

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contours of the second-adjacent WBHD, Olyphant, PA and the second-adjacent W235AA, Wilkes-Barre, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WBHD, Olyphant, PA and W235AA, Wilkes-Barre, PA, second adjacent channel facilities to this translator proposal, are protected from interference within their 60 dBu contours from the associated interference contour (based on 47 CFR 74.1204(a)(1); using the FCC F(50/10) curves) which need be 40 dBu greater than the associated coverage contours (WBHD & W235AA) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.
2. This translator's antenna location is located within the 60 dBu contours (based on 73.333 F(50/50)) of WBHD, Olyphant, PA and W235AA, Wilkes-Barre, PA. As the proposed 100 dBu interference contour is 40 dBu greater than the 60 dBu contours of WBHD & W235AA then this contour is an appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 100 dBu interference contour of this proposed translator.
3. Given this translator's requested effective radiated power of 2 watts, directional; the predicted 100 dBu interference contour for this proposal would be exceedingly small. At any HAAT value, the 100 dBu contour distance for this proposal is 0.1 kilometers at 230 degrees from true north and smaller than this in all other directions.
4. This proposed translator site is situated in a very sparsely populated rural hilltop tower farm area. KFITZ W237BI 74.1204(d) Geo Map, an

attachment to this exhibit, clearly shows how rural the area is within the 100 dBu interference contour of this proposal with no dwellings at all located within this contour. The rule in 47 CFR 74.1204(d) states "an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such factors as may be applicable." In this particular case, as shown in this exhibit, it is clearly evident that there is a "lack of population" as defined in 47 CFR 1204(d) thus allowing this translator to operate at this proposed location.

For the foregoing reasons this Applicant submits that the predicted interference to WBHD, Olyphant, PA and W235AA, Wilkes-Barre, PA is allowable under Section 74.1204(d) of the Commission's rules.

Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facilities, WBHD, Olyphant, PA and W235AA, Wilkes-Barre, PA.

By: Kevin Fitzgerald, Chief Engineer