

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu contour of the second-adjacent WKRZ, Freeland, PA and the predicted interference to the 60 dBu contour of the third-adjacent WUSR, Scranton, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WKRZ, Freeland, PA and WUSR, Scranton, PA, second and third adjacent channel facilities to this translator proposal, are protected from interference within their 54 dBu and 60 dBu contours from the associated interference contour (based on 47 CFR 74.1204(a)(1); using the FCC F(50/10) curves) which need be 40 dBu greater than the associated coverage contours (WKRZ & WUSR) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.

2. This translator's antenna location is located within the 54 dBu contour (based on 73.333 F(50/50)) of WKRZ, Freeland, PA and within the 60 dBu contour (based on 73.333 F(50/50)) of WUSR, Scranton, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WKRZ & WUSR. Included as an attachment (W255BO WQOR Desired to Undesired Ratios Map) is a map showing that the 76 dBu coverage contours of WKRZ and WUSR encompasses the proposed antenna site along with the entire proposed 116 dBu interference contour. As the proposed 116 dBu interference contour is 40 dBu greater than the 76 dBu contours of WKRZ and WUSR then these contours are the appropriate interference contours

for this analysis and it is clearly evident that interference will only occur within these interference contours for this proposed translator.

3. Given this translator's requested effective radiated power of 180 watts Vertical and 90 watts Horizontal; the predicted 116 dBu interference contour for this proposal would be small. At any HAAT value, the maximum 116 dBu contour distance for this proposal is 0.15 kilometers in any direction. This proposal is for directional antennas, a showing using a non directional antenna will be shown as it will encompass the directional patterns completely.

4. This proposed translator site is situated in a very sparsely populated area, recognized as a "Tower Farm" including numerous towers with their outbuildings housing electronic equipment. W255BO WQOR 74.1204(d) Geo Map, attachments to this exhibit, clearly shows how rural the area is within the 116 dBu interference contour of this proposal with no dwellings at all located within this contour. The rule in 47 CFR 74.1204(d) states "an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such factors as may be applicable." In this particular case, as shown in this exhibit, it is clearly evident that there is a "lack of population" as defined in 47 CFR 1204(d) thus allowing this translator to operate at this proposed location.

For the foregoing reasons this Applicant submits that the predicted interference to WKRZ, Freeland, PA and WUSR, Scranton, PA is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facilities, WKRZ, Freeland, PA and WUSR, Scranton, PA.

By: Kevin Fitzgerald, Chief Engineer