

Raleigh “de minimis” Waiver Justification

The proposed increase to the facility will experience a very significant (1.49 times the population) increase in its coverage. WYSZ is second adjacent to the proposed facility and within its 60 dBu contour. WXUT and WXTS are third adjacent to the proposed facility and within its 60 dBu contour. None of these receive interference from the proposed facilities, but each of them does create interference to the proposed facility. Note WXUT and WXTS are not on simultaneously.

This Raleigh analysis is done with the FCC 30 second database for the convenience of the FCC staff. (The more accurate USGS 03 second data was used for interference analysis.)

The 63.62 dBu F(50,50) signal from the proposed facility at WYSZ is derived from the distance 25.89 km, ERP 12.3 kW and HAAT 87.6 meters.

The screenshot shows the 'FCC Curves' window with the following settings: Contour: F(50,50) Protected; Units: Metric Units; Band: FM-Low VHF TV. The input fields are: ERP (kW) = 12.3 (0), HAAT (m or ft.) = 87.6, Contour (dBu) = 63.6262, and Distance (km or mi.) = 25.89. The 'Find Contour' button is highlighted.

ERP (kW)	HAAT (m or ft.)	Contour (dBu)	Distance (km or mi.)
12.3 (0)	87.6	63.6262	25.89

The corresponding interfering contour is thus 103.62 dBu.

The 63.78 dBu F(50,50) signal from the proposed facility at WXUT is derived from the distance 25.55 km, ERP 12.3 kW and HAAT 86.66 meters.

The screenshot shows the 'FCC Curves' window with the following settings: Contour: F(50,50) Protected; Units: Metric Units; Band: FM-Low VHF TV. The input fields are: ERP (kW) = 12.3 (0), HAAT (m or ft.) = 86.66, Contour (dBu) = 63.7837, and Distance (km or mi.) = 25.55. The 'Find Contour' button is highlighted.

ERP (kW)	HAAT (m or ft.)	Contour (dBu)	Distance (km or mi.)
12.3 (0)	86.66	63.7837	25.55

The corresponding interfering contour is thus 103.78 dBu.

The 62.38 dBu F(50,50) signal from the proposed facility at WXTS is derived from the distance 27.18 km, ERP 12.3 kW and HAAT 84.8 meters.

The screenshot shows the 'FCC Curves' window with the following settings: Contour: F(50,50) Protected; Units: Metric Units; Band: FM-Low VHF TV. The input fields are: ERP (kW) = 12.3 (0), HAAT (m or ft.) = 84.8, Contour (dBu) = 62.3859, and Distance (km or mi.) = 27.18. The 'Find Contour' button is highlighted.

ERP (kW)	HAAT (m or ft.)	Contour (dBu)	Distance (km or mi.)
12.3 (0)	84.8	62.3859	27.18

The corresponding interfering contour is thus 102.38

Visually:



dBu.

This gives the following population and area data:

Population Report for All Contours

Population Database: 2010 US Census (PL)

	Population	Area (sq. km)
WTPG.LI (205) [Whitehouse, OH]		
FCC F(50-50) 60.00 dBu	339,464	1595.1
Prop (205) [Whitehouse, OH]		
FCC F(50-50) 60.00 dBu	506,167	1802.2
WYSZ (207) [Maumee, OH]		
FCC F(50-10) 103.62 dBu	4,676	4.9
FCC F(50-10) 100.00 dBu	7,733	8.1
WXUT (202) [Toledo, OH]		
FCC F(50-10) 103.78 dBu	3,203	0.6
FCC F(50-10) 100.00 dBu	4,236	1.5
WXTS-FM (202) [Toledo, OH]		
FCC F(50-10) 102.38 dBu	2,128	0.9
FCC F(50-10) 100.00 dBu	3,643	1.6

Gain in population and area from present (WTPG.LI) to proposed (Prop) facilities

Gain in population	166,703	(506,167-339,464)
Gain in area	207.1 sq km	(1802.2 - 1595.1)

WYSZ

Percentages using 103.62 dBu contour (from D/U processing)		
Population	4.6%	(7,733/166,703)
Area	2.4%	(4.9/ 207.1)
Percentages using 100.00 dBu contour (standard 2 nd adjacent interfering contour)		
Population	2.0%	(3,322/166,703)
Area	3.9%	(8.1/ 207.1)

WXUT

Percentages using 103.78 dBu contour (from D/U processing)		
Population	1.9%	(3,203/166,703)
Area	0.3 %	(0.6/ 207.1)
Percentages using 100.00 dBu contour (standard 2 nd adjacent interfering contour)		
Population	2.5%	(4,236/166,703)
Area	0.7%	(1.5/ 207.1)

WXTS

Percentages using 102.36 dBu contour (from D/U processing)		
Population	1.3%	(2,128/166,703)
Area	0.4%	(0.9/ 207.1)
Percentages using 100.00 dBu contour (standard 2 nd adjacent interfering contour)		
Population	2.2%	(3,643/166,703)
Area	0.8%	(1.6/ 207.1)

The applicant understands that any future modifications by WYSZ, WXUT or WXTS would not be construed as a per se modification of WTPG's license. Thus they can choose to expand and increase the interference to WTPG, should they so desire.

This clearly qualifies as a “**de minimus**” consideration given the significant increase this allows in the coverage area and population of the proposed station, marred only by a few tiny areas where there is no improvement. The applicant thus respectfully requests the customary waiver for this area of interference to his own signal. See the FCC's April 21, 1991 decision, Educational Information Corporation, 6 FCC Rcd 2207 for further details on this established policy.