

Engineering Statement

EXHIBIT 11- 2ND ADJACENT WAIVER STUDY

CHANNEL 260L1 (99.9 MHZ)

BASED ON A STUDY PERFORMED BY EDUCATION THROUGH MEDIA FOUNDATION AND LLAB, INC., IT HAS BEEN DETERMINED THAT THIS PROPOSED SITE QUALIFIES FOR A SECOND ADJACENT WAIVER AS SPECIFIED IN SECTION 73.807(E) OF THE COMMISSIONS RULES.

STATION WRUM (FACILITY ID # 59976) ORLANDO, FL OPERATES ON CHANNEL 262C AND IS LOCATED 51.4 KM FROM THE PROPOSED LPFM SITE. WRUM OPERATES 95 KW ERP AT 482 METERS HAAT IN THE DIRECTION OF THE PROPOSED LPFM TOWER. WRUM PLACES A 74.044 DBU F(50, 50) SERVICE CONTOUR AT THE LPFM SITE.

THE PROPOSED LPFM FACILITY WILL OPERATE FROM AN ANTENNA HEIGHT OF 70 METERS ABOVE GROUND LEVEL WHICH PLACES IT AT 71 METERS HAAT. AS A RESULT, THE LPFM STATION WILL NEED TO OPERATE AT 17 WATTS IN ORDER TO MEET THE MAXIMUM SERVICE CONTOUR ALLOWED UNDER 73.811(A) OF THE COMMISSIONS RULES.

USING THE U/D METHOD, THE PROPOSED LPFM STATION IS PREDICTED TO PRODUCE AN UNDESIRE INTERFERENCE OVERLAP IN RESPECT TO WRUM TO THE PROPOSED LPFM STATION'S 111.044 DBU INTERFERENCE CONTOUR (OVERLAP ZONE).

AT 17 WATTS, THIS OVERLAP ZONE IS PREDICTED TO BE 57 METERS AT THE RADIATION CENTER USING THE FREE SPACE METHOD.

AS THE RADIATION CENTER OF THE PROPOSED LPFM ANTENNA IS 70 METERS ABOVE GROUND LEVEL, THE INTERFERENCE WILL NOT REACH THE GROUND. THE INTERFERENCE REGION IS CONFINED TO HEIGHTS OF 14 METERS OR GREATER. ALL NEARBY RESIDENTIAL AND COMMERCIAL STRUCTURES ARE 1-STORY BUILDINGS AND ARE NO GREATER THAN 5 METERS IN HEIGHT.

THEREFORE, BASED ON THE INFORMATION PRESENTED, WE CONCLUDE THAT THE PROPOSED LPFM STATION WILL NOT CREATE ANY INTERFERENCE TO EXISTING OR POTENTIAL LISTENERS OF SECOND ADJACENT CHANNEL STATION WRUM.

LPFM CHANNEL REPORT- CHANNEL 260 L1

	Ch. MHz	Call	City of License	Class	Status	Distance	Minimum Required Spaced	Fully Margin	Bearing
3rd	257 99.3	WPKA-LP VERA RAMOS (FacID: 194816)	APOPKA FL US	L1	APP	16.8	0.0	0	16.8 32.6
3rd	257 99.3	WLRQ-FM CAPSTAR TX LLC (FacID: 20372)	COCOA FL US	C2	LIC	93.2	0.0	0	93.2 109.0
3rd	257 99.3	WPKA-LP VERA RAMOS (FacID: 194816)	APOPKA FL US	L1	CP	15.7	0.0	0	15.7 31.3
3rd	257 99.3	W257BF BIBLE BROADCASTING NETWORK, INC. (FacID: 87447)	LEESBURG FL US Translator for WYFB, Gainesville, FL	D2	LIC	38.3	0.0	0	38.3 319.0
2nd	258 99.5	WQYK-FM CBS RADIO INC. OF FLORIDA (FacID: 28619)	ST. PETERSBURG FL US	C1	LIC	104.5	73.0	73	31.5 228.7
1st	259 99.7	NEW MUSICA SUBLIME INC. (FacID: 194810)	ORLANDO FL US	L1	APP	29.4	14.0	14	15.4 93.5
1st	259 99.7	WBVL-LP LATINOS BROADCASTING ORGANIZATION (FacID: 133444)	BUENA VENTURA LAKES FL US	L1	CP MOD	30.5	14.0	14	16.5 144.4
1st	259 99.7	NEW RUNNING WITH TIME COMMUNICATION, INC. (FacID: 196382)	WINTER PARK FL US	L1	APP	29.8	14.0	14	15.8 82.7
1st	259 99.7	NEW MALAQUIAS BOSQUES (FacID: 192921)	SANFORD FL US	L1	APP	38.1	14.0	14	24.1 53.6
1st	259 99.7	WBVL-LP LATINOS BROADCASTING ORGANIZATION (FacID: 133444)	BUENA VENTURA LAKES FL US	L1	LIC	36.5	14.0	14	22.5 140.3
1st	259 99.7	NEW BJR COMMUNITY RADIO INC (FacID: 195592)	LONGWOOD FL US	L1	APP	14.1	14.0	14	0.1 43.9
1st	259 99.7	NEW LA MISION, INC. (FacID: 194169)	ORLANDO FL US	L1	APP	21.1	14.0	14	7.1 79.6
1st	259 99.7	NEW LAKE MARY COMMUNITY RADIO INC (FacID: 195634)	LAKE MARY FL US	L1	APP	28.7	14.0	14	14.7 70.2
1st	259 99.7	NEW SPRING MEADOWS BROADCASTING, INC. (FacID: 195266)	SANFORD FL US	L1	APP	36.9	14.0	14	22.9 55.1
1st	259 99.7	NEW AWAKENING/ART & CULTURE (FacID: 192636)	ORLANDO FL US	L1	APP	28.6	14.0	14	14.6 93.2
1st	259 99.7	US 10/9/2008: Coordinate change proposed in BMPH-20080826AAC		A	VAC	70.5	56.0	56	14.5 336.3
1st	259 99.7	NEW ALTAMONTE SPRINGS SEVENTH-DAY ADVENTIST CHURCH (FacID: 194141)	ALTAMONTE SPRINGS FL US	L1	APP	25.6	14.0	14	11.6 63.7
1st	259 99.7	NEW SEMINOLE COUNTY COMMUNITY BROADCASTERS, INC. (FacID: 193421)	ALTAMONTE SPRINGS FL US	L1	APP	26.5	14.0	14	12.5 62.3
1st	259 99.7	WGMA RICARDO D. ARROYO (FacID: 191546)	SILVER SPRINGS SHORE FL US	A	CP	81.9	56.0	56	25.9 328.7
1st	259 99.7	NEW AZALEA PARK COMMUNITY RADIO INC (FacID: 195620)	ORLANDO FL US	L1	APP	29.3	14.0	14	15.3 87.3
CoCh	260 99.9	WGNE-FM RENDA BROADCASTING CORP. OF NEVADA (FacID: 15897)	MIDDLEBURG FL US	C1	LIC	196.2	111.0	178	85.2 358.8
CoCh	260 99.9	NEW HAITIAN RELIEF RADIO AND COMMUNITY SERVICES, INC. (FacID: 192845)	ORLANDO FL US	L1	APP	24.1	24.0	24	0.1 112.1
CoCh	260 99.9	NEW EDUCATION THROUGH MEDIA FOUNDATION, INC. (FacID: 195186)	BELLE ISLE FL US	L1	APP	24.3	24.0	24	0.3 101.2
CoCh	260 99.9	WXJB GEORGE S. FLINN, JR. (FacID: 170182)	HOMOSASSA FL US One Step Application	C3	CP	82.5	78.0	119	4.5 276.9
CoCh	260 99.9	NEW LLAAB INC. (FacID: 193044)	LAKE MARY FL US	L1	APP	29.4	24.0	24	5.4 48.9
CoCh	260 99.9	WXJB GEORGE S. FLINN, JR. (FacID: 170182)	HOMOSASSA FL US	A	LIC	82.5	67.0	92	15.5 276.9
2nd	262100.3	WRUM CLEAR CHANNEL BROADCASTING LICENSES, INC. (FacID: 59976)	ORLANDO FL US	C	LIC	51.4	93.0	93	-41.6 86.4

2nd Adjacent Protection to WRUM



The above image illustrates structures potentially impacted by the interference region. As is depicted, all structures are one-story residential and commercial structures no greater than 5 Meters in height. At the LPFM site, the signal from WRUM-262C is 74.044 dBu. The appropriate interference contour is 111.04 dBu ($74.04+40$). Assuming an ERP of 17 Watts, the 111.04 dBu interference contour extends a distance of 57 meters at the radiation center. Given the LPFM antenna is 70 meters AGL, the interference contour will still be at least 14 meters AGL. The interference region is confined, however to the heights of 14 meters or greater. It can therefore be reasonably inferred that the potential interference zone would affect zero persons.

As a result, a waiver of Section 73.807 of the Commission's Rules is respectfully requested.