

Exhibit 15 - Statement A
ALLOCATION CONSIDERATIONS
 prepared for
The Wheeler School
 WELH(FM) Providence, Rhode Island
 Facility ID 66656
Ch. 201A 4 kW (Max DA) 41 m

The Wheeler School (“*Wheeler*”), licensee of WELH(FM)(Ch. 201A, Providence, Rhode Island) herein seeks to make a minor modification of the WELH Construction Permit¹. The proposed facility would operate on Channel 201 (88.1 MHz) with an effective radiated power (“ERP”) of 4 kW utilizing a directional antenna to be located at a height above average terrain (“HAAT”) of 41 meters. The circularly-polarized antenna will be pole-mounted atop the existing WELH tower with an overall height of 41.1 meters above ground. *Wheeler* also seeks to correct a slight discrepancy in the coordinates of the existing tower.

As demonstrated in **Exhibit 15 – Figure 1**, the proposed 60 dBμ service contour entirely encompasses the principal community of Providence, Rhode Island. A study of the proposed facility shows that the following existing FM facilities require study in regard to prohibited contour overlap under §73.509 of the Commission’s Rules:

Call	Channel	Location	Azi	Dist
WJMF.C	CP	204B1 Smithfield	RI 291.0	19.5
WJMF.P	APP	204B1 Smithfield	RI 253.3	20.8
WJMF	LIC	204A Smithfield	RI 290.9	19.7
WQRI	LIC	202A Bristol	RI 168.1	23.6
WQRI	CP	202A Bristol	RI 168.1	23.7
WGAO	LIC	202A Franklin	MA 345.4	26.2
AP1032	APP	203A Middleboro	MA 82.2	31.1
AP7463	APP	203A Middleborough Center	MA 76.6	32.6
AP4590	APP	201A Newport	RI 175.0	40.2
WFHL	LIC	201A New Bedford	MA 123.3	44.4
WRPS	LIC	202A Rockland	MA 47.6	44.9
WCHC	LIC	201A Worcester	MA 316.4	58.6
WMBR	LIC	201A Cambridge	MA 18.9	59.3
WKIV	LIC	201A Westerly	RI 225.2	66.2
AP6644	APP	201A Provincetown	MA 78.3	103.4

The attached **Exhibit 15 - Figures 2, 2A, 2B, 3, 3A, 3B** and **4** depict the locations of pertinent protected and interfering contours of the proposed facility and the stations listed above. The contours were plotted using the actual ERP and height above terrain along each radial for each facility as specified in §73.509(c). For the facilities under study, the antenna elevation

¹ See File Number BPED-20070906AGD

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above mean sea level, geographic coordinates, and ERP (including directional antenna relative field values, where appropriate) were retrieved from the FCC's engineering database. The requisite contours were determined using U.S.G.S. 3-second digitized terrain data along each of 360 radials and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The F(50,10) distances are used to calculate distance to interfering contours, however in cases where the contour distance is less than 16 km the F(50,50) curves are used, as specified by §73.509(c)(2).

Exhibit 15 - Figure 2 illustrates that there is no prohibited overlap between the proposed facility and any pertinent co-channel facilities. Detailed view maps **Exhibit 15 - Figure 2A** and **2B** demonstrate the lack of prohibited contour overlap to co-channel stations WMBR(FM)(201A, Cambridge, MA) and WFHL(FM)(Ch. 201A, New Bedford, MA) respectively.

Similarly, **Exhibit 15 - Figure 3** shows the allocation situation with all pertinent first-adjacent facilities. Detailed view maps **Exhibit 15 - Figures 3A** and **3B** demonstrate the lack of prohibited overlap to WGAO(FM)(Ch. 202A, Franklin, MA) and both the licensed and permitted facilities of WQRI(FM)(Ch. 202A, Bristol, RI), respectively.

Exhibit 15 - Figure 4 supplies an allocation map for second and third-adjacent facilities. Notably, *Wheeler* and Bryant University, licensee of WJMF(FM)(Ch. 204B1, Smithfield, RI), have coordinated efforts to mutually improve coverage to the general public². The instant application is contingent upon the CP modification requested for WJMF in a simultaneously-filed application. Therefore, only the proposed WJMF CP Mod facility contours are shown in **Figure 4**. As there is no prohibited contour overlap, it is believed that the proposed facility complies with the prohibited overlap criteria of §73.509(a).

A spacing study was performed as required by §73.507(c) (regarding facilities differing in frequency by 10.6 or 10.8 MHz from the proposal). The nearest such facility is WORC-FM

² The cooperation between *Wheeler* and Bryant University is informal. Therefore, there is no written agreement between the parties and a copy of the agreement cannot be provided as required by §73.3517(e). If a waiver of this rule is required, it is hereby requested on behalf of the applicant.

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(Ch 255A, Webster, MA). At a distance of 59 kilometers, the proposed facility easily meets the 10 km minimum distance separation requirement of §73.207.

TV Channel 6 Considerations

The instant proposal complies with the protection requirements to Channel 6 TV broadcast stations as required by the Commission's Rules. Under §73.525(a)(1), interference protection to Channel 6 television stations must be considered if the distance between the proposed FM Channel 201 transmitter and a TV Channel 6 transmitter is 265 km or less. The only licensed or proposed Channel 6 television transmitter within that distance is that of low-power television station WNYZ-LP. Although protection of LPTV stations is not required, at a distance of 252 kilometers, the proposed facility will be of no consequence to WNYZ-LP.

Prior to the transition to digital television broadcasting, WLNE-TV, New Bedford, MA operated on Channel 6 within 265 km of the proposed facility. In keeping with a recent FCC Public Notice on this topic,³ **Attachment 1** provides an unconditional consent letter from this television station concurring with construction of the proposed facility. As shown in the foregoing, the proposed facility complies with the requirements of §73.525 with regard to interference to all television Channel 6 facilities.

Other Allocation Considerations

The nearest FCC monitoring station is 340 km distant at Belfast, Maine. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c) that would suggest consideration of the monitoring station. There are no AM broadcast stations within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's CDBS database.

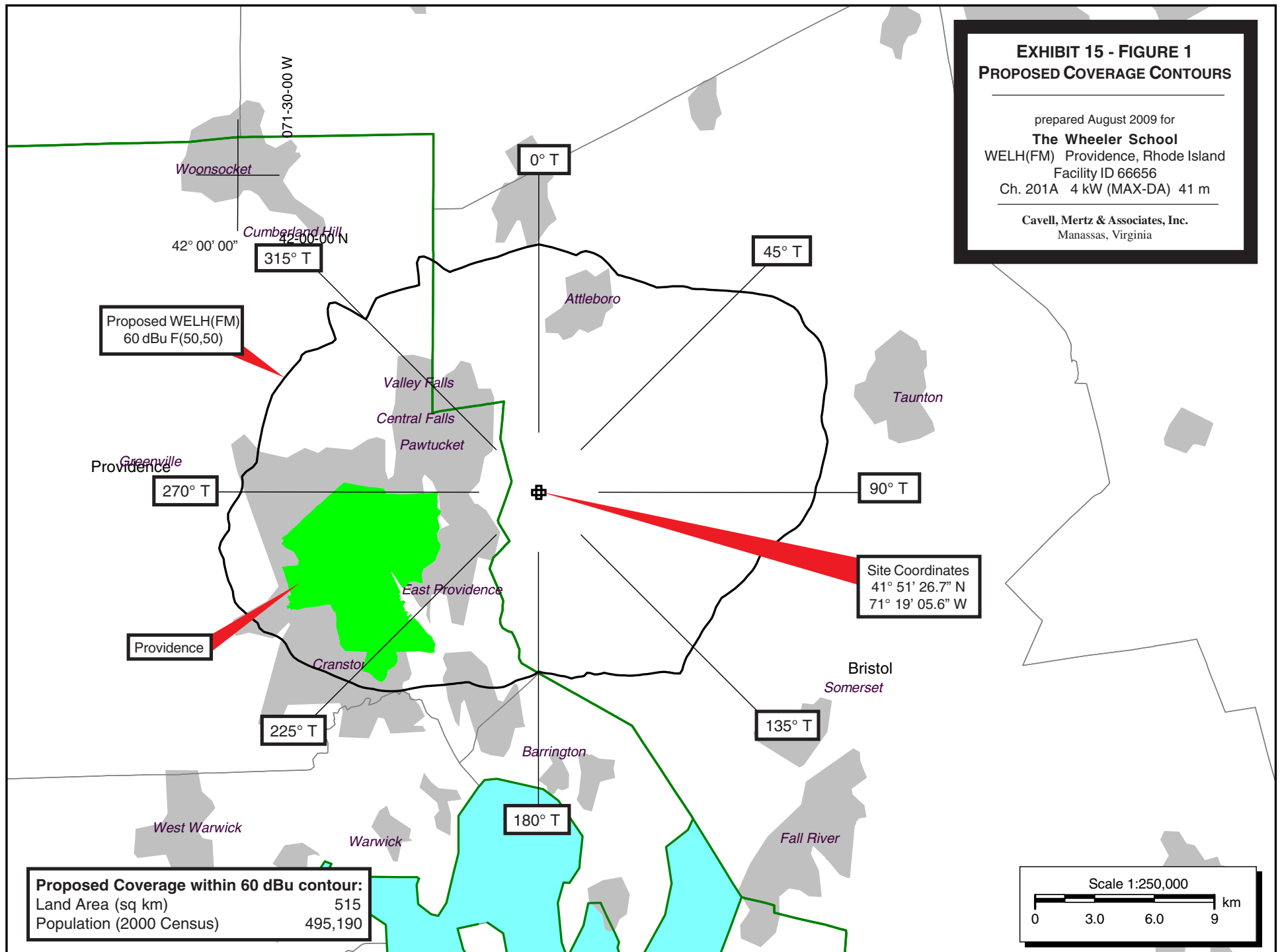
It is thus believed that the facility proposed herein satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

³ *Media Bureau Provides Guidance to NCE FM Stations Regarding Television Channel 6 Protection Requirements* DA 09-744, April 1, 2009

EXHIBIT 15 - FIGURE 1 PROPOSED COVERAGE CONTOURS

prepared August 2009 for
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Cavell, Mertz & Associates, Inc.
 Manassas, Virginia



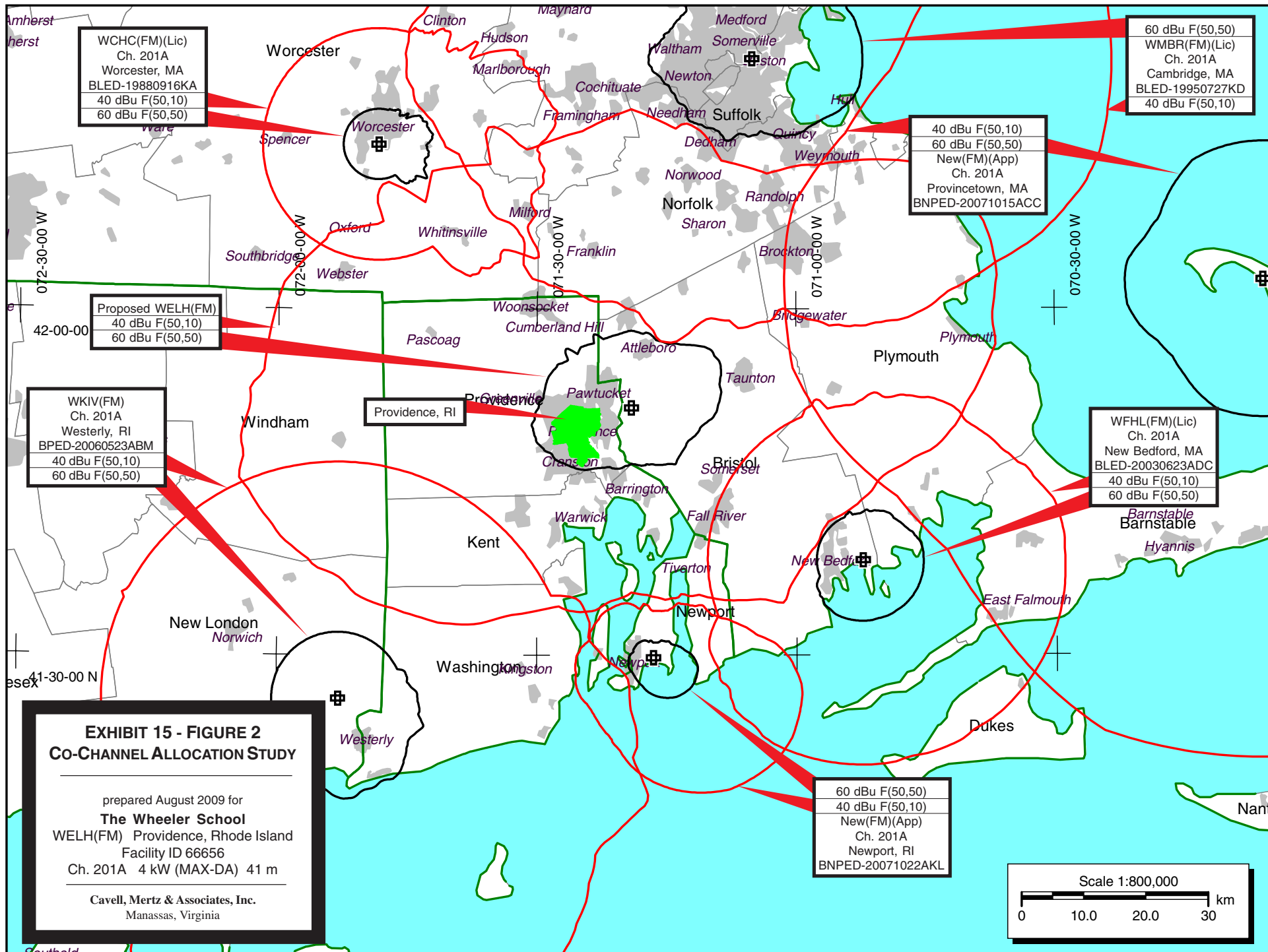


EXHIBIT 15 - FIGURE 2A
Co-Channel Allocation Study Detail
WMBR(FM) CAMBRIDGE, MASSACHUSETTS

prepared August 2009 for
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Facility ID 66656
Ch. 201A 4 kW (MAX-DA) 41 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WMBR(FM)(Lic)
Ch. 201A
Cambridge, MA
BLED-19950727KD
40 dBu F(50,10)

Proposed WELH(FM)
60 dBu F(50,50)

Providence, RI

Woonsocket

Cumberland Hill
42-00-00 N

Franklin

Attleboro

Valley Falls

Central Falls

Pawtucket

Taunton

Greenville
Providence

East Providence

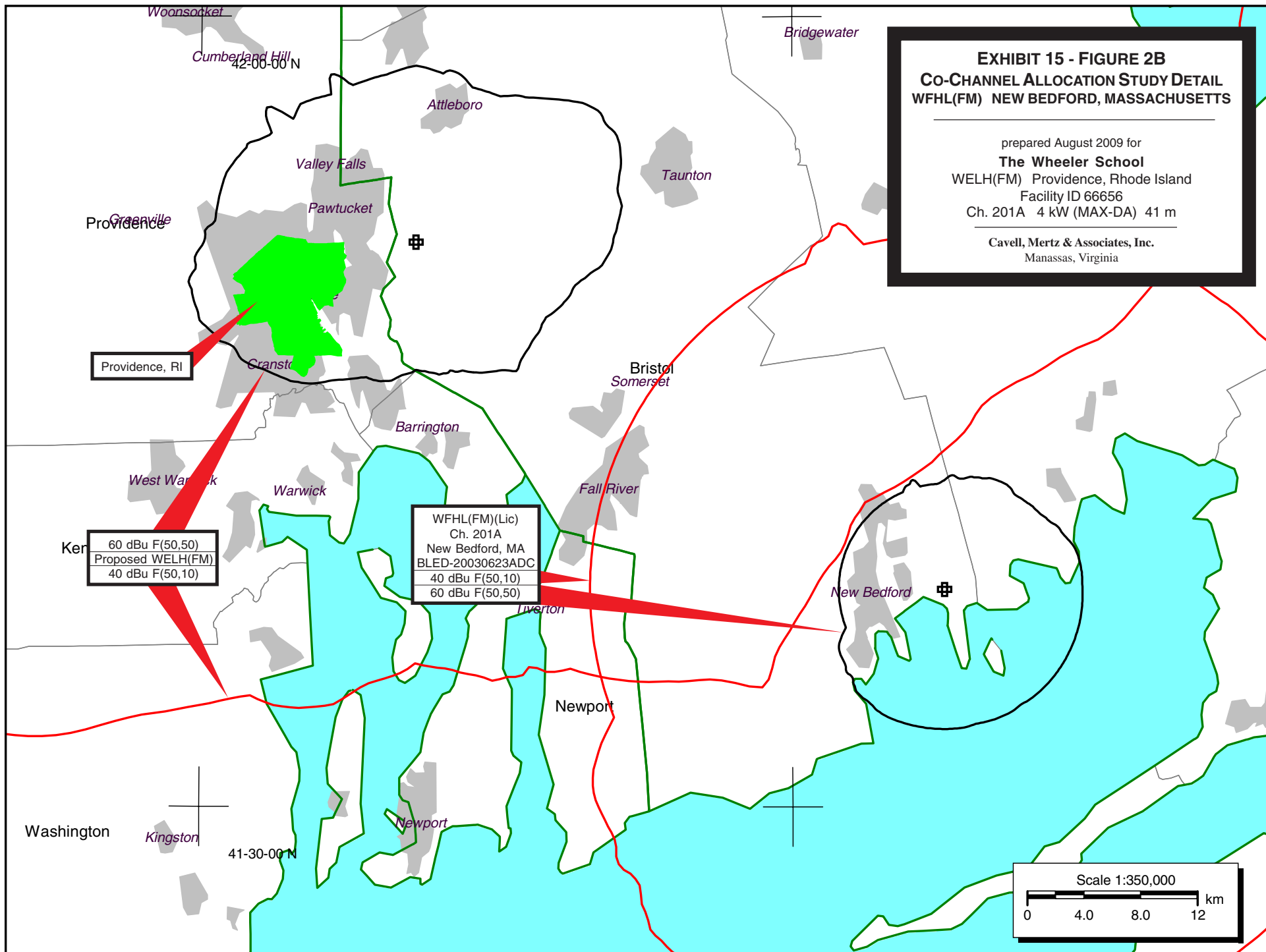
Cranston

Bristol
Somerset

Barrington

Scale 1:225,000

0 3.0 6.0 9 km



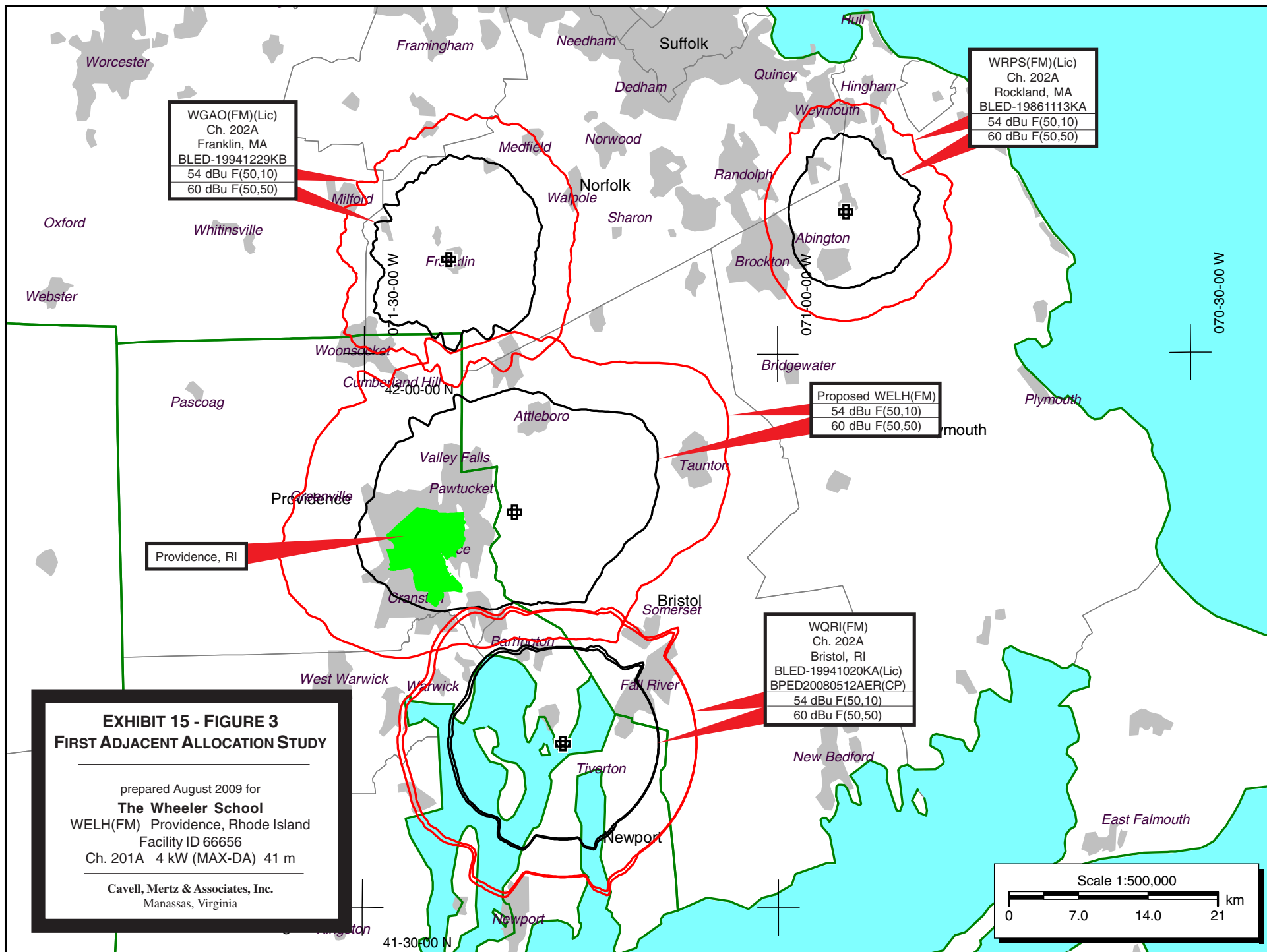


EXHIBIT 15 - FIGURE 3A
FIRST ADJACENT ALLOCATION STUDY DETAIL
WGAO(FM) FRANKLIN, MASSACHUSETTS

prepared August 2009 for
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Ch. 201A 4 kW (MAX-DA) 41 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WGAO(FM)(Lic)
Ch. 202A
Franklin, MA
BLED-19941229KB
54 dBu F(50,10)
60 dBu F(50,50)

Proposed WELH(FM)
54 dBu F(50,10)
60 dBu F(50,50)

071-30-00 W

072-00-00 W

Woonsocket

Franklin

Attleboro

Valley Falls

Central Falls

Pawtucket

Scale 1:150,000

0 2.0 4.0 6 km

EXHIBIT 15 - FIGURE 3B
FIRST ADJACENT ALLOCATION STUDY DETAIL
WQRI(FM) BRISTOL, RHODE ISLAND

prepared August 2009 for
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Facility ID 66656
Ch. 201A 4 kW (MAX-DA) 41 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WQRI(FM)(Lic)
Ch. 202A
Bristol, RI
BLED-19941020KA
54 dBu F(50,10)

WQRI(FM)(CP)
Ch. 202A
Bristol, RI
BPED-20080512AER
54 dBu F(50,10)

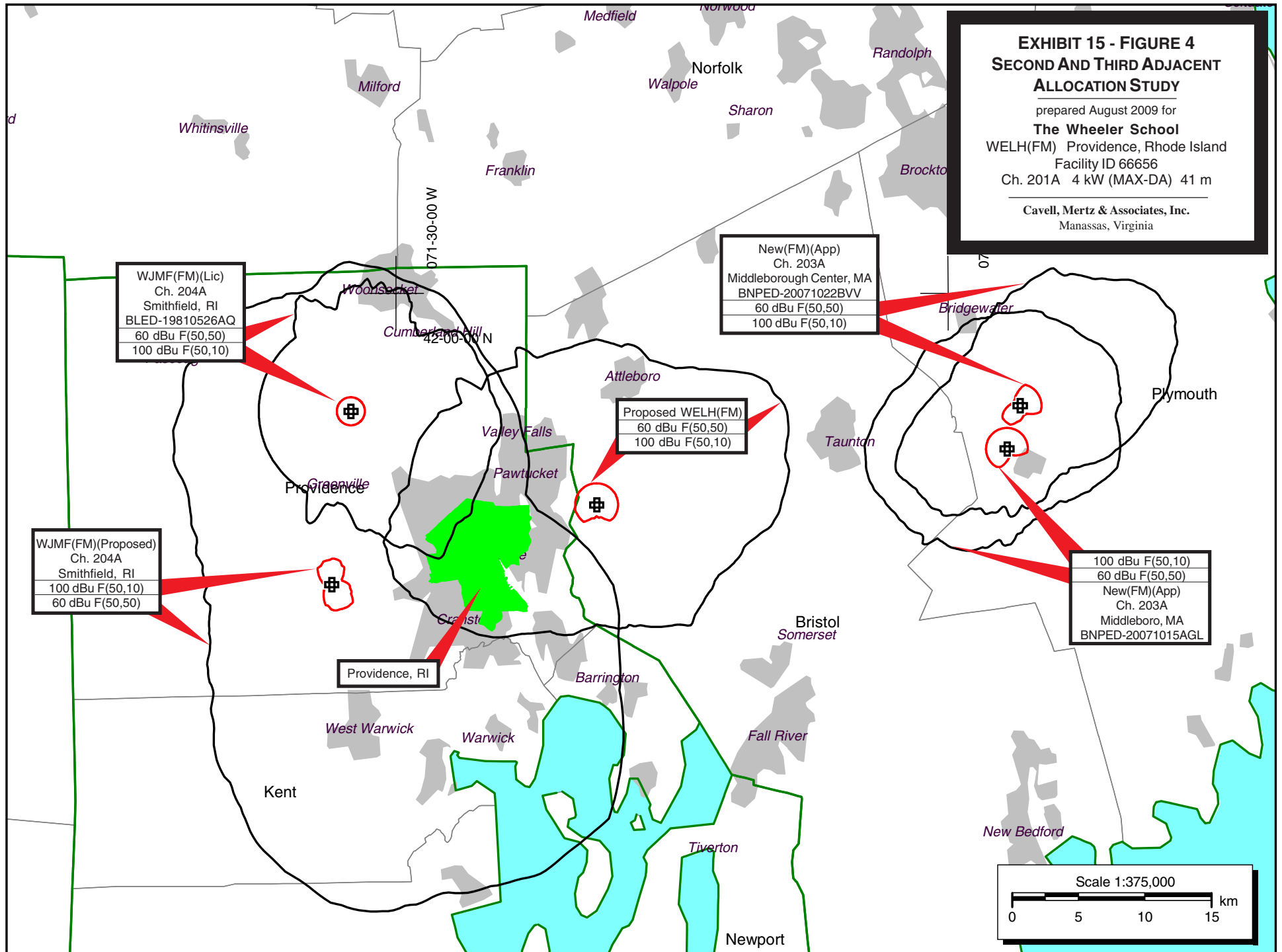
Proposed WELH(FM)
60 dBu F(50,50)

Scale 1:25,000
0 0.33 0.67 1.0 km

EXHIBIT 15 - FIGURE 4
SECOND AND THIRD ADJACENT
ALLOCATION STUDY

prepared August 2009 for
The Wheeler School
WELH(FM) Providence, Rhode Island
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Cavell, Mertz & Associates, Inc.
Manassas, Virginia





August 10, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WELH(FM), Channel 201, Providence, Rhode Island
Facility ID 66656, Application for Construction Permit

Dear Ms. Dortch:

Global Broadcasting of Southern New England LLC ("Global") is the licensee of television station WLNE(TV), New Bedford, Massachusetts (see BLCT-19920604KF). As the Commission is aware, WLNE(TV) has terminated analog transmissions on Channel 6 following its transition to digital operations on Channel 49.

The Wheeler School ("Wheeler"), licensee of FM station WELH, is authorized to construct an improved transmitter facility near Rehoboth, Massachusetts (see BPED-20070906AGD). *Wheeler* now seeks to locate this facility to a tower near Seekonk, Massachusetts, in the vicinity of the licensed WELH transmitter (see BLED-19941228KB).

Accordingly, *Global* herein consents to construction of the proposed WELH(FM) transmitter facility at Seekonk, Massachusetts.

Please contact the undersigned should you have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'Steve Doerr', written over a horizontal line.

Steve Doerr
VP/General Manager

cc: Mr. David Schiano, WELH(FM)
Mr. Dan Ryson, Cavell, Mertz & Associates, Inc.

WLNE-TV • 10 Orms Street • Providence, RI 02904 • 401-453-8000