Educational Media Foundation
5700 West Oaks Boulevard
Rocklin, CA 95765

Part 1 - Channel Study

REFERENCE CH# 213C2- 90.5 MHz, Pwr= 4.5 kW DA, HAAT= 251.9 M, COR= 324.2 M DISPLAY DATES
31 10 18.0 N. Average Protected F(50-50)= 40.1 km DATA 09-29-14
83 21 57.0 W. Standard Directional SEARCH 09-29-14

CH CALL / CITY	TYPE	ANT	AZI. <--	DIST / FILE #	LAT. / LNG.	Pwr(kW) / HAAT(M)	INT(km) / COR(M)	PRO(km) / LICENSEE	*IN* / (Overlap in km)	*OUT*
213C2 WGCN Nashville GA	LIC	DEX	207.0 27.0	1.79 BMLED20140124AGT	31 09 26.0 83 22 28.0	50.000 89	77.6 150	23.4 Educational Media Foundati	-114.3*	-120.9*
06 3E WABW-TV Pelham GA	LI	HY	266.8 86.5	70.54 BLEDT20090612ACC	31 08 05.0 84 06 16.0	10.500 379	18.5 462	85.5 Georgia Public Telecommuni	104.0R	-33.5M
215A WVVS-FM Valdosta GA	LIC	HN	168.7 348.8	36.68 BLED19790702AE	30 50 50.0 83 17 26.0	5.300 21	1.5 68	15.2 Board Regents, Univ System	-4.9*<	17.9
215A WVVS-FM Valdosta GA	CP	CX	161.2 341.3	38.05 BPED20130307ABE	30 50 48.6 83 14 13.1	3.200 60	2.0 119	19.6 Board Regents, Univ System	-4.0*<	14.9
212C2 WAEF Cordele GA	LIC	DV	325.1 144.9	63.40 BLED20010607AAH	31 38 22.0 83 44 58.0	11.000 154	34.9 263	23.3 American Family Associatio	2.5	0.7
216C2 WABR Tifton GA	LIC	DCN	336.3 156.3	38.77 BLED19880211KC	31 29 30.0 83 31 49.0	30.000 76	3.2 172	31.6 Georgia Public Telecommuni	7.2	5.2
213C1 WYFB Gainesville FL	LIC	DC	142.1 322.7	182.63 BMLED20000606ACG	29 52 08.0 82 12 04.0	97.000 207	135.5 248	54.2 Bible Broadcasting Network	6.6	25.7
266C1 WAFT« Valdosta GA	LIC	CX	184.6 4.5	34.23 BMLED20030102AAQ	30 51 50.0 83 23 40.0	100.000 170	138.5 223	65.9 Christian Radio Fellowship	26.5R	7.7M
211C1 WXVS Waycross GA	LIC	DEX	85.6 266.0	75.73 BMLED20080131AJH	31 13 17.0 82 34 24.0	79.000 280	8.1 329	63.9 Georgia Public Telecommuni	27.0	8.3
214A WFSL Thomasville GA	LIC	CX	237.8 57.5	69.62 BLED20030206ACF	30 50 12.0 83 58 57.0	0.250 47	11.5 110	8.1 Florida State University B	26.0	13.1
213A WANM Tallahassee FL	LIC	VN	227.2 46.7	120.79 BLED19910701KB	30 25 49.0 84 17 27.0	1.600 51	47.4 76	12.7 Florida A & M University	39.5	17.1
212A WYJC Greenville FL	LIC	VX	198.0 17.8	90.08 BLED20140606AAP	30 23 56.0 83 39 24.0	0.500 56	17.2 82	11.8 Calvary Chapel Of Twin Fal	33.1	19.2
213C2 WPWB Byron GA	LIC	CN	359.9 179.9	167.46 BLED19900319KA	32 40 55.0 83 22 10.0	16.500 138	110.9 260	41.2 Augusta Radio Fellowship I	20.5	31.6
213A WTLD Jesup GA	LIC	CX	70.4 251.1	143.83 BLED20020305AAO	31 35 49.0 81 56 14.0	6.000 52	75.1 78	19.7 Resurrection House Ministr	28.1	21.3
213A WCOQ Colquitt GA	LIC	VX	270.4 89.7	129.65 BLED20080805ABW	31 10 24.0 84 43 33.0	4.500 47	70.4 94	18.8 D & K Communications Inc.	29.7	27.9
214D W214BG Waycross GA	LIC	C	87.2 267.7	96.04 BLFT20000706AGB	31 12 34.0 82 21 33.0	0.055 52	8.1 91	5.7 Family Worship Center Chur	47.4	30.1
214A WWVO Albany GA	LIC	CX	299.6 119.0	107.64 BLED20011121AAQ	31 38 42.0 84 21 15.0	5.500 93	43.5 172	28.2 Lamad Ministries, Inc.	38.8	41.2
216C1 WUJC St. Marks FL	LIC	DVX	213.6 33.3	87.37 BLED20130909AAN	30 30 55.0 83 52 17.0	74.000 139	2.3 172	25.7 Calvary Chapel Of Twin Fal	47.8	58.5
06 2E WCES-TV Wrens GA	LI	HN	23.4 203.9	252.87 BLEDT20090612ACF	33 15 33.0 82 17 09.0	7.900 429	3.4 544	28.5 Georgia Public Telecommuni	192.5R	60.4M

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM
Contour distances are on direct line to and from reference station. Reference Zone= - Zone 2, Co to 3rd adjacent.
All separation margins (if shown) include rounding
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.
« = Station meets FCC minimum distance spacing for its class.
< = Contour Overlap

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Part 2 - Request for Waiver of 47 C.F.R. Section 73.509

Educational Media Foundation ("EMF") desires to increase the power and service area of station WGCN, Nashville, GA. This proposal is engineered so as to NOT CAUSE interference to any existing station, known application or allocation. However, the proposed increased service area would RECEIVE interference from the following second adjacent facility (see Exhibit 18-X for a contour map of the interference area):

Facility ID	Status	Call Sign	City of License
69649	Licensed	WVVS	Valdosta, GA
69649	Construction Permit	WVVS	Valdosta, GA

Again, this proposal will not cause interference to the above facilities as WGCN's proposed interfering 100dBu contour will not overlap the applications' protected 60dBu contour. WGCN's proposed protected contour would, however, receive prohibited overlap from the WVVS licensed and subsequent WVVS construction permit interfering contours as listed above. The area of "overlap received" from the above referenced facilities will be approximately:

Call Sign (or File #)	Square kM	Total area of proposed 60dBu
WVVS	8.1	.196%
BPED-20130307ABE	11.8	.286%

The grant of this waiver request will provide new service to an estimated 49,049 persons, an increase of 48.9%. It will allow WGCN to increase its overall coverage area by 1075.7 square kilometers, an increase of 35.27%. This waiver request is nearly identical to the requests made by the licensees of WCPE(FM) and WCCE(FM) in *Educational Information Corporation*, 6 FCC Rcd 2207 (1991). WCPE(FM) requested a waiver in its application to permit *de minimus* overlap "received," and WCCE(FM) requested a waiver in its application to permit *de minimus* overlap "caused." In recognition of the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, the Commission granted both waiver requests. The instant request fully satisfies the criteria established by the Commission for waiver of Section 73.509 of the Commission's rules as it pertains to overlap received*.

Significant service will be maintained and enhanced by the proposed expansion of WGCN, and the overlap area is very small and well within the scope of the Commission's waiver policy. Clearly, this benefit heavily outweighs the potential for interference in an area that constitutes less than 1% (total) of the station's proposed service area. Accordingly EMF respectfully submits that a waiver of Section 73.509(a) of the Commission's rules is justified in this instance.

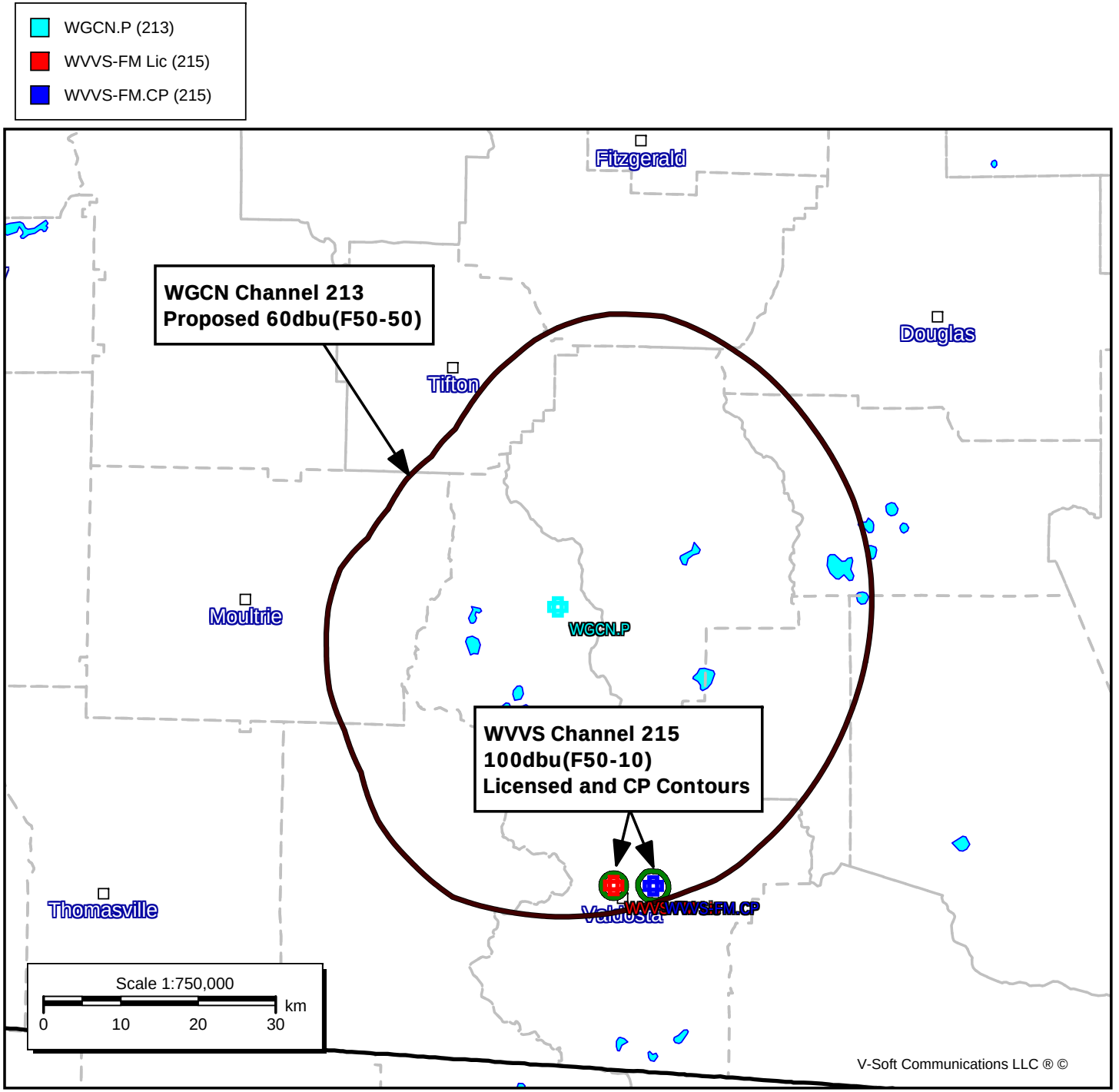
* EMF wishes to emphasize that its request is not at all similar to the second waiver request made by WCPE in *Educational Information Corporation*, 1997 FCC LEXIS 2636 (May 20, 1997). Unlike here, WCPE was seeking a waiver of overlap "caused" in that second case.

Exhibit 18-A

WGCN.P
BMLED20140124AGT
Latitude: 31-10-18 N
Longitude: 083-21-57 W
ERP: 4.50 kW
Channel: 213
Frequency: 90.5 MHz
AMSL Height: 324.2 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

WVVS-FM Lic
BLED19790702AE
Latitude: 30-50-50 N
Longitude: 083-17-26 W
ERP: 5.30 kW
Channel: 215
Frequency: 90.9 MHz
AMSL Height: 68.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

WVVS-FM.CP
BPED20130307ABE
Latitude: 30-50-48.60 N
Longitude: 083-14-13.10 W
ERP: 3.20 kW
Channel: 215
Frequency: 90.9 MHz
AMSL Height: 118.9 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None



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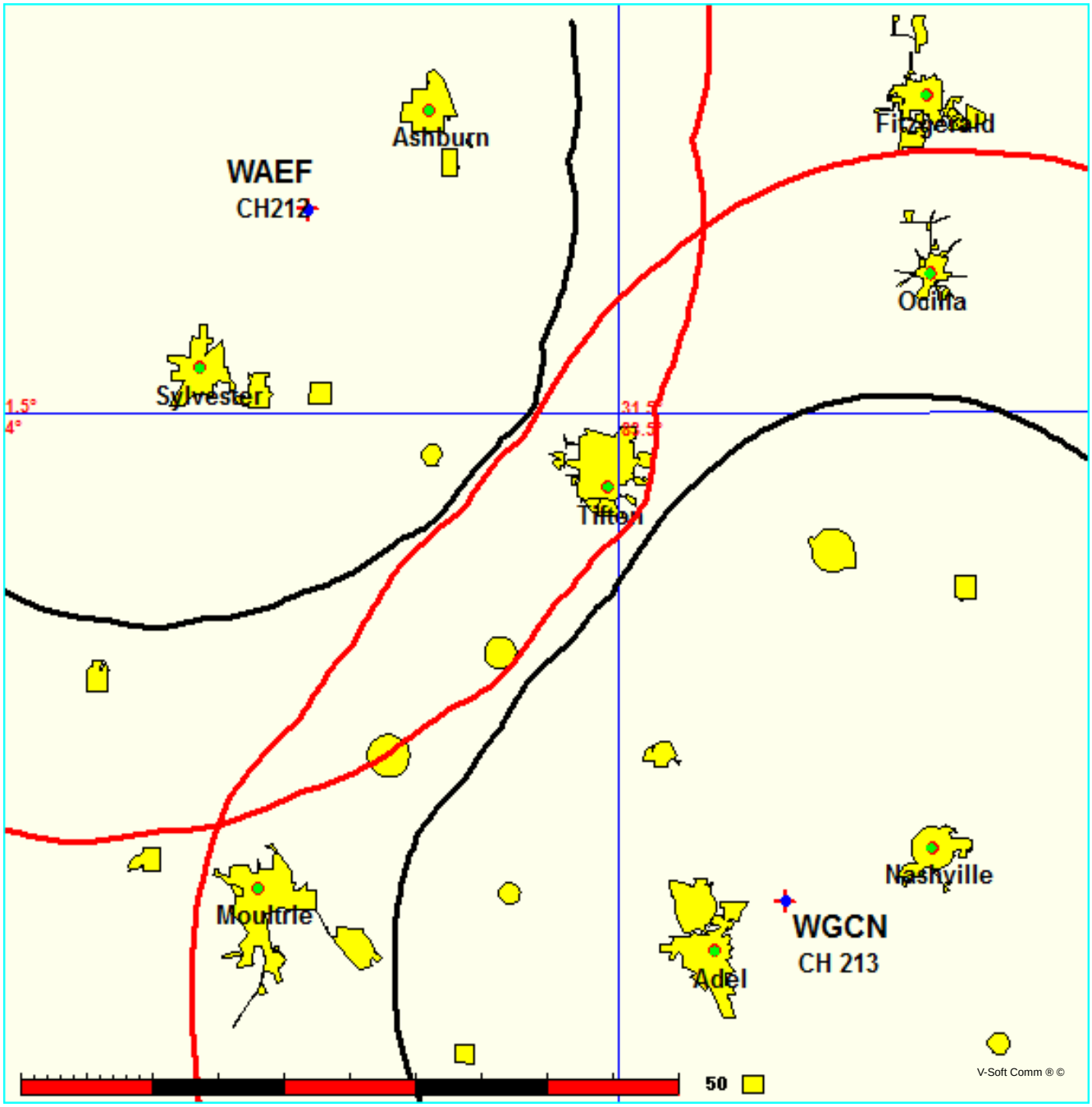
FMCommander Single Allocation Study - 10-01-2014 - NGDC 30 SEC
WGCN's Overlaps (In= 2.47 km, Out= 0.69 km)

WGCN CH 213 C2 DA
Lat= 31 10 18.0, Lng= 83 21 57.0
4.5 kW 251.9 M HAAT, 324.2 M COR
Prot.= 60 dBu, Intef.= 54 dBu

WAEF CH 212 C2 DA BLED20010607AAH
Lat= 31 38 22.0, Lng= 83 44 58.0
11.0 kW 154 M HAAT, 263 M COR
Prot.= 60 dBu, Intef.= 54 dBu



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WAEF vs. WGCN.P

10-01-2014 Terrain Data: NGDC 30 SEC FMOver Analysis

WAEF BLED20010607AAH	WGCN
Channel = 212C2	Channel = 213C2
Max ERP = 11 kW	Max ERP = 4.5 kW
RCAMSL = 263 M	RCAMSL = 324.2 M
N. Lat. 31 38 22.0	N. Lat. 31 10 18.0
W. Lng. 83 44 58.0	W. Lng. 83 21 57.0
Protected	Interfering
60 dBu	54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
122.0	000.6075	0165.5	021.1	335.7	000.9785	0244.6	044.7	53.10	
123.0	000.6336	0165.5	021.3	335.4	000.9677	0244.4	044.4	53.21	
124.0	000.6603	0165.4	021.5	335.1	000.9557	0244.3	044.0	53.30	
125.0	000.6875	0165.1	021.7	334.8	000.9429	0244.2	043.6	53.39	
126.0	000.7153	0164.7	021.9	334.5	000.9292	0244.1	043.3	53.47	
127.0	000.7436	0164.3	022.0	334.2	000.9146	0244.0	043.0	53.54	
128.0	000.7725	0164.0	022.2	333.8	000.8998	0244.0	042.7	53.61	
129.0	000.8019	0164.2	022.4	333.4	000.8848	0244.0	042.3	53.69	
130.0	000.8319	0164.5	022.6	333.1	000.8695	0244.0	042.0	53.77	
131.0	000.8471	0164.7	022.7	332.6	000.8514	0244.1	041.7	53.79	
132.0	000.8624	0164.4	022.8	332.1	000.8324	0244.2	041.5	53.79	
133.0	000.8779	0163.8	022.8	331.6	000.8128	0244.4	041.3	53.77	
134.0	000.8935	0162.9	022.9	331.1	000.7927	0244.7	041.2	53.74	
135.0	000.9092	0161.7	022.9	330.6	000.7723	0245.1	041.1	53.70	
136.0	000.9251	0160.3	022.9	330.1	000.7517	0245.5	041.0	53.64	
137.0	000.9411	0158.6	022.9	329.5	000.7417	0246.0	040.9	53.63	
138.0	000.9573	0156.8	022.8	329.0	000.7332	0246.5	040.8	53.61	
139.0	000.9736	0155.3	022.8	328.4	000.7247	0246.9	040.8	53.60	
140.0	000.9900	0154.3	022.8	327.9	000.7164	0247.4	040.7	53.60	
141.0	001.0233	0153.5	023.0	327.3	000.7083	0247.8	040.6	53.64	
142.0	001.0571	0152.6	023.1	326.8	000.7001	0248.2	040.4	53.66	
143.0	001.0915	0151.6	023.2	326.2	000.6917	0248.5	040.3	53.68	
144.0	001.1264	0150.6	023.3	325.6	000.6833	0248.7	040.2	53.68	
145.0	001.1619	0149.4	023.3	325.1	000.6748	0248.9	040.1	53.67	
146.0	001.1979	0148.1	023.4	324.5	000.6663	0249.0	040.0	53.65	
147.0	001.2345	0147.0	023.5	323.9	000.6578	0248.9	040.0	53.61	
148.0	001.2716	0146.2	023.6	323.3	000.6491	0248.7	039.9	53.58	
149.0	001.3093	0145.9	023.7	322.7	000.6404	0248.6	039.8	53.56	
150.0	001.3475	0146.1	023.9	322.1	000.6316	0248.4	039.7	53.55	
151.0	001.3863	0146.8	024.1	321.4	000.6225	0248.4	039.6	53.55	
152.0	001.4256	0147.7	024.3	320.8	000.6133	0248.5	039.4	53.54	
153.0	001.4655	0148.5	024.5	320.1	000.6040	0248.6	039.3	53.53	
154.0	001.5059	0149.2	024.7	319.4	000.6040	0248.6	039.2	53.57	
155.0	001.5469	0150.0	024.9	318.7	000.6053	0248.6	039.2	53.62	
156.0	001.5884	0150.7	025.1	318.0	000.6067	0248.6	039.1	53.65	
157.0	001.6305	0151.2	025.3	317.3	000.6081	0248.7	039.1	53.68	
158.0	001.6731	0151.4	025.5	316.6	000.6095	0248.8	039.1	53.69	
159.0	001.7163	0151.3	025.6	316.0	000.6108	0248.9	039.1	53.68	
160.0	001.7600	0150.8	025.7	315.3	000.6121	0249.0	039.2	53.65	
161.0	001.8043	0149.9	025.8	314.7	000.6134	0249.0	039.4	53.60	
162.0	001.8491	0148.7	025.8	314.0	000.6146	0248.9	039.5	53.53	

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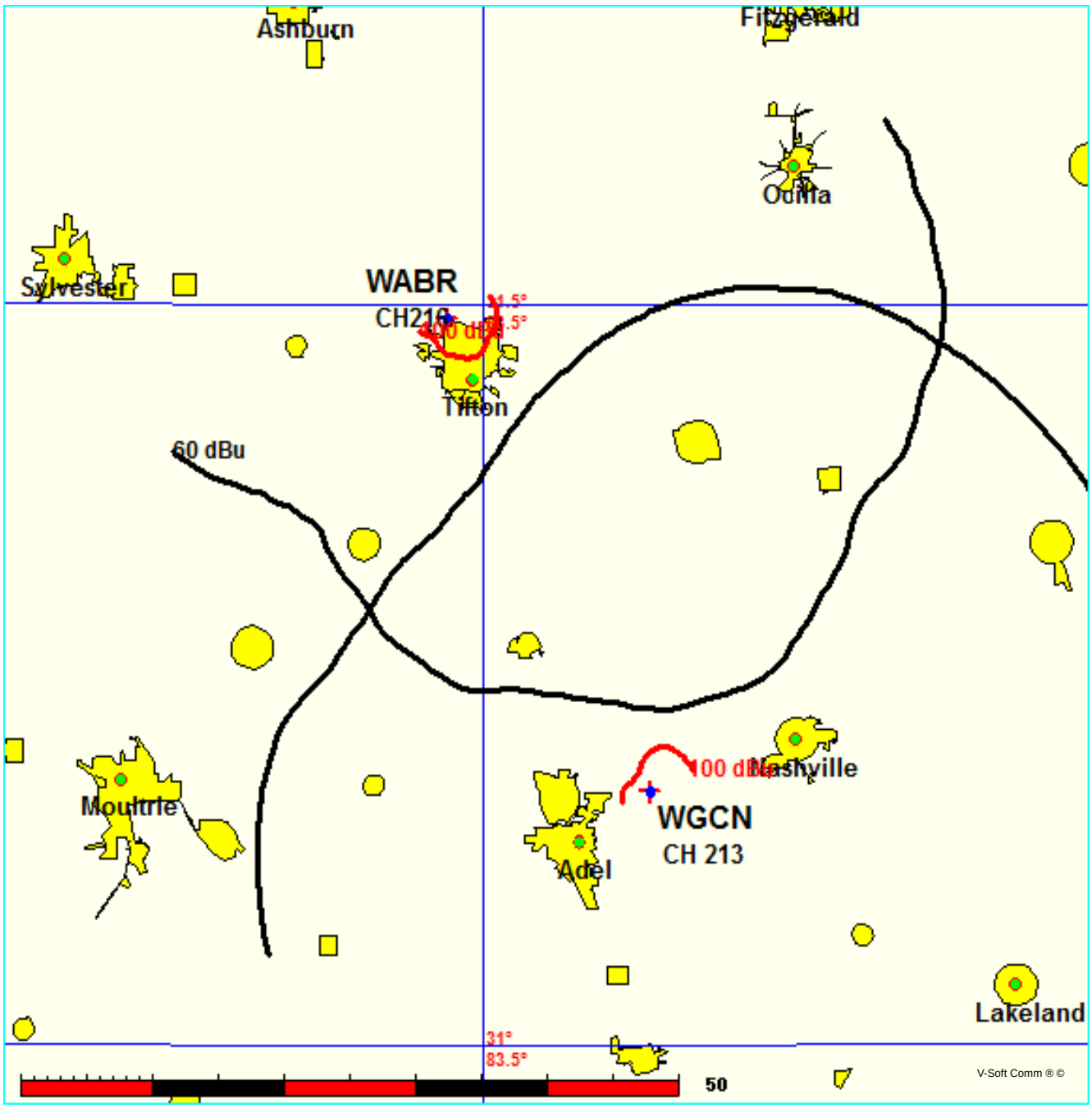
FMCommander Single Allocation Study - 10-01-2014 - NGDC 30 SEC
WGCN's Overlaps (In= 7.18 km, Out= 5.21 km)

WGCN CH 213 C2 DA
Lat= 31 10 18.0, Lng= 83 21 57.0
4.5 kW 251.9 M HAAT, 324.2 M COR
Prot.= 60 dBu, Intef.= 100 dBu

WABR CH 216 C2 DA BLED19880211KC
Lat= 31 29 30.0, Lng= 83 31 49.0
30.0 kW 76 M HAAT, 172 M COR
Prot.= 60 dBu, Intef.= 100 dBu



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FMCommander Single Allocation Study - 10-01-2014 - NGDC 30 SEC
WGCN's Overlaps (In= 6.62 km, Out= 25.72 km)

WGCN CH 213 C2 DA
Lat= 31 10 18.0, Lng= 83 21 57.0
4.5 kW 251.9 M HAAT, 324.2 M COR
Prot.= 60 dBu, Intef.= 40 dBu

WYFB CH 213 C1 DA BMLED20000606ACG
Lat= 29 52 08.0, Lng= 82 12 04.0
97.0 kW 207 M HAAT, 248 M COR
Prot.= 60 dBu, Intef.= 40 dBu