

STU-COMM, INC.

AFTON, VIRGINIA

TABLE OF ATTACHMENTS

ENGINEERING NARRATIVE

CHANNEL STUDY

ALLOCATION STUDY AL 3579, MIDLOTHIAN, VA (RESERVATION)

ALLOCATION STUDY WACL, CHANNEL 255B1, ELKTON, VA

ALLOCATION STUDY WWLB, CHANNEL 255B1, MIDLOTHIAN, VA

MAP OF THE WACL 102.5 dBu CONTOUR AND THE PROPOSED SITE

TOPOGRAPHIC SITE MAP

AERIAL PHOTOGRAPH

DECLARATION

STU-COMM, INC.

AFTON, VIRGINIA

NARRATIVE

This minor change application is filed to change the channel of W201CN to channel 255D, the fifty-fourth adjacent channel. The proposed non-directional antenna will be installed at the same height on the present tower.

Attachments to this exhibit include a channel study, an allocation study for the channel 255B1 reservation at Midlothian, Virginia; an allocation study for WACL, channel 255B1 at Elkton, Virginia; and an allocation study for WWLB, channel 255B1 at Midlothian, Virginia. Also attached are an aerial photograph and a portion of the USGS topographic map showing the site. The photograph and the map show the 102.6 dBu contour.

The proposed site is inside the protected contour of second-adjacent channel station WACL, channel 253B1. As shown on the attached map, the WACL 62.6 dBu contour passes through the proposed translator site. Using the U/D interference computation method, the interfering contour will be the proposed 102.6 dBu which extends 147 meters from the proposed tower. A waiver for this interference is requested under the provision of §74.1204(d) on the basis that no actual interference will occur due to a lack of population. As can be seen in the attached aerial photograph, the proposed 102.6 dBu contour extends 147 meters from the tower. The only buildings inside the contour are used to house communications equipment, and none have personnel in regular attendance. The only vehicular access to the site is through a locked gate and passage through private property.

Further to the above, any person inside the proposed 102.6 dBu contour would be either an electronic technician visiting one of the communications facilities on an irregular basis or a hiker passing by the electronic site on an irregular basis. The road cannot be classified as a highway or a heavily traveled road. Based on the foregoing, if a person were present inside the proposed 102.6 dBu contour, (1) they would not live there, (2) they would not work there on a regular basis, and (3) they would not travel there on a regular basis. Therefore, for purposes of §74.1204(d), there is no population inside the overlap area. (See Living Way Ministries, Inc., 17FCC Rcd 17054 (2002), reconsidered FCC 08-242, released October 10, 2008, especially the section "Guidance for Future Applicants to Demonstrate Lack of Population" at paras, 7-13.)

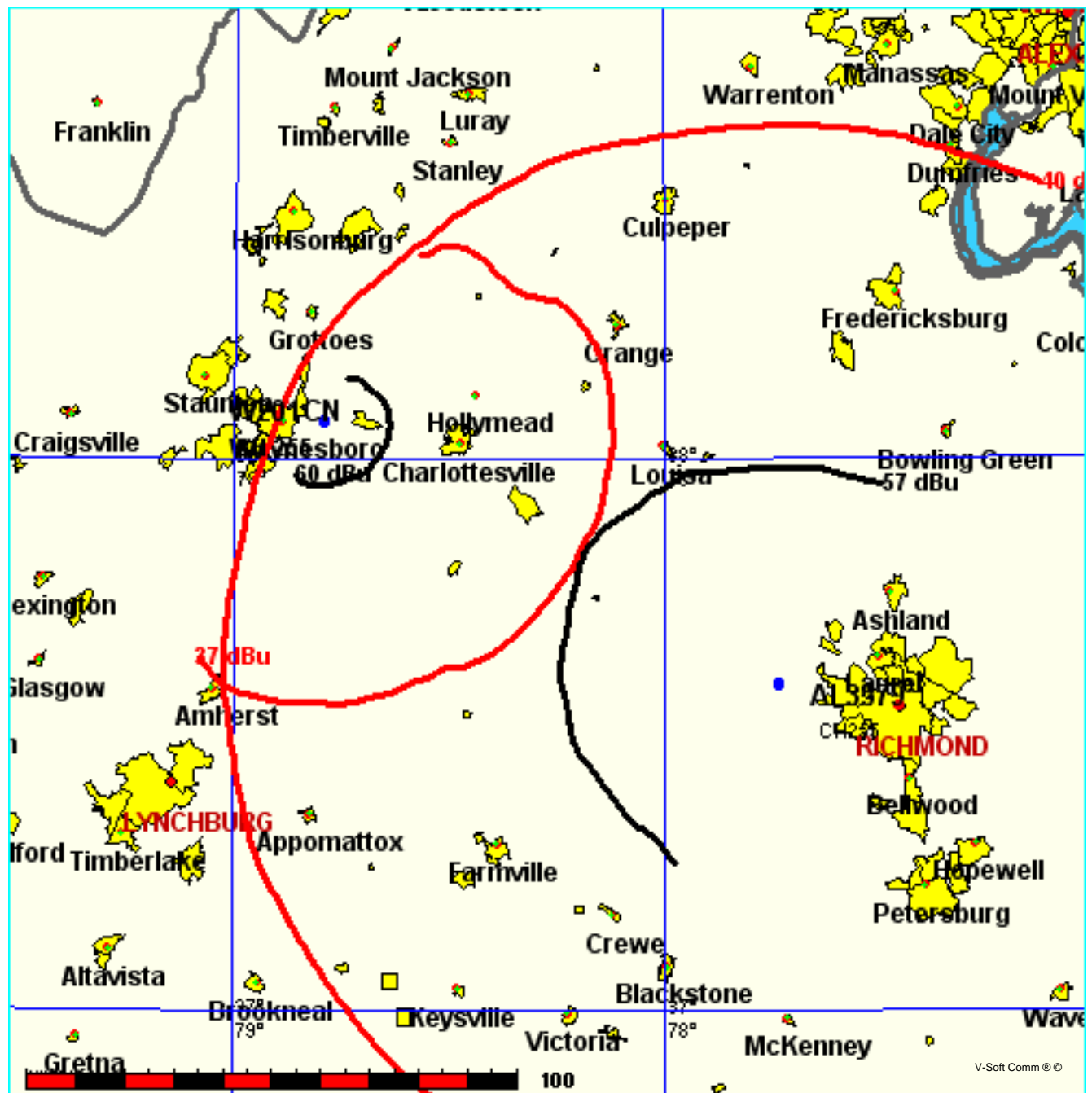
Michael C. Friend, an officer of the applicant corporation, has made an examination of the site and attests to the accuracy of the above statements. His declaration is attached.

NRAO at Greenbank has been notified of this application.

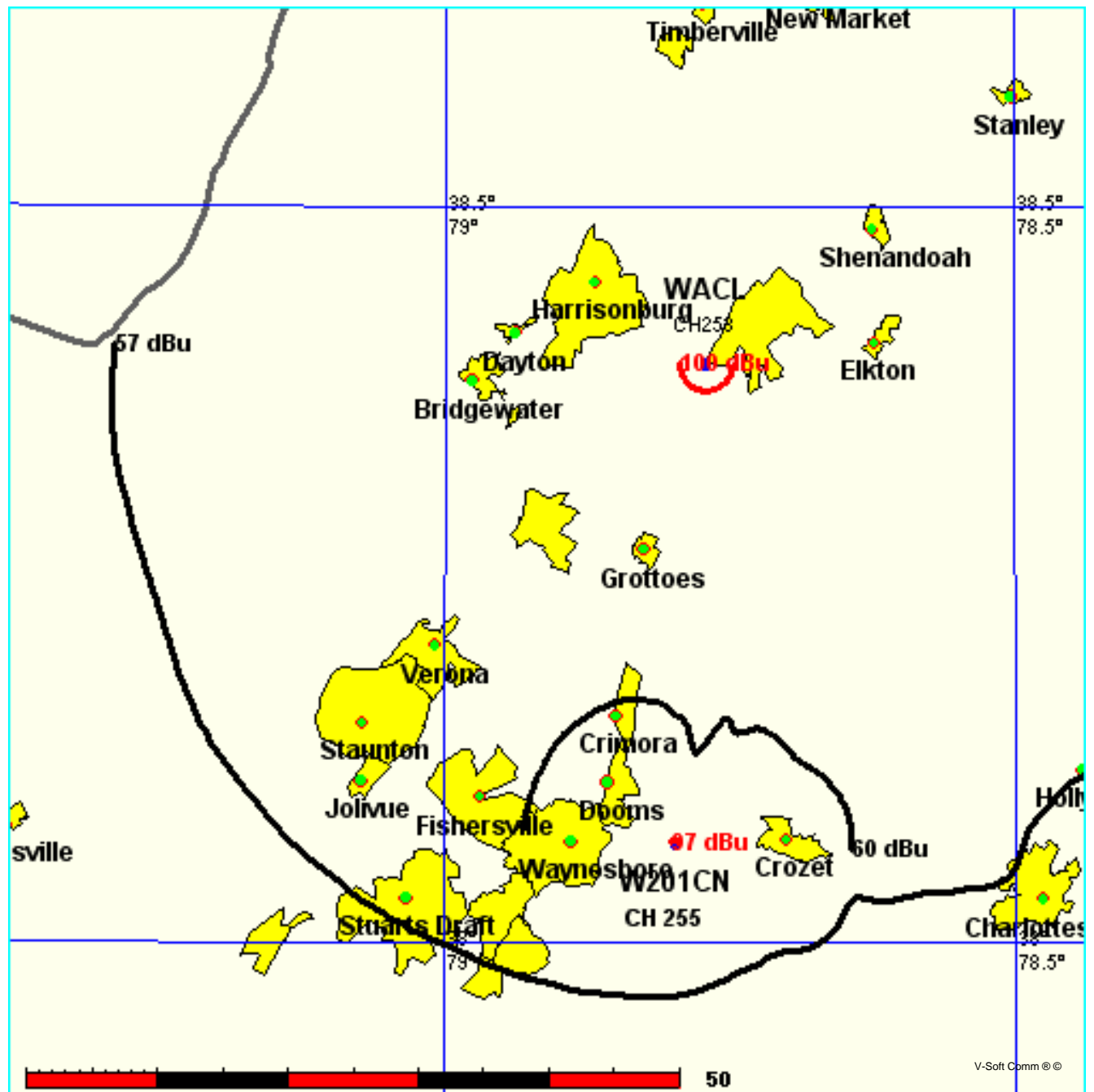
Stu-comm, Inc. W201CN - Afton, Virginia CH# 255D - 98.9 MHz, Pwr= 0.008 kW, HAAT= 502.3 M, COR= 900 M Average Protected F(50-50)= 11.82 km Omni-directional											
REFERENCE 38 03 58.0 N. 78 47 54.0 W.											
DISPLAY DATES DATA 08-15-09 SEARCH 08-24-09											
CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
257D Afton	W201CN	APP DC_ VA		0.0 0.0	0.0 BPFT20090605AAF	38 03 58.0 78 47 54.0	0.195 900	0.9 900	20.6 Stu-comm, Inc.	-10.6*	-20.8*
255D Afton	W201CN	APP _C_ VA		0.0 180.0	0.1 BPFT20090508ABT	38 04 00.0 78 47 54.0	0.008 900	48.6 900	13.0 Stu-comm, Inc.	-58.3*	-45.4*
255B1 Middletown	AL3579	RSV _ VA		119.5 300.2	106.6 RM10592	37 35 23.0 77 44 49.0	25.000 100	115.7 176	46.7	-22.6*<	1.0
253B1 Elkton	WACL	LIC _CN VA		3.8 183.8	36.4 BLH19890315KB	38 23 36.0 78 46 14.0	0.900 490	2.0 902	47.9 Capstar Tx Limited Partner	25.0	-11.8*<
256C Roanoke	WSLQ	LIC _CY VA		231.4 50.6	154.0 BMLH19830922AA	37 11 41.0 80 09 22.0	200.000 607	151.5 1184	102.1 Mel Wheeler, Inc.	-7.4<	37.9
255B1 Middletown	WWLB	LIC ZCX VA		113.6 294.4	123.5 BLH20050308ABO	37 36 52.0 77 30 56.0	4.800 227	99.7 285	44.2 Mlb-richmond Iv, LLC	10.3	20.4
255B1 Elkins	WDNE-FM	LIC _CN WV		317.7 137.1	127.4 BLH19980401KE	38 54 36.0 79 47 18.0	5.100 221	82.5 1015	30.5 West Virginia Radio Corpor	33.1	46.3
254D Farmville	W254AH	LIC _VN VA		150.9 331.2	84.7 BLFT19960521TB	37 23 57.0 78 19 52.0	0.019 85	8.5 202	6.0 Positive Alternative Radi o	63.3	58.1

Terrain database is NGDC 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 = 1, Co to 3rd adjacent.
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
 "*"affixed to 'IN' or 'OUT' values = site inside protected contour.
 Reference station has protected zone issue: WV Quiet Zone

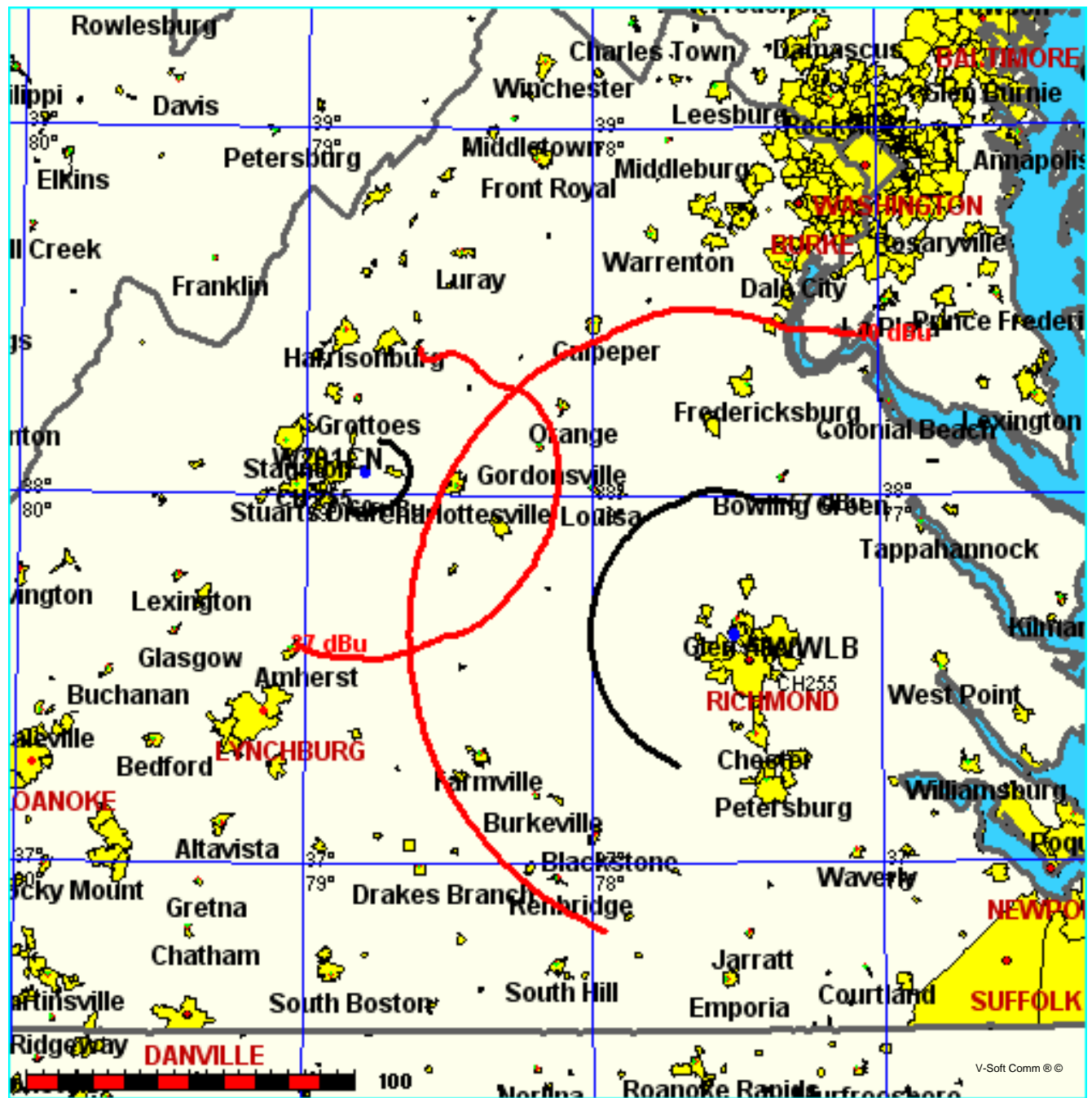
STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND AL3579 AT MIDLOTHIAN,

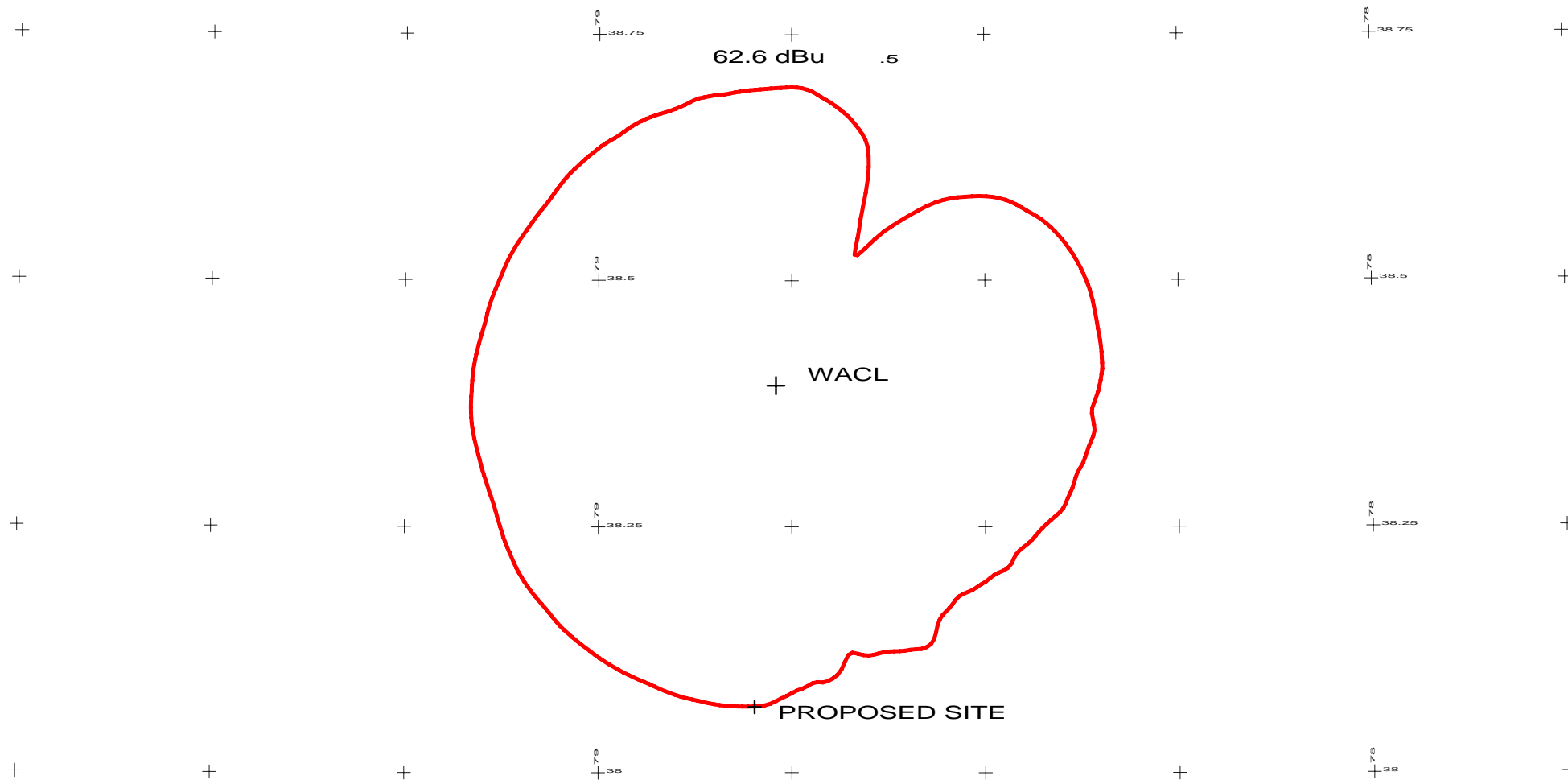


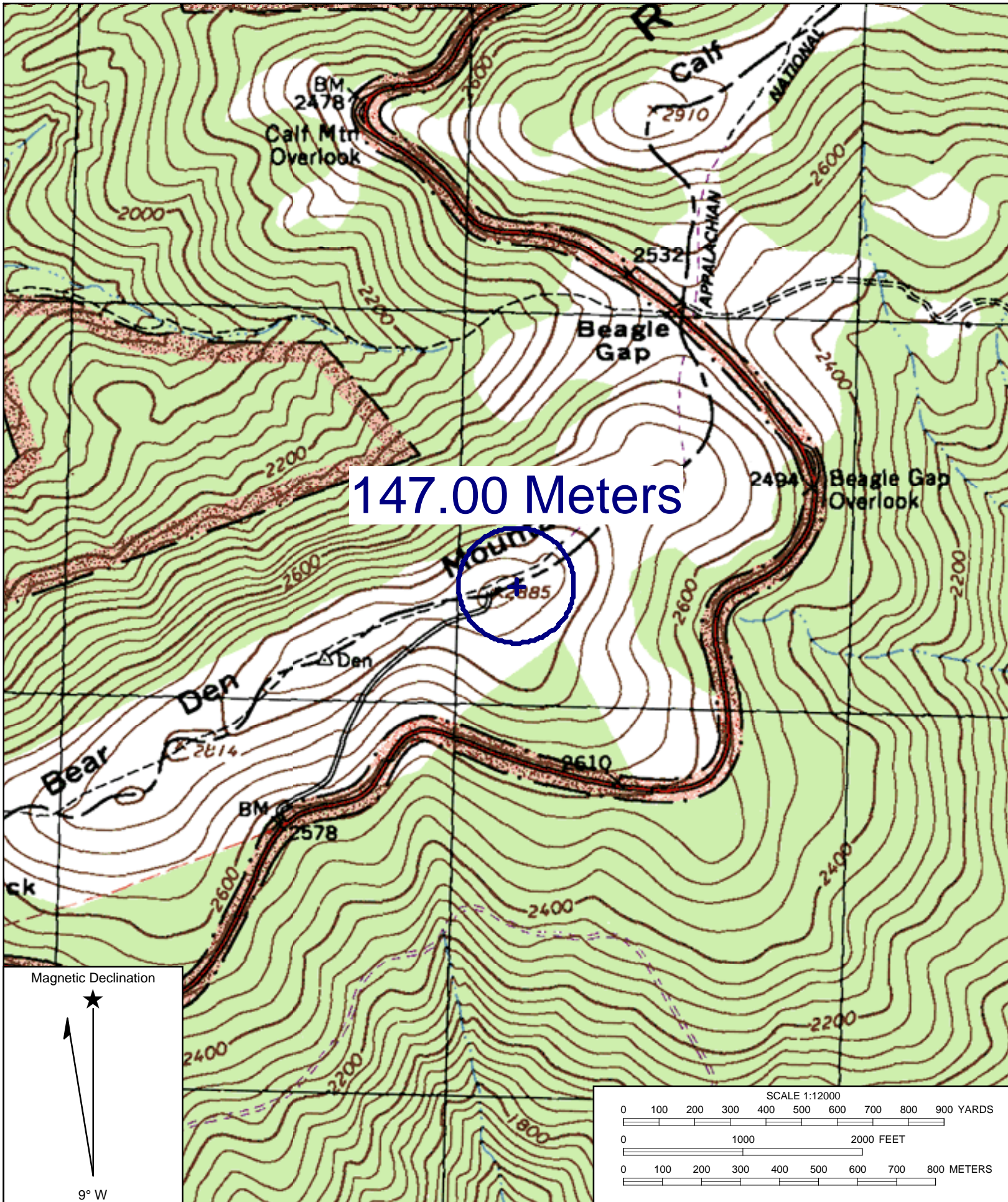
STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND WACL, ELKTON, VA



STUCOMM, INC. - AFTON, VIRGINIA
PROPOSED CHANNEL 255 TRANSLATOR AND WWLB, MIDLOTHIAN, VA

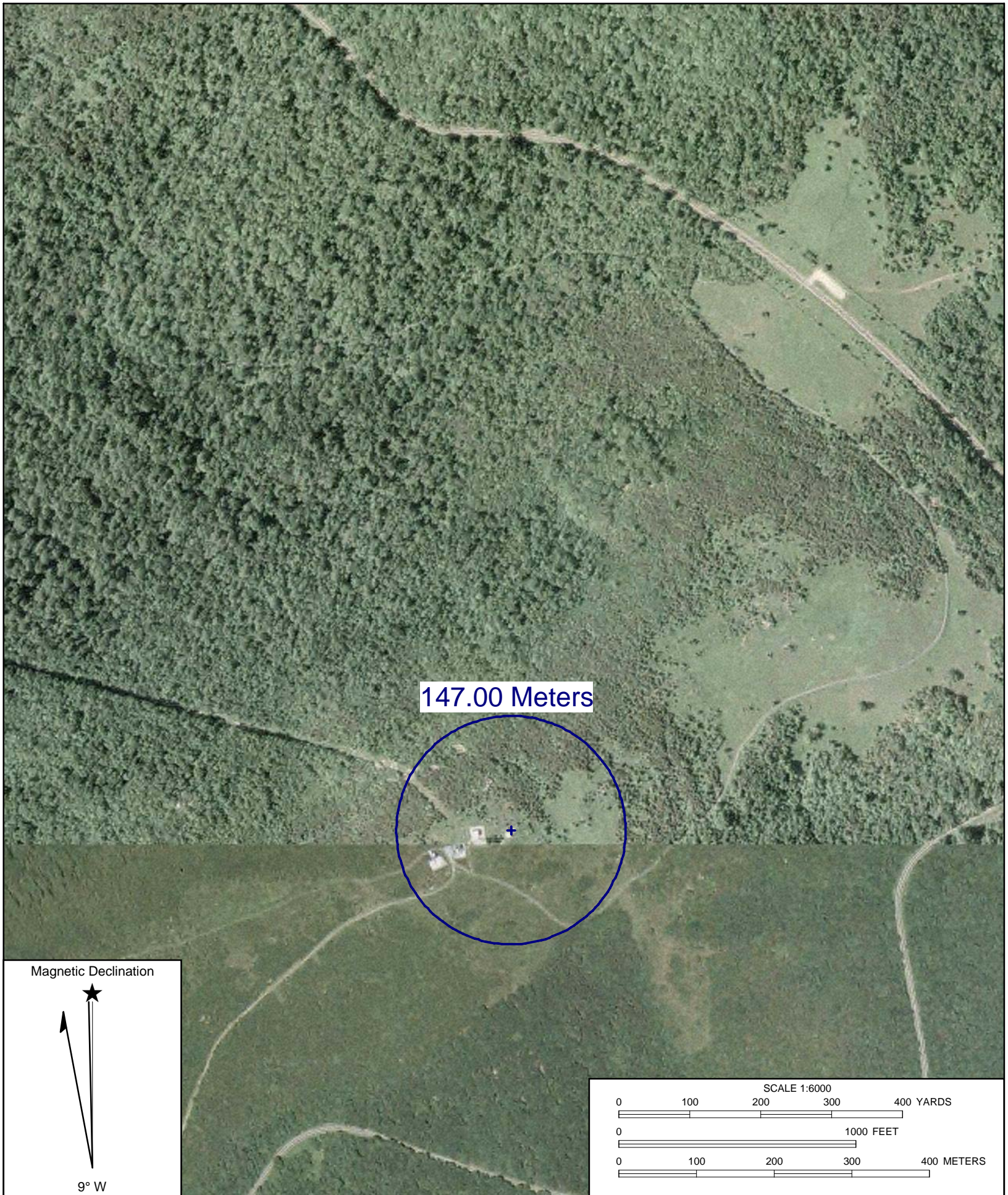






Name: WAYNESBORO EAST
Date: 2/18/2009
Scale: 1 inch equals 1000 feet

Location: 038° 03' 58.59" N 078° 47' 54.43" W NAD27
Caption: The proposed 102.6 dBu contour. Tower location at 38-04-00N and 78-47-53.30W.



147.00 Meters

Magnetic Declination



9° W

SCALE 1:6000

0 100 200 300 400 YARDS

0 1000 FEET

0 100 200 300 400 METERS

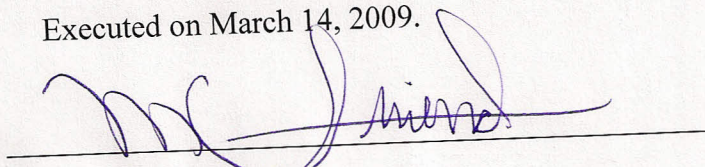
Name: WAYNESBORO EAST NE, VA
Date: 2/18/2009
Scale: 1 inch equals 500 feet

Location: 038° 04' 09.60" N 078° 47' 53.43" W NAD27
Caption: The proposed 102.6 dBu contour. Tower location at 38-04-00N and 78-47-53.30W.

DECLARATION

I declare, under penalty of perjury, that I have personally examined the proposed site that is the subject of this application and that the statements regarding the access road, the gates and the buildings are true to the best of my knowledge and belief.

Executed on March 14, 2009.



Michael C. Friend

President and General Manager
STU-COMM, Inc.