

Exhibit 17 - Statement D
NIGHTTIME ALLOCATION AND COVERAGE CONSIDERATIONS

prepared for

Polnet Communications, Ltd.

WNVR Vernon Hills, Illinois - Facility ID 52910
1030 kHz 27 kW-D 8 kW-CH 0.21 kW-N DA-3 U

As discussed in the attached **Exhibit 12 – Statement A**, *Polnet* is herein proposing certain nighttime coverage improvements concurrently with changes in the daytime and critical hours operations. Although the proposed nighttime improvements will not change the station’s presently licensed Class D status, an incremental improvement in its existing nighttime service would be realized through a grant of this application.

Presently, WNVR operates at night with 0.12 kW at night utilizing a four-tower directional facility. It is herein proposed to employ a different nighttime directional antenna pattern that will permit an increased nighttime power of 0.21 kW and a measured of improved nighttime coverage.

Coverage Considerations

Night limit (incoming interference) calculations were performed in accordance with the methods described in the Commissions rules and are documented in the attached **Exhibit 17 – Table V**. As shown therein, the WNVR nighttime interference free contour is 13.3 mV/m. Using this field strength value, the proposed nighttime antenna system parameters, ground conductivity assumptions, and proposed nighttime operating power, the nighttime interference free contour included on the map of **Exhibit 13 - Figure 8** is developed. Nighttime interference free coverage of Vernon Hills, Illinois is still not realized under this proposal due to the intervening distance, array allocation design constraints, and the night limit. Nevertheless, an improvement in existing nighttime coverage is realized, therefore authority for the proposed improved nighttime operation is being respectfully requested. Again, *Polnet* understands that, given the proposed nighttime power level and the nighttime community of license coverage shortfall, WNVR will still be classified as a Class D station and not gain “protected status” under this proposal.

Nighttime Allocations Considerations

The nighttime antenna design is described in **Exhibit 12 - Table I**, and was based upon considerations involving the incoming night limits on the proposed frequency, along with pertinent allocation/interference constraints for pertinent co-channel and first adjacent channel stations, proposals of interest, and “Class A” stations. Interference was predicted on a site-to-site basis in accordance with the methods specified in the Commission’s Rules except where Class A station were involved. **Exhibit 17 - Table VI** shows how the facilities proposed herein do not enter into the 25% RSS night limit calculation of any licensed or proposed facility.

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Consideration was separately given to Class A stations presently in operation on the same and the adjacent channels. The most significant Class A facility of concern is co-channel WBZ (1030 kHz, 50 kW, DA-1, U, Facility ID 25444), Boston Massachusetts. **Exhibit 17 – Figure 13 (Sheets 1, 2 and 3)** address the proposal's impact on WBZ. Using the criteria of §73.182(q), the location of the predicted WBZ 500 $\mu\text{V/m}$, 50% skywave contour was plotted along with the location of the predicted proposed WNVR 25 $\mu\text{V/m}$, 10% skywave contour. **Exhibit 17 – Figure 13 - Sheet 1** shows the resulting overall protection picture; only two areas of interest within **Sheet 1** merit closer scrutiny. Accordingly, **Exhibit 17 – Figure 13 - Sheet 2** is provided to more clearly illustrate the area of contour overlap in the Great Lakes – Canadian border area. As shown, the instance of overlap occurs entirely over water or Canadian territory. Although this represents an increase in existing overlap over water and Canada, domestic Class A stations are not normally protected in such areas, hence it is believed that this proposal is acceptable under the Commission's Rules with respect to WBZ. , **Exhibit 17 – Figure 13 - Sheet 3** is provided to more clearly illustrate the *lack of* contour overlap within the United States at the point of closest approach between the two pertinent contours. Accordingly, it is believed that this proposal satisfies the requirements of §73.182(q) as it regards co-channel WBZ.

There are two first adjacent Class A stations of interest - KDKA (1020 kHz, 50 kW, ND-1, U, Facility ID 25443) Pittsburgh, Pennsylvania, and WHO (1040 kHz, 50 kW, ND-2, U, Facility ID 51331) Des Moines, Iowa. As shown on **Exhibit 17 – Figure 13 (Sheet 1)**, the proposed predicted WNVR 250 $\mu\text{V/m}$ 10% skywave contour does not come close to the KDKA protected 500 $\mu\text{V/m}$ groundwave contour, thus satisfying the requirements of §73.182(q) of the Commission's Rules.

With respect to WHO, **Exhibit 17 – Figure 13 (Sheet 1)** shows the overall situation between the proposed predicted WNVR 250 $\mu\text{V/m}$ 10% skywave contour and the WHO protected 500 $\mu\text{V/m}$ groundwave contour. **Exhibit 17 – Figure 13 (Sheet 4)** provides a detailed view of the closest point of approach between these two contours. As shown, there is no prohibited overlap, hence it is believed that this proposal satisfies the requirements of §73.182(q) as it regards first adjacent channel WHO.

Accordingly, it is believed that this WNVR nighttime proposal does not violate the Commission's required co-channel Class A protection standards.

Conclusion

Based upon the information contained herein, it is believed that this proposal is compliant with the appropriate nighttime allocation requirements of the Commission's Rules and policies.