

Channel Study

REFERENCE CH# 254D - 98.7 MHz, Pwr= 0.25 kW DA, HAAT= 230.7 M, COR= 562 M DISPLAY DATES
42 02 15.8 N. Average Protected F(50-50)= 19.9 km DATA 06-24-16
80 03 43.8 W. Standard Directional SEARCH 06-28-16

CH CITY	CALL	TYPE	ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
254D Erie	W254AJ!	CP	DC PA	0.0	0.00	42 02 15.8	0.099	34.0	10.1	-46.8	-53.0
				0.0	BMPFT20151215AID	80 03 43.8		562	Family Life Ministries, In		
254D Erie	W254AJ!	LIC	DC PA	349.4	10.46	42 07 49.0	0.220	23.0	6.9	-25.4	-39.7
				169.4	BLFT20120305ABJ	80 05 08.0	-1	237	Family Life Ministries, In		
201A Erie	WEFR%	LIC	CX PA	207.0	8.90	41 57 59.0	0.630	39.5	26.0	10.0R	-1.1M
				27.0	BMLED20130530AMM	80 06 40.0	131	497	Family Stations, Inc.		
256D North East	W256AL	LIC	DC PA	47.2	25.41	42 11 34.0	0.200	0.9	6.3	5.7	18.0
				227.3	BLFT20040709ACN	79 50 10.0	-4	303	Inspiration Time, Inc.		
255L1 Corry	WHYP-LP	CP	PA	111.8	37.87	41 54 39.4	0.100			12.0	7.2
				292.0	BNPL20131113AYC	79 38 16.8	29	520	Corry Area Radio Service		
253B1 Oil City	WGYI	LIC	NCX PA	157.2	74.67	41 25 04.0	20.000	49.3	35.9	9.0	9.9
				337.4	BLH20111205AHW	79 42 53.0	91	501	Fm Radio Licenses, Llc		
254D Jamestown	W254AQ	LIC	C NY	81.2	70.43	42 07 53.0	0.010	20.0	6.1	34.3	12.0
				261.8	BLFT20140129AIL	79 13 13.0	88	543	Calvary Chapel Of Russell		
255B Youngstown	WMXY	LIC	CN OH	204.2	119.33	41 03 24.0	5.900	80.3	67.2	22.3	16.9
				23.8	BLH19890405KE	80 38 44.0	418	745	Citicasters Licenses, Inc.		
257B1 Franklin	WHMJ	LIC	CN PA	170.3	67.60	41 26 16.0	7.300	3.4	41.0	49.2	25.0
				350.3	BLH19891121KC	79 55 29.0	183	598	Fm Radio Licenses, Llc		
252A Ashtabula	WYBL	LIC	ZCX OH	248.7	55.85	41 51 13.8	4.700	2.6	27.3	32.3	27.4
				68.3	BLH20160321ABH	80 41 20.7	110	350	Media One Holdings, Llc		
252D Westfield	W252CG	CP	DV NY	49.9	51.51	42 20 04.9	0.099	0.6	5.3	32.7	45.1
				230.2	BPFT20160317ABQ	79 34 59.7		212	Family Life Ministries, In		
253B Niagara Falls	WKSE	LIC	CX NY	38.8	138.80	43 00 18.0	46.000	71.9	59.6	46.7	36.9
				219.5	BMLH20080910ABV	78 59 34.0	128	304	Entercom Buffalo License,		
253B Niagara Falls	WKSE	CP	ZCX NY	40.5	138.45	42 58 42.2	41.000	70.6	58.8	47.8	37.6
				221.3	BPH20131030AHQ	78 57 24.9	129	307	Entercom Buffalo License,		
255B Simcoe	CHCD-FM	OP	DHN ON	345.1	81.50	42 44 48.0	50.000	16.1	15.8	52.6	38.9<
				165.0	6025	80 19 06.0	150	355	Chcd-fm		
252D Westfield	W252CG	LIC	DV NY	59.1	58.54	42 18 21.0	0.007	0.2	4.3	41.7	53.1
				239.5	BLFT20110124AAS	79 27 08.0	149	521	Family Life Ministries, In		
253B Cleveland	WNCX	LIC	CX OH	241.5	159.68	41 20 28.0	16.000	79.2	67.3	59.7	48.8
				60.4	BMLH20050901AAQ	81 44 24.0	293	573	Cbs Radio Stations Inc.		
201A Jamestown	WUBJ	LIC	DC NY	74.9	61.66	42 10 47.0	2.700	39.5	26.0	10.0R	51.7M
				255.4	BLED20010308AAH	79 20 29.0	152	605	Western New York Public Br		
255D Warren	W255AE	LIC	DHN PA	104.2	79.19	41 51 33.0	0.050	1.6	1.0	61.8	54.5
				284.9	BLFT19950615TE	79 08 15.0	-49	440	Public Broadcasting Of Nor		

Terrain database is GLOBE 30 Sec, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM

Contour distances are on direct line to and from reference station. Reference Zone= East Zone, Co to 3rd adjacent.

Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtlt(Y,N,X)

""affixed to 'IN' or 'OUT' values = site inside restricted contour.

< = Station meets FCC minimum distance spacing for its class.

< = Contour Overlap

Reference station has protected zone issue: Canada- AM tower

% = Station Fails minimum 73.215 spacings. 73.215 spacings are used.

Intermediate Frequency Distance Separation Waiver Request

FLM respectfully requests a waiver of the Intermediate Frequency ("IF") distance separation requirements for the proposed operation of W254AJ with respect to WEFR, Channel 201A, Erie, PA.

A study has been performed in regards to channel 254 as well as the 1st, 2nd, and 3rd adjacent channels. No overlaps will occur to any of these existing or proposed facilities as a result of a grant of this proposal.

However, the channel study does show a short spacing to WEFR, 201A, Erie, Pa, which operates 53 channels (10.6 MHz) below the translator. WEFR is located at a distance of 8.9 km from the proposed site of W254AJ. According to §73.207(b)(1), the required "IF" distance separation is 10 km, under the assumption that both stations are full 6 kW/100m Class A facilities.

We note that §73.213(c)(1) permits a minimum separation of 8 km between "grandfathered" Class A stations not exceeding 3 kW effective radiated power at 100 meters height above average terrain. Since the proposed translator ERP is far less than 3 kW, FLM believes that it is more appropriate to apply this relaxed 3 kW "IF" distance separation, as the §73.207 requirement for 6 kW stations is unnecessarily restrictive. In past proceedings, the Commission has ruled in favor of uniform protection from IF interference rather than maintaining "overprotection"¹, and we believe our request is consistent with that established policy.

We do not anticipate that a grant of this request would set a dangerous precedent, as the waiver does not involve the use of "contour protection", but rather substitution of one existing Part 73 table for another – one that is more suitable in situations involving FM Translators, given their limited potential to cause "IF" interference. At maximum ERP of 250 watts and regardless of antenna height, an FM translator clearly does not have greater ability to cause "IF" interference than a Class A station operating with 3 kW ERP at 100 m HAAT in accordance with §73.213(c)(1).²

A grant of this waiver request would serve the public interest, because it would permit a substantial increase of coverage area and population of W254AJ, as shown in Exhibits 13-B and 13-C. A 20.5% increase in population and a 46.06% increase in the coverage area within the 60dbu contour is predicted. The proposed distance separation of 8.9 km between W254AJ and WEFR exceeds the 8 km requirement of §73.213(c)(1).

1 See *Review of Technical Parameters for FM Allocation Rules of Part 73, Subpart B, FM Broadcast Stations*, 4 FCC Rcd 3557, 3560 (1989), MM Docket 86-144. In this proceeding, the minimum "IF" distance separations for Class B1, C2, and C1 were reduced to eliminate excessive protection.

2 The "IF" separation requirements are based on avoidance of overlap of the 36 mV/m or 91 dBu contours of the affected stations, operating with full Class facilities. According to the FM Propagation Curves, a 3 kW station at 100 meters HAAT has a 91 dBu contour radius of 4.01 kilometers, whereas a translator operating with an ERP of 250 watts at 1600 meters HAAT (a "worst-case scenario") would have a 91 dBu contour radius of only 3.05 kilometers.

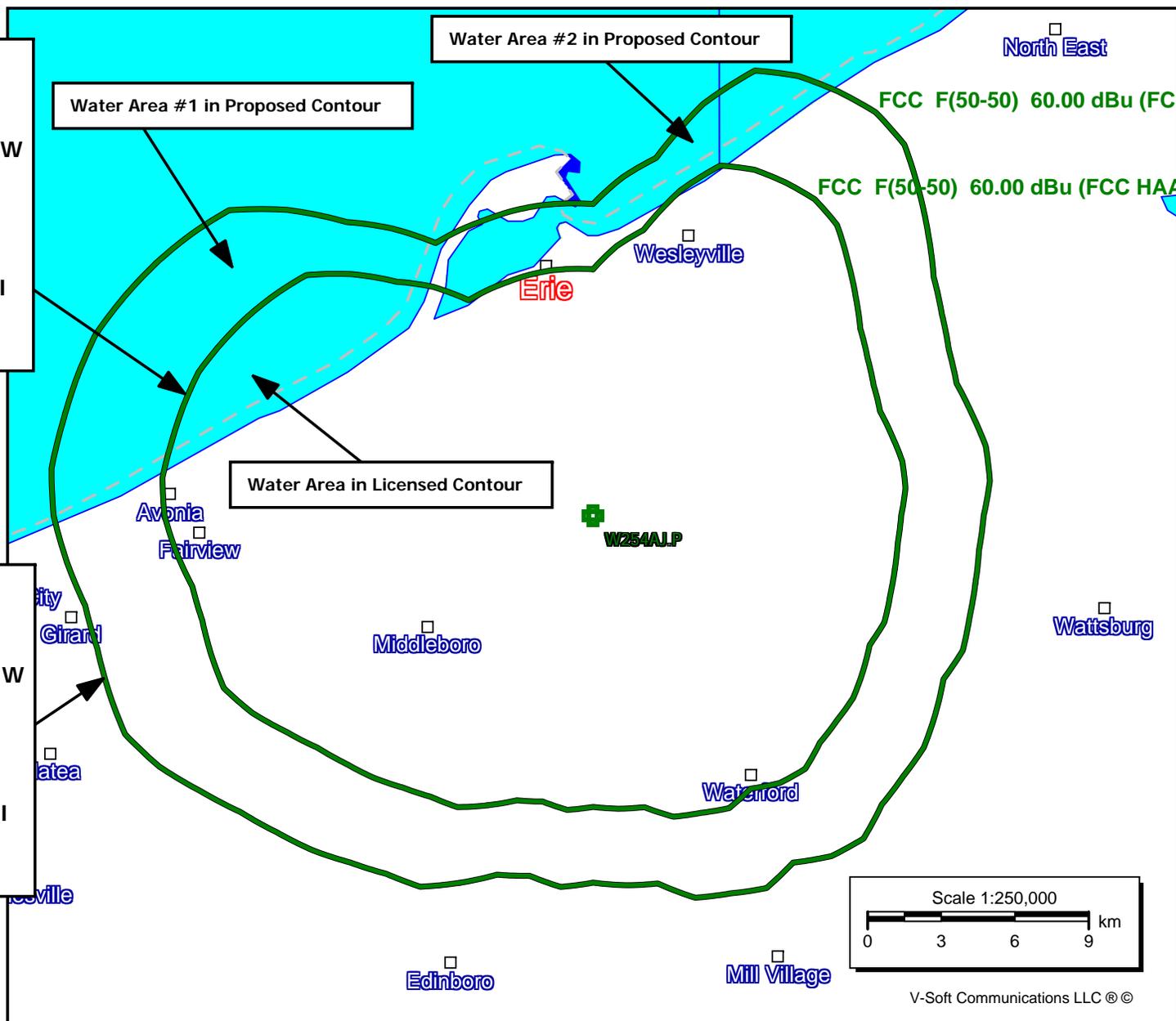
Exhibit 13-B Licensed and Proposed Contours

W254AJ

Latitude: 42-02-15.80 N
 Longitude: 080-03-43.80 W
 ERP: 0.099 kW
 Channel: 254
 Frequency: 98.7 MHz
 AMSL Height: 562.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: No
 Prop Model: None

W254AJ.P

Latitude: 42-02-15.80 N
 Longitude: 080-03-43.80 W
 ERP: 0.25 kW
 Channel: 254
 Frequency: 98.7 MHz
 AMSL Height: 562.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: No
 Prop Model: None



Population and Coverage Area Report

W254AJ 99 watt Licensed Contour

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
W254AJ (254): FCC F(50-50) 6	179,965	591.16	2.5 %	6.3 %
Polygon over water	0	37.13	100.0 %	99.7 %

591.16 (total area) - 37.13 (portion of contour over water) = 554.03 sq km

W254AJ 250 watt Proposed Contour

250w contour over water area #1:

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
W254AJ.P (254): FCC F(50-50)	216,920	950.45	2.1 %	11.4 %
Polygon over water area #1	0	108.35	100.0 %	99.8 %

250w contour over water area #2:

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
W254AJ.P (254): FCC F(50-50)	216,920	950.45	3.9 %	3.4 %
Polygon over water area #2	0	32.9	100.0 %	98.9 %

Total area of portions of contour over water: 108.35 + 32.9 = 141.25 sq km
 950.45 (total area) - 141.25 (portions of contour over water) = 809.2 sq km

809.2 (proposed coverage area) - 554.03 (licensed coverage area) = 255.2 sq km increased coverage area.

255.2 (increased coverage area) / 554.03 (licensed coverage area) = .4606

Increase in coverage area when discounted for water in both contours: 46.06%

Population in licensed contour: 179,965
 Population in proposed contour: 216,920
 Increase in population: 36,955
 36,955 / 179,965 = .205
Percent Increase in Population: 20.5%