STU-COMM, INC.

W201CN, AFTON, VIRGINIA

TABLE OF ATTACHMENTS

STU-COMM, INC.

AFTON, VIRGINIA

MINOR CHANGE APPLICATION TO W201CN

NARRATIVE

PURPOSE OF APPLICATION

The purpose of this application is to change the orientation of the present directional antenna, to increase the power and to make it a "fill-in" translator for WVTU, channel 207B1, Charlottesville, Virginia. The translator will carry the WVTU HD-2 channel.

The proposed translator antenna will be on the WVTU tower. As demonstrated in Figure 1, the proposed 60 dBu contour will not exceed the 60 dBu contour of WVTU in any azimuth.

WAIVER REQUEST FOR INTERFERENCE

The proposed site is inside the protected contour of second-adjacent channel station WVTW, channel 207B1, Charlottesville, Virginia. The WVTW signal strength at the proposed site is 60 dBu as shown on the attached map (Figure 5). Using the FCC sanctioned U/D method of establishing translator interference to full-service FM stations, the interfering signal of the proposed translator to WVTW is 100 dBu. The attached USGS topographic map (Figure 4) shows the location of the proposed translator and its 100 dBu contour.

As shown on the map, the interfering contour covers approximately 200 meters of the Appalachian Trail. The roads inside the 100 dBu contour are privately owned, and they are isolated from The Skyline Drive by locked gates, preventing vehicular access by the general public. There are several unoccupied buildings inside the contour that house communications and broadcast equipment, however, no building is occupied by any person as a dwelling.

The acceptability of this application is premised on a waiver of the Commissions interference rules under §74.1204(d) which states that, “In addition, an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to ...lack of population”.

Any person inside the proposed 100 dBu contour would generally be either an electronic technician visiting one of the communications or broadcast facilities on an irregular basis, or a hiker passing through on an irregular basis. The general public is precluded from driving to the site by locked gates on the access roads. Based on the foregoing, if a person were present inside the 100 dBu contour, (1) they would not live there, (2) they would not work there on a regular basis, and (3) they would not regularly travel there.

Therefore, for the purpose of §74.1204(d), there is no population inside the overlap area. (See Living Way Ministries, Inc., 17 FCC Rcd 17054 (2002), recon denied FCC 08-242, released October 10, 2008, especially the section "Guidance for Future Applicants to Demonstrate Lack of Population" at paras. 7-13.)

CONTOUR PROTECTION

In this application, the WPRZ protected contour is the 60 dBu f(50,50), and the proposed interfering contour is the 40 dBu f(50,10) in accordance with §74.1204 (6). While WPRZ is a class B1 station, it is NOT a commercial station.

RFR

The tower is owned by The Virginia Tech Foundation, Incorporated. There will be four broadcast antennas on the tower as follows:

WVTU, 195 watts, RC 37 m AGL, Power Density 2 meters AGL	7.2 µW/cm²
W201CN 125 w, RC 28 m AGL, Power Density 2 meters AGL	8.7 µW/cm²
W243BT, 70 watts, RC 20 m AGL	
W218BZ, 195 watts, RC 15 m AGL, Power Density 2 meters AGL	64.8 µW/cm²
Total	80.7 µW/cm²

The power density was calculated at 2 meters AGL using FCC program FM Model. W243BT was excluded in accordance with Table 2, page 71 of OET-65. The antenna used in the calculations was the Phelps Dodge Ring Stub (Dipole) which produces the greatest power density of the available selections. The combined power density is 80.7 uW/cm², which is well below the recommended level of 200 µW/cm² for Uncontrolled Spaces.

QUIET ZONE

NRAO at Greenbank was notified of this application by eMail on June 28, 2010.

STU-COMM, INC., CHARLOTTESVILLE, VIRGINIA
CHANNEL STUDY

REFERENCE CH# 201D - 88.1 MHz, Pwr= 0.125 kW DA, HAAT= 0.0 M, COR= 900 M DISPLAY DATES
38 03 58.0 N. Average Protected F(50-50)= 5.96 km DATA 05-07-10
78 47 54.0 W. Standard Directional SEARCH 06-27-10

CH CITY	CALL STATE	TYPE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
201D Afton	W201CN VA	LIC	DC_	0.0 0.0	0.0 BLFT20000301ACG	38 03 58.0 78 47 54.0	0.010	4.8 900	0.7 Stu-comm, Inc.	-23.7*<	-60.1*<
201D Afton	W201CN VA	APP	DC_	0.0 0.0	0.0 BPFT20100304AAA	38 03 58.0 78 47 54.0	0.155	62.9 900	20.3 Stu-comm, Inc.	-81.8*<	-79.7*<
201B1 Brandy Station	WPRZ-FM VA	CP	DCX	52.4 81.6	232.8 BMPED20100301ABZ	38 30 41.6 78 03 22.0	10.000 137	96.2 277	34.2 Praise Communications, Inc	-29.1*<	0.8
203B1 Charlottesville	WVTW VA	LIC	DVX	108.7 29.1	288.9 BLED20071203AKK	37 58 55.0 78 29 03.0	1.000 317	2.0 485	29.5 Virginia Tech Foundation,	23.0	-0.5*<
202C1 Lynchburg	WRVL VA	LIC	DEN	206.9 108.1	26.6 BLED19831012AJ	37 11 50.0 79 21 07.0	50.000 330	95.3 565	65.3 Liberty University, Inc.	1.7	26.7
201D Stanardsville	W201BC VA	LIC	_VN	69.4 37.6	249.6 BLFT19951018TC	38 11 03.0 78 23 49.0	0.055 45	20.9 213	5.7 Positive Alternative Radio	5.1	13.2
204A Harrisonburg	WXJM VA	LIC	_CN	351.2 41.9	171.1 BLED19901010KB	38 26 22.0 78 52 21.0	0.390 19	1.4 445	10.9 James Madison University B	18.9	30.3
202A Edinburg	WOTC VA	LIC	_CX	6.6 82.4	186.6 BMLED20090204AAS	38 48 13.0 78 41 21.0	1.000 123	40.0 545	26.2 Valley Baptist Church - Ch	21.9	29.9
202A Edinburg	WOTC VA	LIC	_CX	6.6 82.4	186.6 BMLED20100325AAA	38 48 13.0 78 41 21.0	1.000 123	40.0 545	26.2 Valley Baptist Church - Ch	21.9	29.9
202A Edinburg	WOTC VA	CP	_CX	6.6 82.5	186.7 BPED20100325AAB	38 48 14.2 78 41 20.0	1.000 123	40.0 545	26.2 Valley Baptist Church - Ch	22.0	29.9
204A Lexington	WRIQ VA	CP	NCX	245.8 48.1	65.5 BNPED20071018AQN	37 53 17.0 79 17 50.0	3.900 67	2.1 600	20.7 Virginia Tech Foundation,	43.7	27.0
201B1 Richmond	WRIH VA	LIC	DVX	106.8 131.9	287.7 BLED20091215ACF	37 42 54.0 77 21 55.0	5.000 146	88.0 187	30.1 American Family Associatio	33.7	78.6
201B Clarksburg	WKJL WV	LIC	DEX	317.1 188.8	136.2 BLED20090910AAV	39 17 59.0 80 17 30.0	32.000 149	124.0 512	48.7 He's Alive, Incorporated	42.0	69.7
201D Front Royal	W201BA VA	LIC	_V_	27.7 109.0	208.0 BLFT20060327AHF	38 56 01.0 78 12 45.0	0.250	23.8 183	7.1 Positive Alternative Radio	68.0	49.6
201C2 Emporia	NEW VA	CP	DCX	146.4 172.5	327.1 BMPED20091027ADS	36 46 04.0 77 43 39.0	30.000 102	109.1 179	38.9 Roanoke Valley Communicati	51.1	86.1
204D Madison Heights	W204AZ VA	LIC	_C_	195.5 68.8	15.4 BLFT20050825ABO	37 28 08.0 79 00 26.0	0.010	0.2 401	7.7 Calvary Chapel Of Costa Me	57.9	60.9
06ZT Mt. Olive	W06CP VA	CP	D_N	17.1 104.6	197.3 BNPTVL20000831CKO	38 57 57.0 78 26 32.0	3.000 188	15.1 360	2.7 Word Of God Fellowship, In	147.5R	-42.9M

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone = 1, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.
Reference station has protected zone issue: WV Quiet Zone

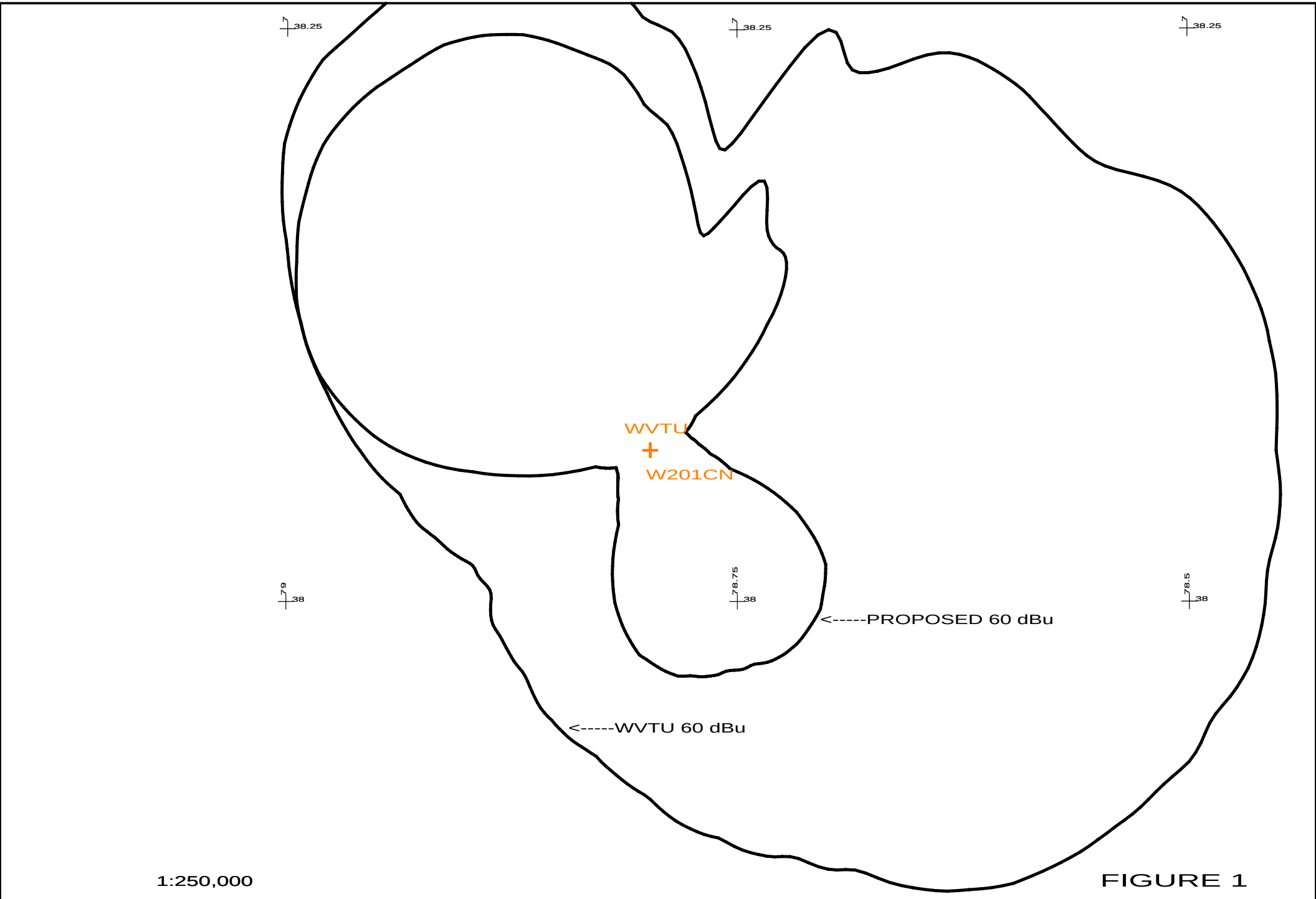


FIGURE 1

Scale in km

0 10 20

THE PROPOSED 60 dBu CONTOUR AND THE 60 dBu CONTOUR OF WVTU

STU-COMM, INC.
CHARLOTTESVILLE, VA

STU-COMM, INC., CHARLOTTESVILLE, VIRGINIA -- FIGURE 2
W201CN AND WVTW

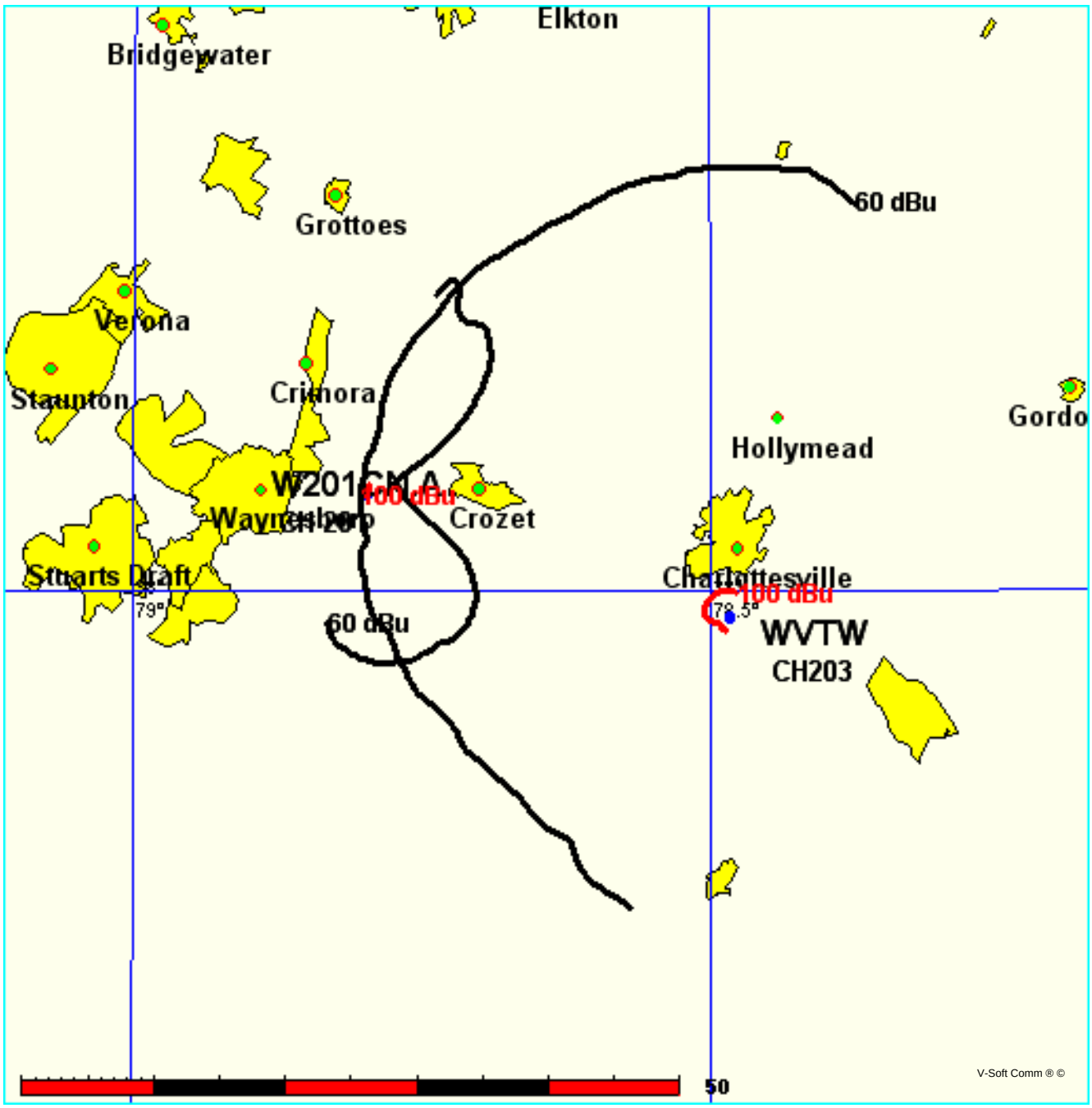
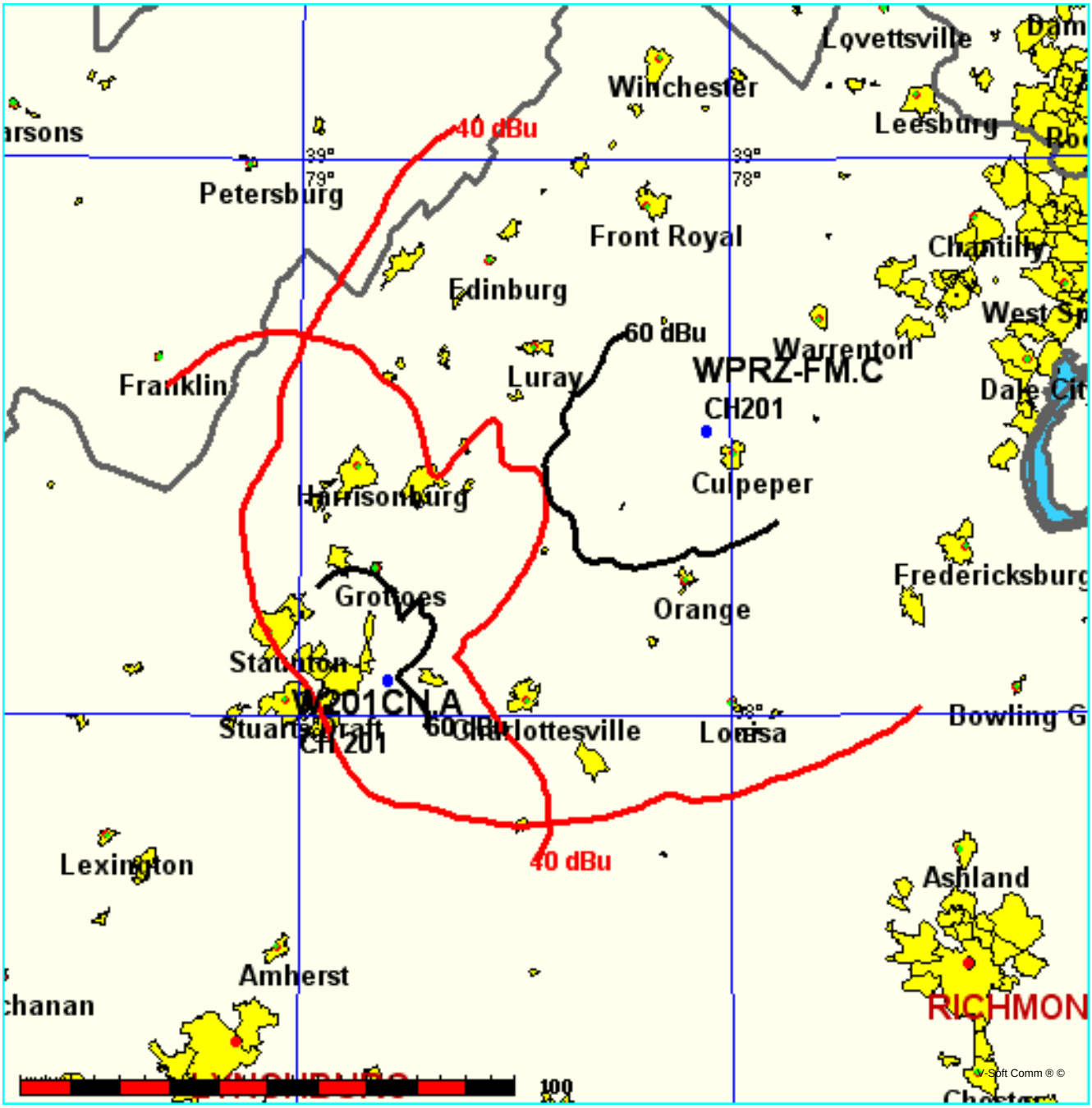
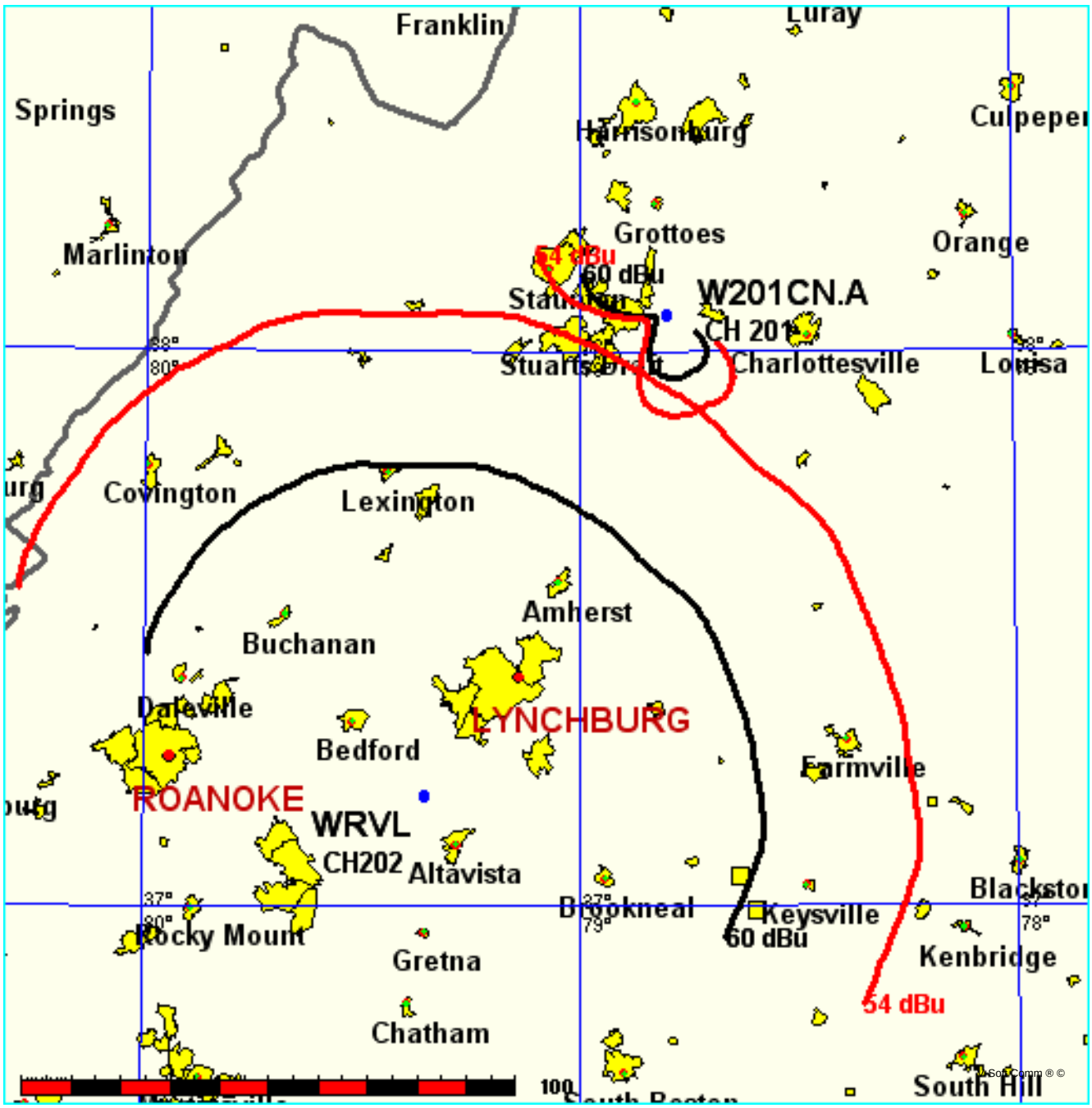
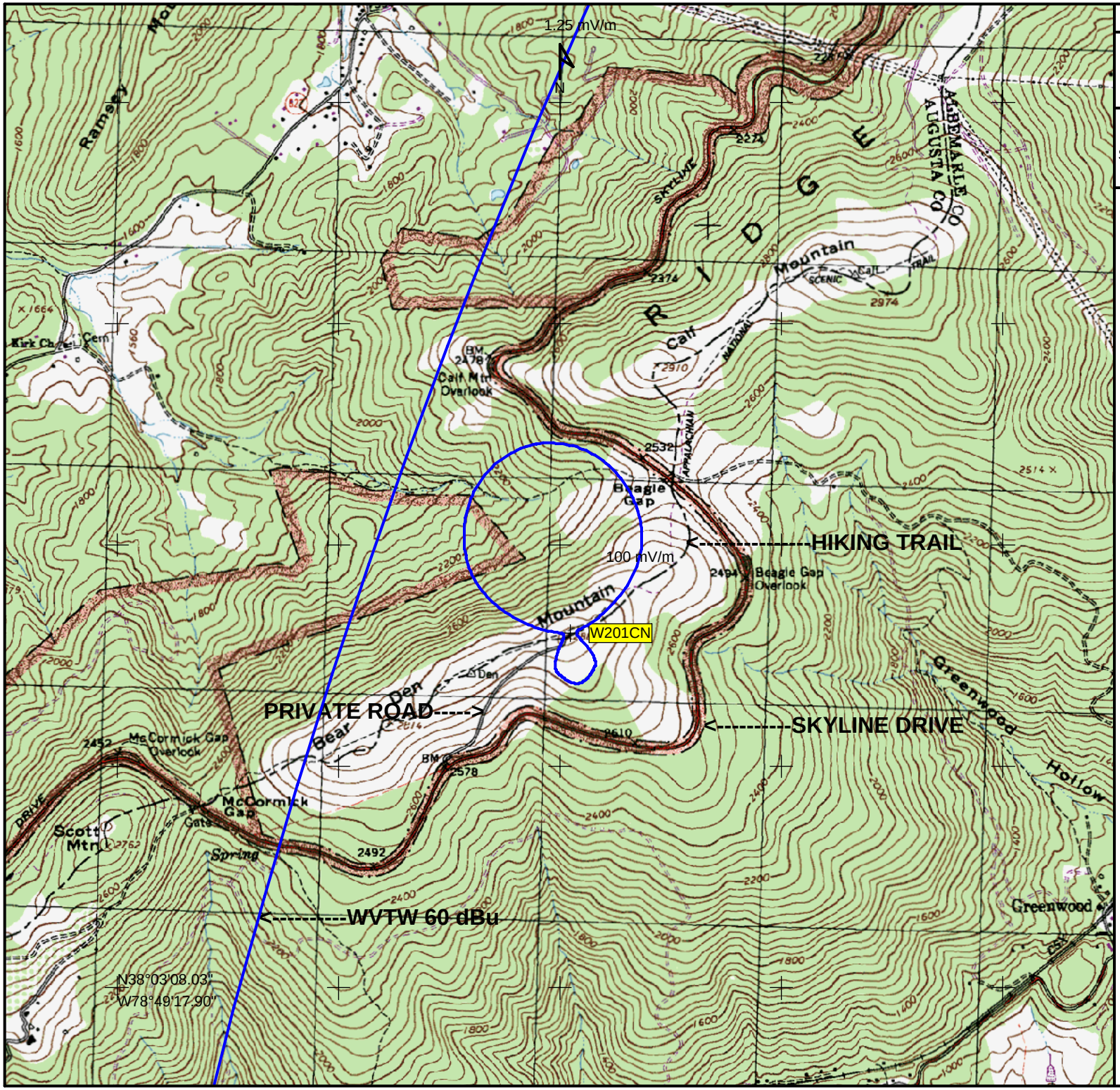


FIGURE 3 -- Stu-comm, Inc., CHARLOTTESVILLE, VA
W201CN vs WPRZ, BRANDY STATION CH 201B1



STU-COMM, INC., CHARLOTTESVILLE, VIRGINIA -- FIGURE 4
W201CN AND WRVL





AMW™: W201CN.am

METERS

-500 0 500

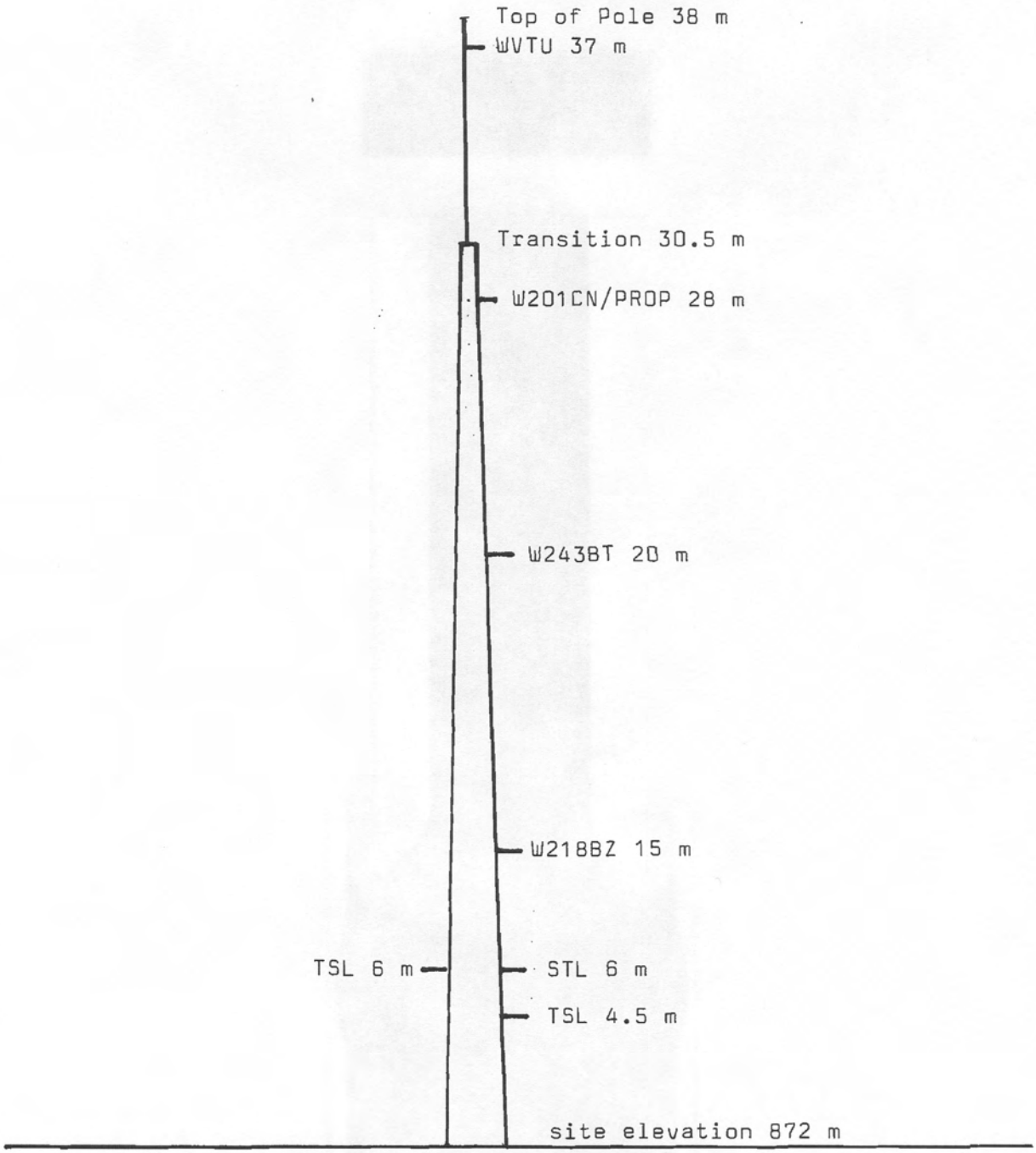
STU-COMM, INC. - W201CN

SECOND-ADJACENT ALLOCATION STUDY

SCALE 1:24,000

FIGURE 5

VIRGINIA TECH FOUNDATION TOWER



Drawing not to scale
All antennas 88 - 108 mHz are single bay or single boom LP