

Exhibit 30 – Statement A  
**NATURE OF THE PROPOSAL**  
 prepared for  
**Delmarva Broadcasting Company**  
 WNCL(FM) Milford, Delaware  
 Ch. 267A 6 kW(Max-DA) 93.5 m

*Delmarva Broadcasting Company (“DBC”), licensee of WNCL(FM)(Ch. 267A) Milford, Delaware,<sup>1</sup> herein proposes to replace the WNCL main antenna following replacement of the station tower.*

The proposed facility will operate with an effective radiated power (“ERP”) of 6 kW (Max-DA) and an antenna height above average terrain (“HAAT”) of 93.5 meters. The proposed antenna will be mounted on a tower bearing Antenna Structure Registration Number 1033215. As shown in the attached **Exhibit 30 – Figure 1** coverage map, the principal community of Milford, Delaware will be encompassed by the proposed 70 dBμ coverage contour.

As detailed below, the proposed facility is fully spaced to all stations except the licensed facility of WROZ(FM)(Ch. 267B) Lancaster, Pennsylvania. *DBC* seeks processing under the FCC's Contour Protection Rules (§73.215) with respect to this short-spaced station.

REFERENCE							DISPLAY DATES	
38	51	21.7	N.	CLASS = A			DATA	12-11-15
75	28	59.1	W.	Current Spacings to 3rd Adj.			SEARCH	12-11-15
----- Channel 267 - 101.3 MHz -----								
Call	Channel		Location	Azi		Dist	FCC	Margin
-----								
WROZ	LIC	267B	Lancaster	PA	323.7	163.32	177.5	-14.2
WZXL	LIC	264B	Wildwood	NJ	64.1	68.93	68.5	0.43
WRYD	LIC-N	266A	Snow Hill	MD	168.8	72.43	71.5	0.9
WZEB	LIC-Z	269A	Ocean View	DE	156.5	40.26	30.5	9.8
WAAI	LIC	265A	Hurlock	MD	233.9	43.65	30.5	13.2

**Exhibit 30 – Figure 2** provides a map of the protected and interfering contours of the proposed facility and a hypothetical, Max Class B WROZ. As shown, there is no prohibited contour overlap.

<sup>1</sup> See FCC File BLH-19901119KH.

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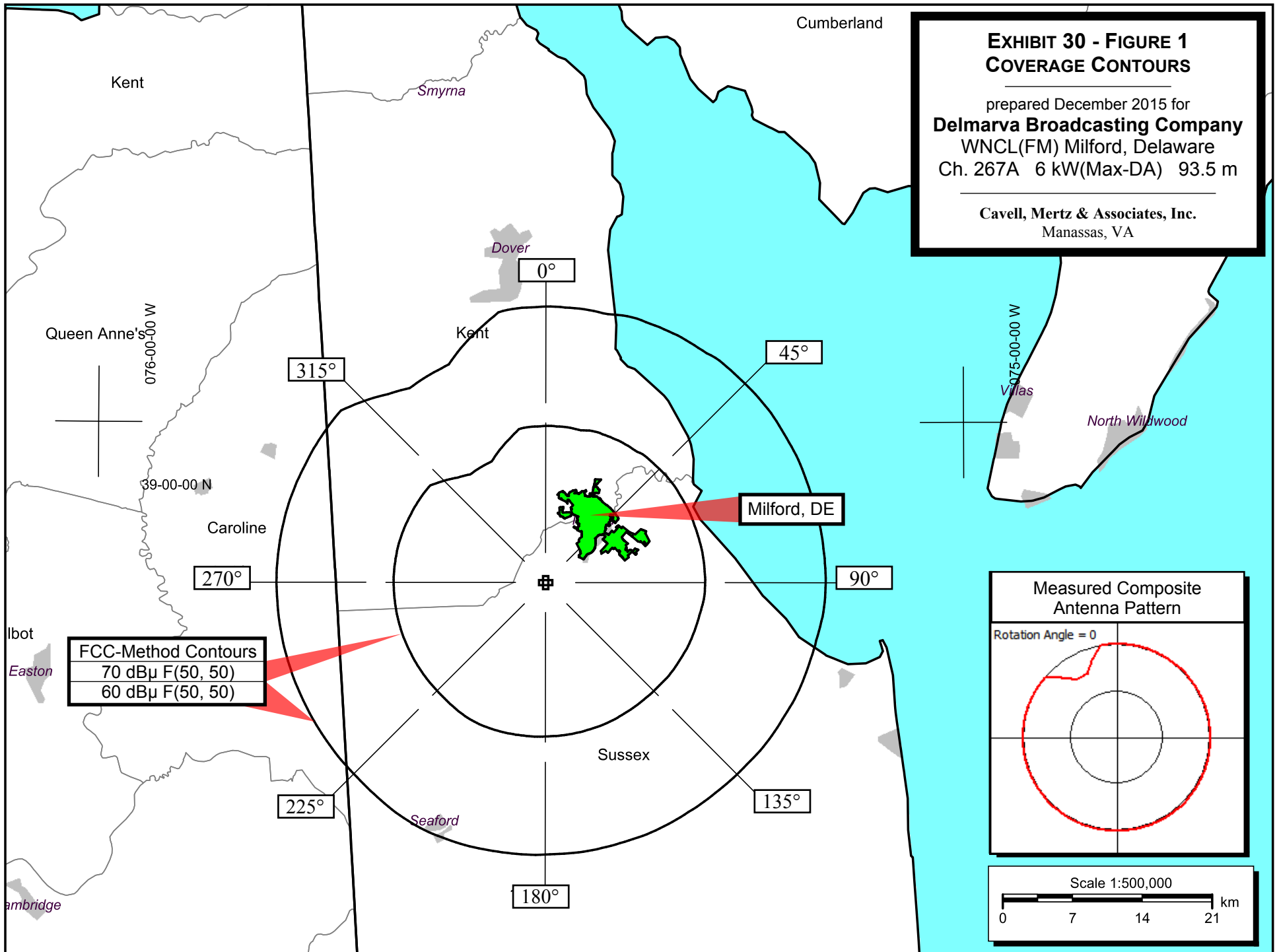
Pertinent data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns. The contour locations were determined using digitized 3 arc-second U.S.G.S. terrain data along radials spaced every degree from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The detailed distances to contours were then used with a GIS mapping program to generate the attached maps.

The proposed site is located more than 500 km from Canada, well beyond the 320 km “border area” with that country.<sup>2</sup> The nearest FCC monitoring station is 121 km distant at Laurel, Maryland. This distance exceeds the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. With respect to AM stations, according to information extracted from the Commission’s Media Bureau database, there are no facilities within 3.2 km of the proposed site.

It is therefore believed that the proposed facility satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

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<sup>2</sup> See “*Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement between the Government of Canada and the Government of the United States of America relating to the FM Broadcasting Service*,” February, 1991



**EXHIBIT 30 - FIGURE 2**  
**PROTECTED AND INTERFERING CONTOURS**

prepared December 2015 for  
**Delmarva Broadcasting Company**  
WNCL(FM) Milford, Delaware  
Ch. 267A 6 kW(Max-DA) 93.5 m

**Cavell, Mertz & Associates, Inc.**  
Manassas, VA

WROZ(FM)(Ch. 267B) Lancaster, PA  
Maximum Class B Facility  
60 dB $\mu$  F(50, 50) Protected Contour  
40 dB $\mu$  F(50, 50) Interfering Contour

WNCL(FM) Proposed Facility  
34 dB $\mu$  F(50, 50) Interfering Contour  
60 dB $\mu$  F(50, 50) Protected Contour

