

DELAWDER COMMUNICATIONS, INC.

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ENGINEERING REPORT

Garwood, TX, Channel 247A FM Application

EXHIBIT 28 –ENGINEERING STATEMENT REGARDING SECTION 73.315

When the terrain from the transmitter site to the community of license departs significantly from the average terrain, the FCC Rules permit use of an alternative or supplemental coverage showing (see Section 73.313). The FCC has established that such an alternative showing is permitted “Where Δh is used as the sole determinant that the terrain along a radial widely departs from the 50 meter standard, a Δh value of 20 meters or less, or 100 meters or more”¹.

The pertinent radial through the community of Garwood is 140 degrees True. This profile is attached as Figure E28-1.

Figure E28-2, attached, is a map showing the calculated 70 dBu F50,50 Service Contour and the results of a Longley-Rice alternative propagation model². The alternative study was conducted for 360 equally-spaced radials.

Also shown on the E28-2 map is the re-defined 70 dBu F50,50 Service Contour based on Longley-Rice in the direction of the community of license. The re-defined 70 dBu F50,50 Service Contour distances are as follows:

For 136 degrees True:	15.8 km (an increase of 25 percent);
For 138 degrees True:	16.1 km (an increase of 29 percent);
For 140 degrees True:	16.0 km (an increase of 28 percent);
For 142 degrees True:	16.1 km (an increase of 29 percent);
For 144 degrees True:	16.5 km (an increase of 32 percent).

¹ Δh “delta h” is terrain roughness as defined in Section 73.313 of the FCC Rules. Three arc-second USGS terrain data is used. Also, see Woodstock and Broadway, Virginia, 2 FCC Rcd 6398 (1988). *Current FCC Policy apparently no longer requires a delta h test in order for a supplemental showing to be used. The delta h qualification is herein made out of an abundance of caution.*

² Longley-Rice version 1.2.2 determined using EDX Engineering, Inc. SignalPro™ software and a 30 arc-second USGS terrain database is used. A receive antenna height of 9.1 meters AGL is also used.

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The 70 dBu service contour is extended by much more than 10% than the standard 70 dBu F50,50 service contour. Furthermore, the re-defined 70 dBu service contour does not extend beyond the predicted 60 dBu F50,50 service contour. Both the 10% increase and the 60 dBu contour limit are conditions set by the FCC for use of the supplemental showing when it is used in order to establish community of license service.

The re-defined 70 dBu F50,50 Service contour serves 100 percent of Garwood, TX.

Further information regarding the use of the alternative model will be provided upon request. As a sample calculation, the free space loss to the end point of the 140 degree profile (a point located 16.0 kilometers from the proposed transmitter site) is 96.3 dB between isotropic antennas. The excessive loss (due to the Longley-Rice prediction model) is 18.9 dB. Subtracting the free space loss and excessive loss values from the ERPi (69.9 dBmW) yields a received power of minus 47 dBmW (using a 2.15 dBi receive antenna gain). This converts to a received signal strength of 70 dBuV/m (when subtracting an assumed 2 dB cover loss). (Note that the terrain profile provides values referenced to isotopic source and receiver.)

FIGURE E28-1: TERRAIN PROFILE AT 140 DEGREES TRUE

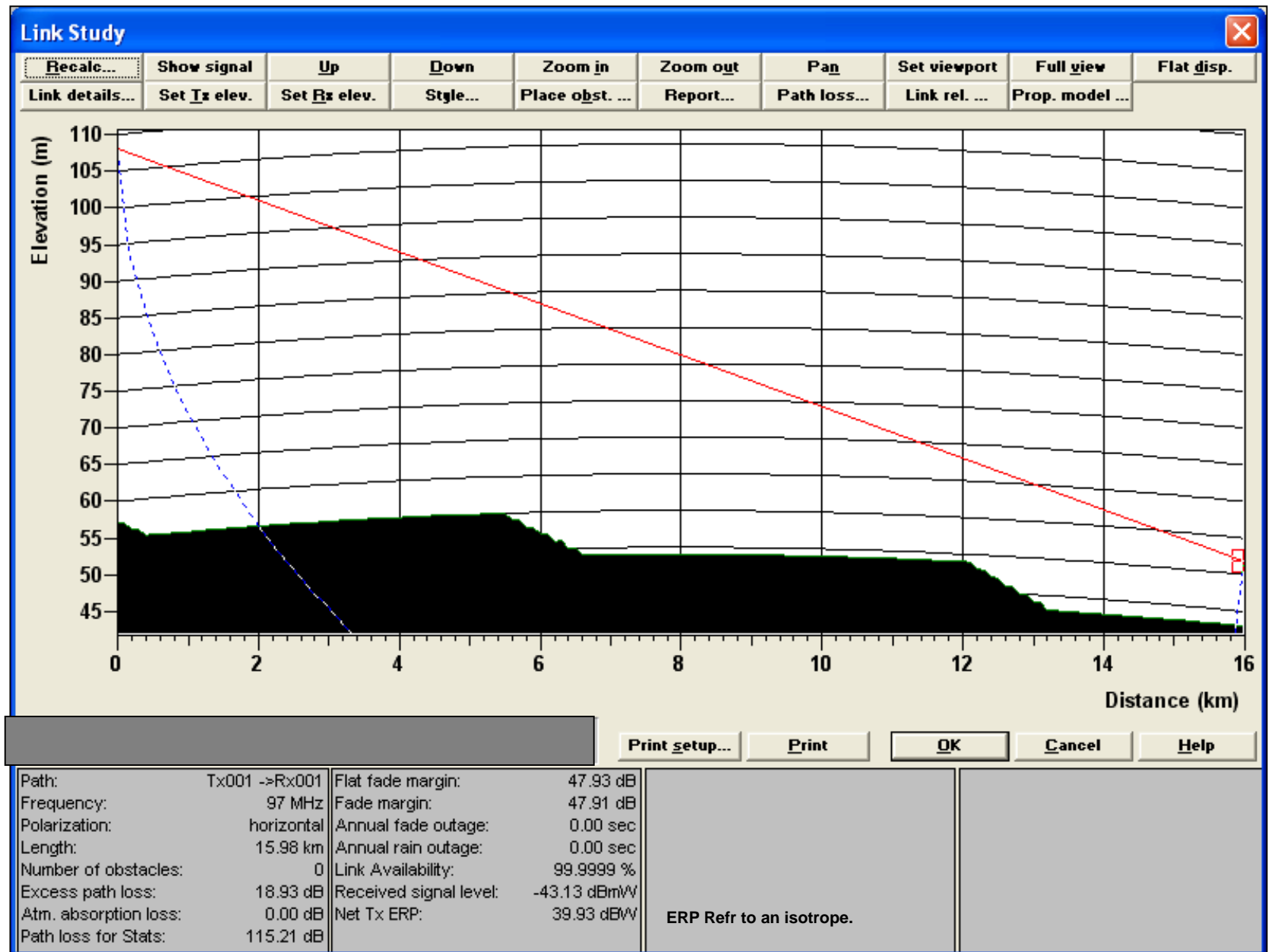


FIGURE E28-2: SECTION 73.315 MAP SUPPORT WITH LONGLEY-RICE RESULTS

