

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu contour of the second-adjacent WBSX, Hazleton, PA and the predicted interference to the 60 dBu contour of the second-adjacent WBHT, Mountain Top, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WBSX, Hazleton, PA and WBHT, Mountain Top, PA, second adjacent channel facilities to this translator proposal, are protected from interference within their 54 dBu and 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 (WBSX & WBHT) 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 54 dBu contour (based on 73.333 F(50/50)) of WBSX, Hazleton, PA and within the 60 dBu contour (based on 73.333 F(50/50)) of WBHT, Mountain Top, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WBSX & WBHT. Included as an attachment (KFITZ 97.5 Hazleton, PA Desired to Undesired Ratios Map) is a map showing that the 70 dBu coverage contour of WBSX & the 60 dBu coverage contour of WBHT encompasses the proposed antenna site along with the entire proposed 110 dBu and 100 dBu interference contours. As the proposed 110 dBu

interference contour is 40 dBu greater than the 70 dBu contour of WBSX and the proposed 100 dBu interference contour is 40 dBu greater than the 60 dBu contour of WBHT then these contours are the appropriate interference contours for this analysis and it is clearly evident that interference will only occur within these interference contours for this proposed translator.

3. Given this translator's requested effective radiated power of 10 watts, Directional; the predicted 110 dBu and 100 dBu interference contours for this proposal would be exceedingly small. At any HAAT value, the 110 dBu contour distance for this proposal is 0.07 kilometers at 350 degrees from true north and smaller than this in all other directions and the 100 dBu contour distance for this proposal is 0.22 kilometers at 350 degrees from true north and smaller than this in all other directions.

4. This proposed translator site is situated in a sparsely populated hilltop tower farm area. KFITZ 97.5 Hazleton, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 110 dBu and 100 dBu interference contours of this proposal with no dwellings at all located within these contours. 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 WBSX, Hazleton, PA and WBHT, Mountain Top, 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, WBSX, Hazleton, PA and WBHT, Mountain Top, PA.

By: Kevin Fitzgerald, Chief Engineer