

Exhibit 16 - Statement C
DAYTIME 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

Polnet Communications, Ltd. (“*Polnet*”) licensee of WNVR, 1030 kHz, Vernon Hills, Illinois proposes to increase its daytime operating power to 27 kW utilizing a six-tower directional antenna pattern as described elsewhere in this application. (Changes in the WNVR critical hours and nighttime operation are being concurrently proposed as well.)

Coverage Considerations

The proposed daytime coverage contours are shown in **Exhibit 12-Figure 5**¹. These contours utilize ground conductivities obtained from the most recent WNVR proof of performance and from measurements provided in BP-20070725AEZ. Where measured conductivities are not available, FCC Figure M-3 ground conductivity was used. Distances to contours and associated ground conductivity data for the proposed WNVR facility are summarized in **Exhibit 12-Tables II and III**.

Daytime Allocation Considerations

The locations of the protected and interfering contours of pertinent nearby domestic stations operating on the same channel, and within three channels above and below the proposed frequency of use, were predicted using the same methodology. FCC Figure M-3 conductivity data, and measured conductivity data where available, were employed for these predictions. The locations of the “protected” and “interfering” contours for the licensed and proposed WNVR operation, along with those of each of the “other” stations on pertinent frequencies, are shown on **Exhibit 16-Figures 9, 10, 11, and 12**². All contours were predicted at 1° intervals but reported in the included tabulations less finely. Full tabulations can be provided upon request.

Exhibit 16-Figure 9 shows the *co-channel* allocation situation for WNVR, both as presently licensed (yellow highlighted dashed lines) and as proposed. **Sheet 1** of this Figure provides an overview of the allocations picture for the surrounding area. **Sheet 2** provides a “zoomed in” detailed look at the contour separation between the closest point of the proposed WNVR operation’s 0.025 mV/m contour and the licensed WCTS 0.5 mV/m contour. Similarly, **Sheet 3** provides a detailed view of the contour separation between the

¹ The predicted 1000 mV/m contour is included in **Exhibit 12-Figure 4**.

² The radiation and conductivity assumptions, along with the resulting distances to the identified contours, are tabulated in **Exhibit 16-Table IV** for stations which measured conductivities were used. Tabulations of contour distances and conductivity assumptions using only Figure M-3 conductivity data can be provided upon request of Commission Staff. Where appropriate, notations are included in the data tabulations as to facility status or operational considerations.

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closest point of the proposed WNVR operation's 0.025 mV/m contour and the predicted 0.5 mV/m contour for the WGYV CP operation. Finally, **Sheet 4** provides a detailed look at the contour separation between the closest point of the proposed WNVR operation's 0.025 mV/m contour and the licensed WUFL 0.5 mV/m contour.

Exhibit 16-Figure 10 shows the *first adjacent channel* allocation situation for WNVR both as presently licensed (yellow highlighted dashed lines) and as proposed. **Sheet 1** of this Figure provides an overview of the allocations picture for the surrounding area. **Sheets 2 and 3** provide a detailed look at the contour separation between the two closest points of the proposed WNVR operation's 0.25 mV/m and 0.5 mV/m contours and those of the licensed WPEO operation.

Exhibit 16-Figure 11 shows the *second adjacent channel* allocation situation for WNVR both as presently licensed (yellow highlighted dashed lines) and as proposed. **Sheet 1** of this Figure provides an overview of the allocations picture for the surrounding area while **Sheet 2** provides a detailed look at the contour separation between the two closest points of the proposed WNVR operation's 5 mV/m contour with respect to those of the licensed WLIP operation.

Finally, **Exhibit 16-Figure 12** shows the *third adjacent channel* allocation situation for WNVR as presently licensed (yellow highlighted dashed lines) and as proposed.

As shown in the Figures of **Exhibit 16**, there is no predicted prohibited contour overlap over land areas caused by the proposed WNVR 27 kW daytime operation.

Consideration of Co and Adjacent Channel Class A Operations

The only pertinent co-channel Class A facility is WBZ, Boston, Massachusetts. The two relevant first adjacent stations are WHO Des Moines, Iowa, and KDKA Pittsburgh, Pennsylvania. All three were studied using the guidance contained in Section 73.182(q) of the Commission's Rules. It was determined that WBZ and KDKA are too far away for prohibited contour overlap to be an issue. (Maps showing the locations of these stations and the involved protected and interfering contours can be provided upon request.) With respect to WHO, the map of **Exhibit 16 – Figure 10, Sheet 1** shows that prohibited contour overlap is not created under the instant WNVR proposal.