



**STATEMENT OF CYNTHIA M. JACOBSON, P.E.
IN SUPPORT OF AN
APPLICATION FOR CONSTRUCTION PERMIT
FOR A MINOR MODIFICATION OF FM TRANSLATOR STATION
W247AV - PETERSBURG, VIRGINIA
CH. 247 - 5.5 WATTS ERP - 26 M HAAT**

Applicant: The River Educational Media, Inc.

I am a Consulting Radio Engineer, an employee of Carl T. Jones Corporation with offices in Springfield, Virginia.

My education and experience are a matter of record with the Federal Communications Commission. I am a Registered Professional Engineer in the Commonwealth of Virginia, Registration No. 027914.

GENERAL

This office has been authorized by The River Educational Media, Inc. ("The River"), licensee of FM translator station W247AV, Petersburg, Virginia, to prepare engineering in support of an Application for Construction Permit seeking a minor change in W247AV. The purpose of this application is to relocate the W247AV transmitting antenna 7.89 kilometers north of the present site.

COVERAGE CONTOURS

W247AV rebroadcasts the signal of non-commercial FM station WAUQ, Charles City, Virginia. The W247AV is defined as an "other area" FM translator and therefore not

required to maintain the translator's proposed 60 dBu within the 60 dBu of the primary station.

The antenna height above average terrain was determined for each of 12 distinct radials, with each radial spaced 30 degrees apart beginning from true north. The resulting 12 - radial average HAAT is 26 meters.

The predicted 60 dBu (1.0 mV/m) coverage contour of the proposed translator facility was calculated in accordance with the method described in Section 74.1235 of the FCC Rules utilizing appropriate F(50,50) propagation curves, effective radiated power, and antenna height above average terrain. The present and proposed 60 dBu is shown in Figure 1. Since Figure 1 indicates a portion of the current 60 dBu service area will continue to be provided this level of service, this proposed relocation is a "minor" change as defined in Section 74.1233 of the Rules.

FM ALLOCATION CONSIDERATIONS

No change in the translator station's channel of operation is proposed. The proposed transmitter location is only 7.89 kilometers from the W247AV licensed site. The current Dielectric, Model DCR-L1E, nondirectional antenna will be employed at the proposed site.

A complete overlap study was performed in accordance with Section 74.1204 of the FCC Rules. The study revealed that the proposed operation would not cause prohibited

overlap with respect to any licensed broadcast facility, outstanding construction permit, or pending application pertinent to the instant proposal, see Figure 2.

FAA NOTIFICATION AND TOWER REGISTRATION

The antenna proposed herein will be side mounted on an existing tower such that the overall height of the tower is not increased. The tower's FCC registration number for the structure is 1058038.

ENVIRONMENTAL CONSIDERATIONS

The proposal described herein meets the criteria specified in Section 1.1306 of the FCC Rules and Regulations as an action which is categorically excluded from environmental processing. The proposed FM support structure is an existing site and involves neither a site location specified under Section 1.1307(a)(1)-(7) of the Rules, nor high intensity lighting as specified in Section 1.1307(a)(8).

RADIOFREQUENCY RADIATION IMPACT

The proposed facility will not result in human exposure to radiofrequency (RF) radiation in excess of safety standards specified in Section 1.1307(b). Based on the methods published in OST Bulletin No. 65 ("Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation"), the predicted power density

value produced by the proposed facility will be below the established guideline limits.

The proposed translator facility will operate at a radiation centerline above ground level of 37 meters and a maximum ERP of 55 Watts. For a worst case study, the RF fields produced at two meters above ground level at the base of the supporting structure were calculated to be 0.003 mW/cm². The Controlled/Occupational radiation limit is 1.0 mW/cm² and the Uncontrolled/General Population radiation limit is 0.2 mW/cm². The proposed translator contributes a power density of 0.30% of the Controlled/Occupational limit and 1.5% of the Uncontrolled/General limit.

It is submitted that the proposed translator station will not constitute a potential hazard to the quality of the human environment. Accordingly, the W247AV proposal, as described herein, should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Rules.

OCCUPATIONAL SAFETY

To ensure RF radiation protection to station personnel working in the vicinity of the antenna, the translator will reduce power or cease operation as necessary during times of service or maintenance of the transmitting system. Access to the tower base will be restricted to authorized maintenance personnel only.

STATEMENT OF CYNTHIA M. JACOBSON, P.E.
W247AV - PETERSBURG, VIRGINIA
PAGE 5

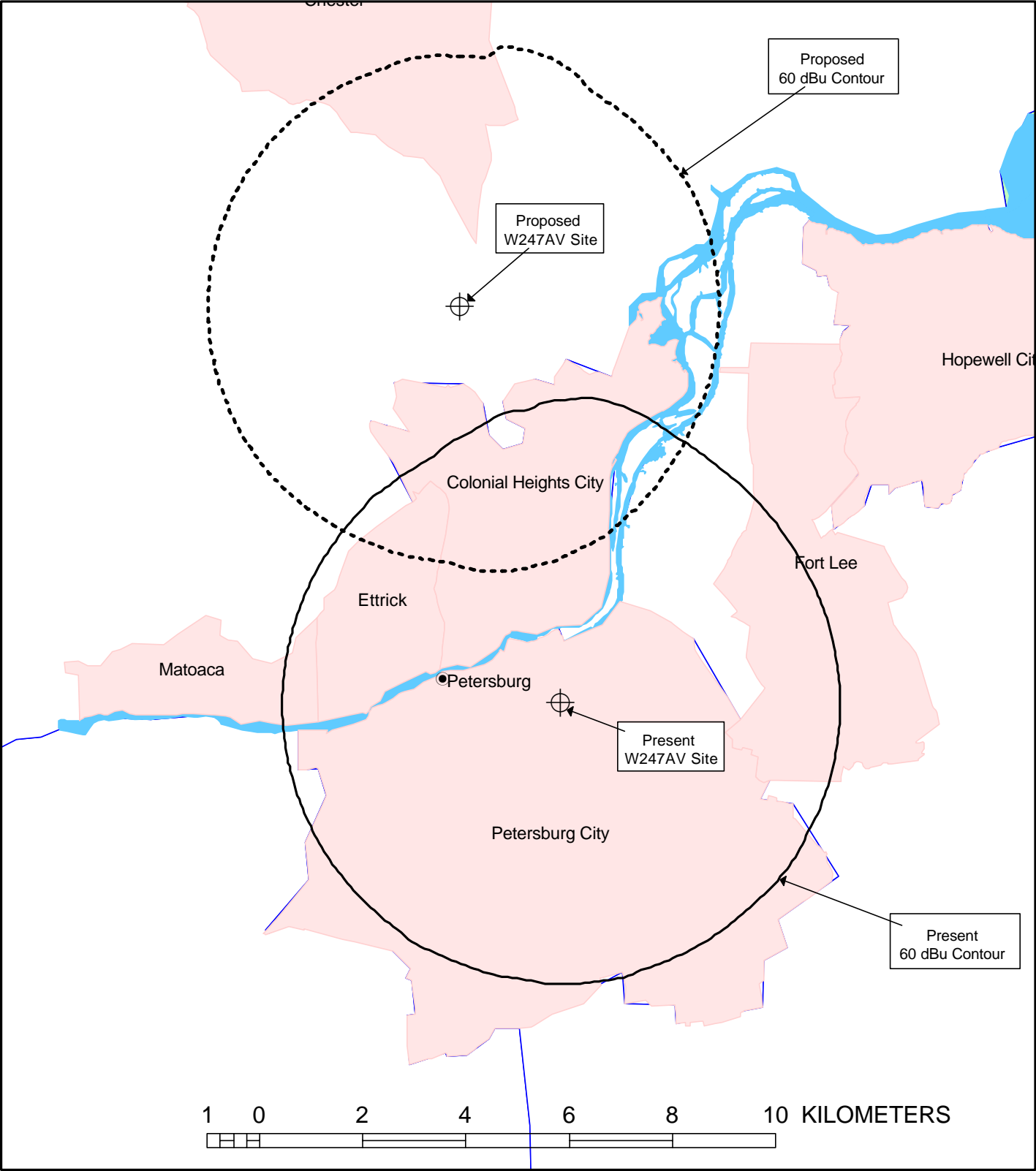
SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 349 Section III-A, and associated engineering figures were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: February 17, 2010

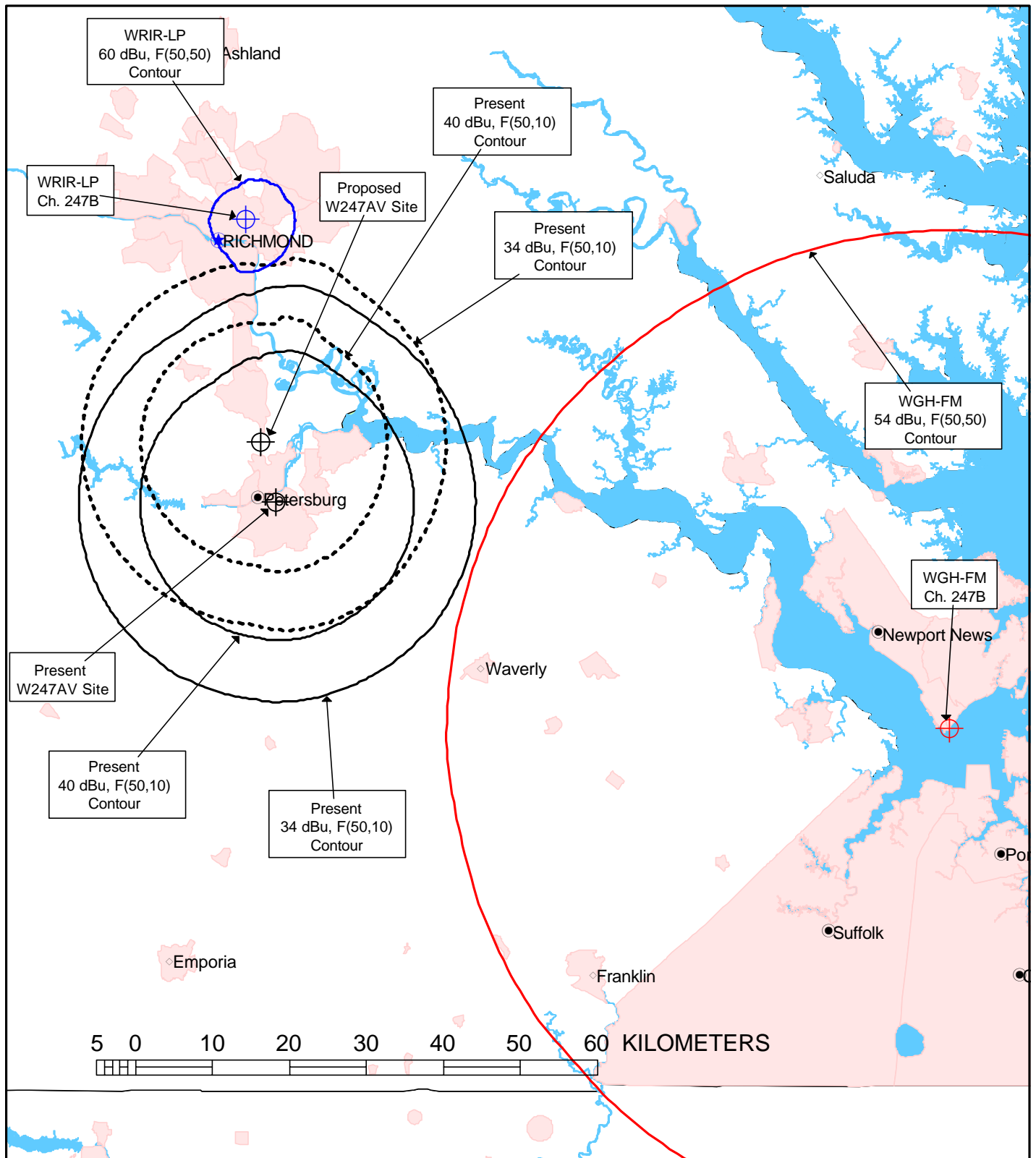


FIGURE 1



PRESENT & PROPOSED
60 DBU CONTOURS OF W247AV
W247AV - PETERSBURG, VIRGINIA
CH. 247D - 0.055 KW ERP - 26 M HAAT
FEBRUARY, 2010

FIGURE 2



INTERFERENCE STUDY
FOR
W247AV - PETERSBURG, VIRGINIA
CH. 247D - 0.055 KW ERP - 26 M HAAT
FEBRUARY, 2010