

**APPLICATION FOR ONE-STEP AND ADJACENT CHANNEL UPGRADE OF
WTNE-FM, TRENTON, TN FROM 248C3 TO 249C2**

This minor application is filed pursuant to the Commission's rules permitting one-step upgrade on co-channel and adjacent channel stations through a Form 301 minor change.

ALLOCATION ANALYSIS

The proposal to modify to an adjacent channel is consistent with Commission rules regarding one-step upgrades. Exhibits E-1 and E-2 clearly show that the adjacent channel 249C2 proposal is entirely mutually exclusive with the existing WTNE-FM licensed operation on 248C3.

A fully spaced reference point for the WTNE-FM allocation is provided at N 35-55-51W 88-55-33 (4.5 km southeast of Trenton, TN at 165 degrees True). Exhibit E-2 demonstrates that all required separations are met at that point. The fully spaced site is entirely arbitrary. It is clear from E-2 that any number of sites could be selected. Furthermore, it is clear that unobstructed city-grade service with a 70 dBu contour can be provided well past the Trenton, TN city limits with a full facility C2.

The instant application utilizes the existing WTNE-FM transmitter site with 49 kw ERP at 92 meters HAAT. Exhibit E-1 demonstrates that Section 73.207 separations are met at that site to all facilities with the exception of station KBXB on 250C2 at Sikeston, MO and WSIX-FM at Nashville, TN. **Section 73.215 processing is requested to KBXB and WSIX-FM.** The short-spacing to those stations are minor and well within the permissible minimum spacing specified in Section 73.215(e). Interference plots are

provided to demonstrate clearance. E-3 with respect to KBXB and E-5 with respect to WSIX-FM. An FMOVER analysis provided as E-4 demonstrates that the KBXB 40 dBu (50,10) does not overlap the proposed WTNE-FM 60 dBu (50,50). It is also noted that protection to the 249A proposed allocation at Bethel Springs, TN is not required. The Commission recently denied that proposal in a Report and Order in MM Docket 99-196 as procedurally defective.

All interference plots were performed utilizing V-Soft's InterDLG program and the NGDC 30 second terrain database.

CONCLUSION

It is concluded that station WTNE-FM may be upgraded to 249C2 in full accordance with the Commission's allocation rules and policies. Furthermore, the one-step upgrade will provide a 60 dBu service to a population of 156,607, a gain of 30,461(+24%), and an area of 5,698, a gain of 1,023 square kilometers (+22%) based on 2000 Census data utilizing the V-Soft INTERDLG program.



Charles M. Anderson January 8, 2002