

WCRJ, Jacksonville, FL
Section 73.509 Overlap Showing
May, 2012

Noncommercial Educational FM (NCE-FM) radio station WCRJ, Jacksonville, FL, is presently licensed to operate on Channel 201 (88.1 MHz) with an Effective Radiated Power (ERP) of 8.0 kW (DA-MAX) at an antenna Height Above Average Terrain (HAAT) of 151 meters pursuant to FCC License File No. BLED-19991117ABF. The current WCRJ facility both causes and receives Section 73.509 contour overlap from third-adjacent channel station WJFR(FM), Jacksonville, FL (Channel 204, 8.0 kW ERP, 107 meters HAAT, FCC File No. BLED-19870928KC). The two stations operate today with mutual Section 73.509 overlap pursuant to a waiver granted in accordance with the Commission's decision in *Educational Information Corporation*, Memorandum Opinion and Order, 6 FCC Rcd 2207 (1991) ("*EIC*").

By means of the instant application, the applicant proposes to relocate the WCRJ FM transmission system to the taller tower immediately adjacent to the existing WCRJ tower in order to mitigate signal degradation problems caused by the nearby tall tower. To accommodate the proposed relocation of WCRJ, the applicant requests a continuance of the Section 73.509 waiver with respect to the existing and proposed overlap caused to and received from third-adjacent channel station WJFR. As demonstrated herein, the continuance of the Section 73.509 waiver serves the public interest benefit and is in accordance with established Commission precedent as applied to existing, second or third-adjacent channel related NCE-FM stations.

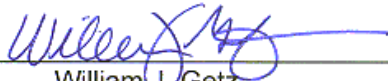
The instant WCRJ proposal results in no change in Section 73.509 overlap received. Further, the new directional antenna pattern was specifically designed to reduce the small amount Section 73.509 overlap caused to WJFR. Therefore, the WCRJ proposal is analogous to the WCCE (overlap caused) proposal in *EIC* and the WCRJ proposal follows the Commission's clear guidelines set forth in *EIC* for waiver of Section 73.509 and grant of the WCRJ proposal. In fact, the *EIC* decision allows existing second and third adjacent channel related noncommercial educational stations to slightly *increase* prohibited overlap, whereas the instant proposal will actually *decrease* overlap caused to third-adjacent channel station WJFR.

Exhibit 5 is a map which depicts the WCRJ present and proposed 100 dBu F(50,10) interfering contours. Because the WJFR 60 dBu F(50,50) protected contour fully encompasses the WCRJ interfering contour(s), the contours shown on Exhibit 5 represent the present and proposed area of overlap caused to WJFR. As shown on Exhibit 5, the land area within the WJFR protected contour subject to Section 73.509 overlap caused from WCRJ would be reduced from 35.4 km² to 35.2 km². Further, the population within the overlap area caused to WJFR would be reduced from 37,964 persons to 35,571 persons. While the proposed area of overlap caused is slightly reduced, the population within the affected area is reduced by 2,393 persons.

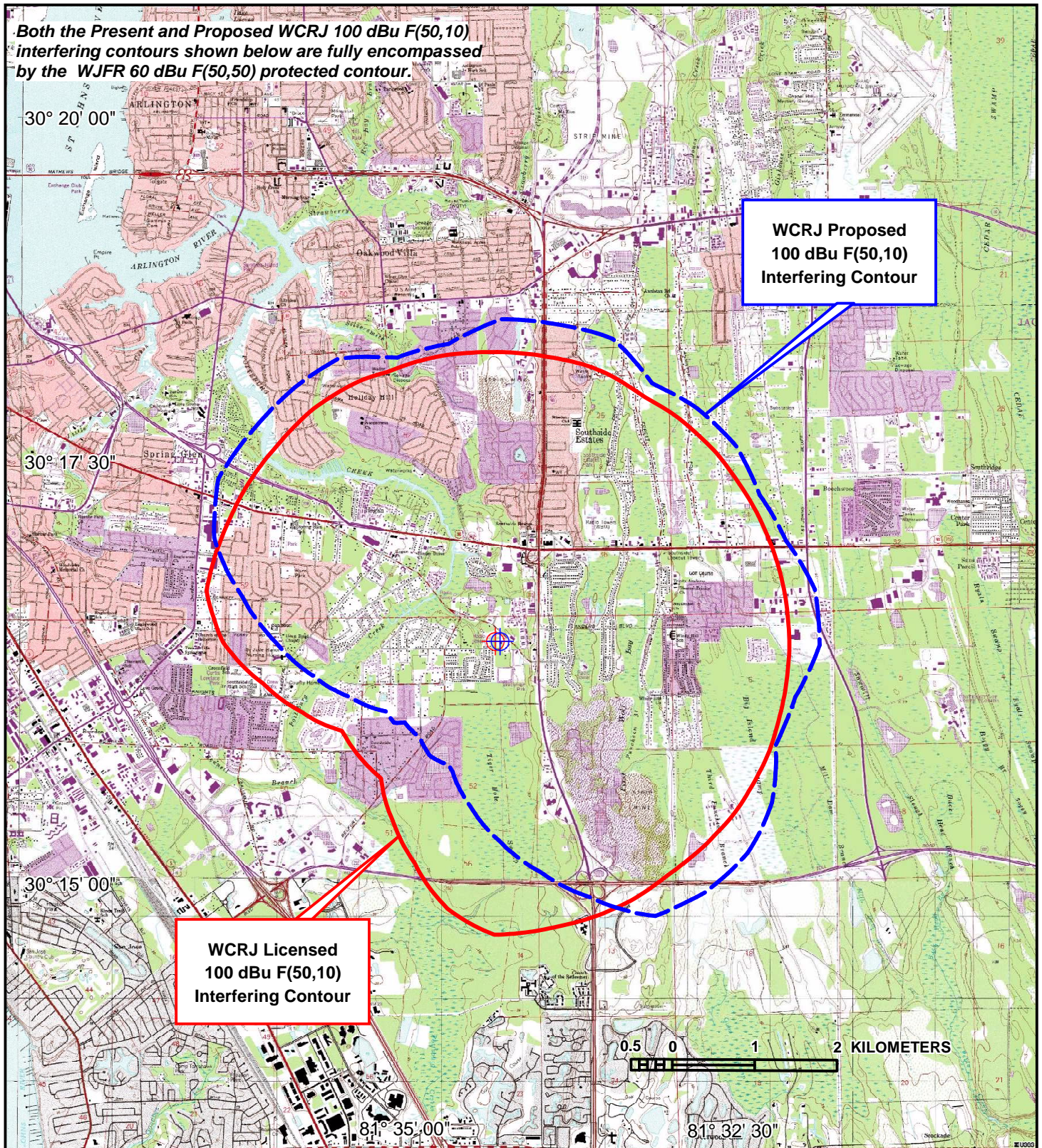
According to the *EIC* decision, the Commission required no further analysis of the overlap area in support of a request for waiver of Section 73.509 overlap caused by an existing second or third adjacent channel related station.

Considering the limited nature of the interference potential between the stations, the slight decrease in predicted overlap caused (to both total area and population), the instant proposal serves a clear public interest benefit and is in accordance with established Commission precedent as applied to existing, second or third-adjacent channel related NCE-FM stations.

Dated: May 1, 2012



William J. Getz

PRESENT Area = 35.4 km² / 2010 Population = 37,964PROPOSED Area = 35.2 km² / 2010 Population = 35,571

**THIRD-ADJACENT CHANNEL EXISTING OVERLAP
SECTION 73.509 SHOWING**

WCRJ(FM), JACKSONVILLE, FLORIDA

WCRJ-LIC : Ch. 201C3, 8.0 kW (DA-MAX), 151 m HAAT

WCRJ-APP: Ch. 201C3, 8.0 kW (DA-MAX), 194 m HAAT

to WJFR(FM), JACKSONVILLE, FL

Ch. 204C3, 8.0 kW ERP, 107 m HAAT

MAY, 2012