

Exhibit 28 - Statement A  
**NATURE OF THE PROPOSAL  
PROPOSED ANTENNA SYSTEM  
ALLOCATION CONSIDERATIONS  
WITH §73.215 CONTOUR PROTECTION**

prepared for

**CWA Broadcasting, Inc.**  
WINX-FM Cambridge, Maryland  
Facility ID 14774  
Ch. 232B1 21.6 kW 107 m

### **Nature of Proposal**

*CWA Broadcasting, Inc.* ("*CWA*") is the licensee of WINX-FM, Ch. 232A, Cambridge, Maryland<sup>1</sup>. With the instant application *CWA* seeks a one-step upgrade for WINX from Class A to Class B1. As noted in the application and discussed below, *CWA* has identified a fully spaced reference site on land. However, *CWA* is proposing to keep WINX on its existing antenna support structure by utilizing the contour protection provisions of §73.215 of the Commissions Rules.

### **Proposed Antenna System**

The proposed WINX-FM antenna system will be mounted on its existing antenna supporting structure, having FCC Antenna Structure Registration number 1037391. The proposed transmitting antenna will be directional in the horizontal plane. The antenna system will be installed in accordance with the manufacturer's instructions. Said installation will be supervised on-site by a competent technical representative of the applicant. Attached as **Figure 1** is a horizontal plane radiation pattern representing the maximum envelope for contour protection purposes of §73.215, expressed in terms of relative field and dBk. A tabulation is provided on the FCC Form 301, Section III-B, Item 12.

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<sup>1</sup> *CWA* has previously petitioned the Commission to change the table of allotments to assign Ch. 232A to St. Michaels, Maryland instead of Cambridge, Maryland (MM Docket 92-291). *CWA* has now filed a petition to dismiss the proceeding so as to retain Ch. 232A and WINX-FM at Cambridge, MD.

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& ALLOCATION CONSIDERATIONS WITH §73.215 CONTOUR PROTECTION**  
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**Allocations Considerations and §73.215 Contour Protection**

The instant application is a "One-Step" proposal seeking to change WINX-FM from a Class A to a Class B1 facility on Channel 232. The proposed allotment "reference point," FCC Form 301 Section III-B, Item 4 is located at North Latitude: 38° 29' 39", West Longitude: 76° 13' 21". This point meets all pertinent minimum distance separation requirements of §73.207 and the community of license coverage requirements of §73.315 toward Cambridge, Maryland.

The site for the proposed WINX-FM facility meets all pertinent minimum distance separation requirements toward neighboring facilities except with respect to WWZK(FM) (Ch. 232A, Avalon, New Jersey, Facility ID 16910), and WDAC(FM) (Ch. 233B, Lancaster, Pennsylvania, Facility ID 71309). Thus, *CWA* is seeking authorization for WINX-FM pursuant to §73.215 of the Commission's Rules by utilizing contour protection as described herein. Attached as **Figures 2** and **2A** are maps depicting the pertinent protected and interfering contours for the proposed WINX-FM facility with those of WWZK and WDAC.

**WWZK(FM) Ch. 232A - Avalon, New Jersey**

The proposed WINX-FM facility is situated 123.2 km distant from WWZK(FM). §73.207 of the Commission's rules requires a minimum separation between fully spaced co-channel Class A and Class B1 facilities of 143 km. However, §73.215 provides for co-channel Class A and Class B1 stations to be separated by as little as 119 km so long as pertinent interfering and protected contours for the respective facilities do not overlap. As illustrated by **Figures 2** and **2A** (*A Detailed View*), the 1.0 mV/m (60 dB $\mu$ , F(50,50)) protected service contour for WWZK is not overlapped by WINX's proposed 20 dB weaker 40 dB $\mu$  F(50,10) interfering contour. Nor does WINX's proposed 0.7 mV/m (57 dB $\mu$  F(50,50)) protected service contour receive overlap from WWZK's 20 dB weaker 37 dB $\mu$  F(50,10) interfering contour. It should be noted that the contours for WWZK are based on a maximum Class A facility of 6.0 kW at an effective antenna height of 100m above average terrain ("AAT") from the WWZK site, pursuant to §73.215(b)(2).

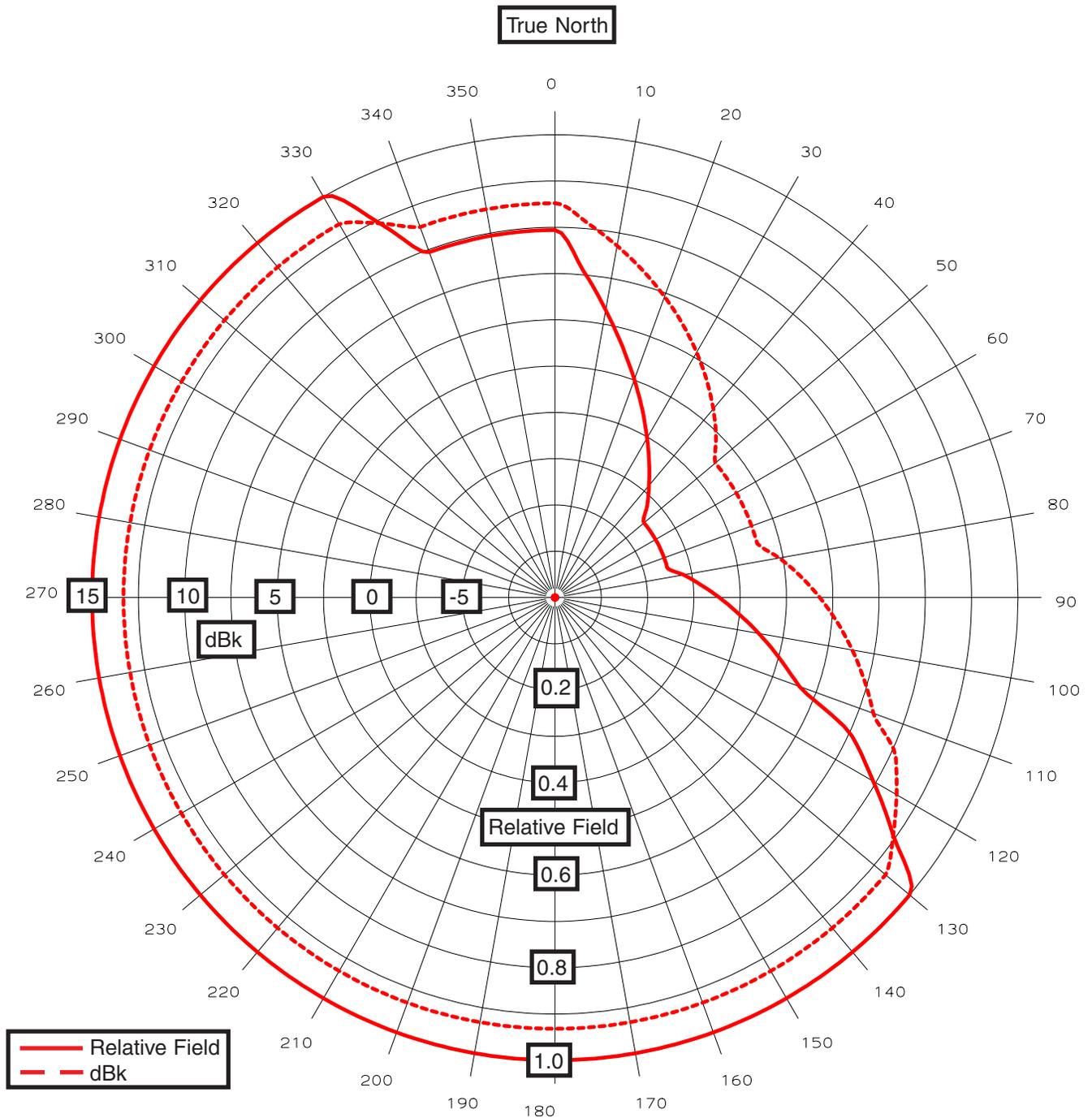
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**WDAC(FM) Ch. 233B - Lancaster, Pennsylvania**

The proposed WINX-FM facility is situated 141.4 km distant from WDAC(FM). §73.207 of the Commission's rules requires a minimum separation between fully spaced 1st adjacent channel Class B1 and Class B facilities of 145 km. However, §73.215 provides for 1st adjacent channel Class B1 and Class B stations to be separated by as little as 114 km so long as pertinent interfering and protected contours for the respective facilities do not overlap. As illustrated by **Figure 2**, the 0.5 mV/m (54 dB $\mu$ , F(50,50)) protected service contour for WDAC is not overlapped by WINX's proposed 6 dB weaker 48 dB $\mu$  F(50,10) interfering contour. Nor does WINX's proposed 0.7 mV/m (57 dB $\mu$  F(50,50)) protected service contour receive overlap from WDAC's 6 dB weaker 51 dB $\mu$  F(50,10) interfering contour. It should be noted that the contours for WDAC are based on a maximum Class B facility of 50 kW at an effective antenna height of 150m AAT from the WDAC site, pursuant to §73.215(b)(2).

**Conclusion**

*CWA* is seeking a one step upgrade for WINX from Class A to Class B1. Except with respect to WWZK and WDAC, WINX's proposed facility meets all pertinent minimum distance separation requirements of §73.207 of the Commission's Rules. With regard to these two stations, WINX meets the minimum distance separation requirements of §73.215(e) for short-spaced facilities. As shown by **Figures 2** and **2A**, WINX's proposed Class B1 facility meets all pertinent contour protection requirements of §73.215 of the Commission's rules toward WWZK and WDAC by utilizing a directional antenna system.



**EXHIBIT 28 - FIGURE 1**  
**HORIZONTAL PLANE RADIATION ENVELOPE PATTERN**  
**EXPRESSED IN RELATIVE FIELD AND dBK**

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prepared July 2002 for  
**CWA Broadcasting, Inc.**  
 WINX-FM Cambridge, Maryland  
 Facility ID #14774

Ch. 232B1 21.6 kW 107 m

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Cavell, Mertz & Davis, Inc.  
 Manassas, Virginia

**EXHIBIT 28 - FIGURE 2  
CONTOUR PROTECTION  
PERTINENT PROTECTED  
AND INTERFERING CONTOURS  
FOR PROPOSED WINX-FM  
WITH WWZK(FM) AND WDAC(FM)**

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WDAC(FM)  
Ch. 233B  
Assumed facility of  
50 kW at 150 m  
51 dBu F(50,10)  
54 dBu F(50,50)

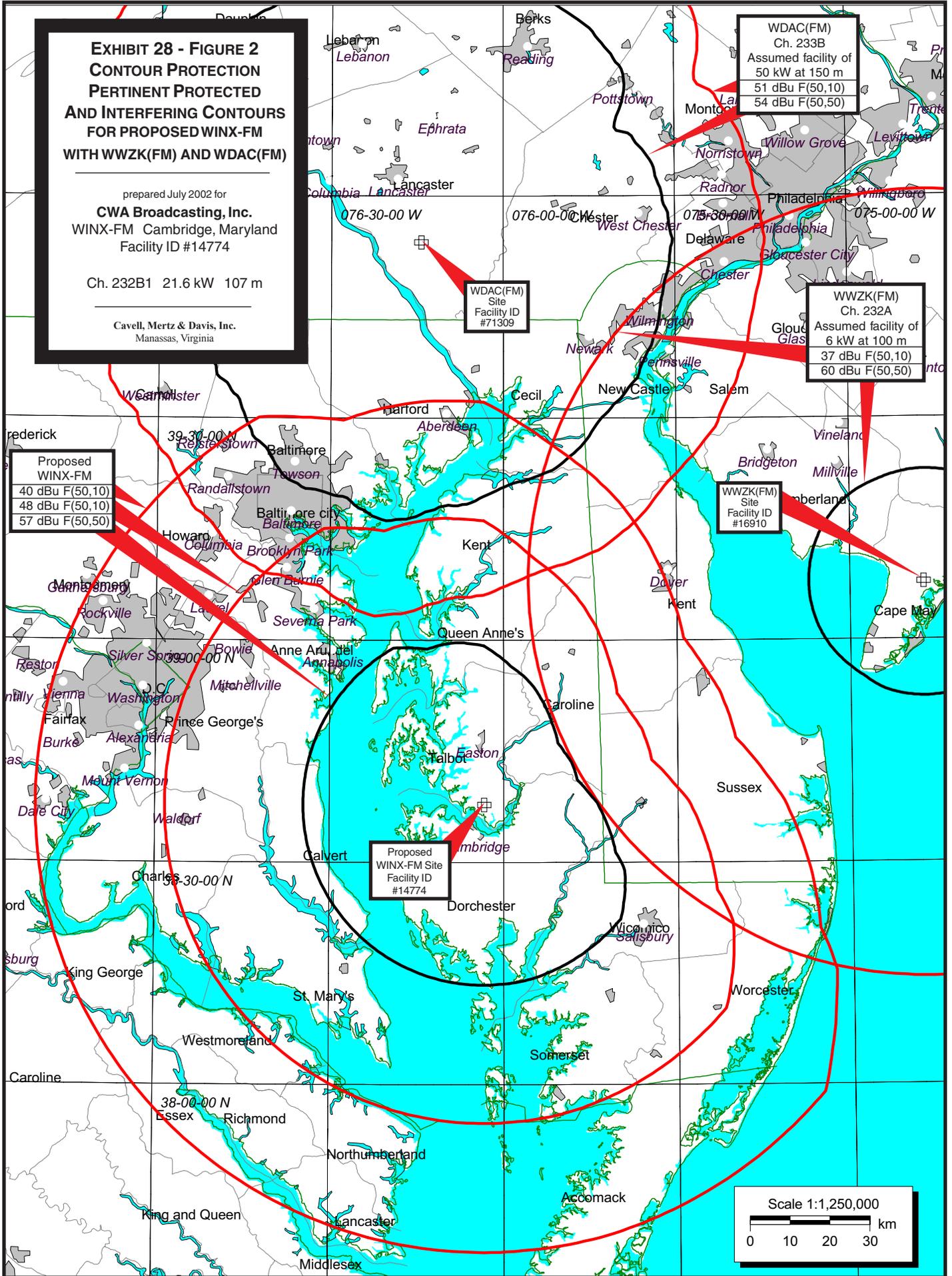
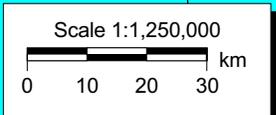
WDAC(FM)  
Site  
Facility ID  
#71309

WWZK(FM)  
Ch. 232A  
Assumed facility of  
6 kW at 100 m  
37 dBu F(50,10)  
60 dBu F(50,50)

Proposed  
WINX-FM  
40 dBu F(50,10)  
48 dBu F(50,10)  
57 dBu F(50,50)

WWZK(FM)  
Site  
Facility ID  
#16910

Proposed  
WINX-FM Site  
Facility ID  
#14774





**EXHIBIT 28 - FIGURE 2A  
(DETAIL VIEW)  
CONTOUR PROTECTION  
PERTINENT PROTECTED  
AND INTERFERING CONTOURS  
FOR PROPOSED WINX-FM  
WITH WWZK(FM)**

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