



PO Box 367 402 Tenth Avenue Haddon Heights, NJ 08035

856-546-8008 fax 856-546-1841

**Exhibit 12, Figure 2
Overlap Study Narrative
W264BT (amended)
June 2005**

This exhibit shows compliance with FCC Rules and Regulations § 74.1204. This rule requires that FM Translators cause no interference to FM Broadcast Stations and Existing FM Translator Stations. This is initially established by showing that there is no overlap between the service contours of protected stations and the potentially interfering contours of the proposed translator.

Co Channel and First Adjacent channel allocations are shown in Exhibit 12 Figure 1A. This map shows the 54 dbu F(50,50) contour of Cochannel Class B stations WHUD, Peekskill, NY, WLEV, Allentown, PA and the 34dbu F(50,10) contour of the proposed translator station. There is no overlap of the proposed nuisance contour and the service contour of these stations. It also shows the proposed co-channel FM translators W264BH, BNPFT30317FKM and BNPFT-20030313BOK protected and interfering contours and demonstrates that there is no prohibited overlap of this proposal and any of these.

Second and Third Adjacent channel allocations are shown in Exhibit 12, Figure 1B. The only stations in consideration are third adjacent channel stations WCBS-FM, New York, NY, and WHTZ, Newark, NJ. The translator is located within the protected 54dbu V F(50,50) contour of WCBS-FM and WHTZ. In a letter granting Jersey Shore Broadcasting Corporation's application BPFT-950830TD (September 25, 1996 1800B3-JDB) the FCC stated that the Ratio method is suitable for translator applicants to demonstrate lack of interference for application purposes.

There are several licensed facilities for WHTZ (contours shown in blue) and WCBS-FM (contours shown in blue). The various 54 dbu F(50,50) contours of these facilities are shown extending well beyond the proposed facility. The facility which provides the lowest signal is from WHTZ. The 62 dbu contour of WHTZ and WCBS-FM are also plotted on figure 1B. This 62 dbu F(50,50) contour extends well beyond the proposed translator location for both stations. The third adjacent channel protection ratio is 40 db, so it would normally be required that the 62 dbu contour is protected from the proposed 102 dbu contour of the translator.

AMFM Radio Licenses, LLC, ("AMFM") licensee of WHTZ (FM) pointed out that the Longley Rice analysis shows that the WHTZ (FM) field intensity in the vicinity of the proposed translator location is 59 dbuV.

Recognizing the responsibility of translator licensees to resolve all complaints of interference to FM broadcast stations, and that WHTZ(FM) and WCBS-FM have many listeners in the Middlesex County, NJ area; the applicant amends the technical proposal to assure that no interference to WHTZ(FM), nor WCBS-FM can possible occur from the translator.

Although the use of Longley Rice in this case is questionable, the protected contour signal level of 59 dbuV, a nuisance contour value of 99 dbuV will be used instead of the 104dbuV contour for this analysis. Since the distance to the 99 dbu contour is below the minimum distance for the F(50,10) and F(50,50) curves the signal level existing on the ground in the vicinity of the translator was calculated using inverse distance as has been accepted by the FCC in recent applications. In addition, the actual location of the 99dbu V contour was determined and plotted on Exhibit 12, Figure 4. Exhibit 12 Figure 5 is a tabulation of these calculations showing that at no point on the ground will the translator produce more than 95.4 dbuV and that the minimum elevation above ground where the 99dbuV contour occurs is 23.3 meters above ground. This more than adequately protects WCBS-FM and WHTZ by the ratio method.

RADIOTECHNIQUES

PO Box 367 402 Tenth Avenue Haddon Heights, NJ 08035

856-546-8008 fax 856-546-1841

Exhibit 12 Figure 3 is an aerial photograph of the proposed translator location with the antenna site marked and the maximum horizontal distance to the 99dbuV contour shown. Figure 3 pages 2 and 3 are photographs taken from the tower location that show that the immediate area of the antenna locations consists of a parking lot, woods, and single story industrial buildings.

Exhibit 12, figure 4 is a plot of the vertical location of the 99 dbu contour with the heights and distances of the various buildings shown. This demonstrates that no structures extend vertically into the area where the prohibited contour exists. It is believed that this application as amended thoroughly demonstrates compliance with FCC Rules and Regulations 74.1204(d).

In conclusion, the proposed translator meets all the overlap requirements of § 74.1204 of the FCC Rules and Regulations, and thoroughly demonstrates that no interference to existing facilities or proposals would occur from its operations.