

#### SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu and 60 dBu contours of the second-adjacent WPEL-FM, Montrose, PA and WBHD, Olyphant, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WPEL-FM, Montrose, PA and WBHD, Olyphant, PA, second adjacent channel facilities to this translator proposal, are protected from interference within their 54 dBu and 60 dBu contours from the associated interference contour (based on 47 CFR 74.1204(a)(1); using the FCC F(50/10) curves) which need be 40 dBu greater than the associated coverage contour (WPEL-FM and WBHD) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.
2. This translator's antenna location is located within the 54 dBu and 60 dBu contours (based on 73.333 F(50/50)) of WPEL-FM, Montrose, PA and WBHD, Olyphant, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WPEL-FM and WBHD. Included as an attachment (W241BB Wilkes-Barre Bunker Desired to Undesired Ratios Map) is a map showing that the 57.8 dBu coverage contour of WPEL-FM and the 60 dBu coverage contour of WBHD encompass the proposed antenna site along with the entire proposed 97.8 dBu interference contour. The proposed 97.8 dBu interference contour is 40 dBu greater than the 57.8 dBu contour of WPEL-FM and more than 40 dBu greater than the 60 dBu contour of WBHD. This 97.8 dBu contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 97.8 dBu interference contour of this proposed translator.

3. Given this translator's requested maximum effective radiated power of 40 watts, directional; the predicted 97.8 dBu interference contour for this proposal would be small. At any HAAT value, the maximum 97.8 dBu contour distance for this proposal is 0.57 kilometers towards 263 degrees true and less than that in all other directions.

4. This proposed translator site is situated in a sparsely populated tower farm area. W241BB Wilkes-Barre Bunker 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 97.8 dBu interference contour of this proposal with no dwellings at all located within this contour. This map shows the 97.8 dBu contour with correct directional distances with 40 watts horizontal and 10 watts vertical. The rule in 47 CFR 74.1204(d) states "an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such factors as may be applicable." In this particular case, as shown in this exhibit, it is clearly evident that there is a "lack of population" as defined in 47 CFR 1204(d) thus allowing this translator to operate at this proposed location.

For the foregoing reasons this Applicant submits that the predicted interference to WPEL-FM, Montrose, PA and WBHD, Olyphant, PA is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facilities, WPEL-FM, Montrose, PA and WBHD, Olyphant, PA.

By: Kevin Fitzgerald, Director of Engineering