

DELAWDER COMMUNICATIONS, INC.

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Loleta, CA, FM Channel 254C1
Gain Area Other Services Study

ENGINEERING STATEMENT

1. This Engineering Statement has been prepared on behalf of Miriam Media, Inc. ("Miriam"), in support of its proposal for Loleta, CA, channel 254C1. This Engineering Statement demonstrates the underserved aural service (FM and full-time AM) that exists to the "gain area" of the Loleta 254C1 facility when compared with the Willow Creek 253A facility.

2. Figure 1, attached, shows the 60 dBu service contours for the Loleta 254C1 (with contour shown in red) and Willow Creek 253A (with contour shown in yellow) facilities, and the 60 dBu service contours for all licensed and construction permit FM stations that overlap the "gain area" (the area inside the Loleta 254C1 60 dBu service contour and outside of the Willow Creek 253A 60 dBu service contour)¹. (As demonstrated by Figure 1, the "loss area" is completely served by five or more FM stations.)

3. Figure 2, attached, is the same showing of other aural service as provided by Figure 1, but magnified to show only those areas in the northern portion of the gain area that receives less than five other fulltime aural services. (Note that there are no known AM stations that service the underserved areas of Figure 2 with nighttime protected service².) As demonstrated by Figure 2, there are various distinct geographical areas in the gain area

¹ All Commercial FM contours are determined pursuant to *Memorandum Opinion and Order, MM Docket No. 86-29, Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Greenup, Kentucky and Athens, Ohio), Adopted April 11, 1989, 66 R 2d, page 366*. Based on this MO&O, the 1 mV/m (60 dBu) contour is used for all classes and maximum class service for all Class A, C3, C2, C1 and C0 are assumed when determining contour service using the eight cardinal radials and three arc-second terrain data in order to determine each station's antenna height above average terrain ("HAAT"). The allowed ERP for each facility is then determined pursuant to 47 CFR Section 73.211. (The exception is that the actual licensed or authorized facilities are used for Class C and reserved-band FM facilities.) Each contour is determined using the actual terrain and contour distances along each of 360 equally-spaced azimuths pursuant to 47 CFR Section 73.313.

² For AM Class A stations, the 0.5 mV/m groundwave contour is the nighttime groundwave protection pursuant to 47 CFR Section 73.182. There are no AM Class A stations whose 0.5 mV/m groundwave service contour overlaps the underserved gain area. Also, there are no licensed or authorized AM stations that provide protected nighttime service contours (based on the RSS night-limit contour of 47 CFR Section 73.182 for AM Class B stations) that overlap the underserved gain area.

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that contain less than five other fulltime aural services. The total underserved population within the gain area is 1,256 persons, which is distributed as follows:

<u>Number of other Full-time Aural Services</u>	<u>Population (Census Year 2000)</u>
0	91
1	252
2	141
3	612
4	<u>28</u>
Total:	1,124

The total underserved land area is as follows:

<u>Number of other Full-time Aural Services</u>	<u>Land Area (square kilometers)</u>
0	16
1	211
2	381
3	219
4	<u>198</u>
Total:	1,025

FIGURE 1: LOLETA 254C1 GAIN & LOSS AREA WITH OTHER SERVICES

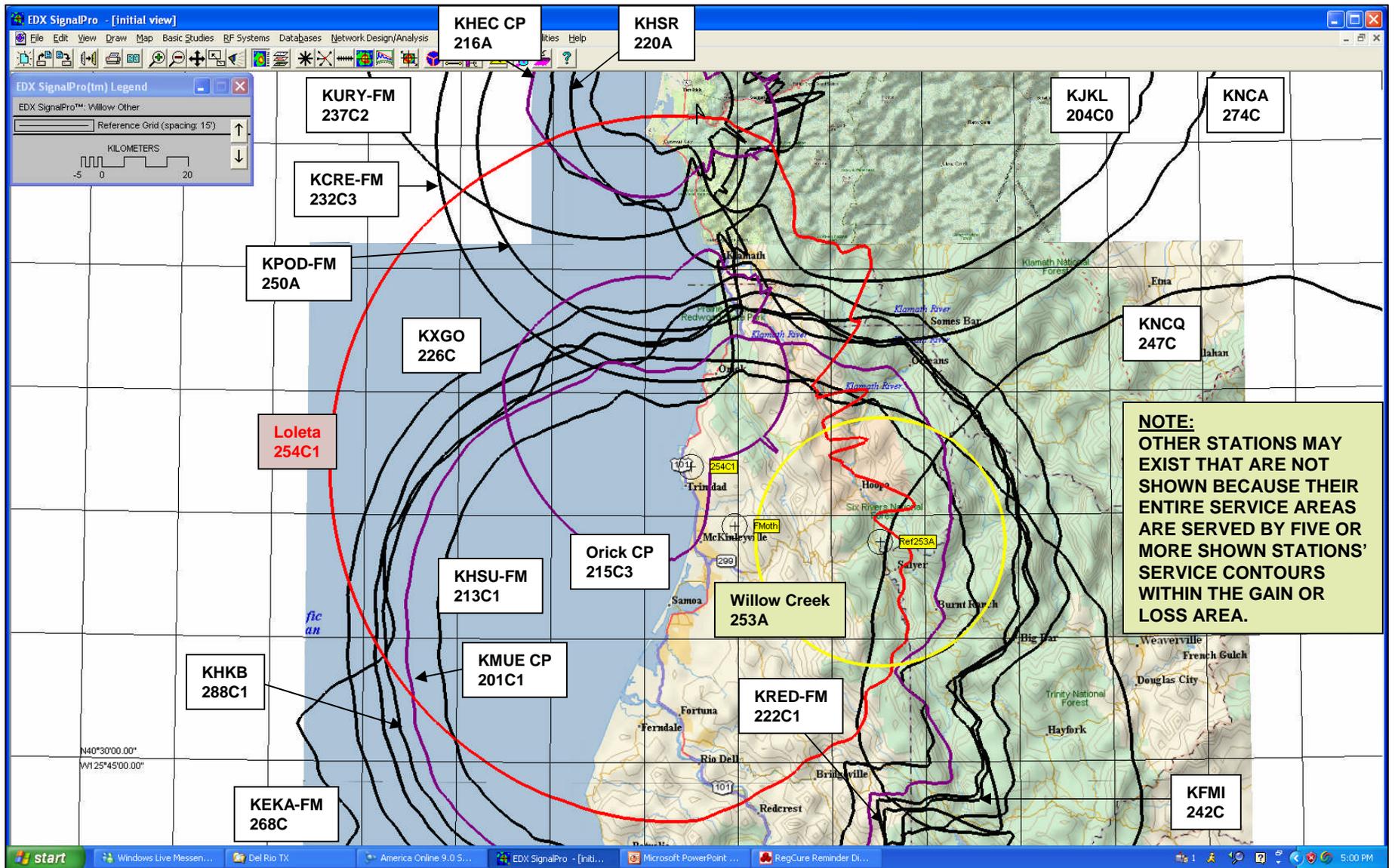


FIGURE 2: LOLETA 254C1 LESS THAN FIVE SERVICES AREA TO GAIN AREA

