

Exhibit 17 - Statement A
ALLOCATION CONSIDERATIONS
prepared for
Bd. Of Educ., City Sch. Dist., Columbus
WCBE(FM) Columbus, Ohio
Facility ID 4325
Ch. 213B 11 kW 161.9 m

Bd. Of Educ., City Sch. Dist., Columbus (“*Columbus City Schools*”), licensee¹ of WCBE(FM), herein proposes a minor change to its licensed facility for the sole purpose of correcting geographical coordinates. No construction or change in operational parameters is proposed.

Columbus City Schools proposes to utilize the existing, Dielectric model DCR-H7C5R seven-bay, half-wavelength spaced, circularly polarized FM antenna. The antenna will remain at a height 177 meters above ground level and continue operating with an ERP of 11 kW. As shown in **Exhibit 17 - Figure 1**, the 60 dBμ principal community contour encompasses Columbus, Ohio.

An allocations study revealed the potentially affected facilities listed below. As shown in **Exhibit 17 – Figures 2 – 4**, there would be no prohibited contour overlap between the coordinate-corrected WCBE and the following facilities.

Call	Channel	Location	Azi	Dist	FCC
WAOM	CP -D 213B	Mowrystown	OH 213.6	124.06	240.5
WVML	CP -D 213B1	Millersburg	OH 55.9	128.58	210.5
WKCD	LIC-D 212B	Cedarville	OH 256.5	110.42	168.5
WAOM	LIC 213A	Mowrystown	OH 216.6	125.82	177.5
WVML	LIC-D 213A	Millersburg	OH 55.9	128.58	177.5
WGLE	LIC-D 214B	Lima	OH 309.7	121.53	168.5
WDUB	LIC 216A	Granville	OH 73.3	42.64	68.5
WFCO	LIC 215A	Lancaster	OH 132.1	46.69	68.5

The contours shown in **Exhibit 17** were plotted using the actual ERP and height above terrain along each radial for each facility, as specified in §73.509(c). For the facilities under study, the antenna elevation above mean sea level, geographic coordinates, and ERP (including directional antenna relative field values, where appropriate) were retrieved from the FCC’s engineering database. The requisite contours were determined using U.S.G.S. 30-second digitized terrain data along each radial of interest from each transmitter site and an implementation of the Commission’s TVFMFS computer program, which simulates the FM propagation curves.

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TV Channel 6 Considerations

The instant proposal complies with the protection requirements to Channel 6 television stations required by §73.525. Under §73.525(a)(1), TV Channel 6 stations must be considered with a proposed non-commercial educational facility on Channel 213 if the distance between the respective transmitter sites is 193 km or less. A search of the Media Bureau's engineering database revealed one active low-power station within that distance.

Low Power Television station WLFM-LP (Cleveland, OH) is located a distance of 192 km from the proposed facility. At this distance, just 1 km less than the spacing required for a full-power television facility, the WCBE facility has no adverse impact.

FCC Monitoring Stations and Other Broadcast Facilities

The nearest FCC monitoring station is located at Allegan, Michigan and is 384 km distant. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c) that would suggest consideration of the monitoring station. With respect to other broadcast facilities, a search of the FCC Media Bureau database shows the nearest non-directional AM antenna to be beyond 0.8 km and the nearest directional antenna to be beyond 3.2 km from the existing WCBE facility.

It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

¹ See BMLED-20111027AQG.

EXHIBIT 17 - FIGURE 1 PROPOSED COVERAGE CONTOUR

prepared November 2012 for
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Cavell, Mertz & Associates, Inc.
Manassas, Virginia

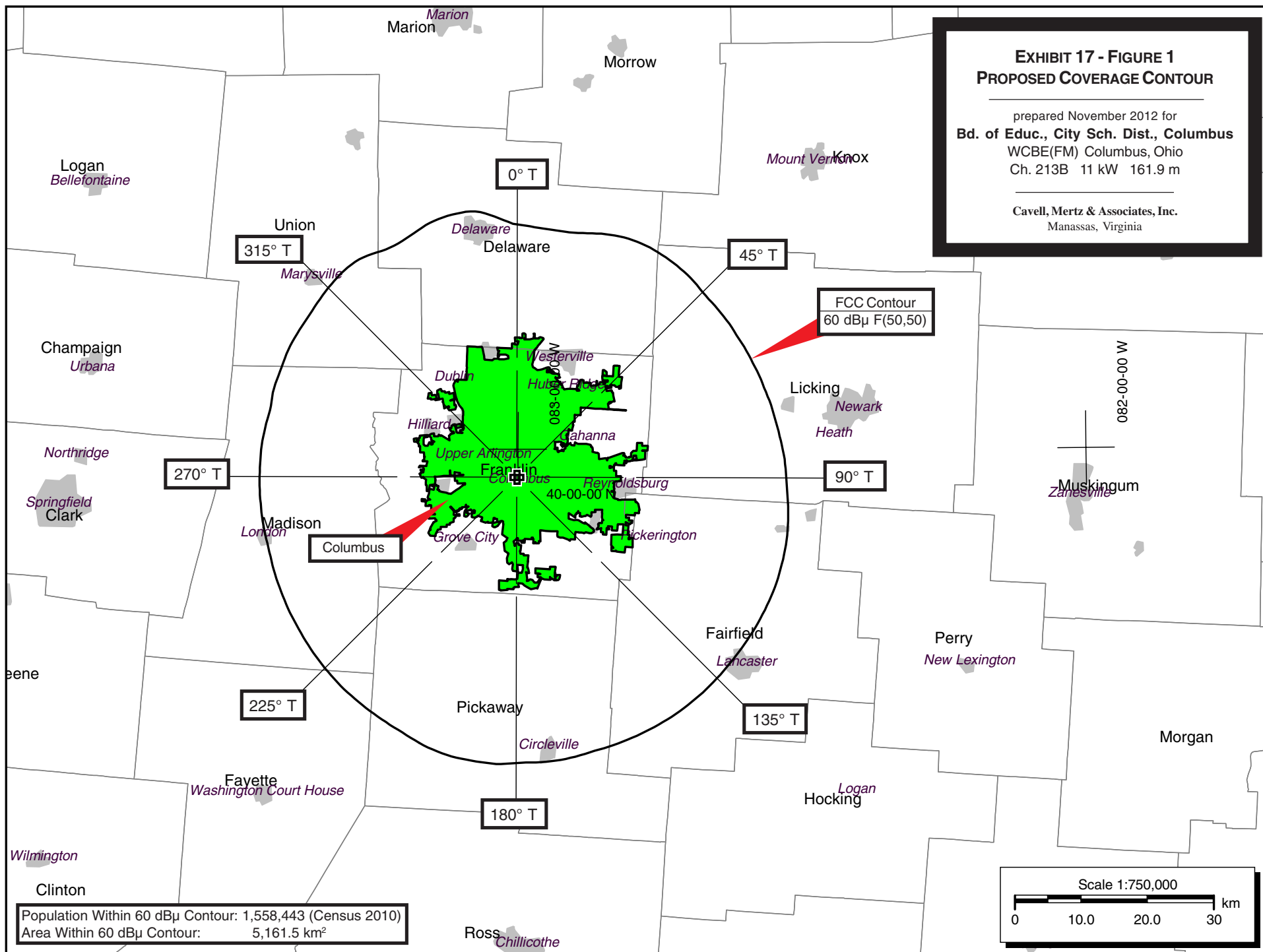


EXHIBIT 17 - FIGURE 2
CO-CHANNEL ALLOCATION STUDY

prepared November 2012 for
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Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WVML(FM) Ch. 213 Millersburg, OH
CP: BPED-20091027AEN (Dashed Lines)
Lic: BLED-20040924ADJ (Solid Lines)
40 dBμ F(50,10) Interfering Contours
60 dBμ F(50,50) Protected Contours

WAOB(FM) Ch. 213 Mowrystown, OH
CP: BPED-20110825AAA (Dashed Lines)
Lic: BLED-20110718AAJ (Solid Lines)
40 dBμ F(50,10) Interfering Contours
60 dBμ F(50,50) Protected Contours

Proposed WCBE(FM) Ch. 213B
60 dBμ F(50,50) Protected Contour
40 dBμ F(50,10) Interfering Contour

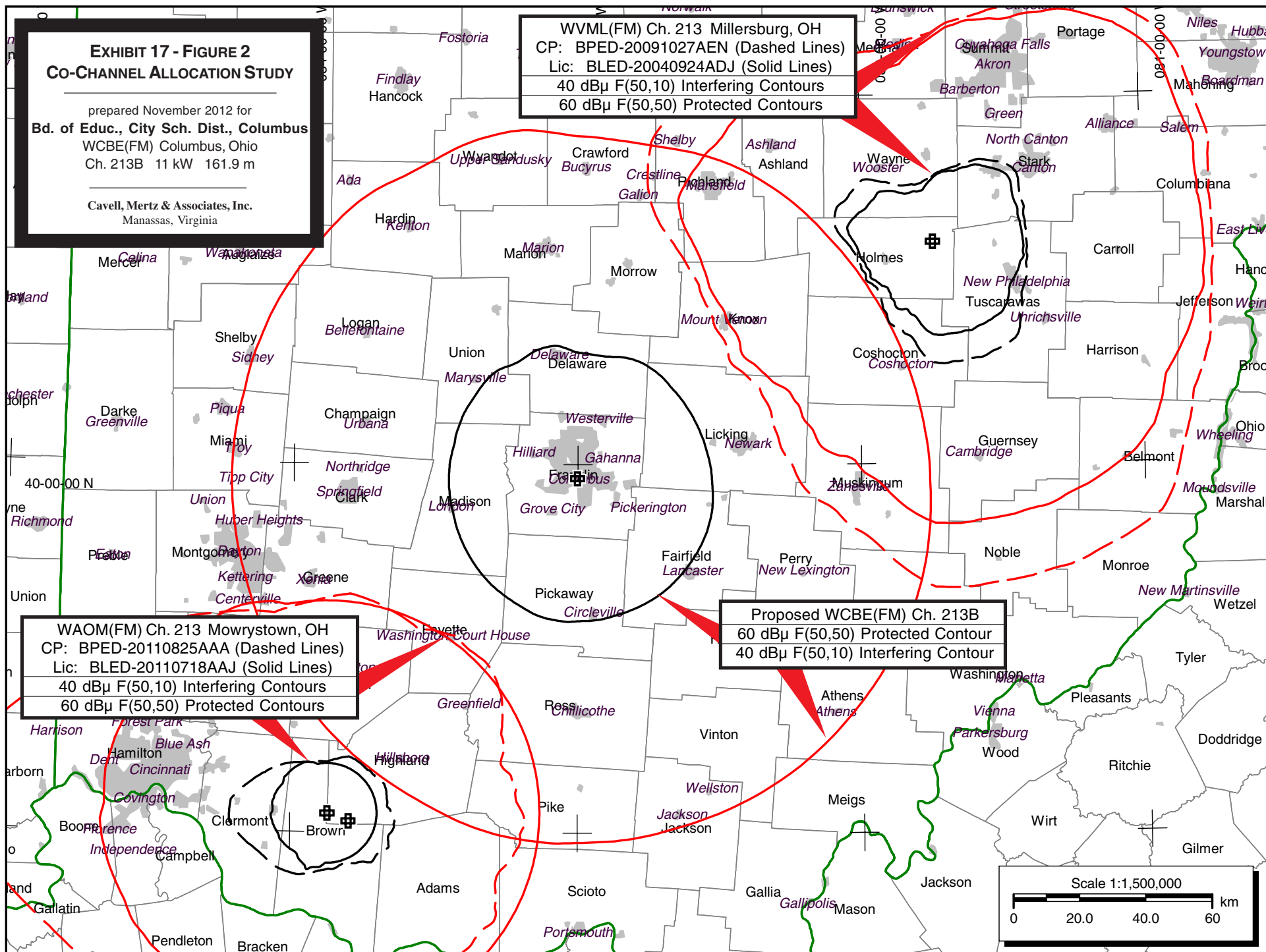


EXHIBIT 17 - FIGURE 2A
Co-CHANNEL ALLOCATION STUDY - DETAILED

prepared November 2012 for
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Manassas, Virginia

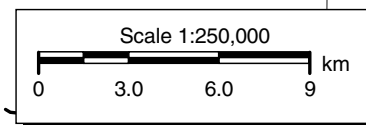
Proposed WCBE(FM) Ch. 213B
40 dB μ F(50,10) Interfering Contour

WVML(FM) Ch. 213 Millersburg, OH
CP: BPED-20091027AEN (Dashed Line)
60 dB μ F(50,50) Protected Contour
Lic: BLED-20040924ADJ (Solid Line)
60 dB μ F(50,50) Protected Contour

Holmes

Coshocton

Coshocton



**EXHIBIT 17 - FIGURE 3
FIRST ADJACENT CHANNEL
ALLOCATION STUDY**

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Ch. 213B 11 kW 161.9 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Proposed WCBE(FM) Ch. 213B
54 dBμ F(50,10) Interfering Contour
60 dBμ F(50,50) Protected Contour

WGLE(FM)(Lic) Ch. 214B Lima, OH
BMLED-20051219ACI
60 dBμ F(50,50) Protected Contour
54 dBμ F(50,10) Interfering Contour

WKCD(FM)(Lic) Ch. 212B Cedarville, OH
BLED-20120927ABO
60 dBμ F(50,50) Protected Contour
54 dBμ F(50,10) Interfering Contour

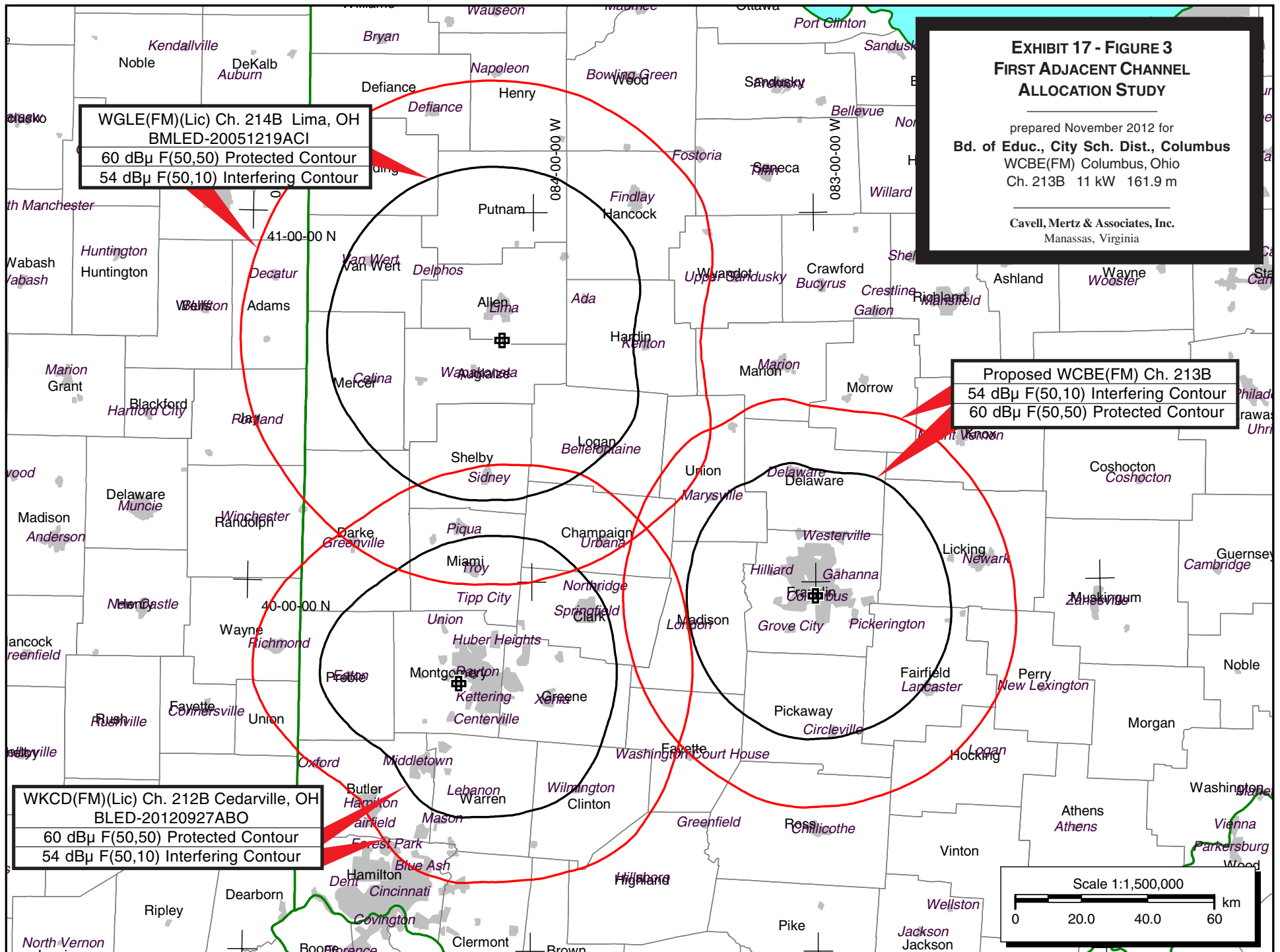


EXHIBIT 17 - FIGURE 3A
FIRST ADJACENT CHANNEL
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prepared November 2012 for
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Ch. 213B 11 kW 161.9 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Proposed WCBE(FM) Ch. 213B
54 dB μ F(50,10) Interfering Contour
60 dB μ F(50,50) Protected Contour

WKCD(FM)(Lic) Ch. 212B Cedarville, OH
BLED-20120927ABO
60 dB μ F(50,50) Protected Contour
54 dB μ F(50,10) Interfering Contour

Scale 1:250,000
0 3.0 6.0 9 km

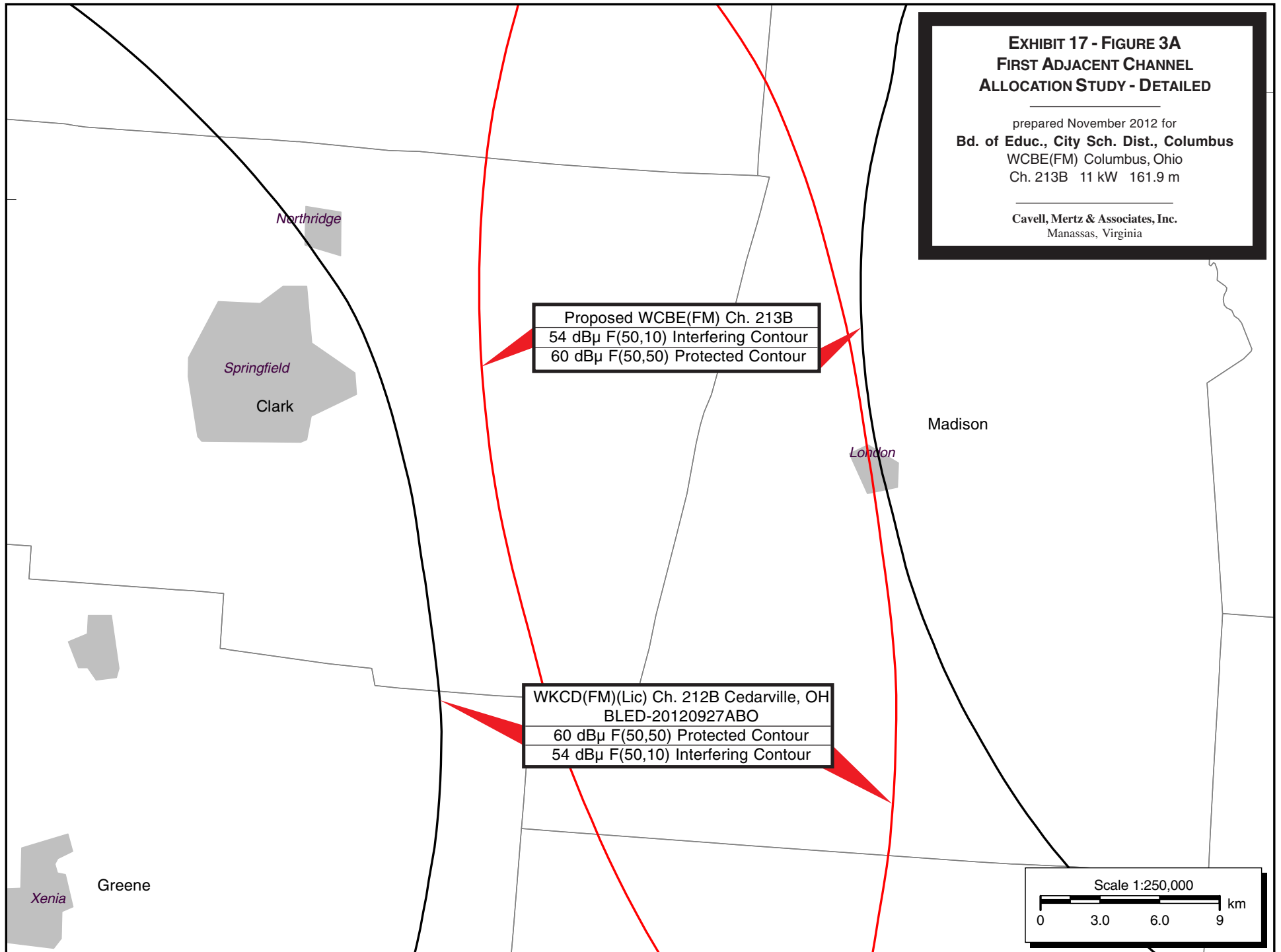


EXHIBIT 17 - FIGURE 4
SECOND AND THIRD ADJACENT CHANNEL
ALLOCATION STUDY

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Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Proposed WCBE(FM) Ch. 213B
100 dB μ F(50,10) Interfering Contour
60 dB μ F(50,50) Protected Contour

WDUB(FM)(Lic) Ch. 216A Granville, OH
BLED-20120209ACR
60 dB μ F(50,50) Protected Contour
100 dB μ F(50,10) Interfering Contour

WFCO(FM)(Lic) Ch. 215A Lancaster, OH
BLED-20051215ABD
60 dB μ F(50,50) Protected Contour
100 dB μ F(50,10) Interfering Contour

