

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contour of the second-adjacent W262AI, Forty Fort, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. W262AI, Forty Fort, PA, second adjacent channel facility to this translator proposal, is protected from interference within its 60 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 (W262AI) 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 60 dBu contour (based on 73.333 F(50/50)) of W262AI, Forty Fort, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to W262AI. This proposal's antenna location is very close to W262AI, only 90 meters away. W262AI operates with 10 watts ERP Non directional. Using the free space equation, the 106 dBu coverage contour for W262AI would extend 111 meters from W262AI, encompassing this instant proposal's antenna location which is 90 meters from W262AI. The appropriate interference contour for this proposal would be the 146 dBu interference contour which is 40 dBu greater than the 106 dBu contour of W262AI, the 146 dBu contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 146 dBu interference contour of this proposed translator.
3. Given this translator's requested effective radiated power of 8 watts ERP maximum at 350 degrees true north with less output in all other

directions, 8 watts will be used as reference ERP in all directions. Then, calculating the 146 dBu contour distance using the free space equation this proposal's 146 dBu interference contour will extend out only 1 meter in all directions. As this instant proposal's antenna is to be mounted 10 meters above ground the entire area of interference would be located more than 8 meters above ground at this antenna location.

4. As the 146 dBu interference contour never reaches the ground, there would be no population and no dwellings within this interference contour. 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 W262AI, Forty Fort, 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, W262AI, Forty Fort, PA.

By: Kevin Fitzgerald, Chief Engineer