

Exhibit B-16
WAAF(FM) Channel 297B1 Westborough, MA
Allocation Considerations

Westborough Channel 297B1 Allotment Site

The attached spacing study shows that the proposed Channel 297B1 allotment site meets the co-channel and adjacent channel spacing requirements for Class B1 stations as prescribed in §73.207 of the Commission's Rules, with the exception of short-spacings to third-adjacent-channel stations WMJX 294B Boston and WXKS 300B Medford. The licensed operation of WAAF is also short-spaced to WMJX and WXKS. These grandfathered short-spacings have existed continuously since prior to November 16, 1964. Therefore, per §73.213(a)(4) of the Commission's Rules there are no distance separation or interference protection requirements for WAAF with respect to WMJX and WXKS.

It should be noted that in the Report and Order in MM Docket No. 02-49 (which approved the reallocation of WAAF from Worcester to Westborough) the Commission acknowledged these pre-1964 grandfathered short-spacings. The instant application seeks to maintain WAAF's grandfathered short-spaced status with respect to WMJX and WXKS.

SEARCH PARAMETERS

FM Database Date: 040210

Channel: 297B1 107.3 MHz
 Latitude: 42 20 9
 Longitude: 71 42 57
 Safety Zone: 32 km
 Job Title: WESTBOROUGH 297B1 ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW-T APP	NEEDHAM MA	BNPFT-030317JQI	243D 96.5	0.010 178.0	42-18-12 071-13-08	94.9	41.13 0.00	0 TRANS
WMJX LIC	BOSTON MA	BLH-911018KC	294B 106.7	21.500 235.0	42-20-50 071-04-59	88.4	52.16 -18.84	71 SHORT
NOTE: PRE-1964 GRANDFATHERED SHORT-SPACING								
WMJXaux LIC	BOSTON MA	BLH-920827KC	294B 106.7	1.000 221.0	42-20-50 071-04-59	88.4	52.16 0.00	0 AUX
WMJXaux LIC	BOSTON MA	BMLH-981027KC	294B 106.7	1.900 351.0	42-18-27 071-13-27	94.3	40.65 0.00	0 AUX
WMJXaux CP	BOSTON MA	BXPB-030929AGP	294B 106.7	1.000 224.0	42-20-50 071-04-59	88.4	52.16 0.00	0 AUX
WFHN LIC	FAIRHAVEN MA	BLH-990224KE	296A 107.1	6.000 99.0	41-37-43 071-00-24	143.1 SS	98.11 2.11	96 CLOSE
WFHN CP	FAIRHAVEN MA	BPH-000821AAC	296A 107.1	5.400 105.0	41-38-25 070-55-03	139.3 SS	101.71 5.71	96 CLOSE
WFHNaux LIC	FAIRHAVEN MA	BXMLH-990513KF	296A 107.1	1.450 106.0	41-38-26 070-55-03	139.3	101.69 0.00	0 AUX
NEW-T APP	CONCORD NH	BNPFT-030829ARR	296D 107.1	0.010 127.0	43-13-00 071-34-34	6.6	98.52 0.00	0 TRANS
NEW-T APP	CONCORD NH	BNPFT-030314AZX	296D 107.1	0.010 130.0	43-13-00 071-34-34	6.6	98.52 0.00	0 TRANS
WERZ LIC	EXETER NH	BLH-000322AAF	296A 107.1	5.200 106.0	43-01-38 070-52-51	41.3 SS	102.87 6.87	96 CLOSE
WERZaux LIC	EXETER NH	BLH-900104KC	296A 107.1	3.000 21.0	42-59-23 070-56-14	40.9	96.70 0.00	0 AUX
WERZ CP	EXETER NH	BPH-020531AAF	296A 107.1	6.000 100.0	42-59-23 070-56-14	40.9 SS	96.70 0.70	96 CLOSE
WZSH LIC	BELLOWS FALLS VT	BMLH-920522KC	296A 107.1	1.150 162.0	43-12-33 072-19-58	332.8	109.37 13.37	96 CLEAR

SEARCH PARAMETERS

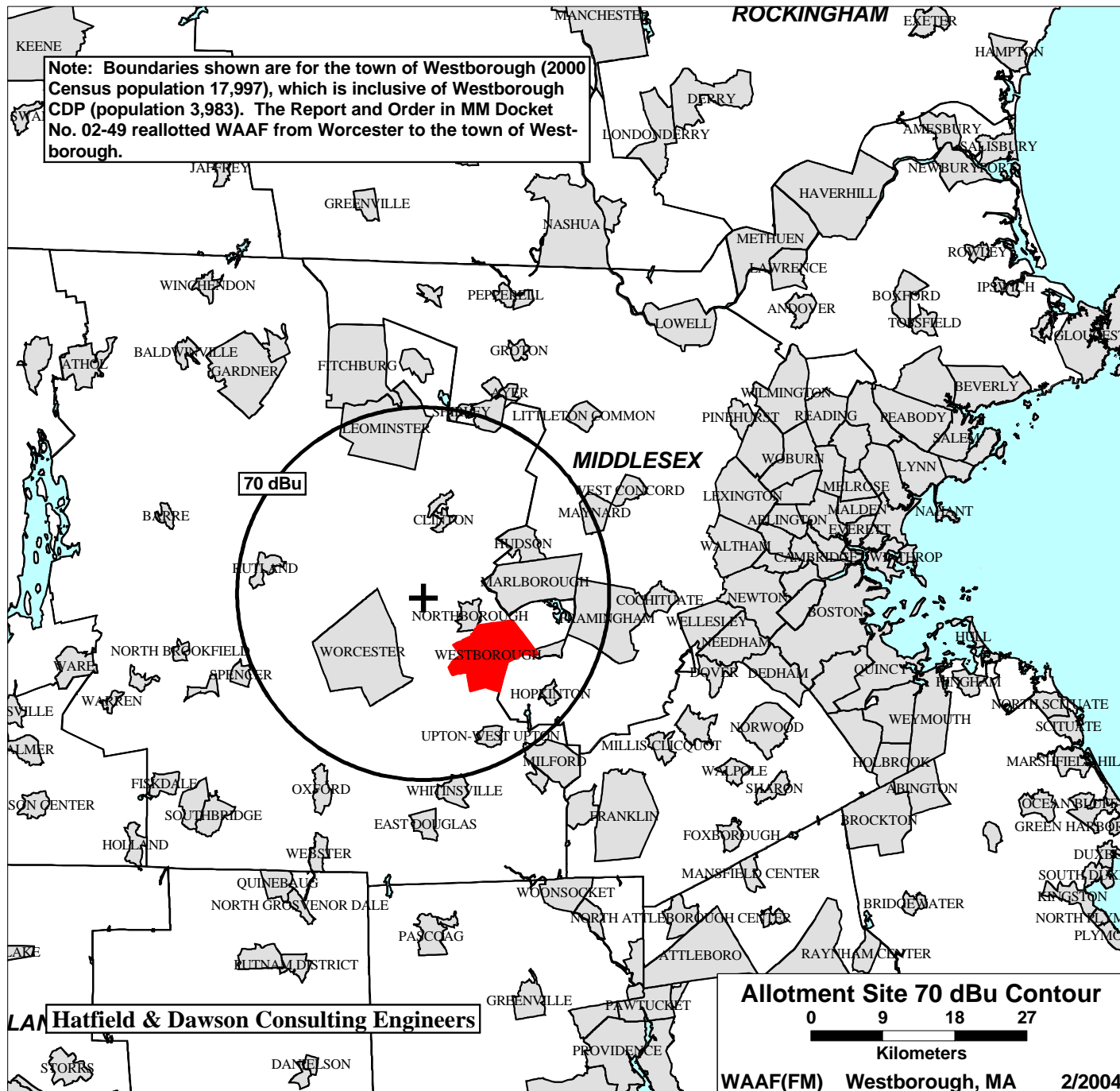
FM Database Date: 040210

Channel: 297B1 107.3 MHz
 Latitude: 42 20 9
 Longitude: 71 42 57
 Safety Zone: 32 km
 Job Title: WESTBOROUGH 297B1 ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
RSV	WESTBOROUGH MA	RM-10220	297B 107.3	0.000 0.0	42-18-11 071-53-52	256.4	15.43 -195.57	211 SHORT
WAAF LIC	WORCESTER MA	BLH-980416KB	297B 107.3	20.000 239.0	42-18-11 071-53-52	256.4	15.43 -195.57	211 SHORT
WAAF CP	WORCESTER MA	BPH-030228AJE	297B 107.3	9.600 DA 335.0	42-20-09 071-42-57	0.0 SS	0.00 -211.00	211 SHORT
NEW-T APP	EASTHAMPTON NY	BNPFT-030317KIM	297D 107.3	0.250 23.0	40-58-30 072-11-16	194.7	156.17 0.00	0 TRANS
WFCC-FM LIC	CHATHAM MA	BMLH-990910AAH	298B 107.5	50.000 104.0	41-44-14 070-00-40	114.7	156.04 11.04	145 CLEAR
W298AH LIC	CLAREMONT NH	BLFT-980911TC	298D 107.5	0.000 DA 406.0	43-23-34 072-18-16	338.0	126.89 0.00	0 TRANS
NEW-T APP	KEENE NH	BNPFT-030313BNO	298D 107.5	0.010 329.0	42-57-41 072-12-49	329.8	80.59 0.00	0 TRANS
NEW-T APP	KEENE NH	BNPFT-030317AIO	298D 107.5	0.210 45.0	42-56-47 072-18-33	324.6	83.47 0.00	0 TRANS
NEW APP	GREENFIELD MA	BNPL-010615AXU	300L1 107.9	0.100 -32.6	42-36-28 072-35-57	293.0	78.67 32.67	46 CLEAR
WXKS-FM LIC	MEDFORD MA	BLH-911018KE	300B 107.9	20.500 235.0	42-20-50 071-04-59	88.4	52.16 -18.84	71 SHORT
NOTE: PRE-1964 GRANDFATHERED SHORT-SPACING								
WXKSaux CP	MEDFORD MA	BXPH-021219ABO	300B 107.9	1.800 364.0	42-18-27 071-13-27	94.3	40.65 0.00	0 AUX
WXKSaux LIC	MEDFORD MA	BLH-920827KE	300B 107.9	1.000 218.0	42-20-50 071-04-59	88.4	52.16 0.00	0 AUX
NEW APP	JERSEY CITY NJ	BNPL-010611AGH	300L1 107.9	0.100 -7.6	42-36-28 072-35-57	293.0	78.67 32.67	46 CLEAR
NEW APP	TRENTON NJ	BNPL-010613AGM	300L1 107.9	0.100 -7.6	42-36-28 072-35-57	293.0	78.67 32.67	46 CLEAR

44444 END OF FM SPACING STUDY FOR CHANNEL 297 44444

Note: Boundaries shown are for the town of Westborough (2000 Census population 17,997), which is inclusive of Westborough CDP (population 3,983). The Report and Order in MM Docket No. 02-49 reallocated WAAF from Worcester to the town of Westborough.



WAAF Channel 297B1 Transmitter Site

The attached spacing study shows that the proposed Channel 297B1 transmitter site meets the co-channel and adjacent channel spacing requirements for Class B1 stations as prescribed in §73.207 of the Commission's Rules, with the following exceptions:

WMJX 294B Boston

WXKS 300B Medford

The proposed operation of WAAF would be short-spaced to third-adjacent-channel stations WMJX and WXKS. The licensed operation of WAAF is also short-spaced to WMJX and WXKS. These grandfathered short-spacings have existed continuously since prior to November 16, 1964. Therefore, per §73.213(a)(4) of the Commission's Rules there are no distance separation or interference protection requirements for WAAF with respect to WMJX and WXKS.

It should be noted that in the Report and Order in MM Docket No. 02-49 (which approved the reallocation of WAAF from Worcester to Westborough) the Commission acknowledged these pre-1964 grandfathered short-spacings. The instant application seeks to maintain WAAF's grandfathered short-spaced status with respect to WMJX and WXKS.

WERZ 296A Exeter

WFHN 296A Fairhaven

WFCC 298B Chatham

The proposed operation of WAAF would be short-spaced to the licensed and authorized facilities of WERZ, to the licensed and authorized facilities of WFHN, and to the licensed facility of WFCC. Processing pursuant to §73.215 of the Commission's Rules is requested with respect to WERZ, WFHN, and WFCC, and the attached allocation study maps are included to demonstrate the lack of prohibited contour overlap with those facilities.

SEARCH PARAMETERS

FM Database Date: 040210

Channel: 297B1 107.3 MHz
 Latitude: 42 23 2
 Longitude: 71 29 37
 Safety Zone: 32 km
 Job Title: WAAF 297B1 WESTBOROUGH TRANSMITTER SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW-T APP	NEEDHAM MA	BNPFT-030317JQI	243D 96.5	0.010 178.0	42-18-12 071-13-08	111.5	24.34 0.00	0 TRANS
NEW-T APP	QUINCY MA	BNPFT-030317KMD	243D 96.5	0.010 291.0	42-14-49 071-02-56	112.5	39.69 0.00	0 TRANS
WMJX LIC	BOSTON MA	BLH-911018KC	294B 106.7	21.500 235.0	42-20-50 071-04-59	96.8	34.06 -36.94	71 SHORT
NOTE: PRE-1964 GRANDFATHERED SHORT-SPACING								
WMJXaux LIC	BOSTON MA	BLH-920827KC	294B 106.7	1.000 221.0	42-20-50 071-04-59	96.8	34.06 0.00	0 AUX
WMJXaux LIC	BOSTON MA	BMLH-981027KC	294B 106.7	1.900 351.0	42-18-27 071-13-27	110.9	23.77 0.00	0 AUX
WMJXaux CP	BOSTON MA	BXPH-030929AGP	294B 106.7	1.000 224.0	42-20-50 071-04-59	96.8	34.06 0.00	0 AUX
WFHN LIC	FAIRHAVEN MA	BLH-990224KE	296A 107.1	6.000 99.0	41-37-43 071-00-24	154.2 SS	93.09 -2.91	96 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 72 KM								
WFHN CP	FAIRHAVEN MA	BPH-000821AAC	296A 107.1	5.400 105.0	41-38-25 070-55-03	149.9 SS	95.39 -0.61	96 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 72 KM								
WFHNaux LIC	FAIRHAVEN MA	BXMLH-990513KF	296A 107.1	1.450 106.0	41-38-26 070-55-03	149.9	95.36 0.00	0 AUX
NEW-T APP	CONCORD NH	BNPFT-030829ARR	296D 107.1	0.010 127.0	43-13-00 071-34-34	355.9	92.76 0.00	0 TRANS
NEW-T APP	CONCORD NH	BNPFT-030314AZX	296D 107.1	0.010 130.0	43-13-00 071-34-34	355.9	92.76 0.00	0 TRANS
WERZ LIC	EXETER NH	BLH-000322AAF	296A 107.1	5.200 106.0	43-01-38 070-52-51	34.8 SS	87.34 -8.66	96 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 72 KM								
WERZaux LIC	EXETER NH	BLH-900104KC	296A 107.1	3.000 21.0	42-59-23 070-56-14	33.8	81.29 0.00	0 AUX

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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
WERZ	EXETER		296A	6.000 DA	42-59-23	33.8	81.29	96
CP	NH	BPH-020531AAF	107.1	100.0	070-56-14	SS	-14.71	SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 72 KM								
WZSH	BELLOWS FALLS		296A	1.150	43-12-33	323.6	114.53	96
LIC	VT	BMLH-920522KC	107.1	162.0	072-19-58		18.53	CLEAR
	WESTBOROUGH		297B	0.000	42-18-11	255.0	34.49	211
RSV	MA	RM-10220	107.3	0.0	071-53-52		-176.51	SHORT
WAAF	WORCESTER		297B	20.000	42-18-11	255.0	34.49	211
LIC	MA	BLH-980416KB	107.3	239.0	071-53-52		-176.51	SHORT
WAAF	WORCESTER		297B	9.600 DA	42-20-09	253.8	19.07	211
CP	MA	BPH-030228AJE	107.3	335.0	071-42-57	SS	-191.93	SHORT
NEW-T	EASTHAMPTON		297D	0.250	40-58-30	200.4	166.81	0
APP	NY	BNPFT-030317KIM	107.3	23.0	072-11-16		0.00	TRANS
WFCC-FM	CHATHAM		298B	50.000	41-44-14	119.9	142.19	145
LIC	MA	BMLH-990910AAH	107.5	104.0	070-00-40		-2.81	SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 114 KM								
NEW-T	KEENE		298D	0.010	42-57-41	317.7	87.17	0
APP	NH	BNPFT-030313BNO	107.5	329.0	072-12-49		0.00	TRANS
NEW-T	KEENE		298D	0.210	42-56-47	313.4	91.52	0
APP	NH	BNPFT-030317AIO	107.5	45.0	072-18-33		0.00	TRANS
WXKS-FM	MEDFORD		300B	20.500	42-20-50	96.8	34.06	71
LIC	MA	BLH-911018KE	107.9	235.0	071-04-59		-36.94	SHORT
NOTE: PRE-1964 GRANDFATHERED SHORT-SPACING								
WXKSaux	MEDFORD		300B	1.800	42-18-27	110.9	23.77	0
CP	MA	BXPB-021219ABO	107.9	364.0	071-13-27		0.00	AUX
WXKSaux	MEDFORD		300B	1.000	42-20-50	96.8	34.06	0
LIC	MA	BLH-920827KE	107.9	218.0	071-04-59		0.00	AUX

44444 END OF FM SPACING STUDY FOR CHANNEL 297 44444

