

Exhibit 16 - Statement C  
**NIGHTTIME ALLOCATION CONSIDERATIONS**  
prepared for  
**Potomac Radio, LLC**  
WAGE Leesburg, Virginia  
Facility Id 54876  
1190 kHz 50 kW-D 1.3 kW-N DA-2

As discussed in the attached **Exhibit 11 – Statement A**, *Potomac* herein proposes to change the WAGE frequency of operation from 1200 kHz to 1190 kHz, and change its nighttime antenna system by adding two towers to its existing two tower antenna array at the presently licensed WAGE transmitter site. The instant application addresses the nighttime proposal only – a separate Application for Construction Permit was granted on October 28, 2008 for the proposed changes in the daytime operation (see BP-20070118AEM).

**Nighttime Allocations Considerations**

The antenna design is described in **Exhibit 11 - Table I**, and was based upon considerations involving the incoming night limits on the proposed frequency along with the involved channel allocation/interference constraints. **Exhibit 16 - Table IV** presents the basis for the calculations determining the proposed WAGE nighttime interference free limit (calculated to be 19.496 mV/m). This night limit value was employed for the development of the associated contour plot of **Exhibit 12 – Figure 6**. As shown thereon and discussed in **Exhibit 12 – Statement B**, the 19.496 mV/m nighttime interference free contours cover at least 80% of the area and population of the community of license, Leesburg, Virginia. Therefore the instant proposal complies with the provisions of §73.24(i) of the FCC Rules.

With respect to frequency interference and allocation matters, for all pertinent co-channel and first adjacent channel stations and proposals of interest (except “Class A” stations), interference was predicted on a site-to-site basis in accordance with the methods specified in the Commission’s Rules. **Exhibit 16 - Table V** shows how the facilities proposed herein do not enter into the 25% RSS night limit calculation of any licensed or proposed facility.

Consideration was separately given to Class A stations presently in operation on the same and the adjacent channels. The most significant Class A facility of concern is first adjacent WHAM (1180 kHz, 50 kW, ND-1, Facility ID 37545, Rochester, New York). Accordingly, a detailed study of the proposed operation’s signal strength at the WHAM 500  $\mu$ V/m (0.5 mV/m) protected groundwave contour was conducted in accordance with Section 73.182 of the Commission’s Rules. As shown in the attached **Exhibit 16 - Table VI**, the instant proposal complies with this rule section in that in no instance does the proposed WAGE signal level exceed 250  $\mu$ V/m (0.250 mV/m) at the WHAM 0.5 mV/m groundwave contour.

Exhibit 16 - Statement C  
**NIGHTTIME ALLOCATION CONSIDERATIONS**  
(Page 2 of 2)

The only other Class A station of concern is the co-channel operation of KEX, Portland, Oregon. However, this facility is sufficiently distant (approximately 3773 km), and located within one of the proposed operation's null structures, so as to not be impacted during nighttime hours by this proposal. Details of these skywave calculations can be provided upon request as can maps showing the contours of interest.

**Other Interference Considerations**

This application will not require coordination with Canada or Mexico since this location is more than 400 km from the nearest points on the Canadian and Mexican borders. Further, the proposed WAGE nighttime operation would not have an adverse impact on any known protected monitoring stations, identified "quiet zones", or other existing or proposed broadcasting facilities.

The nearest FCC Monitoring Station is located at Laurel, Maryland, more than 69 km from the existing/proposed WAGE nighttime site. Inasmuch as the proposed nighttime operation will not place a field intensity of 10 mV/m or greater over the Laurel monitoring station, and the proposed operation is well beyond the distance requiring consideration of the monitoring station for a station of the involved proposed operating power level (1.3 kW), it is believed that advance consultation and coordination is not necessary. The nearest known radio astronomy and radio research installations are the National Radio Astronomy Observatory and the National Radio Research Observatory located within the Green Bank NRAO "Quiet Zone" in West Virginia. Inasmuch as the proposed 1190 kHz WAGE nighttime site is located well outside of (more than 76 km away from) this "quiet zone", it is believed that notification or coordination is not required with respect to these facilities. The nearest known radio receiving installation is the Table Mountain Radio Receiving Zone in Boulder County, Colorado, which is sufficiently distant from the proposed site as to not require advance consultation with the Department of Commerce. There are no other AM broadcast stations located within 3.2 km from the WAGE nighttime site, according to information contained within the Commission's engineering database. According to information contained within the Commission's engineering database, there are no FM or TV broadcast stations located within 10 km of this site. One FM translator station, W282BA, is located within 5.97 km. Given the existing distances from these other operations, it is believed that the instant proposal would not have an impact on this station.

**Conclusion**

Based upon the information contained herein, it is believed that this proposal is compliant with the appropriate nighttime allocation requirements of the Commission's Rules and Policies.