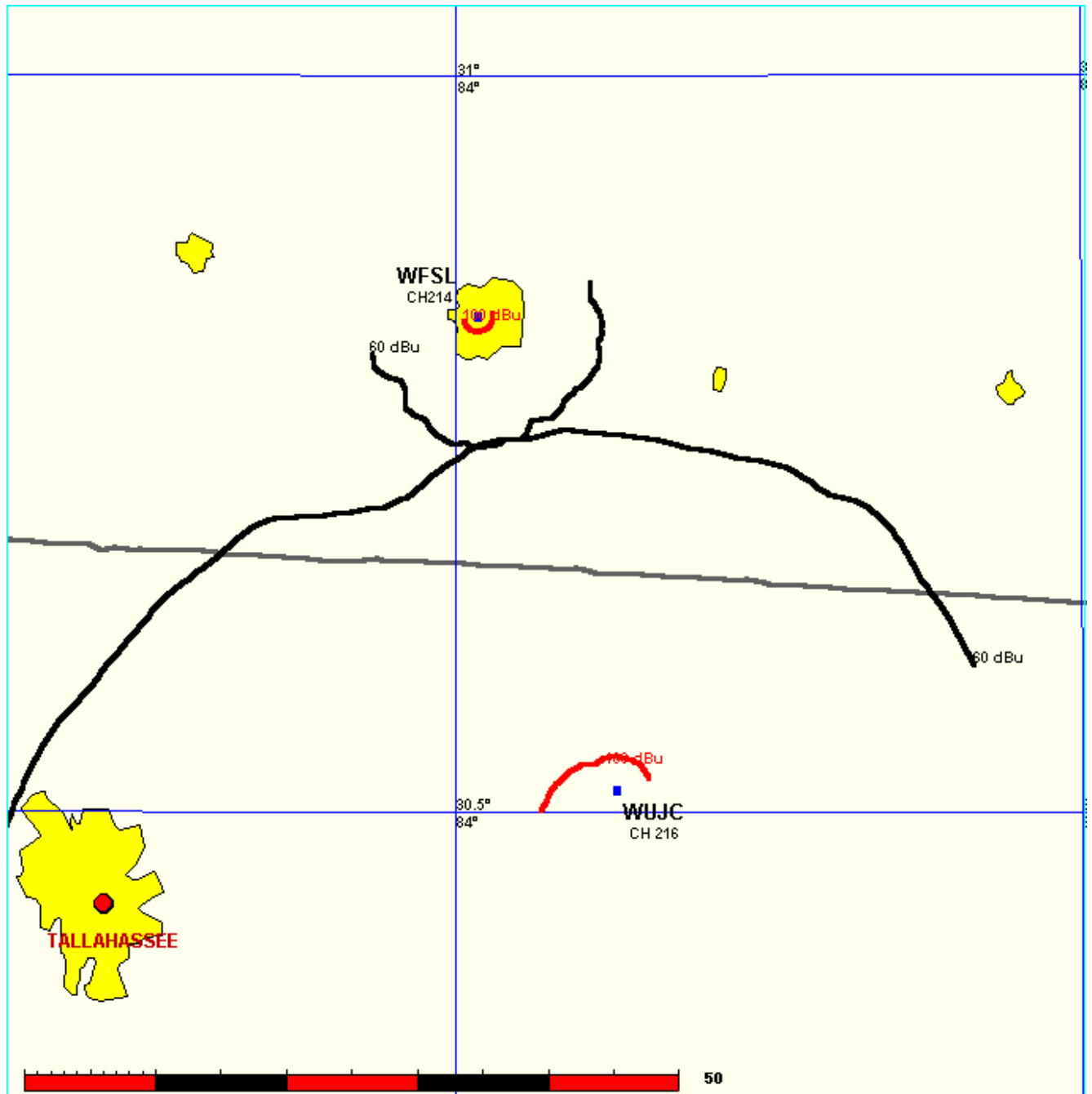
FMCommander Single Allocation Study  
12-30-2006

WUJC CH 216 C1  
100.0 kW 172 M COR DA  
Prot. = 60 dBu  
Intef. = 100 dBu

WFSL CH 214 A  
0.25 kW, 110 M COR  
Prot. = 60 dBu  
Intef. = 100 dBu

BLED20030206ACF

Scale = 1:750,



Csn International  
FL St Marks - WVVS

FMCommander Single Allocation Study  
12-30-2006

WUJC CH 216 C1  
100.0 kW 172 M COR DA  
Prot. = 60 dBu  
Intef. = 54 dBu

WVVS-FM CH 215 A  
5.3 kW, 68 M COR  
Prot. = 60 dBu  
Intef. = 54 dBu

BLED19790702AE

Scale = 1:1,500

