

Allocation Study

1. Compliance with 47 C.F.R. 73.207

The proposed facility meets all minimum distance separation requirements with regard to co-channel, first, second, or third adjacent channel stations, and those separated by 53/54 channels, except the licensed facilities of the following stations:

Station	Channel	City of License	Facility ID	Distance Short-Spaced
WLBC-FM	281B	Muncie, IN	17602	10.4km
WNLT	282A	Delhi Hills, OH	69986	10.1km
WJKR	280A	Worthington, OH	60099	9.3km
WNRJ	280A	Vienna, WV	18534	1.8km

This application proposes contour protection (47 C.F.R. 73.215. 47 C.F.R. 73.215(e)) for WLBC-FM, WNLT, WJKR, and WNRJ.

The minimum separation requirement between a class C0 and a class B facility (WPAY-FM and WLBC-FM), which are cochannel, is 266 km. Exhibit 18-A shows that WLBC-FM is separated from the proposed facility by 261.59 km. The existing CFR 73.213(a) spacing with respect to WLBC-FM 281B will continue to be upheld. As seen in Exhibit 20, there is no prohibited overlap of the service and interfering contours of WPAY-FM and WLBC-FM.

The minimum separation requirement between a class C0 and a class A facility (WPAY-FM and WNLT), which are first adjacent channels, is 130 km. Exhibit 18-A shows that WNLT is separated from the proposed facility by 141.91 km.

The minimum separation requirement between a class C0 and a class A facility (WPAY-FM and WJKR), which are first adjacent channels, is 130 km. Exhibit 18-B shows that WJKR is separated from the proposed facility by 142.71 km.

The minimum separation requirement between a class C0 and a class A facility (WPAY-FM and WNRJ), which are first adjacent channels, is 130 km. Exhibit 18-B shows that WNRJ is separated from the proposed facility by 150.25 km.

Therefore, the proposed facility is permitted to use contour protection toward the short-spaced facility (See Exhibit 20 for compliance with contour protection requirements).

2. Fully Spaced Theoretical Site

A theoretical allotment site has been identified. It is located at 38° 32' 09.0" N by 082° 57' 56.0" W and is, in fact, fully spaced. If necessary, the applicant could construct a tower at that location. However, to construct a new tower would cause financial hardship.

Exhibit Index:

- Exhibit 18-A shows the spacing at the proposed site.
- Exhibit 18-B demonstrates the theoretical allotment site meets the minimum distance separation requirements of 47 C.F.R. 73.207.
- Exhibit 18-C is a topographical map showing the location of the theoretical allotment site.
- Exhibit 18-D shows the city of license coverage map for the theoretical allotment site. Note both the 70dbu(F50-50) and the 59km uniform circle fully encompass the proposed Community of License of Portsmouth, OH.
- Exhibit 20 shows the protected and interfering contours of the proposed operation and the short-spaced stations.

WPAY-FM Site Spacing

REFERENCE 38 41 00.0 N. CLASS = C0 Int = C DISPLAY DATES
 83 00 46.0 W. Current Spacings to 3rd Adj. DATA 09-21-17
 ----- Channel 281 - 104.1 MHz ----- SEARCH 09-22-17

Call	Channel	Location	Azi	Dist	FCC	Margin
WPAY-FM	LIC-Z 281C0	New Boston	OH 0.0	0.00	270.0	-270.0
WASP-LP	LIC 283L1	Huntington	WV 128.1	55.07	84.0	-28.9
W283BO	APP 281D	Lancaster	OH 19.1	120.01	141.0	-21.0
WLBC-FM*	LIC 281B	Muncie	IN 309.7	261.59	272.0	-10.4
WNLT	LIC-N 282A	Delhi Hills	OH 289.8	141.91	152.0	-10.1
WJKR	LIC-Z 280A	Worthington	OH 356.8	142.71	152.0	-9.3
WNRJ	LIC-Z 280A	Vienna	WV 60.3	150.25	152.0	-1.8
WZDA	LIC-Z 280A	Beavercreek	OH 318.6	154.83	152.0	2.8
W279CE	LIC 279D	Middleport	OH 63.3	93.97	84.0	10.0
W227CI	LIC 227D	Catlettsburg	KY 123.5	43.44	25.0	18.4
WYWH-LP	LIC 283L1	Athens	OH 47.6	107.73	84.0	23.7
WXKQ-FM	LIC-N 280A	Whitesburg	KY 172.1	176.23	152.0	24.2
WCKQ	LIC-Z 281C3	Campbellsville	KY 234.8	255.84	226.0	29.8
WNNP	LIC 282A	Richwood	OH 351.5	182.20	152.0	30.2
W283AP	LIC 283D	Prestonsburg	KY 170.7	114.42	84.0	30.4
WETT	LIC 281A	Bridgeport	WV 72.9	245.48	215.0	30.5
WCBJ	LIC 279A	Campton	KY 198.1	120.54	86.0	34.5
W283AQ	LIC-D 283D	Cross Lanes	WV 104.9	120.01	84.0	36.0
W283AQ	CP -D 283D	Cross Lanes	WV 104.9	120.01	84.0	36.0
W283BO	LIC 283D	Lancaster	OH 16.9	122.22	84.0	38.2
WJFZ-LP	LIC 281L1	Zanesville	OH 30.7	162.81	122.0	40.8
W227AX	LIC 227D	Morehead	KY 211.5	66.05	25.0	41.1
WJFY-LP	LIC 282L1	Newark	OH 19.6	152.10	111.0	41.1
WQAL	LIC 281B	Cleveland	OH 19.7	314.47	272.0	42.5
WWEL	LIC 280A	London	KY 209.0	195.12	152.0	43.1
WLKT	LIC-N 283C2	Lexington-fayette	KY 239.3	132.44	89.0	43.4
W281AJ	LIC 281D	Beckley	WV 122.3	189.96	141.0	49.0
WYDX-LP	CP 281L1	Frankfort	KY 252.8	171.53	122.0	49.5
W280DO	LIC 280D	Lexington	KY 239.6	145.02	94.0	51.0
WRBI	LIC 280A	Batesville	IN 287.9	203.50	152.0	51.5
WGRR	LIC-Z 278B	Hamilton	OH 294.2	142.94	89.0	53.9
W283CL	LIC-D 283D	Columbus	OH 359.7	139.20	84.0	55.2
WNNND	LIC-Z 278A	Pickerington	OH 9.9	142.80	86.0	56.8
WVPV-LP	LIC 282L1	Cairo	WV 69.2	171.03	111.0	60.0
W283BL	LIC 283D	Malta	OH 42.6	146.00	84.0	62.0
WULL-LP	LIC 282L1	Ivydale	WV 94.8	173.04	111.0	62.0
WVRC-FM	LIC 284A	Spencer	WV 84.7	150.00	86.0	64.0
WTQR	LIC-N 281C	Winston-salem	NC 136.9	346.61	281.0	65.6
WTUE	LIC 284B	Dayton	OH 318.6	154.83	89.0	65.8
1762480	APP 278D	Parkersburg	WV 60.4	149.90	84.0	65.9
1763024	APP 278D	Spencer	WV 84.7	150.00	84.0	66.0
W282CD	LIC 282D	Dayton	OH 322.7	160.35	94.0	66.4

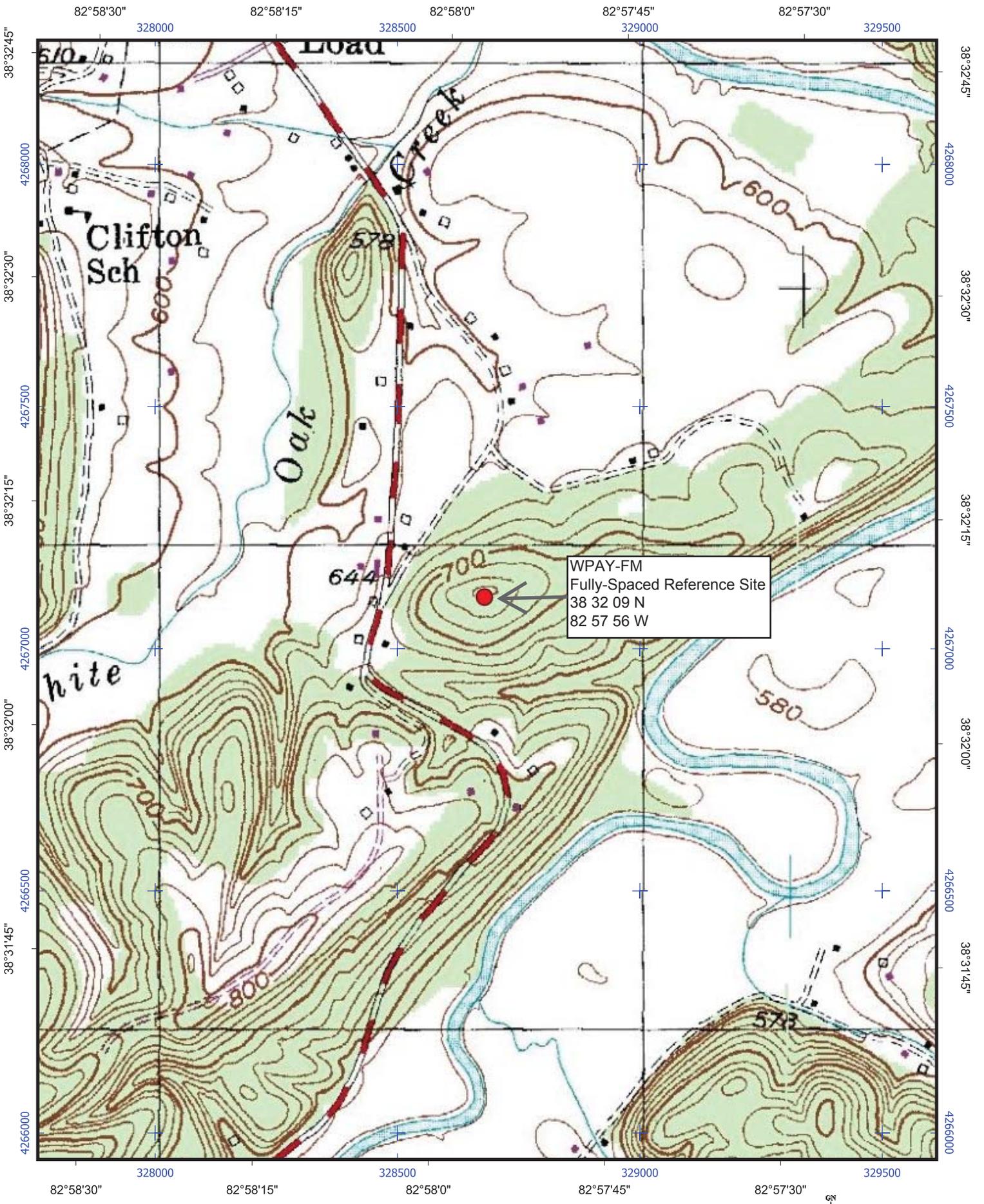
* = WPAY-FM will continue to be a 73.213(a) facility with respect to WLBC-FM

Theoretical Site Spacing

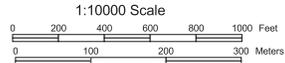
REFERENCE 38 32 09.0 N. CLASS = C0 DISPLAY DATES DATA 08-22-17
 82 57 56.0 W. Current Spacings to 3rd Adj. SEARCH 08-23-17
 ----- Channel 281 - 104.1 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
WPAY-FM	LIC-Z 281C0	New Boston	OH 346.0	16.88	270.0	-253.1
WASP-LP	LIC 283L1	Huntington	WV 114.1	43.02	84.0	-41.0
W283BO	APP 281D	Lancaster	OH 15.2	134.44	141.0	-6.6
WNLT	LIC-N 282A	Delhi Hills	OH 295.2	151.96	152.0	-0.04
WLBC-FM	LIC 281B	Muncie	IN 311.8	275.38	272.0	3.4
WNRJ	LIC-Z 280A	Vienna	WV 54.3	155.62	152.0	3.6
WJKR	LIC-Z 280A	Worthington	OH 355.6	159.32	152.0	7.3
WXXQ-FM	LIC-N 280A	Whitesburg	KY 172.7	159.46	152.0	7.5
W227CI	LIC 227D	Catlettsburg	KY 103.2	33.03	25.0	8.0
W283AP	LIC 283D	Prestonsburg	KY 171.6	97.60	84.0	13.6
W279CE	LIC 279D	Middleport	OH 53.7	99.00	84.0	15.0
WZDA	LIC-Z 280A	Beavercreek	OH 321.3	170.00	152.0	18.0
WCBJ	LIC 279A	Campton	KY 203.0	106.65	86.0	20.7
WCKQ	LIC-Z 281C3	Campbellsville	KY 238.5	250.30	226.0	24.3
W283AQ	LIC-D 283D	Cross Lanes	WV 97.4	112.80	84.0	28.8
W283AQ	CP -D 283D	Cross Lanes	WV 97.4	112.80	84.0	28.8
W227AX	LIC 227D	Morehead	KY 224.1	55.59	25.0	30.6
WWEL	LIC 280A	London	KY 212.6	183.17	152.0	31.2
WETT	LIC 281A	Bridgeport	WV 69.0	246.92	215.0	31.9
WYWH-LP	LIC 283L1	Athens	OH 40.3	116.66	84.0	32.7
W281AJ	LIC 281D	Beckley	WV 118.6	178.14	141.0	37.1
WLKT	LIC-N 283C2	Lexington-fayette	KY 246.6	128.68	89.0	39.7
WNNP	LIC 282A	Richwood	OH 351.1	199.01	152.0	47.0
W280DO	LIC 280D	Lexington	KY 246.2	141.24	94.0	47.2
WYDX-LP	CP 281L1	Frankfort	KY 258.5	171.47	122.0	49.5
WTQR	LIC-N 281C	Winston-salem	NC 135.5	331.95	281.0	51.0
W283BO	LIC 283D	Lancaster	OH 13.3	136.96	84.0	53.0
WJFZ-LP	LIC 281L1	Zanesville	OH 26.8	175.18	122.0	53.2
W282BZ	LIC-D 282D	Elkhorn City	KY 157.8	147.28	94.0	53.3
WJFY-LP	LIC 282L1	Newark	OH 16.4	166.39	111.0	55.4
WQAL	LIC 281B	Cleveland	OH 18.1	328.61	272.0	56.6
WULL-LP	LIC 282L1	Ivydale	WV 89.4	168.32	111.0	57.3
WRBI	LIC 280A	Batesville	IN 291.8	212.92	152.0	60.9
WVRC-FM	LIC 284A	Spencer	WV 78.3	148.34	86.0	62.3
WVPV-LP	LIC 282L1	Cairo	WV 63.7	173.78	111.0	62.8
WEZJ-FM	LIC-Z 282C3	Williamsburg	KY 208.8	226.21	163.0	63.2
WJMD	LIC 284A	Hazard	KY 187.4	150.24	86.0	64.2
1763024	APP 278D	Spencer	WV 78.3	148.34	84.0	64.3
WGRR	LIC-Z 278B	Hamilton	OH 299.2	153.96	89.0	65.0

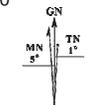
WPAY-FM Reference Site Topographical Map Exhibit 18-C



WPAY-FM
Fully-Spaced Reference Site
38 32 09 N
82 57 56 W



Universal Transverse Mercator (UTM) Projection Zone 17
North American Datum of 1983 (NAD83)
UTM Grid shown in Blue



Magnetic declination at center of map on
April 30, 2009

Exhibit 18-D Community of License Coverage From Theoretical Fully Spaced Site

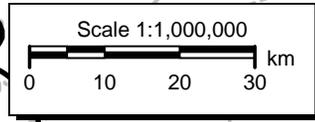
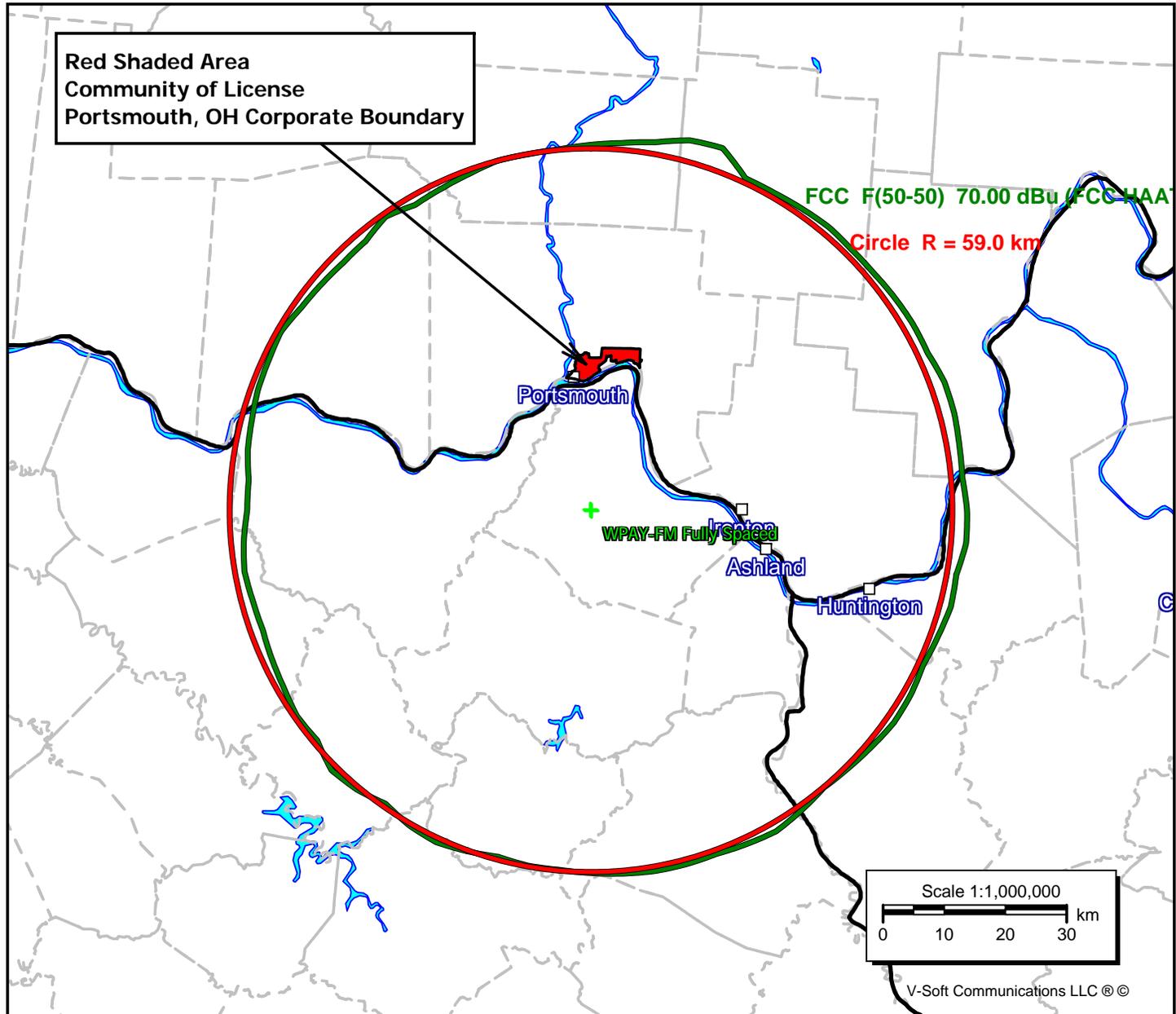
WPAY-FM Fully Spaced (281)

WPAY-FM Fully Spaced
BLED20110609AAI
Latitude: 38-32-09 N
Longitude: 082-57-56 W
ERP: 100.00 kW
Channel: 281
Frequency: 104.1 MHz
AMSL Height: 689.035 m
Elevation: 323.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Red Shaded Area
Community of License
Portsmouth, OH Corporate Boundary

FCC F(50-50) 70.00 dBu (FCC HAA)

Circle R = 59.0 km



V-Soft Communications LLC ©