

## **Exhibit 18**

### **WWOZ Allocations Study and Request for Waiver**

A Contour Overlap Allocation Study was performed using the short-spaced facilities<sup>1</sup> outlined in Table 1.<sup>2</sup>

#### **Co-Channel Allocation Issues**

There is one critical station, KPEF, White Castle, LA, BLED-20120302ABG involved in the co-channel allocation study. This WWOZ application fully protects that facility according to the rules outlined in 73.509(a). Figure 1 demonstrates full protection of this critical co-channel facility. Figure 1a details the contour to contour protection for KPEF.

#### **First Adjacent Channel Allocation Issues**

KSLU, Hammond, LA, BLED-19850610KA and KTLN, Thibodaux, LA, BLED-19950602KA are short-spaced 1<sup>st</sup> adjacent facilities. These facilities are fully protected. The critical 1st adjacent station protected by this application is KSLU on channel 215. Figure 2 demonstrates the required protection to 1st adjacent facilities outlined in 73.509(a). Figure 2a details the protection to KSLU.

#### **Second and Third Adjacent Channel Allocation Issues**

This application receives interference from the overlap of the 60 dbu WWOZ coverage contour with the 100 dbu contour of one adjacent facility and one new application.

The WNKV licensed facility BLED-20070820AGM 100 dbu overlaps the WWOZ 60 dbu with an interference area of 7.903 sq. km. This small area contains a population of 908. The total area within the 60 dbu contour of this WWOZ proposal is 7,519.725 sq. km. This coverage area contains a population of 992,786. Thus, this WWOZ application receives interference to 0.11% of its area and 0.09% of its covered population from this WNKV license facility.

The WNKV application BPED-20120706AAI 100 dbu overlaps the WWOZ 60 dbu with an interference area of 26.083 sq. km. containing a population of 995. Thus, this WWOZ application receives interference to 0.35% of its area and 0.10% of its covered population from this WNKV application.

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<sup>1</sup> All applicable facilities were checked using contour to contour protection criteria. The short-spaced facilities were found to require further detailed study.

<sup>2</sup> Contours are based on Standard FCC Distance to Contour Curves and 3 arc-sec terrain data taken every 1 degree about the site.

Population is determined from 2010 Census data.

This proposal readily accepts this minute amount of 2<sup>nd</sup> adjacent channel interference from the WNKV licensed and construction permit facilities. A waiver is requested from the Commission to allow this de minimis amount of received interference. The overall service to the public will be greatly enhanced by a grant of this application.

On November 5, 2008, WNKV was granted construction permit BPED-20070821AAX. The grant of that construction permit required that the Commission waive its rules so as to permit WNKV(FM) to receive interference from WWOZ inasmuch as the 60 dBu contour of the facilities proposed by WNKV completely encompassed WWOZ's 100 dBu contour. Thus, in its application, WNKV requested that the Commission waive Section 73.509 of its rules so as to permit WKKV to receive interference from WWOZ over an area constituting 0.62% of WNKV's proposed 60 dBu coverage area. The Commission granted the construction permit and thus the Section 73.509 waiver request, but, in doing so, the Commission held that WWOZ would not perpetually be locked into its facilities. The Commission thus conditioned the grant of the WNKV application by imposing the following condition upon the resultant WNKV construction permit:

Future modifications by KTLN(FM), Thibodaux, Louisiana (Facility ID No.4219), WWOZ(FM), New Orleans, Louisiana (Facility ID No. 22659) and WTUL(FM), New Orleans, Louisiana (Facility ID No. 68321) shall not be considered as a "per se" modification of WNKV's construction permit (BPED-20070821AAX). (See Educational Information Corporation, 6 FCC Rcd. 2207 (1991)).

Although WNKV did not construct the facilities authorized in construction permit BPED-20070821AAX, it nevertheless continues to rely on the waiver of Section 73.509 granted in that construction permit. Thus, in its application BPED-20120706AAI it does not seek a new waiver of Section 73.509 to permit it to receive interference from WWOZ even though its proposed facilities would receive interference from WWOZ, but simply assumes the continuation of that waiver.

Grant of the instant application would be consistent with the Commission's holding in Educational Information Corporation, 6 FCC Rcd 2207 (1991) ("WCPE"), wherein the Commission recognized that, in granting a "received interference" waiver request (as the Commission has done here with respect to WNKV), it would not perpetually restrict the station causing the received interface to its current facilities, but would permit that station to modify its facilities if there is a public interest benefit to doing so. As is demonstrated below, in this case, permitting WWOZ to modify its facilities is warranted inasmuch as it would allow the station to nearly double its coverage area. Moreover, the coverage area that would be achieved by the facilities requested in the instant application is essentially the same as that achieved by the facilities for which WWOZ holds its construction permit, the primary difference in facilities being that WWOZ is hereby seeking authority to place its antenna lower on the tower.

In WCPE, the Commission also indicated that it would grant waivers of Section 73.509 to permit overlap between the applicant's coverage contour and the interfering contours of second- and third-adjacent stations if the amount of received interference is *de minimis*. In that case, the amount of overlap constituted 0.45% of the applicant's proposed coverage contour in the case of one second-adjacent station and 0.39% of the applicant's proposed coverage contour in the case of another second-adjacent station. In the present case, WWOZ's proposed overlap with the 100 dBu contour of second-adjacent WNKV is only one tenth of one percent of the proposed WWOZ 60 dBu contour in the case of WNKV's licensed facilities, and thirty five hundredths of one percent of the proposed WWOZ 60 dBu contour in the case of WNKV's CP facilities. Thus, in the worst case, the total overlap would result in only 0.35% of the proposed WWOZ 60 dBu contour receiving interference – a figure that is less than half of the total received interference permitted by the Commission in WCPE.

Moreover, a grant of this WWOZ upgrade proposal would allow WWOZ to increase its coverage area from 3,082.95 sq. km. to 7,519.725 sq. km., an increase of 143.9%. The covered population would increase from 863,948 to 992,786, an increase of 14.9%. This proposal receives only *de minimis* interference from a 2nd adjacent station while permitting WWOZ to significantly improve its coverage. As a result, grant of the requested waivers would be consistent with WCPE and thus the application should be granted.



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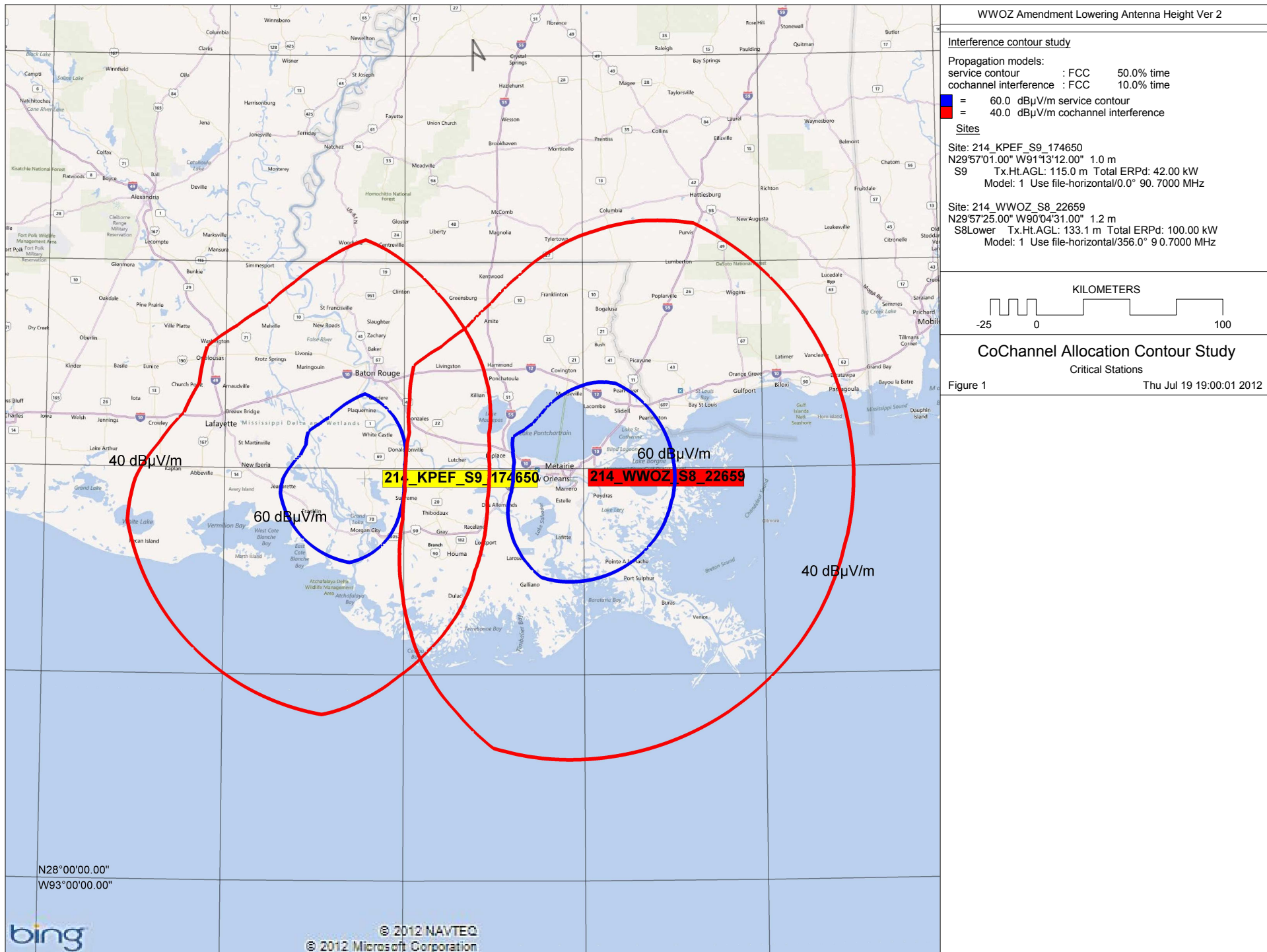
Charles F. Ellis, PE  
Ellis Engineering  
July 19, 2012

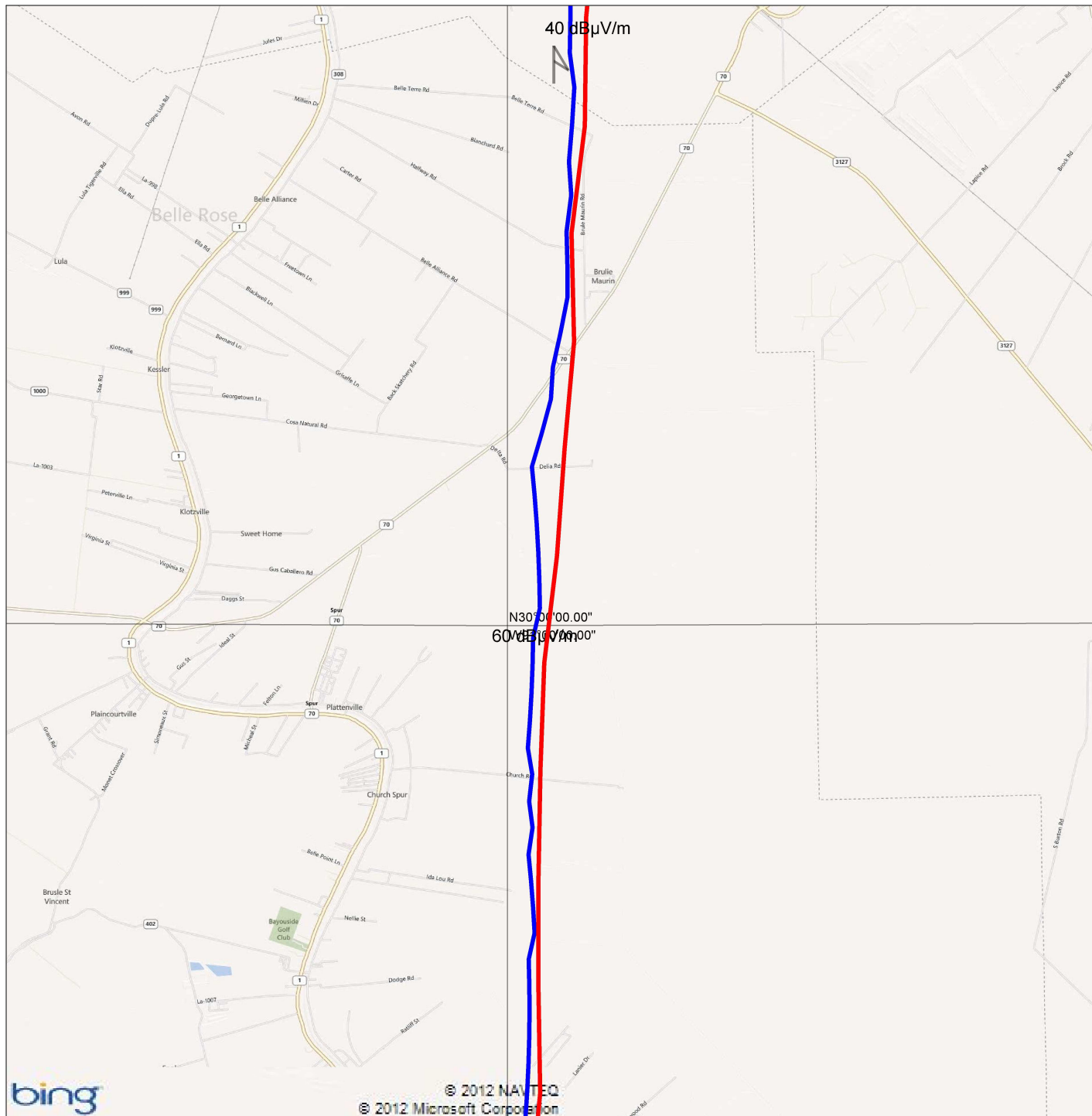
**Table 1****Spacing Allocation Study**

Client: WWOZ  
 FM Study for Proposed Site: 29-57-25, 90-4-31  
 Desired Class: C1  
 Channel 214 Frequency 90.7 MHz

| Channel | Facility/<br>Application ID | City         | State | Callsign | Licensee   | Facility<br>Status | Class | Service | Latitude        | Longitude       | Distance<br>Between Facilities | Direction<br>True North | Required<br>Distance | Spacing Status | Separation<br>Distance |
|---------|-----------------------------|--------------|-------|----------|--|--------------------|-------|---------|-----------------|-----------------|--------------------------------|-------------------------|----------------------|----------------|------------------------|
| 213     | 4219                        | THIBODAUX    | LA    | KTLN     | UNIVERSITY OF NEW ORLEANS                                | LIC                | A     | FM      | 29-43-18.000000 | 90-46-33.000000 | 72.5532                        | 248.9333                | 133                  | ****SHORT****  | -60.4468               |
| 214     | 22659                       | NEW ORLEANS  | LA    | WWOZ     | FRIENDS OF WWOZ, INC.                                    | LIC                | C3    | FM      | 29-57-24.000000 | 90-4-31.000000  | 0.0308                         | 180                     | 211                  | ****SHORT****  | -210.9692              |
| 214     | 22659                       | NEW ORLEANS  | LA    | WWOZ     | FRIENDS OF WWOZ, INC.                                    | CP                 | C1    | FM      | 29-57-25.000000 | 90-4-31.000000  | 0                              | 0                       | 245                  | ****SHORT****  | -245                   |
| 214     | 174650                      | WHITE CASTLE | LA    | KPEF     | PROVIDENCE EDUCATIONAL FOUNDATION                        | LIC                | C2    | FM      | 29-57-1.000000  | 91-13-12.000000 | 110.506                        | 269.6168                | 224                  | ****SHORT****  | -113.494               |
| 214     | 22659                       | NEW ORLEANS  | LA    | WWOZ     | FRIENDS OF WWOZ, INC.                                    | APP                | C1    | FM      | 29-57-25.000000 | 90-4-31.000000  | 0                              | 0                       | 245                  | ****SHORT****  | -245                   |
| 215     | 61234                       | HAMMOND      | LA    | KSLU     | SOUTHEASTERN LOUISIANA UNIVERSITY                        | LIC                | A     | FM      | 30-30-53.000000 | 90-27-59.000000 | 72.391                         | 328.6633                | 133                  | ****SHORT****  | -60.609                |
| 216     | 89686                       | NORCO        | LA    | WNKV     | EDUCATIONAL MEDIA FOUNDATION                             | LIC                | A     | FM      | 29-48-34.000000 | 90-25-17.000000 | 37.2182                        | 243.941                 | 75                   | ****SHORT****  | -37.7818               |
| 216     | 89686                       | NORCO        | LA    | WNKV     | EDUCATIONAL MEDIA FOUNDATION                             | APP                | C2    | FM      | 29-49-33.000000 | 90-25-44.000000 | 37.1197                        | 246.9507                | 79                   | ****SHORT****  | -41.8803               |
| 217     | 172708                      | SLIDELL      | LA    | WGON     | CRISIS PREGNANCY HELP CENTER OF SLIDELL                  | CP                 | C3    | FM      | 30-32-9.000000  | 89-51-52.000000 | 67.3034                        | 17.5482                 | 76                   | ****SHORT****  | -8.6966                |
| 212     | 43198                       | BILOXI       | MS    | WMAH-FM  | MISSISSIPPI AUTHORITY FOR EDUCATIONAL TV                 | LIC                | C     | FM      | 30-45-18.000000 | 88-56-44.000000 | 140.0841                       | 50.8365                 | 105                  | OK             | 35.0841                |
| 212     | 18185                       | BATON ROUGE  | LA    | WBRH     | EAST BATON ROUGE PARISH SCHOOL BOARD                     | LIC                | C3    | FM      | 30-26-36.310000 | 91-10-53.610000 | 119.3999                       | 296.8494                | 76                   | OK             | 43.3999                |
| 213     | 79031                       | MCCOMB       | MS    | WAQL     | AMERICAN FAMILY ASSOCIATION                              | LIC                | C2    | FM      | 31-26-1.000000  | 90-34-45.000000 | 170.674                        | 343.569                 | 158                  | OK             | 12.674                 |
| 213     | 172397                      | KAPLAN       | LA    | KLFT     | TALENTS MINISTRY, INC.                                   | CP MOD             | C2    | FM      | 29-50-27.800000 | 92-17-45.200000 | 214.8638                       | 266.5725                | 158                  | OK             | 56.8638                |
| 213     | 172397                      | KAPLAN       | LA    | KLFT     | TALENTS MINISTRY, INC.                                   | APP                | C2    | FM      | 29-52-10.000000 | 92-18-7.000000  | 215.2525                       | 267.4174                | 158                  | OK             | 57.2525                |
| 214     | 4218                        | ALEXANDRIA   | LA    | KLSA     | BD SUPERVISORS, LOUISIANA STATE UNIVERSITY & A&M COLLEGE | LIC                | C     | FM      | 31-33-56.000000 | 92-32-50.000000 | 296.3384                       | 306.9981                | 270                  | OK             | 26.3384                |
| 215     | 82443                       | LAUREL       | MS    | WATP     | AMERICAN FAMILY ASSOCIATION                              | LIC                | C1    | FM      | 31-52-39.000000 | 88-52-44.000000 | 241.6895                       | 28.2405                 | 177                  | OK             | 64.6895                |
| 215     | 36225                       | LAFAYETTE    | LA    | KIKL     | EDUCATIONAL MEDIA FOUNDATION                             | LIC                | C3    | FM      | 30-17-5.000000  | 92-4-3.000000   | 195.4006                       | 280.7164                | 144                  | OK             | 51.4006                |
| 215     | 177359                      | WILSON       | LA    | WJVI     | CENTRO COMUNITARIO JUVENIL MAHANAIM, INC.                | LIC                | A     | FM      | 30-56-30.000000 | 91-6-38.000000  | 147.6638                       | 317.6688                | 133                  | OK             | 14.6638                |
| 216     | 38604                       | BATON ROUGE  | LA    | KLSU     | LOUISIANA STATE UNIVERSITY                               | LIC                | A     | FM      | 30-24-37.000000 | 91-10-37.000000 | 117.4006                       | 295.3436                | 75                   | OK             | 42.4006                |







# WWOZ Amendment Lowering Antenna Height Ver 2

## Interference contour study

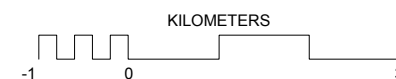
Propagation models:  
service contour : FCC 50.0% time  
cochannel interference : FCC 10.0% time

■ = 60.0 dBuV/m service contour  
■ = 40.0 dBuV/m cochannel interference

## Sites

Site: 214\_KPEF\_S9\_174650  
N29°57'01.00" W91°13'12.00" 1.0 m  
S9 Tx.Ht.AGL: 115.0 m Total ERPd: 42.00 kW  
Model: 1 Use file-horizontal/0.0° 90.7000 MHz

Site: 214\_WWOZ\_S8\_22659  
N29°57'25.00" W90°04'31.00" 1.2 m  
S8Lower Tx.Ht.AGL: 133.1 m Total ERPd: 100.00 kW  
Model: 1 Use file-horizontal/356.0° 90.7000 MHz



## CoChannel Allocation Contour Study

Critical Station Detail

Figure 1a

Thu Jul 19 19:03:44 2012



## Interference contour study

Propagation models:

service contour : FCC 50.0% time  
 1st adjacent interference : FCC 10.0% time

■ = 60.0 dBμV/m service contour  
■ = 54.0 dBμV/m 1st adjacent interference

## Sites

Site: 213\_KTLN\_S4\_4219

N29°43'18.00" W90°46'33.00" 1.0 m

S4 Tx.Ht.AGL: 108.0 m Total ERPd: 0.20 kW

Model: 1 Isotropic-horizontal/0.0° 90.5000 MHz

Site: 214\_WVOZ\_S8\_22659

N29°57'25.00" W90°04'31.00" 1.2 m

S8Lower Tx.Ht.AGL: 133.1 m Total ERPd: 100.00 kW

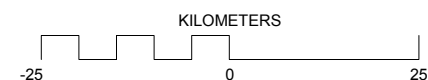
Model: 1 Use file-horizontal/356.0° 90.7000 MHz

Site: 215\_KSLU\_S11\_61234

N30°30'53.00" W90°27'59.00" 15.0 m

S11 Tx.Ht.AGL: 41.0 m Total ERPd: 3.00 kW

Model: 1 Isotropic-horizontal/0.0° 90.9000 MHz

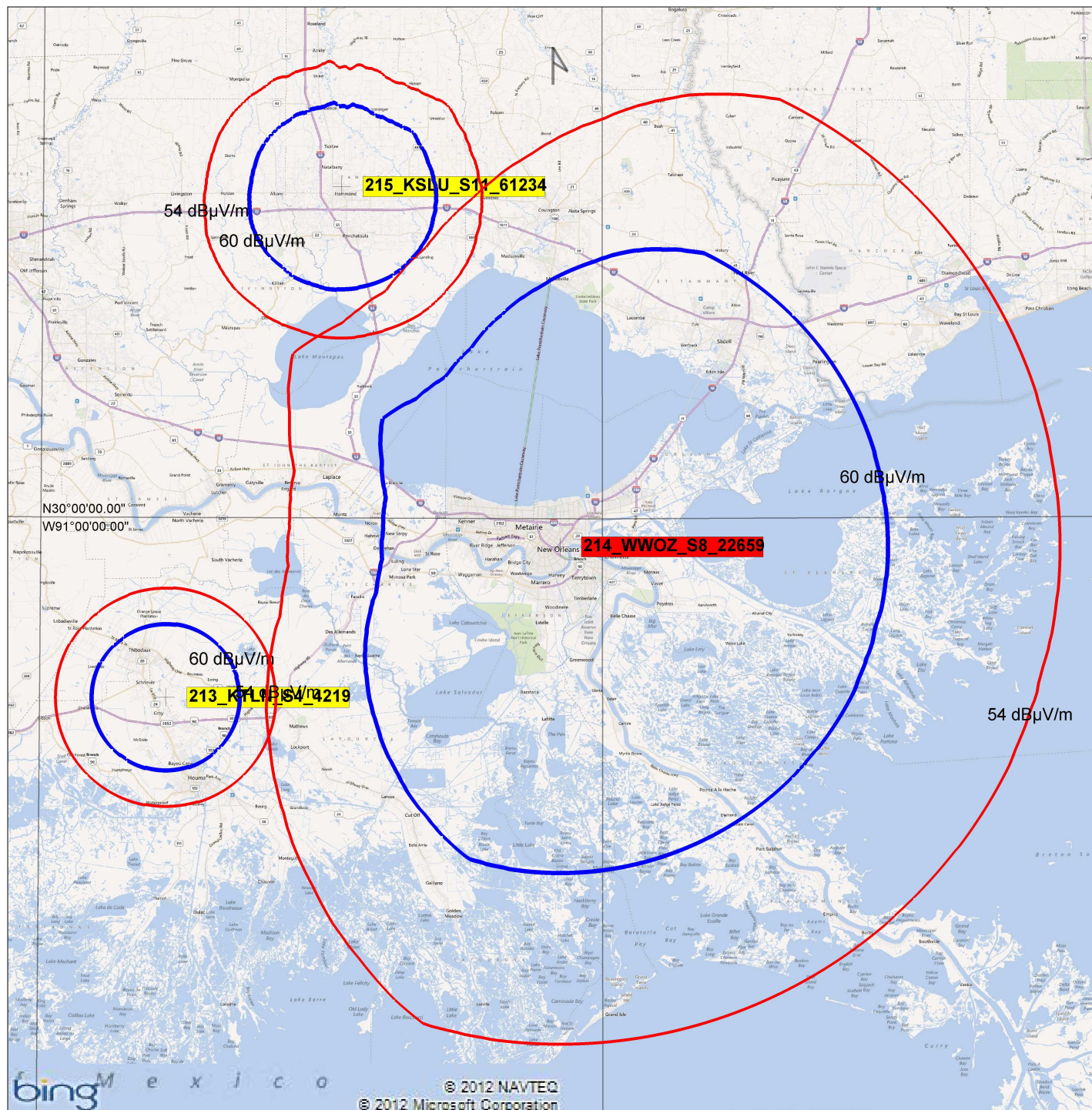


## First Adjacent Channel Contour Study

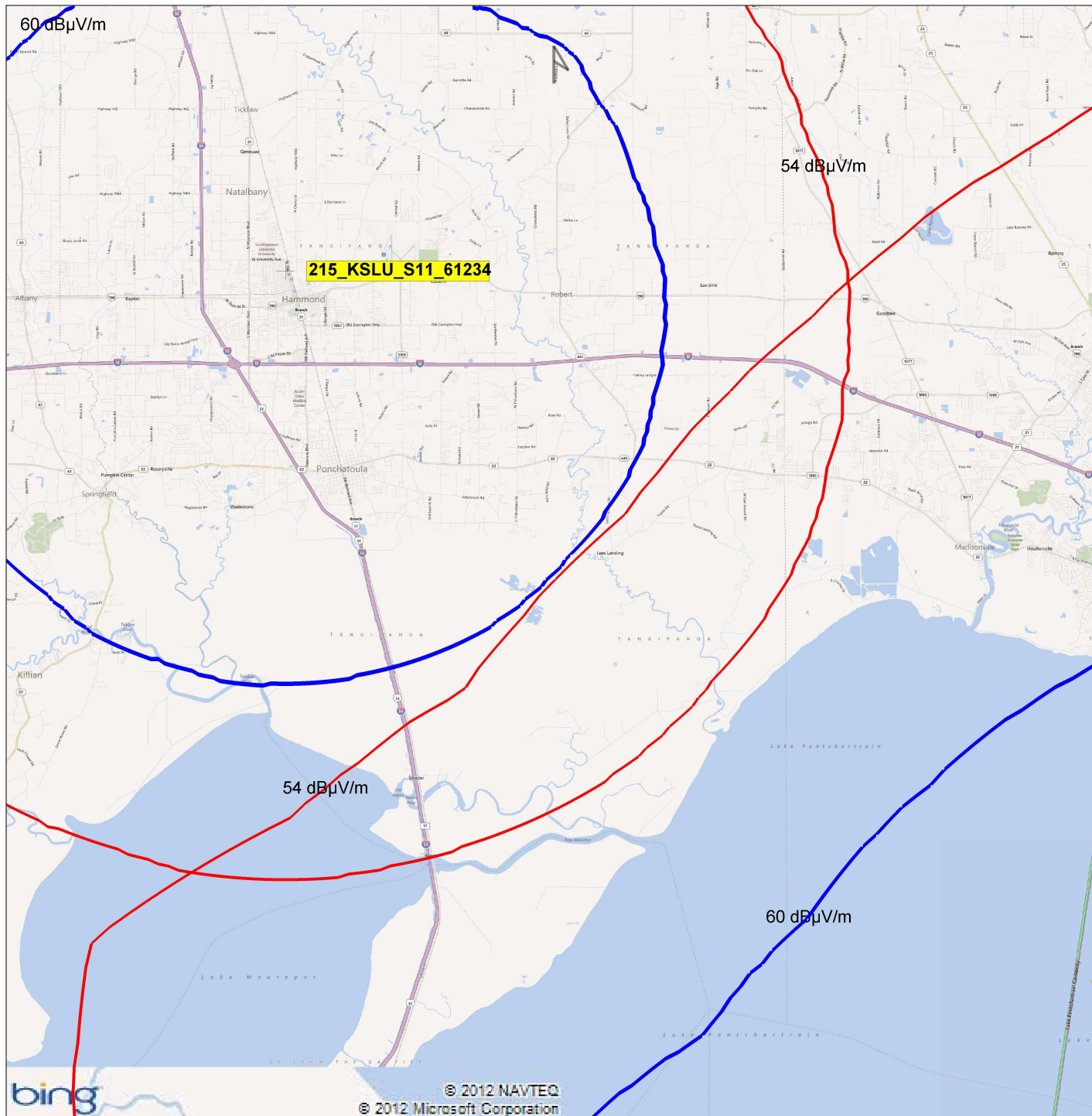
Critical Stations

Figure 2

Thu Jul 19 19:15:16 2012







Interference contour study

Propagation models:  
service contour : FCC 50.0% time  
1st adjacent interference : FCC 10.0% time

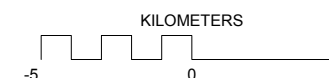
■ = 60.0 dBµV/m service contour  
■ = 54.0 dBµV/m 1st adjacent interference

Sites

Site: 213\_KTLN\_S4\_4219  
N29°43'18.00" W90°46'33.00" 1.0 m  
S4 Tx.Ht.AGL: 108.0 m Total ERPd: 0.20 kW  
Model: 1 Isotropic-horizontal/0.0° 90.5000 MHz

Site: 214\_WWOZ\_S8\_22659  
N29°57'25.00" W90°04'31.00" 1.2 m  
S8Lower Tx.Ht.AGL: 133.1 m Total ERPd: 100.00 kW  
Model: 1 Use file-horizontal/356.0° 90.7000 MHz

Site: 215\_KSLU\_S11\_61234  
N30°30'53.00" W90°27'59.00" 15.0 m  
S11 Tx.Ht.AGL: 41.0 m Total ERPd: 3.00 kW  
Model: 1 Isotropic-horizontal/0.0° 90.9000 MHz



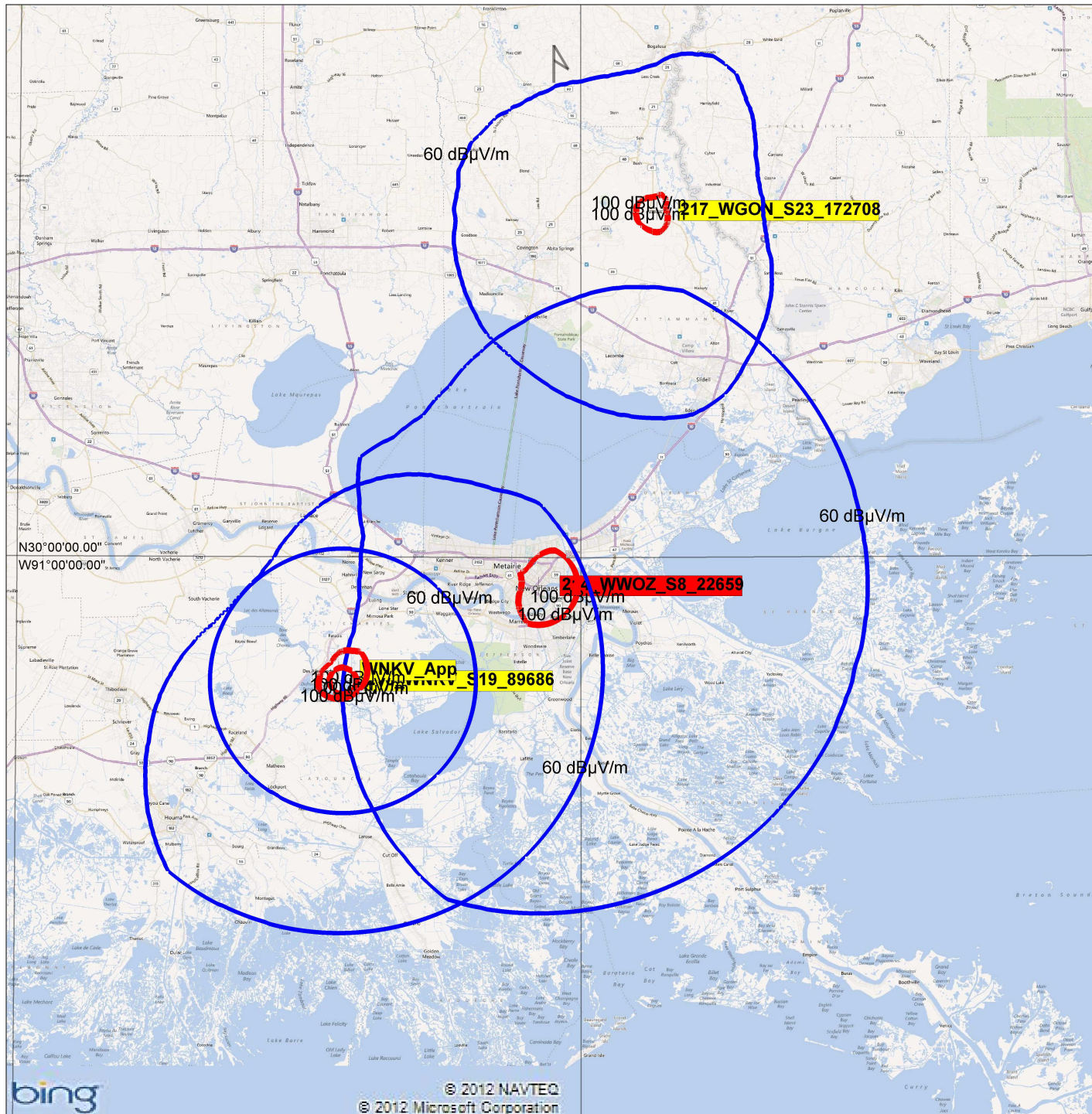
First Adjacent Channel Contour Study

Critical Station Detail

Figure 2a

Thu Jul 19 19:17:28 2012





## WWOZ Amendment Lowering Antenna Height Ver 2

### Interference contour study

#### Propagation models:

service contour : FCC 50.0% time  
2nd adjacent interference : FCC 50.0% time  
3rd adjacent interference : FCC 50.0% time

60.0 dBuV/m service contour  
100.0 dBuV/m 2nd adjacent interference  
100.0 dBuV/m 3rd adjacent interference

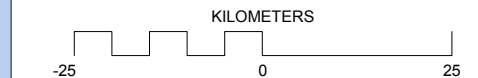
### Sites

Site: 214\_WWOZ\_S8\_22659  
N29°57'25.00" W90°04'31.00" 1.2 m  
S8Lower Tx.Ht.AGL: 133.1 m Total ERPd: 100.00 kW  
Model: 1 Use file-horizontal/356.0° 90.7000 MHz

Site: 216\_WNKV\_S19\_89686  
N29°48'34.00" W90°25'17.00" 0.0 m  
S19 Tx.Ht.AGL: 70.0 m Total ERPd: 4.70 kW  
Model: 1 Isotropic-horizontal/0.0° 91.1000 MHz

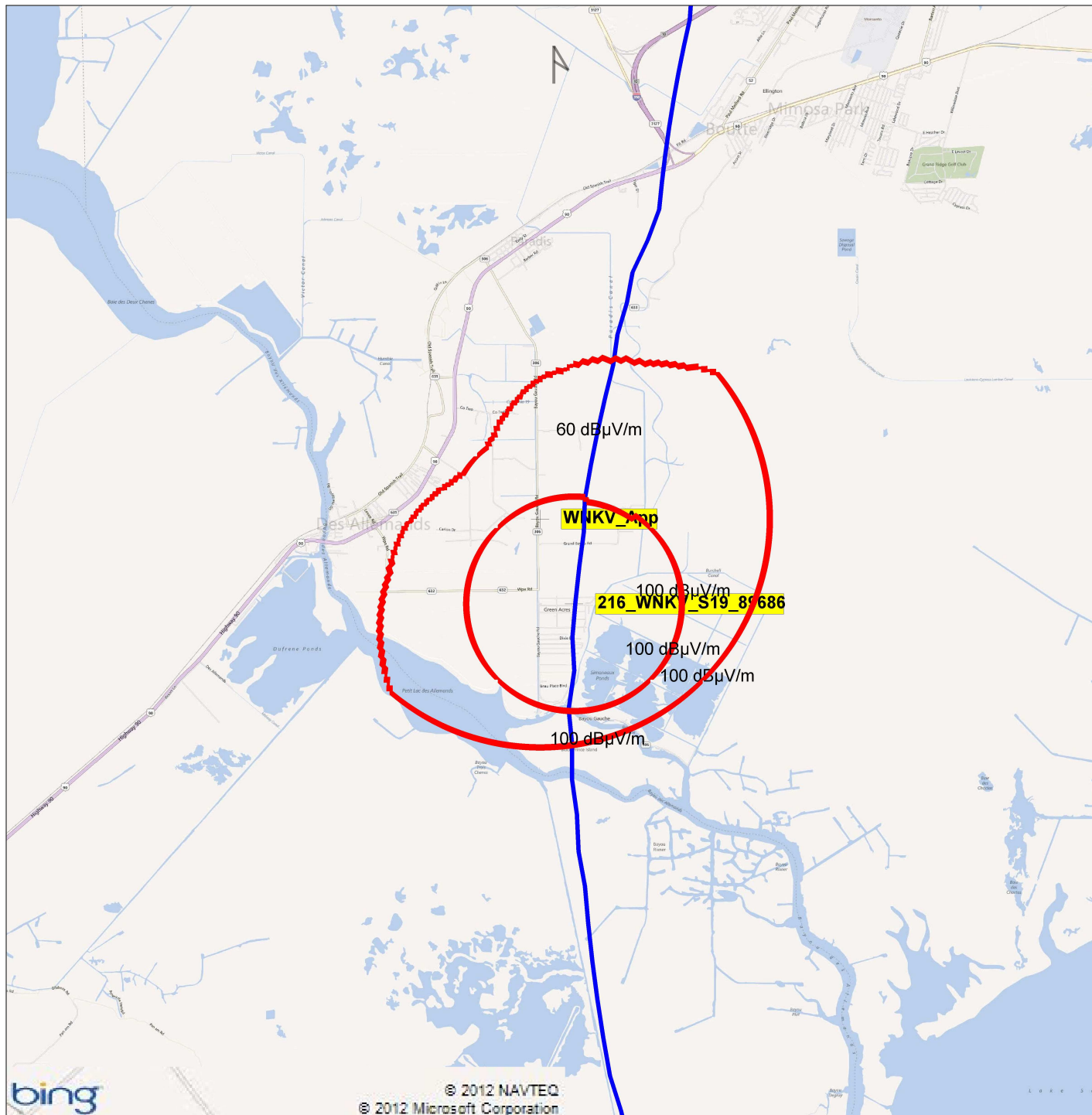
Site: 217\_WGNV\_S23\_172708  
N30°32'09.00" W89°51'52.00" 18.0 m  
S23 Tx.Ht.AGL: 82.0 m Total ERPd: 23.00 kW  
Model: 1 Use file-horizontal/0.0° 91.3000 MHz

Site: WNKV\_App  
N29°49'33.00" W90°25'44.00" 1.0 m  
S27 Tx.Ht.AGL: 105.0 m Total ERPd: 46.00 kW  
Model: 1 Use file-horizontal/0.0° 91.1000 MHz



## 2nd and 3rd Adjacent Channel Study

Critical Stations  
Figure 3 Thu Jul 19 19:30:32 2012



WWOZ Amendment Lowering Antenna Height Ver 2

Interference contour study

Propagation models:  
service contour : FCC 50.0% time  
2nd adjacent interference : FCC 50.0% time  
3rd adjacent interference : FCC 50.0% time

= 60.0 dBμV/m service contour  
 = 100.0 dBμV/m 2nd adjacent interference  
 = 100.0 dBμV/m 3rd adjacent interference

Sites

Site: 214\_WWOZ\_S8\_22659  
N29°57'25.00" W90°04'31.00" 1.2 m  
S8Lower Tx.Ht.AGL: 133.1 m Total ERPd: 100.00 kW  
Model: 1 Use file-horizontal/356.0° 9 0.7000 MHz

Site: 216\_WNKV\_S19\_89686  
N29°48'34.00" W90°25'17.00" 0.0 m  
S19 Tx.Ht.AGL: 70.0 m Total ERPd: 4.70 kW  
Model: 1 Isotropic-horizontal/0.0° 91 .1000 MHz

Site: 217\_WGON\_S23\_172708  
N30°32'09.00" W89°51'52.00" 18.0 m  
S23 Tx.Ht.AGL: 82.0 m Total ERPd: 23.00 kW  
Model: 1 Use file-horizontal/0.0° 91. 3000 MHz

Site: WNKV\_App  
N29°49'33.00" W90°25'44.00" 1.0 m  
S27 Tx.Ht.AGL: 105.0 m Total ERPd: 46.00 kW  
Model: 1 Use file-horizontal/0.0° 91. 1000 MHz

KILOMETERS

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2nd and 3rd Adjacent Channel Study

Critical Station Detail

Figure 3a Thu Jul 19 19:34:48 2012