

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu contour of the third-adjacent WGGY, Scranton, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WGGY, Scranton, PA, third adjacent channel facility to this translator proposal, is protected from interference within its 54 dBu contour 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 (WGGY) 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 79 dBu contour (based on 73.333 F(50/50)) of WGGY, Scranton, PA. As the proposed 119 dBu interference contour is 40 dBu greater than the 79 dBu contour of WGGY then this contour is an appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 119 dBu interference contour of this proposed translator.

3. Given this translator's requested effective radiated power of 10 watts, directional; the predicted 119 dBu interference contour for this proposal would be very small. At any HAAT value, the 119 dBu contour distance for this proposal is 0.0249 kilometers at 315 degrees and less in all other directions. A table of contour distances is included as an attachment to better illustrate these distances.

4. This proposed translator site is situated in a sparsely populated area. W271BI 101.9 Dunmore 74.1204(d) Geo Map and W271BI 101.9 Dunmore Aerial Map, attachments to this exhibit, show how rural the area is

within the 119 dBu interference contour of this proposal with no dwellings at all located within this contour. The aerial map and table of contour distances were included to better show that no dwellings receive interference from this proposal. 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 WGGY, Scranton, 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 facility, WGGY, Scranton, PA.

By: Kevin Fitzgerald, Chief Engineer